

Submission to Toowoomba Regional Council

RE: Application (Ref: MCUI/2026/4930) – Proposed Development of Short-Term Accommodation at Lot 84 Kynoch Road, Ravensbourne on Lot 84 CSH515

We refer to the abovementioned application and wish to state our objection to the proposed development for short-term accommodation at Lot 84 Kynoch Road, Ravensbourne being a property of approximately 5.45 hectares located in Palmtree, Qld.

The proposed development first came to our attention by means of the notice placed at the property's entrance as shown in Figure 1 below and more recently by public notification (shown in Figure 2 below) appearing in the online August 6, 2026 edition of the Western Downs & Darling Downs Town & Country Free Newspaper. We would like to mention that there appears to be a discrepancy between the application reference number stated on the property notice (MCIU/2026/4930) and that appearing in the newspaper (MCUI/2026/4930). To prevent confusion for other persons wishing to reference the correct application when making a submission, we request that Council check this discrepancy and arrange for the necessary amendment where applicable.



Figure 1: Proposed Development Notice at Entrance to Lot 84 Kynoch Road, Palmtree, Qld

PUBLIC NOTICES

Proposed Development

Make a submission from
7th August to 28th August 2026
Short Term Accommodation

Where: Lot 84, Kynoch Road, Ravensbourne
On: Lot 84 CSH 515
Approval sought: Development Permit for Material Change of Use
Application ref: MCUI/2026/4930
You may obtain a copy of the application and make a submission to:
Toowoomba Regional Council
PO Box 3021, Toowoomba Qld 4350
development@tr.qld.gov.au
131 872
www.tr.qld.gov.au

Public notification requirements are in accordance with the Planning Act 2016

Figure 2: Western Downs & Darling Downs Town & Country Free Newspaper, 6 August 2026: Proposed Development Notice - Lot 84 Kynoch Road, Ravensbourne

We note from the Town Planning Report submitted to the Toowoomba Regional Council on 3 June 2026 that the applicant is seeking a development permit for material change of use for *Nature-based Tourism*.

While we acknowledge the need to support appropriate tourism opportunities within the Toowoomba Region, we do not believe this proposal fully considers the impacts it will have on the existing rural community, the capacity of local infrastructure, or the rural amenity currently enjoyed by long-term residents of the Palmtree area.

We also note that the applicant describes the proposal as being a low-intensity development that will accommodate a maximum of two guests with the conclusion that it will have no adverse impact on surrounding infrastructure and neighbouring properties. However we believe that this assessment does not accurately reflect the realities of the Palmtree area or the limitations of the existing rural road and service infrastructure.

Inadequate Road Infrastructure

The applicant's Town Planning Report, describes Kynoch Road as an "all-weather gravel sealed road" that the majority of (guest) traffic will ultimately access via Shearer Road and National Park Road which are both gravel roads. The report claims that all these roads are in reasonable condition and that no upgrades are warranted.

This description does not accurately reflect the current condition, function or limitations of the local rural road network which was primarily established to support agricultural and rural residential use rather than commercial tourism activity. Lot 84 Kynoch Road has multiple possible access routes, each presenting similar infrastructure constraints as follows:

- **Access via Shearer Road** - Access via Shearer Road and National Park Road ultimately requires vehicles travelling to or from Esk to negotiate the intersection with the Esk-Hampton Road. This intersection has limited signage, restricted visibility and a tight hairpin alignment creating safety concerns for vehicles entering or exiting the Esk-Hampton Road, particularly for unfamiliar drivers travelling in conditions of reduced visibility.

Council should assess whether this intersection is suitable to accommodate additional tourism traffic or whether upgrades would be required, with any associated costs ultimately borne by Council and ratepayers.
- **Access via Perseverance Hall Road** - Access via Perseverance Hall Road involves negotiating a predominantly unsealed section of Kynoch Road without posted speed limits. This section receives limited maintenance from Toowoomba Regional Council, generally around once per year, resulting in overgrown vegetation, full gutters and deterioration between maintenance periods resulting in significantly reduced road reliability, particularly following wet weather events.
- **Access via Murphy Road** - Lot 84 Kynoch Road can also be accessed via Murphy Road, Ralph Road and Cullen Road, all of which are gravel roads. This route includes narrow sections, restricted visibility due to roadside vegetation, a crossing of Ballard Creek, a hairpin corner and access through an area containing farming enterprises and concealed property entrances.

