

Submission to Toowoomba Regional Council

Re: Development Application Number MCUI/2026/4930 – Material Change of Use for Nature-based Tourism at Lot 84 Kynoch Road, Palmtree (Lot 84 CSH515)

I strongly object to the proposed development on the basis that the existing road network is inadequate, unsafe and incapable of safely accommodating the additional traffic that this proposal would generate, particularly when considered together with the increasing traffic associated with new residential development in the area.

I am an elderly family member who regularly visits the family farm in this area. I know these roads well and travel them regularly. My concerns are based on my experience of the road conditions and the difficulties and risks already faced by local road users.

1. The existing roads are not suitable for increased commercial traffic

Kynoch Road and the connecting roads are rural roads with limitations that should not be overlooked when considering a commercial tourism proposal.

They include narrow sections, limited opportunities to safely pass, blind crests, bends, variable road surfaces, loose gravel, potholes and drainage issues. During dry conditions, dust can significantly reduce visibility, while wet weather can result in deterioration of the road surface, potholes, corrugations and water running across the road.

These conditions are challenging enough for people who know the roads. They present an even greater risk for visitors who are unfamiliar with the area and may be relying on GPS navigation to find their accommodation.

These roads were not designed to accommodate regular commercial tourism traffic, and I do not believe they are currently safe enough to do so.

2. Traffic is already increasing

This application must be considered in the context of what is already happening in the area.

Additional dwellings are being constructed, resulting in increased vehicle movements, including construction vehicles, tradespeople, deliveries and trucks.

The proposed tourism development would add another regular source of traffic, including cars and potentially larger vehicles such as four-wheel drives, caravans, trailers and recreational vehicles.

The cumulative effect cannot reasonably be dismissed. More development means more vehicles using the same roads, while the underlying road infrastructure remains substantially unchanged.

The Council should therefore assess the combined impact of existing, approved and proposed development rather than considering this application in isolation.

3. Road safety is my greatest concern

As an elderly driver, I already find some sections of these roads difficult to negotiate safely. Meeting an oncoming vehicle on a narrow section, travelling around a blind corner or crest, or negotiating changing road conditions requires considerable care.

An increase in unfamiliar visitors using these roads will increase the likelihood of mistakes, sudden braking, vehicles travelling too quickly for conditions, or vehicles meeting in locations where there is insufficient room to pass safely causing damage to small vehicles.

The local road users include residents, elderly people, families, school buses, farm machinery, trucks, cyclists, motorcyclists and pedestrians. Adding unfamiliar tourism traffic to this mix without first addressing the deficiencies of the road network is, in my view, an unacceptable safety risk.

Council should not wait for a serious accident to demonstrate that the road network was inadequate.

4. Necessary upgrades must be identified before considering approval

Before approving this development, Council should require a comprehensive and independent assessment of the traffic and road impacts.

This assessment should identify:

- the additional traffic likely to be generated by the development;
- the cumulative increase in traffic from other development in the area;
- the capacity and safety of Kynoch Road and connecting roads;
- locations requiring widening or improved road formation;
- intersections requiring improvement;
- sight-distance and visibility issues;
- drainage and culvert requirements;
- pavement and surface improvements;
- safe passing opportunities; and
- the cost and responsibility for completing the necessary works.

Any substantial road upgrades required to make the development safe should be identified and completed before the tourism operation commences, rather than allowing the development to proceed and addressing infrastructure deficiencies afterwards.

Council should also clearly establish who will bear the cost of any required upgrades so that the financial burden does not unexpectedly fall upon local ratepayers.

5. The safety of existing residents must not be compromised

I value this rural area and want it to remain a safe and liveable place for families, elderly residents and future generations.

I am not opposed to appropriate development, but development should not be approved where the existing infrastructure cannot safely accommodate the additional demand it creates.

Road safety must always come before development.

In conclusion, I respectfully ask Council to refuse the application unless it can first be demonstrated that the surrounding road network can safely accommodate the additional tourism traffic and that all necessary road and intersection upgrades will be properly funded and completed.