

To: Douglas Shire Council
Email: enquiries@douglas.qld.gov.au
Cc: [REDACTED]

Dear [REDACTED]

Submission opposing Development Application CA 2025 5732/1

We, [REDACTED] Port Douglas QLD 4877, wish to lodge a submission objecting to the proposed development on Lot 2 Captain Cook Highway, Port Douglas, being Development Application CA 2025_5732/1.

Our property at [REDACTED] is located immediately adjacent to the Crees Creek area and close to the proposed sewer infrastructure associated with the development. As nearby residents, we are particularly concerned about the potential effects of the development on flooding, drainage, sewerage infrastructure, noise and the residential amenity of Egret Close and Endeavour Street.

We oppose the application on the following grounds:

1. Flooding and displacement of floodwater

We are very concerned about the extent of filling proposed on land adjoining the Crees Creek floodplain.

The development requires substantial filling and alteration of land which is presently capable of storing and conveying flood and storm-tide water. Removing flood-storage capacity from this area has the potential to displace water towards adjoining and downstream residential areas, including properties around Crees Creek, Endeavour Street and Egret Close.

This is of particular concern to us because [REDACTED] is located [REDACTED] this creek system.

We understand Council itself previously identified that the majority of the development area is mapped as floodplain and within the 1-in-100-year flood event and considered a localised flood study essential to determine the hydraulic implications of the development. Egret Close has been flooded a number of times in the [REDACTED]. During cyclone Yasi, water entered [REDACTED].

We do not believe a development of this scale should be approved unless Council is satisfied, on the basis of comprehensive and independently reviewed hydraulic modelling, that the proposed filling and development will not increase flood levels, flood velocities, stormwater flows or flood risk to existing residential properties or the Crees Creek system.

Given the increasing importance of flood and storm-tide resilience in Port Douglas, we believe council should take a careful, precautionary approach.

2. Sewerage infrastructure and risk to Crees Creek and nearby residents

We are also very concerned about the proposed sewerage arrangements.

The development may accommodate several hundred people and proposes a sewer connection extending across or near Crees Creek towards the existing sewerage infrastructure in the Endeavour Street area.

Our home is close to this proposed infrastructure.

Council's earlier assessment of the application identified that the application had not adequately demonstrated how the development could connect to Council's sewerage system and noted that a significant length of sewer pressure main would be required.

Before any approval is granted, we believe Council must be fully satisfied that:

- the existing pump station and downstream sewerage network have adequate capacity for the development;
- the proposed sewer main can safely and reliably cross or pass adjacent to Crees Creek;
- wet-weather inflow and infiltration have been properly considered;
- there is adequate protection against pump failure, power failure or sewer overflow; and
- there is no unacceptable risk of sewage entering Crees Creek or backing up into the existing residential sewerage network.

The consequences of a sewer failure beside a tidal creek and residential neighbourhood would be significant, and these matters should be resolved before approval rather than left to be dealt with later by conditions.

3. Noise and residential amenity

We are concerned about the noise generated by a tourist park and workers' accommodation facility of this size immediately across Crees Creek from established residential properties.

The proposed development includes accommodation, communal facilities, recreation areas and associated vehicle and pedestrian activity. These uses have the potential to generate noise during the evenings and at night.

Noise travels readily across the open creek area and we are concerned that residents of Egret Close and Endeavour Street could be affected by voices, music, communal activities, vehicles and other operational noise.

We believe a proper acoustic assessment should demonstrate the likely impacts on existing homes, particularly during evening and night-time periods, and there should be clearly defined operating hours and enforceable noise-management requirements.

The existing residents should not be expected to accept a significant reduction in their residential amenity as a consequence of a new commercial development.

4. Scale and intensity of development

We are concerned that the proposed scale and intensity of the development is excessive for this environmentally sensitive location.

A facility capable of accommodating hundreds of people will substantially change the intensity of activity beside Crees Creek and close to an established residential area.

While we recognise that Port Douglas requires accommodation for workers and visitors, this need should not outweigh appropriate planning, environmental, infrastructure and flood-safety considerations.

The applicant should be required to demonstrate that this particular site can accommodate the proposed scale of development without adversely affecting existing residents or the Crees Creek environment.

Conclusion

We therefore request that Douglas Shire Council **refuse Development Application CA 2025_5732/1 in its present form.**

Alternatively, Council should not approve the application unless it is satisfied through appropriate independent technical assessment that the flooding, sewerage, environmental and noise impacts have been comprehensively addressed and that there will be no material increase in risk or loss of amenity for existing residents.

As residents of 10 Egret Close, these concerns directly affect our home and neighbourhood and we ask Council to give them careful consideration in its assessment of the application.

Please acknowledge receipt of this submission and confirm that it has been accepted as a properly made submission.

Yours faithfully,

