
From: Josh Gibson <joshagibson4@gmail.com>
Sent: Tuesday, 7 September 2021 12:17 PM
To: Enquiries
Subject: Comments on DA for Mowbray Helipad

Dear Sir/Madam,

Please find below my comments on the development application to establish a helipad and pilot accommodation on land located on the Captain Cook Highway near Yule Points (Lot 78 on SR416).

I note the development application seeks a material changes of use for air services and ancillary use. It is currently zoned rural.

Comments

Private vs commercial

Page 2 of the RPS Mowbray Helipad Report (the Report) states:

"the development approval is for the establishment of a "private helipad and pilot accommodation".

However on pp 19 the report states

"The purpose of the development is to provide a base for helicopters to land and refuel, and provide accommodation for approximately 2 pilots. The helicopters are for use in airlifting materials for the construction of the Wangetti trail although it is important to note that those construction materials will not be stored on this site, but will be airlifted from other designated storage points as part of the Wangetti project."

Given its purpose surely this qualifies as a commercial use?

Is this proposal part of, or related to, a larger development application/proposal?

As noted above the proposal states that its purpose is to airlift materials for the construction of the Wangetti Trail. I note that pages 1 to 31 of the Report have 'Port Douglas Wave Park' on the footer and that the description of the Port Douglas Wave Park (see 'Surf Port Douglas Architectural Report') refers to helipads under ancillary structures and services.

Is it envisaged that this helipad will service /be part of the Port Douglas Wave Park proposal? If this proposal is intended to be part of this or any other larger/related development this should be made explicit and its establishment and operation assessed in this context. In this regard I note:

PP 18 states "

- However, if there is a change, whereby the proposed development will include a commercial component such as scenic or joy flights or a reliance on visiting customers, the existing shared access will be required to be upgraded to accommodate increased traffic generation from the proposed commercial development.

Justification of need

Given its purpose is to airlift material for the construction of the Wangetti Trail - and materials will not be stored at this site - it appears that the entire purpose of this development is as a short-term temporary staging post for helicopters and pilots.

Given alternate established sites exist within 5min (flight time) I do not believe there is justification to support a material change from zoning in use for this location. Particularly, as noted above, its purpose is in effect a temporary staging post to support the construction phase of the Wangetti trail and its potential impacts on adjoining environmental values and the unsuitability of its location. See below.

Location

The local community has fought hard for rural zoning in this part of Douglas Shire. It is a very narrow corridor between two beautiful world heritage areas where the Douglas Shire opens up to visitors following the magnificent range road scenic drive. The rural zoning

complements and acts as transitioning buffer from the range road corridor of outstanding natural beauty to more built up areas in Craiglie, Port Douglas and Mossman.

I do not believe there is justification to change this zoning particularly as there are alternative more suitable sites for a helipad in the shire.

The property is also subject to tidal inundation and high risk of storm tide hazards. It seems like a highly inappropriate site to consider such a development.

Environmental values - no assessment of impacts to adjoining areas of high environmental significance - particularly areas under inbound and outbound routes

While the lot itself is highly disturbed it is adjacent to areas of high ecological significance. It is immediately adjacent to a Great Barrier Reef wetland of high ecological significance and take-off and landing flight paths are over the Great Barrier Reef World Heritage Area and Marine Park - both Matters of National Environmental Significance.

The DA examines impacts to ecological values within the immediate footprint of the proposed development but does not assess impacts on adjoining areas of state and national environmental significance.

Of particular concern are the noise and impacts of land and take-off flight operations over the intertidal sand flats of Yule Point. Yule Point is an important foraging area for waders and coastal birds (potentially listed migratory) and the proposed helicopter take off and landing is directly over this area.

The area is zoned 'conservation park' under the Great Barrier Reef Marine Parks Zoning Plan and I note under the Marine Parks Zoning Plan there are permit requirements for operating aircraft in this zone.

The potential to impact matters of state and national environmental significance in the adjoining area and requirements for any Marine Park's permissions to operate in this airspace (the Great Barrier Reef Marine Park includes airspace to 1000 feet/915m) are not addressed in the DA and should be considered as part of any assessment on a material change of use.

If you have any questions regarding this matter please do not hesitate to contact me.

Kind regards,

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