Assessment of Existing Road Infrastructure and Access Constraints

Council should assess whether Kynoch Road and all access roads are capable of safely accommodating ongoing commercial tourism traffic in their current condition.

We note that with additional dwellings currently under construction in the area, the road network is already experiencing increased usage and deterioration resulting from associated construction traffic in addition to regular vehicle movements. The proposed development would further increase traffic volumes and introduce additional vehicles with drivers unfamiliar with local road conditions.

For much of its length, Kynoch Road is a narrow, rural road with winding sections, limited passing opportunities and areas prone to corrugations, potholes and surface deterioration, particularly following wet weather events. These adverse road conditions are also prevalent in the access roads mentioned above.

All roads within the Palmtree area were established primarily to service rural residential properties and agricultural operations. They were not designed to accommodate regular commercial tourism traffic or a continual turnover of short-term visitors unfamiliar with local road conditions.

Council should therefore determine whether substantial upgrades to the signage, road formation, width and surface would be required to safely accommodate the additional tourism-related traffic associated with the development. Any such works would represent a significant cost to Council and ultimately to ratepayers.

Agricultural Use of the Road Network

Kynoch Road is an active agricultural road used regularly by local landholders for moving cattle and livestock between paddocks and adjoining properties. Farm machinery, bulk fuel deliveries, livestock transport vehicles and other agricultural equipment are also common users of these roads.

These activities require motorists to slow down, exercise patience and understand that rural roads operate differently from urban road networks. As demonstrated in Figure 3 below, the narrow road widths, restricted sight distances and lack of formal passing areas already create challenges for residents who are familiar with the area.



Figure 3: Truck negotiating Kynoch Road near entrance to Proposed Development site at Lot 84 Kynoch Road, Palmtree, Qld

Visitor Traffic, Navigation and Road Safety Considerations

Additional tourism traffic including recreational cyclists using the local roads is likely to increase the potential for conflicts between unfamiliar drivers and established agricultural activities. Visitors may have limited experience driving on gravel roads or sharing roads with livestock and heavy agricultural machinery.

Furthermore, many visitors unfamiliar with the area are likely to rely on GPS navigation systems, which can be inaccurate in rural areas. Navigation systems appear to direct visitors travelling from Hampton or Esk via alternate access routes rather than the access route identified in the applicant's Town Planning Report.

This creates a realistic possibility that visitors unfamiliar with the area may be directed onto unsuitable local roads with limited visibility, narrow formations and varying road conditions. This is particularly concerning during early morning, evening and night-time periods when reduced visibility, wildlife movements and livestock activity create additional safety risks.

The concern is not simply the number of additional vehicle movements, but whether the existing road infrastructure is appropriate and safe for commercial tourism traffic alongside established agricultural use and the overall cost to Council and ultimately ratepayers in the event of numerous potential necessary upgrades.

Cumulative Impacts on Rural Roads

The applicant's Town Planning Report assesses only the traffic generated by this individual proposal and does not adequately consider the cumulative impacts of additional short-term accommodation developments throughout the district.

While each individual proposal may appear minor, collectively these developments increase pressure on rural road networks and Council resources.

Additional visitor traffic is likely to contribute to:

- accelerated deterioration of unsealed road surfaces;
- increased dust affecting neighbouring properties during dry conditions;
- increased potholes, corrugations and rutting during wet conditions;
- increased maintenance requirements and costs for Council;
- increased risks for motorists, cyclists, livestock and farm machinery; and
- reduced rural amenity for permanent residents.

