



Council Ref: WP25 029 RAI
wildPLAN Ref: MCUI 2025_5809/1

21 January 2026

The Chief Executive Officer
Douglas Shire Council
PO Box 723
MOSSMAN QLD 4873

Attention: Jenny Elphinstone
Via email: jenny.elphinstone@douglas.qld.gov.au

Dear Jenny,

RESPONSE TO SUBMISSIONS RECEIVED - PROPOSED DEVELOPMENT PERMIT FOR A MATERIAL CHANGE OF USE (IMPACT ASSESSMENT) FOR PERMANENT PLANTATION (ECOLOGICAL RESTORATION OF NATIONALLY SIGNIFICANT WETLAND AND SURROUNDS) AT 110, L1, L2, L3, L9 CAPE TRIBULATION ROAD, L8, L337, L354 MOSSMAN-DAINTREE ROAD AND L1, L1, L2, L5 PRINS ROAD, LOWER DAINTREE, QLD, 4873

We understand that 29 'properly made submissions' and several 'not properly made submissions' were received by Council during the public notification period for the above-referenced application.

In respect to the properly-made submissions received, only two (2) were not in support.

The balance of submissions received, including all not properly-made submissions were in support of the proposed Permanent Plantation.

A summary of the grounds¹ made against the project, and our attendant response is provided following.

GROUND / RESPONSE

1. Ground 1 – Non-compliance with Strategic Framework

RESPONSE:

Concerns have been raised by submitters, suggesting that the proposal may conflict with the Strategic Framework of the Douglas Shire Planning Scheme 2018, specifically Theme 3: Natural Resource Management and Theme 5: Economy.

¹ For the purposes of succinctness, each ground is paraphrased to distil the matter presented in submissions.

In response, it is advised that the proposed Permanent Plantation is considered to avoid conflict with the Strategic Framework, whilst also representing a positive planning outcome that actively helps deliver the intent of the Strategic Framework, particularly in terms of:

- mitigation of hazards and climate resilience, including improved floodplain function, reduced erosion potential, and improved land stability (consistent with Theme 1 hazard mitigation); and
- economic diversification and sustainable rural employment, supporting nature-based industries that complement the existing rural economy (consistent with Theme 5). Further, the proposed Permanent Plantation is:

(a) appropriately defined as a Rural Activity, as per the Planning Regulation 2017; and

(b) located on premises that has been independently assessed as having an Agricultural Land Classification of D -

Class D: *Non-agricultural land and land not suitable for agricultural uses due to extreme limitations. This may be undisturbed land with significant conservation or catchment values, land that may be unsuitable because of very steep slopes, shallow soils, rock outcrop, poor drainage, salinity, acidic drainage, or is an urbanised area.*

Accordingly, it is reaffirmed that the site is not viable for sustained agricultural use. In this context, ecological restoration is the most appropriate and beneficial long-term use, providing enhanced environmental stability and protection of surrounding World Heritage values and sensitive ecosystems.

Importantly, this is a site-specific conclusion, based on independent land capability and hydrological constraints associated with the Oxbow area. It is not a position that weakens planning protections for productive agricultural land elsewhere in the Shire or broader floodplain.

Therefore, the development does not conflict with the strategic intent of Theme 3 or Theme 5. Conversely, the proposal actively supports and advances several key objectives of the Planning Scheme's Strategic Framework, satisfying multiple elements within Themes 1–5, including:

- Theme 1 - Element: 3.4.7 Mitigation of Hazards
- Theme 2 – Elements: 3.5.3 Biodiversity; 3.5.4 Coastal Zones; 3.5.5 Scenic Amenity
- Theme 3 - Elements: 3.6.2 Land and Catchment Management; 3.6.3 Primary Production
- Theme 4 - Elements: 3.7.1 Strategic Outcomes; 3.7.2 Social Planning and Infrastructure
- Theme 5 - Elements: 3.8.1 Strategic Outcomes; 3.8.2 Economic Growth and Diversification; 3.8.3 Tourism; 3.8.4 Primary Production

Refer to Section 5 of the Planning Report provided with the Development Application for the full Strategic Framework assessment.

2. Ground 2 – Land Suitability

RESPONSE:

Concerns have been raised by submitters regarding the suitability of the site for the proposed use, noting a history of sugarcane cultivation and grazing on the site and surrounding properties.

While historical agricultural use is acknowledged, it is relevant that none of the subject land is currently in production, and landholders have expressed support for the proposal (including submission of landholder letters of support), reflecting the practical constraints on ongoing agricultural viability in this location.

Further, the Ecology Technical Memo submitted to Council on 8 September 2025 as part of the Information Request Response identifies clear evidence of ongoing soil degradation, wetland decline, and altered hydrological function resulting from historic clearing and drainage works associated with agricultural practices. These impacts have reduced soil quality and landscape resilience, rendering the land biophysically and environmentally unsuitable for continued cropping or grazing.

