

MP ref: M2651
DA ref: MCU26/0008
QA: sj.pm

16 June 2026

Assessment Manager
Burdekin Shire Council
PO BOX 974
AYR QLD 4810

Via: *development@burdekin.qld.gov.au*

Attention: Peter Boyd - Planning and Development

Dear Peter,

**Re: Response to Submissions Received
Development Application seeking a Development Permit for Material Change of
Use – Non-Resident Workforce Accommodation on land described as Lot 6 on
RP733798 and located at 60 Mount Kelly Road, Mount Kelly**

On behalf of the Applicant, Milford Planning refer to the abovementioned development application and two submissions received during the recently completed public notification period (refer **Attachments 1 and 2**).

The development application will formalise an existing non-resident workforce accommodation arrangement on the subject site, which has been occurring on the subject since approximately 2023 and allow up to a maximum of ten workers to reside in the non-resident workforce accommodation. The workers will continue to be participants associated with the Palm Island Workers Scheme, further commentary in relation to this is provided in the responses in **Table 1** overleaf.

To assist in Council's assessment of the development application and submissions received, we hereby provide our response to the items raised in the submissions as detailed in **Tables 1 and 2** overleaf.



Table 1 – Response to Submission 1

Item	Response
Item 1 Incompatibility with Rural Residential Character	This item raised concerns that the proposed development risks altering both the visual and social character of the community, potentially creating an appearance similar to a temporary accommodation park rather than a rural residential neighbourhood. In response to this item, the proposed development does not involve a large-scale workers camp and associated infrastructure, the Applicant is simply seeking to reuse an existing dwelling house for non-resident workforce accommodation, for ten workers. No changes are proposed to the scale or external appearance of the existing dwelling, hence there will be no change visually within the streetscape of Mount Kelly Road or to the existing rural residential character or setting of the neighbourhood. The proposed development does not involve the construction of any additional permanent or temporary buildings, the property remains a residential dwelling and continues to present as such, in terms of scale and visual appearance. The character of the streetscape will not change as a consequence of the proposed development, refer to Figure 1 below.



Figure 1: Existing and Proposed Streetscape of part of Mount Kelly Road (Source: Queensland Globe)

Since the development involves the reuse of an existing building, with no changes to the scale and/ or external appearance of the building, it is considered compatible with and will complement the rural residential character of the immediate and wider locality.

The development application seeks to formalise the existing non-resident workforce accommodation arrangement that has been established and has been operating on site for approximately three years. The capacity to date has been five workers, with this development application seeking a maximum capacity of up to 10 workers. The non-resident workforce accommodation will continue to house workers participating in the Palm Island Workers Scheme, and occupants will typically reside at the property during the seasonal work period, so there will continue to be infrequent turnover of workers.

The accommodation will continue to be actively managed through a nominated house captain, regular professional cleaning, direct oversight



Table 1 – Response to Submission 1

Item	Response
	by the owners who reside nearby, and compliance with the requirements of the Palm Island Workers Scheme. These management arrangements have been successfully implemented throughout the period the property has operated with no complaints from local residents, Council or the Police. The above response addresses this item of Submission 1.
Item 2 Limited Integration with the Local Township	This item raised concerns about the proximity of proposed development to the local township limiting the opportunities for workers to integrate with the community and bring meaningful economic return to the community. In response to this item, the concerns raised are speculative in nature with no evidence to substantiate them and are not directly related to the planning land-use impacts of the proposed development. The workers associated with the non-resident workforce accommodation are employed locally and will continue to positively contribute to the regional workforce during periods of labour demand and support local businesses and industries. As the owner of a local business, the Applicant relies on access to a stable and reliable workforce. Without suitable accommodation options, employers may experience increased difficulty attracting and retaining workers necessary, which may have a detrimental impact on business operations. The assumption that workers are unlikely to participate in community activities or contribute economically to local businesses has not been substantiated by the submitter. Workers will continue to purchase groceries, fuel, household supplies, meals and other goods and services during their stay (some attend local church services), contributing to the local economy regardless of the location of the non-resident workforce accommodation within the shire. The nominated house captain is responsible for driving the company vehicle and transporting the workers to and from work and other locations as required. The property has accommodated participants of the Palm Island Workers Scheme for approximately three years, and therefore is well established in the local community with negligible impacts on the local or wider community. Importantly, no planning grounds have been provided to substantiate this area of concern and therefore should not be given any weight in Council's assessment of the development application. The proposed development will facilitate the continued provision of well managed non-resident workforce accommodation for locally employed workers while maintaining an arrangement that has been operating successfully for the last few years without detriment to the community of Mount Kelly. The above response addresses this item of Submission 1.
Item 3 Safety Concerns for Families and Children	This item raised concerns for the safety of families and children due to the submitter perceived conduct and behaviour concerns associated with transient and unsupervised workers. In response to this item, the proposed workers are by no way transient or unsupervised, the non-resident workforce accommodation will continue to house workers participating in the Palm Island Workers Scheme and