In addition, the applicant's Town Planning Report indicates that the water supply for the proposed development site is by means of a 60,000 litre, rainwater tank and concludes that due to the high rainfall in the area, the need for a water truck to access the property site is not likely to be a regular event.

However this assessment does not reflect the true nature of rainfall events which occur over a period of time in the Palmtree area. As evidenced by low rainfall totals of 493.5mm, 555.5mm, 678mm and 518.1mm recorded for the years 1991, 1994, 2005 and 2019 respectively, the Palmtree area is prone to frequent dry conditions to the extent that creek beds run dry for extended periods.

Since short-term accommodation guests tend to use more water than permanent residents who are conditioned to conserving water, the need for a water truck to replenish the property's water supply on a regular basis during dry periods is highly likely and therefore will place added strain on the local rural road network.

Council should carefully assess whether existing rural road infrastructure is capable of supporting further commercial tourism activity without requiring additional signage, upgrades or ongoing maintenance commitments.

Waste Infrastructure

The applicant proposes that waste bins will be emptied by the owner or property manager. However, this does not remove the requirement for waste to ultimately enter Council's waste management system.

Residents in the Palmtree and Ravensbourne areas rely on the Ravensbourne Waste Management Facility. This is a small rural facility with finite capacity that is already servicing the needs of the local community. Additional visitor accommodation will generate further waste requiring disposal and place additional pressure on the existing rural waste infrastructure.

Council should also consider the cumulative impact of multiple short-term accommodation approvals throughout the region. Individually minor developments can collectively create increased demand on waste facilities and Council services without corresponding infrastructure improvements.

Waterway Protection - Impact on the Northern Branch of Perseverance Creek

The Northern Branch of Perseverance Creek originates just opposite the entrance gate to Lot 84 Kynoch Road. This waterway forms part of the broader Perseverance Creek catchment system and represents an important environmental feature of the locality.

Although the proposed development is relatively small in scale, Council should consider the potential cumulative impacts associated with visitor accommodation, including stormwater runoff, erosion, wastewater management and protection of water quality.

Increased vehicle movements, human activity and wastewater generation have the potential to affect the long-term health of the waterway if not appropriately managed.

Given the location of the creek in close proximity to the subject property, the applicant's Town Planning Report should clearly demonstrate how the proposal will protect this watercourse and maintain downstream water quality for human consumption and livestock production.

Impact on Rural Residential Amenity

Palmtree is valued for its quiet rural character, low traffic volumes and peaceful lifestyle.

The introduction of commercial short-term accommodation changes the nature of the locality by introducing a continual turnover of visitors rather than permanent residents who understand and respect local conditions.

Increased vehicle movements, dust and noise resulting from visitor activities have the potential to diminish the rural amenity currently enjoyed by neighbouring landholders.

With no vegetation screening in place on its western side, residents living on properties down-slope from the proposed accommodation will experience reduced privacy due to the ongoing presence, arrival and departure of unfamiliar visitors who will have unobstructed views over the adjoining rural properties.

The applicant concludes that the proposal will have no adverse impact on surrounding amenity. However, we disagree and believe the potential impacts on privacy, traffic, road safety, waterways and the enjoyment of neighbouring properties have been underestimated.

Conclusion

As concerned citizens of the Toowoomba Region who are familiar with the Palmtree locality, we believe the proposal does not adequately address the realities of the existing rural environment or the limitations of supporting infrastructure.

The assessment understates the condition and capability of the local road network, fails to adequately consider the established agricultural use and potential upgrades and signage of all three access roads, and does not sufficiently address cumulative impacts on rural infrastructure, waste services, waterway protection, privacy and the rural amenity of neighbouring residents.

We request that Toowoomba Regional Council carefully consider these matters before determining the application.

At a minimum, Council should require an independent assessment of the local road network and its suitability for commercial tourism traffic, together with consideration of cumulative impacts on rural infrastructure, waste management services, Perseverance Creek and the amenity of the Palmtree community.

For these reasons, we respectfully submit that the application should not be approved in its current form.