In contrast, the proposed wetland restoration through targeted native revegetation seeks to re-establish natural hydrological, drainage, and sedimentation processes, enhance ecosystem function, and improve long-term environmental stability.

This approach represents a more sustainable and beneficial land use outcome and can also be appropriately viewed as a form of preventative, nature-based infrastructure, reducing the severity and likelihood of future flood and erosion impacts, improving land stability, and supporting downstream water quality outcomes, thus reducing long-term risk and potential intervention requirements for Council.

In this context, while the historical agricultural use of the land is acknowledged, prevailing environmental and climatic conditions, combined with the degraded landform and drainage constraints, have significantly diminished its agricultural viability. The proposed development therefore represents a logical and responsible transition to an ecologically appropriate and sustainable use, consistent with contemporary planning objectives, land suitability principles, and environmental best practice.

3. Ground 3 – Financial and Funding Concerns

RESPONSE:

Submitters have expressed concern regarding the proposed fee waiver request for the development application, suggesting that approval may impose a financial burden on Council or set an undesirable precedent for future applications.

In response, it is noted that fee arrangements and waivers are administrative matters distinct from the planning and land use assessment process. Importantly, the proposed development delivers significant long-term environmental and community benefits, including flood mitigation, erosion control, improved water quality, and enhanced reef and rainforest protection. These outcomes align with regional, state, and national strategies for sustainable land rehabilitation and climate adaptation and may reduce future government expenditure associated with management of flood impacts, erosion, and downstream environmental degradation.

This is particularly relevant in the context of Council's increasing focus on coastal erosion, flood resilience, and long-term hazard planning. The proposal is therefore appropriately characterised as preventative land management infrastructure, which can reduce future compliance, intervention and cost pressures for Council.

Given the scale, purpose, and public benefit of the project, a partial fee reduction or waiver for the application is considered fair and reasonable.

Moreover, it is highlighted that the Douglas Shire currently applies one of the highest assessment fees for an Impact Assessable Permanent Plantation in Queensland, providing further justification for the Applicant's fee waiver request in this instance.

In addition, submitters have raised concerns regarding the Applicant's funding model and long-term capacity. Rainforest Rescue is a registered not-for-profit organisation with a demonstrated record of prudent financial management and accountability. Recent annual audited financial statements are publicly available through the ACNC register, evidencing appropriate governance and financial oversight.

The Project is funded and managed through a combination of philanthropic and corporate partnerships and is expected to support further diversification of funding streams over time, including through carbon and emerging biodiversity credit markets.

4. Ground 4 – Local Economy, Tourism and Employment Risks

RESPONSE:

Submitters have expressed concern that the Project may negatively impact tourism marketing for the region, benefit the Applicant more than the broader community, and generate negligible local employment opportunities.

In response, it is emphasised that the proposed development aims to enhance the nature-based tourism potential of the local area by improving the environmental quality and integrity of the Daintree, thereby reinforcing the eco-tourism brand and conservation focused marketing appeal of the region.

The Project is not intended to compete with existing tourism operators; rather, its goal is to strengthen the existing activities that support the visitor economy throughout the Shire, support the long-term sustainability of tourism, and enhance the environmental values that underpin the Daintree's global appeal.

Further, the Project will generate direct, skilled local employment in ecological restoration, land management, seed collection, nursery propagation, monitoring, and associated local contracting and Indigenous engagement opportunities. This includes ongoing employment pathways for residents of the Douglas Shire Council region.

By way of current and imminent commitments:

- Rainforest Rescue currently employs local staff across nursery and on-ground land operations, including a biodiversity and nature impact lead role;
- Two new full-time local employees are commencing in January 2026; and

- Additional part-time roles are planned in the coming months as restoration activity scales.

These roles support long-term sustainable employment for locals and will increase as the Project continues. Volunteers are used only occasionally (such as annual community planting events); the core restoration and land management program is delivered through structured, paid employment and contracting.

The Project will also create additional flow-on benefit through increased work for local contractors and tourism operators. In the longer term, wetland restoration and improved habitat connectivity is expected to support improved fish breeding conditions and broader ecological function of the river system, representing an indirect benefit to local fisheries and recreational fishing opportunities over time.

Accordingly, the development will deliver tangible tourism and economic benefits through enhanced environmental amenity, regional branding opportunities, and alignment with the character and scale of the surrounding natural landscape.

5. Ground 5 – Environmental Doubts

RESPONSE:

Submitters have raised concerns regarding the Applicant's capacity to deliver measurable environmental outcomes and manage the Project appropriately.

In response, it is maintained that Rainforest Rescue has a long-standing and demonstrated record of ecological restoration and land stewardship in the Daintree region and across Australia. The organisation has been operating for over 25 years and has delivered multiple projects that have achieved and continue to meet measurable ecological and conservation outcomes. Rainforest Rescue's partnerships with Traditional Owners, research institutions, local organisations, and relevant agencies support transparency, accountability, and sound project delivery.

