

Manager, Development Assessment

Douglas Shire Council

64-66 Front Street

Mossman QLD 4873

enquiries@douglas.qld.gov.au

PROPERLY MADE SUBMISSION

Development Application CA-2025_5732/1

Combined Development — Workers' Accommodation, Tourist Park, Caretaker's Accommodation and Advertising Device

Site: Lot 2 Captain Cook Highway, Lot 3 AP15871, Crees Creek and Lot 168 Endeavour Street, Port Douglas

Applicant: Krystal Marie DeMenna

My name is [REDACTED]

[REDACTED] Port Douglas, [REDACTED]

I have lived at [REDACTED] and have [REDACTED] in Port Douglas for approximately [REDACTED] years. As a [REDACTED] have extensive firsthand experience of the local environment, weather conditions, flooding, traffic and the character of this area.

[REDACTED]

I strongly object to the proposed development at this location.

While I recognise the need for appropriate accommodation within the Douglas Shire, I do not believe this particular site is suitable for a development of the

proposed scale and intensity, including accommodation for approximately 200-400 people.

My principal concerns relate to:

- Flooding and storm-tide risk
- Noise and impacts on residential amenity
- Traffic and road safety
- Sewage infrastructure and potential environmental impacts
- Impacts on Crees Creek and surrounding waterways
- Loss and fragmentation of wildlife habitat and movement corridors
- Increased pressure on water and essential infrastructure
- The cumulative environmental and community impacts associated with developing this flood-prone coastal area

I respectfully request that these matters be given careful and comprehensive consideration before any approval is granted.



1. Flooding and Storm-Tide Risk

My greatest concern is the significant flooding and storm-tide risk associated with this location.

Endeavour Street and Egret Close are located within a flood-prone area. The Douglas Shire Council Flood and Storm Tide Inundation Overlay Map Sheet FST-020 identifies these areas as being within the 100-year ARI floodplain and the Storm Tide Medium Hazard Zone.

[REDACTED] have personally experienced the effects of Cyclone Jasper and numerous other significant weather events. Over [REDACTED] I have witnessed the behaviour of the Crees Creek catchment through successive wet seasons and periods of intense rainfall. The area is clearly susceptible to significant flooding.

Of particular concern is that the proposed development boundary extends into an area identified as having High Hazard Storm Tide risk. I also understand that the proposed sewer main would traverse this high-hazard area beneath Crees Creek.

I understand the proposal involves filling approximately three hectares of floodplain. I am concerned that altering the existing floodplain in this manner may affect the natural movement and storage of floodwaters and potentially alter flood behaviour affecting surrounding properties and infrastructure.

These concerns are particularly relevant given the proximity of the development to Crees Creek and the history of flooding in the area. The Crees Creek bridge has experienced flooding on multiple occasions in recent years.

I believe these risks require a comprehensive and current assessment before the development is considered suitable for approval.

In particular, I request that consideration be given to:

- Whether a comprehensive flood assessment has been undertaken using current information, including the experience and data arising from Cyclone Jasper.
- The effect of filling the proposed area of floodplain on existing floodwater flows and neighbouring properties.
- The potential impacts of climate change and increasing extreme rainfall and storm-tide events.
- The resilience and safety of proposed infrastructure during major flooding and storm-tide events.
- The consequences of locating critical sewage infrastructure within or adjacent to high-hazard areas.

Given the scale of the proposed development, I believe these matters should be resolved comprehensively rather than being addressed through conditions after approval.

2. Noise and Impact on Residential Amenity

I am deeply concerned about the potential impact of noise generated by a development accommodating a large density of people immediately adjacent to existing residential properties.

The existing character of this area is relatively quiet and predominantly rural, with established homes and lifestyle properties. A development of this scale would represent a substantial increase in the intensity of activity in an area that currently has a very different character.

Sound already travels considerable distances through this area. Noise from nearby lifestyle properties, cattle properties and traffic on the Captain Cook Highway can already be heard [REDACTED] including noise from more than 600 metres away.

This is particularly noticeable under prevailing westerly winds, which commonly occur during the evening and night.

On Sunday, 6 September 2026, I could clearly hear machinery operating from the area of the proposed development [REDACTED]. The noise was readily audible and intrusive despite the proposed large-scale development not yet being established.

This experience demonstrates how readily sound travels between the subject site and surrounding residences.

If the proposal proceeds, noise would not be limited to the construction phase. There would potentially be ongoing noise associated with:

- Construction and earthworks
- Vehicles and deliveries
- Waste collection and rubbish disposal
- Maintenance activities
- Machinery
- Residents and guests
- Recreational and social activities
- General day-to-day operation of the accommodation facility

Given the proposed capacity of occupants and the proximity of the development to existing homes, I am concerned that the cumulative effect of these activities could materially affect the peaceful enjoyment and residential amenity of neighbouring properties.

I am not satisfied that a vegetated or physical buffer alone would necessarily provide adequate protection from these impacts, particularly given the existing ability for sound to travel from this area.

