

DOUGLAS SHIRE COUNCIL	
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Attention	
Information	

PROPERLY MADE SUBMISSION

DEVELOPMENT APPLICATION CA-2025/5732

MATERIAL CHANGE OF USE – WORKERS ACCOMODATION, TOURIST PARK

CARETAKERS ACCOMODATION AND ADVERTISING DEVICE

Part of Lot on RP745166, Lot 2 Captain Cook Highway, Port Douglas

Applicant: Krystal Marie DeMenna



PROPERLY MADE SUBMISSION

Development Application CA-2025/5732/1

150-site Tourist Park and Workers' Accommodation – Lot 2 Captain Cook Highway,
Port Douglas

I wish to lodge this submission in opposition to the above development application.

While I do not currently live in the immediate area, I am a **lifelong Mossman resident within the Douglas Shire the region with a strong cultural connection to the Kuku Yalanji Traditional Landscape**. My traditional family has longstanding cultural knowledge and experience of Country, including **traditional hunting, gathering and the use of natural resources within the Kuku Yalanji Traditional Landscape**.

Cultural Consultation and Traditional Knowledge

I also seek clarification as to whether **consultation with Kuku Yalanji Traditional Owners and Elders was undertaken prior to the submission of this development application**, particularly in relation to the proposed earthworks, floodplain modification, sewerage infrastructure beneath Crees Creek and potential impacts on Country and cultural values.

Given the cultural significance of the Kuku Yalanji Traditional Landscape, I consider it important that Traditional Owners and Elders with relevant cultural knowledge have a meaningful opportunity to identify cultural, environmental and traditional-use concerns before any development is approved.

I request that Council clarify:

- whether consultation with relevant Kuku Yalanji Traditional Owners and Elders occurred prior to the development application being lodged;
- who was consulted and when that consultation occurred;
- whether cultural knowledge relating to hunting, gathering, waterways, wildlife, vegetation and other cultural values was considered in the preparation of the application; and
- whether any cultural heritage or cultural values assessment was undertaken and, if so, whether the findings have been appropriately incorporated into the application.

If meaningful consultation has NOT occurred, I request that this be addressed before Council determines the application.

Environmental and Sewerage Concerns

I am particularly concerned about the potential environmental impacts associated with the proposed **sewerage infrastructure**. The proposal involves a sewerage pressure main being bored beneath Crees Creek, a tidal waterway within a High Hazard Storm Tide area, to service a development accommodating potentially hundreds of people. Port Douglas sewage network was never designed to service a development of this scale in this location.

The environmental risks associated with the installation, operation, maintenance and potential failure of this infrastructure require thorough assessment.

There appears to be insufficient information demonstrating how the proposed sewerage infrastructure would perform during flooding, storm tide events or other extreme weather conditions, or what the consequences would be if the pressure main or associated infrastructure were to fail. Any release of untreated or inadequately contained sewage into Crees Creek could have significant consequences for the waterway, surrounding environment, aquatic ecosystems and the wider Great Barrier Reef catchment.

I am also concerned that the existing Endeavour Street pump station has not been adequately assessed for the additional demand generated by the proposed development. The application should demonstrate that the existing sewerage network has sufficient capacity and resilience to safely accommodate the proposed increase in population without creating unacceptable environmental risks.

The proposed development also involves filling approximately 3 hectares of adjacent floodplain. Given the site's relationship with the existing floodplain and Crees Creek, a comprehensive flood study is essential to properly understand the potential impacts of this earthworks on surrounding land, waterways, stormwater flows and flood behaviour.

I further note concerns regarding the apparent absence of comprehensive assessment of:

- the environmental impacts of the proposed sewerage infrastructure and its installation beneath Crees Creek;
- the consequences of sewerage infrastructure failure during flood or storm tide events;

- the capacity and suitability of the existing sewerage network and Endeavour Street pump station;
- stormwater management and potential impacts on Crees Creek;
- acid sulphate soils associated with large-scale earthworks;
- electric ant management within the confirmed restricted zone;
- noise impacts associated with the proposed tourist park, camp kitchen, recreation areas and workers' accommodation; and
- broader environmental impacts within the Great Barrier Reef catchment.

As someone with a lifelong cultural connection to the Kuku Yalanji Traditional Landscape, I believe development within this area must be carefully considered in terms of its potential impacts on **Country, waterways, wildlife, traditional hunting and gathering areas, environmental values and cultural heritage.**

The site is zoned Rural. Council refused ecological reforestation on rural land just five months ago citing the importance of protecting agricultural assets. Approving a 150-site tourist park on identically zoned rural land, without explanation, would be inconsistent with that decision and set a damaging precedent for rural land across the Shire.

I therefore respectfully request that Council require the outstanding technical, environmental, flooding, stormwater, sewerage, acoustic, soil and cultural assessments to be completed and appropriately considered before determining this application.

I also request that my submission be accepted as a **properly made submission**, that I be notified of Council's decision on Development Application CA-2025/5732/1, and that I be afforded any appeal rights available to a properly made submitter under the relevant planning legislation.

I strongly oppose the application in its current form and request that it not be approved until the significant environmental, infrastructure, flooding, sewerage and cultural concerns identified above have been adequately addressed.

A refusal with clearly stated reasons — particularly regarding the incomplete flood assessment, rural zoning inconsistency, and inadequate infrastructure — would ensure that any future development proposal for this flood-prone rural land must demonstrate these fundamental issues have been properly addressed before proceeding. This site should not be developed until those issues are resolved to the satisfaction of Council's own technical standards. The issues are too fundamental and too numerous to be resolved by conditions after approval.

I request that I be notified of the decision on this application and provided with full appeal rights as a properly made submitter.

Yours sincerely,