Rainforest Rescue also maintains strong and ongoing community engagement throughout the Shire, as evidenced by the breadth of local submissions and letters of support, active participation in community events, and consistent consultation with local stakeholders.

Importantly, the scale and calibre of support received provides Council with confidence that the proposal will be well delivered, aligned with community interest, and is unlikely to become a future compliance burden or enforcement issue.

Although the matters raised above warrant consideration, it is acknowledged that 27 of the 29 properly made submissions, along with several additional not properly made submissions, expressed constructive, optimistic, and supportive feedback.

Importantly, the supportive submissions were received from a high-calibre cross-section of the community, including established not-for-profit environmental organisations, respected research institutions, and long-standing local tourism and eco-tourism operators, including the following -

Statutory Bodies

- Wet Tropics Management Authority
- Tourism Tropical North Queensland

Research Institutions

- James Cook University
- Daintree Rainforest Observatory
- Flinders University

Not-for-Profit & Environmental Organisations

- Cairns and Far North Environment Centre
- Queensland Wildlife Trust
- Climate Force
- Queensland Conservation Council
- Foundation for National Parks and Wildlife
- Daintree Life
- Wildlife Tourism Australia
- Restore Blue

Private Enterprise

- Hartley's Crocodile Adventures
- Walkabout Cultural Adventures
- Daintree Discovery Centre
- Solar Whisperer
- Integrity Ag

This support was further reinforced by numerous local landowners who also provided clear and consistent expressions of support.

The key matters raised by the remaining submitters are summarised following:

1. Economic and Social Benefits

- Job creation: Generates local employment in restoration, eco-tourism, nursery production, and land care.
- Economic diversification: Will support the region's transition toward alternative options, including ecological industries, while recognising that productive agriculture and nature-based land management can both contribute to a resilient and diversified Shire economy.
- Tourism enhancement: Enriches the visual and ecological appeal of the Daintree, strengthening its global eco-tourism brand.
- Education and research: Builds partnerships with James Cook University and others for research, training, and education.
- Community engagement: Encourages local participation and connection to the environment.

2. Environmental and Ecological Benefits

- Restoration of degraded land: Rehabilitates over 400 hectares of former cane farmland into a biodiverse ecosystem.
- Protection of ecosystems: Reconnects nationally significant wetlands and habitats for threatened species, including the cassowary and spectacled flying-fox.
- Improved water and reef health: Reduces sediment and nutrient runoff, protecting the Daintree River and the Great Barrier Reef.
- Flood and erosion control: Restores wetlands to act as natural flood buffers and stabilise riverbanks.
- Sustainable land use: Converts unviable farmland into a productive ecological asset that complements regional land management.

3. Climate and Resilience Outcomes

- Climate-adaptive planning: Support national climate policies through reforestation and wetland restoration that mitigates climate risk.
- Carbon benefits: Increases carbon storage via large-scale revegetation.
- Natural resilience: Strengthens the capacity of the area to absorb stormwater and recover from floods, storms, and climate extremes.
- Nature-based adaptation: Demonstrates a sustainable, cost-effective climate resilience method through ecosystem restoration.

4. Policy Alignment

- Legislative compliance: The proposal is acknowledged to align with the *Planning Act 2016*, promoting environmental protection, sustainable growth, and community wellbeing.
- Strategic consistency: The development is considered to advance the sustainability vision of the Douglas Shire Planning Scheme and climate-responsive objectives of the Far North Queensland Regional Plan.
- World Heritage Rainforest and Great Barrier Reef support: Reinforces Wet Tropics and Reef 2050 conservation priorities through improved ecological resilience.

5. Scientific and Organisational Endorsement

- Academic validation: Endorsed by experts from James Cook University and other institutions as a best practice, evidence-based restoration initiative.
- Proven capability: Builds on Rainforest Rescue's 25-year record of successful restoration and conservation delivery.
- Widespread support: The project has unified support from conservation organisations, researchers, local businesses, and the broader community.

Overall, the Project has received strong and widespread support from the Douglas Shire community, as well as from large conservation organisations, local tourism operators, and scientific experts across the region. The proposed development is recognised as a transformative initiative that will restore degraded land, protect biodiversity, and strengthen climate resilience.

Further, the proposed development is widely regarded as an opportunity to create sustainable employment, diversify the local economy, and enhance the reputation of the Douglas Shire as a global leader in eco-tourism and environmental stewardship.

Importantly, the project is consistent with local, regional, and state planning and sustainability policies, and has attracted unified and enthusiastic support from the public, institutional stakeholders, and the scientific community, reflecting strong confidence in its environmental, social and economic benefits.

In addition, a video submission will be provided under separate cover to this submissions response, and it is respectfully requested that the video be circulated to all Councillors for their consideration in lieu of a deputation. It is intended that this video form part of the 'common material' for this development application.

We trust that the above assists in providing additional information required for Council's continued assessment of the proposed development. Please do not hesitate to contact the undersigned, should you wish to discuss the subject application.

Yours sincerely,



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