I therefore request that any assessment properly considers:

- The existing acoustic environment;
- The proximity of neighbouring residences;
- Prevailing wind conditions;
- The topography and acoustic characteristics of the site;
- Construction noise;
- Ongoing operational noise; and
- The cumulative effect of all noise-generating activities.

The applicant should be required to provide a comprehensive and independent acoustic assessment demonstrating that the development can operate without causing unreasonable impacts on surrounding residents.

3. Traffic and Road Safety

I am also concerned about the proposed location in relation to traffic and road safety.

A development accommodating approximately 400 workers, backpackers and other guests would inevitably generate a significant increase in pedestrian, bicycle, e-bike, scooter and vehicle movements.

Many seasonal workers and backpackers are likely to rely on bicycles, e-bikes or electric scooters to travel between their accommodation, workplaces, shops and recreational areas.

The location of the proposed development presents particular concerns because it is situated along a road with a high speed limit. This creates a potentially significant safety issue for vulnerable road users, particularly during periods of darkness and poor visibility.

Many hospitality and tourism workers finish work late at night. Cyclists and scooter users may also travel without adequate lighting or visibility, increasing the potential for conflicts with vehicles travelling at higher speeds.

The location should therefore be assessed not simply in terms of providing accommodation, but also in terms of whether it provides safe and practical access to employment, essential services and recreational facilities.

I believe locating high-density workers' accommodation in an area with safer and more appropriate transport connections would be a more responsible approach.

The traffic and road safety implications of accommodating approximately 400 people at this location therefore warrant detailed assessment.

4. Wildlife and Habitat

I am also deeply concerned about the potential impact of the development on local wildlife and habitat.

Over many years living adjacent to this area, I have personally observed a significant amount of native wildlife using and moving through the creek and surrounding areas.

The area provides habitat for feeding, movement and potentially breeding, and appears to form an important connection between the mountain environment and Dickson Inlet.

The proposed development has the potential to remove, disturb or fragment this habitat and interfere with established wildlife movement corridors.

Wildlife displaced from existing habitat does not simply disappear. If natural movement corridors are interrupted, animals may be forced into alternative areas, potentially increasing interactions with roads, vehicles and residential properties.

This could increase the risk of wildlife injury or mortality while also creating additional safety concerns for motorists.

I therefore believe the ecological consequences of the proposal need to be assessed at a broader landscape and cumulative level, rather than considering the development footprint in isolation.

5. Water Security and Essential Infrastructure

Cyclone Jasper also demonstrated the vulnerability of local infrastructure and essential services during significant weather events.

During that event, residents in the area experienced extended interruptions to water services, with some properties being without water for several weeks.

The addition of a development capable of accommodating approximately 500 people would place additional demand on local water supply, sewerage and other essential infrastructure.

I therefore request that the applicant clearly demonstrate that existing infrastructure has sufficient capacity to safely and reliably service the proposed development, including during periods of extreme weather and infrastructure disruption.

In particular:

- Does the existing water supply have sufficient capacity for the proposed development?
- What additional demand would approximately 200-400 occupants place on the local water supply?
- How will the development affect the reliability of essential services for existing residents?
- Is the proposed sewerage infrastructure appropriately located and designed to withstand major flooding and storm-tide events?
- What measures are proposed to prevent sewage contamination of Crees Creek and surrounding waterways during extreme events?

These questions are particularly important given the site's flood-prone location.

Key Concerns

In summary, my primary concerns are:

- Flooding and storm-tide risk
- The impact of filling existing floodplain
- Noise and disturbance to existing residents
- The scale and intensity of a development accommodating approximately 500 people

- Traffic and road safety
- Sewage infrastructure and potential contamination
- Potential impacts on Crees Creek and surrounding waterways
- Loss and fragmentation of wildlife habitat and movement corridors
- Increased pressure on water supply and essential infrastructure
- The cumulative environmental and residential impacts of locating a development of this scale in this particular location

Conclusion

I respectfully request that Development Application CA-2025_5732/1 be refused rather than deferred, on the basis that the proposed site is not an appropriate location for a development of this scale and intensity.

I want to make clear that my objection is not based on opposition to workers' accommodation or tourism generally. Port Douglas is a tourism community and I recognise the importance of providing appropriate accommodation for workers and visitors.

My objection is to the scale, intensity and location of this particular proposal and the potential consequences for existing residents, surrounding infrastructure, flood behaviour, wildlife, waterways and the broader coastal environment.

I believe it is entirely possible for our community to accommodate additional workers while also recognising that not every site is appropriate for high-density accommodation.

In my view, the combination of the site's flood and storm-tide constraints, proximity to existing residences, potential noise impacts, road safety concerns, infrastructure requirements and environmental sensitivities makes this location unsuitable for the proposed development.

The potential consequences extend beyond the immediate boundaries of the development site. Crees Creek, the surrounding habitat and the broader coastal environment form part of an area of significant environmental and tourism value. Decisions regarding development in this area therefore need to be made with considerable care and with proper regard to the long-term interests of the wider Port Douglas community.

For these reasons, I strongly request that Council refuse the application.

Kind regards,

