

22 September 2026

Chief Executive Officer  
Douglas Shire Council  
PO Box 723, Mossman QLD 4873

Submitted via email: [enquiries@douglas.qld.gov.au](mailto:enquiries@douglas.qld.gov.au)

**RE: FORMAL SUBMISSION OF OBJECTION**

- **Application Reference:** MCUI 2026\_5936/1.
- **Proposal:** Material Change of Use for Solar Farm (including ancillary device for storing and releasing energy).
- **Property Location:** 6868 Captain Cook Highway, Killaloe QLD 4877 - Lot 32 on SP332240.

Dear Chief Executive Officer,

I am writing to formally lodge my objection to the proposed 7 hectare industrial development at 6868 Captain Cook Highway, Killaloe. As a resident/stakeholder of the Douglas Shire, I request that Council refuse this application based on the following valid planning and environmental grounds:

**1. Inappropriate Industrialisation of Rural Land (This is a Factory, Not a Farm)**

The applicant repeatedly refers to this project as a solar "farm" to soften its impact, but this terminology is highly misleading.

- **Heavy Industrial Use:** This project is not an agricultural enterprise; it is a heavy industrial power-generation facility that produces no agricultural yield, food, or fibre.
- **De-facto Rezoning:** Replacing natural soil and vegetation with hectares of concrete footings, silicon panels, steel racking, inverters, and high-voltage electrical infrastructure constitutes a fundamental shift from rural use to industrial factory use.

**2. Degradation of Scenic Visual Amenity**

The proposed site sits directly adjacent to the Captain Cook Highway, which serves as the primary, iconic tourism corridor connecting Cairns, Port Douglas, and the World Heritage-listed Daintree region.

- **Impact on Tourism Gateway:** Constructing an industrial utility factory destroys the pristine rural character, natural landscape, and scenic green gateway that visitors expect when entering our world-renowned tourism region.
- **Inadequate Screening:** Mechanical infrastructure, heavy security fencing, and glare risk are entirely incompatible with this high-exposure highway frontage. Proposed ground-level landscaping will fail to obstruct views of the installation from surrounding elevated hillside residences.

### 3. Destruction of Prime Agricultural Land

The 7 hectare footprint sits on highly valuable, class-A agricultural land previously utilised for sugarcane production.

- **Protection of Fertile Soils:** While the local sugar industry faces transitional challenges, regional planning schemes dictate that prime agricultural land must be protected for future food production, agritourism, or sustainable crop diversification.
- **Precedent Risk:** Allowing an industrial factory to permanently decommission this rural land sets a dangerous precedent for the widespread industrialisation of the shire's fertile rural plains that could be utilised for other agricultural purposes.

### 4. Bushfire and Environmental Safety Risks

The location is highly vulnerable to seasonal weather extremes, and the development introduces severe environmental liabilities.

- **Specialised Fire Hazards:** Operating an industrial-scale electrical plant and potential battery storage unit presents severe, specialised chemical and electrical bushfire risks in a rural zone where local emergency services face logistical and access and capability constraints.
- **Deficient Risk Management:** The current application lacks a comprehensive fire management strategy tailored to the unique chemical hazards of large-scale solar infrastructure.
- **Runoff and Flooding:** The physical clearing and installation of impervious panels risk changing localized stormwater runoff patterns, exacerbating flooding hazards on the surrounding low-lying plains during heavy wet-season events.
- **Great Barrier Reef Contamination:** In the event of a catastrophic structural fire or thermal runaway, toxic chemical runoff and atmospheric pollution

present a direct, unmitigated threat to the local catchment, the Great Barrier Reef ecosystem, and protected marine wildlife such as green turtles.

5. The application does not comply with **Section 9.3.17 Rural Activities Code** of the Douglas Shire Planning Scheme.

For these reasons, I believe the proposal fails to comply with the strategic intent of the Douglas Shire Planning Scheme. I urge the Council to protect our scenic gateway and refuse application MCUI 2026\_5936/1.

Please confirm receipt of this properly made submission and keep me updated on the progress of this application.

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