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[REDACTED]
Port Douglas. 4877.

10th September 2026

Manager, Development Assessment

Douglas Shire Council

64-66 Front Street, Mossman Qld. 4873

enquiries@douglas.qld

PROPERLY MADE SUBMISSION

Development Application CA-2025_5732

Material Change of Use – Workers Accommodation, Tourist Park, Caretakers
Accommodation and Advertising Device.

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

Applicant: Krystal DeMenna

I am a [REDACTED] Port Douglas. My
property [REDACTED] and
then [REDACTED]

I OBJECT TO THIS DEVELOPMENT APPLICATION AND MY CONCERNS ARE:

The flood study required by Council has not been completed, and assessment of fill impacts on adjoining residential properties and lake front residential properties has not been provided.

My street is already in a flood risk area – This development could make it worse.

[REDACTED] in a flood zone. The DSC flood and Storm Tide Inundation Overlay Map Sheet FST-020 formally identifies [REDACTED] within the 100 – year ARI floodplain and the Storm Tide Medium Hazard zone and [REDACTED] both Storm Tide High and Medium Hazard.

Our [REDACTED] have flooded in the past, including during a heavy rain event at **low** tide. I am very concerned that filling the floodplain would worsen impacts on our property, particularly if a flood coincides with a **high** tide. Some insurers already refuse to provide cover because of [REDACTED]

The developer is proposing to fill a 3-hectare floodplain that drains toward streets already in a Medium Hazard Storm Tide zone, with a sewer main crossing through a High Hazard zone. Filled placed on a floodplain doesn't make water disappear, it displaces it. This excess water could be disastrous for our properties in a flood.

The site is within the Acid Sulphate Soils overlay. The overlay is Council's pre-existing mapping that flags the risk. No acid sulphate testing has been carried out as it is not considered necessary for the project as no disturbance of PAS will be undertaken. Proper testing should be undertaken as there is an unacceptable risk that Acid Sulphate would be disturbed with the sewer and pump station construction.

When acid sulfate runoff enters a creek draining into the Great Barrier Reef catchment, it triggers severe water acidification, releases toxic heavy metals and aluminum, strips oxygen from the water and can stimulate noxious marine algal blooms, severely degrading coastal and marine ecosystems. A site-specific acid sulphate soils investigation must be completed before any earthworks are approved.

The developer's plans underestimate the scale of the proposal, particularly as the impacts on water use and sewage capacity have not been properly assessed.

The subject site is zoned Rural under the Douglas Shire Planning Scheme 2018. It is within the Regional Landscape and Rural Production Area under the Far North Queensland Regional Plan 2026 – adopted just three months ago, in May 2026. The brand-new Regional Plan still identifies this land as rural production, not urban development.

The Rural Zone Code exists to protect agricultural land from incompatible urban development. A large tourist park and workers accommodation facility with camp kitchen, recreation area, sewage pump station, and advertising signage is not compatible with rural character.

Not abiding by the code will set a precedent for developers in the future.

I fully understand and support the need for workers' accommodation. However, the Douglas Shire Council has already approved more suitable sites for this type of development that would not increase flood risk for nearby residents or have as many negative impacts on our shire.

Yours sincerely,

[REDACTED]