

17 September 2026
Chief Executive Officer
Douglas Shire Council

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RE: FORMAL SUBMISSION OF OBJECTION

- Application Reference: MCUI 2026_5936/1
- Proposal: Material Change of Use for **Solar Farm (including ancillary device storing and releasing energy)**
- Property Location: Lot 2 on RP748154 – 6868 Captain Cook Highway, Killaloe QLD 4873

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,

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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 and viewpoints.

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.

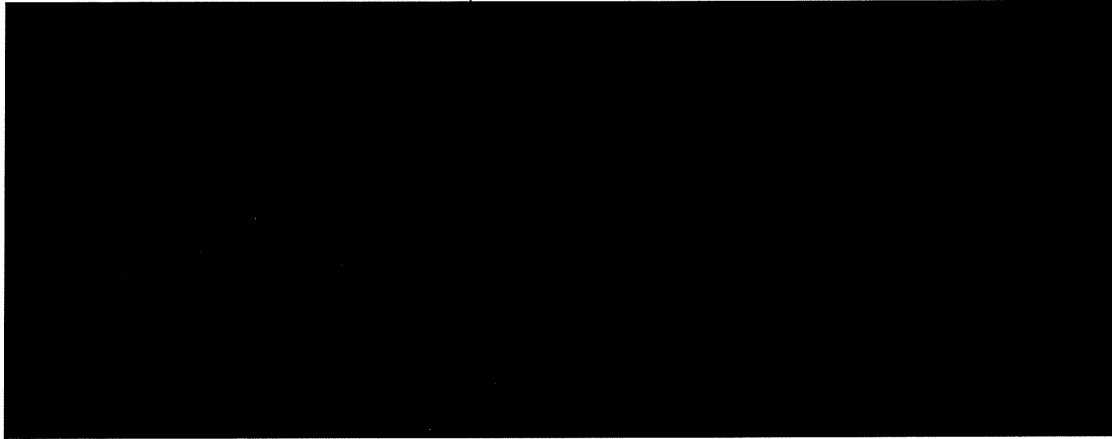
- **Specialised Fire Hazards:** Operating an industrial-scale electrical plant and potential battery storage unit presents severe, specialised chemical and electrical bushfire risks in a rural zone where local emergency services face logistical and access and capability constraints.
- **Deficient Risk 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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