Table 1 – Response to Submission 1

Item	Response
	occupants will typically reside at the property during the seasonal work period, so infrequent turnover of workers. The accommodation will continue to be actively managed through a nominated house captain, regular professional cleaning, direct oversight by the owners who reside nearby, and compliance with the requirements of the Palm Island Workers Scheme. These management arrangements have been successfully implemented throughout the period the property has operated, no complaints from local residents, Council or the Police have been recorded. The concerns raised in terms of antic social behaviour, higher risk of alcohol and drug use are speculative in nature with no evidence to substantiate them as such Council should give not weight to this item in the assessment of the development application. The property has accommodated participants of the Palm Island Workers Scheme for approximately three years without any known pattern of antisocial behaviour, criminal activity, safety incidents, or complaints that would demonstrate any risk to or adverse impact on the surrounding community or complaints to Council or the police. The accommodation has a demonstrated history of operating without the behavioural concerns identified by the submitter. The application seeks to reuse an existing dwelling as non-resident work force accommodation for a maximum of 10 workers, it is not seeking a worker's camp with a capacity for 100 + workers. Council's assessment of this development application should be based on demonstrated and reasonably anticipated impacts or the lack of, rather than assumptions regarding the behaviour of future workers. The application seeks to formalise an accommodation arrangement that has been operating successfully for several years. There have been no police call-outs, substantiated complaints or enforcement actions relating to the operation of the accommodation. Accordingly, it is submitted that the concerns raised regarding public safety are not substantiated by the existing established operation of the accommodation and should be given limited weight in the assessment of the application. The behaviour of patrons/ occupants/ employee's is somewhat out of the control of an Applicant. Furthermore, the fact that the use has operated (at a smaller capacity) for a few years with no complaints associated with anti-social behaviour or higher risk of alcohol use, drug use or unsafe driving appropriately addresses this item. The above response addresses this item of Submission 1.
Item 4 Road Safety and Traffic Risks	This item raised concerns in relation to road safety and traffic risks because seasonal and non-resident workers are often unfamiliar with rural road conditions, including cane trains and slow moving agricultural machinery. In response to this item, once again the submitter has made assumptions in relation to the workers that will occupy the non-resident workforce accommodation and the concerns raised do not reflect the manner in which the accommodation will continue to operate and do not reflect the property's established operating history. To date, there have been no



Table 1 – Response to Submission 1

Item	Response
	known incidents, complaints, or safety issues associated with traffic generated by the accommodation. Importantly, transportation arrangements will continue to be managed. The property has a single work vehicle which will continue to be operated exclusively by the nominated house captain. Other occupants will not be permitted to drive the vehicle. As such, the accommodation will not result in multiple workers independently travelling local roads or a significant increase in vehicle movements associated with the proposed development. The workers will continue to be transported to and from work and other locations by the house captain and therefore generate fewer vehicle movements than a typical household with multiple licensed drivers and vehicles. The house captain has resided at the property and fulfilled this role for the past three years. Through this ongoing involvement, the house captain is familiar with local road conditions, seasonal agricultural activities, cane haul-outs, cane train operations and other matters relevant to safe travel within the area. The application does not propose any increase in vehicle numbers, or any change to the established transportation arrangements that have operated safely and efficiently for approximately three years. It is considered that the above addresses this item. The established management arrangements for the property will continue to address the concerns raised in this item. The above response addresses this item of Submission 1.
Item 5 Impact on Property Values	This item raised concerns that the introduction of high-density, transient accommodation in a lifestyle property area will adversely impact on property values and undermine property investment. In response to this item, potential impacts on property values and property investment are not valid planning grounds, consequently Council should not give any weight to this item of concern in their assessment of the development application. The above response addresses this item of Submission 1.
Item 6 Precedent and Existing Concern	This item raised concerns that introducing a large non-resident workforce population may intensify the challenges the community is already experiencing. Even a single instance of disruptive behaviour can have a In response to this item, the development application seeks to reuse an existing permanent dwelling as non-resident workforce accommodation for a maximum of 10 workers. The Applicant is not seeking approval for a workers camp with a capacity for 50 + workers. The scale of the development complements the rural residential setting and will not cause any challenges for the community. The accommodation (five occupants) has operated for approximately three years under established management arrangements and will continue to do so. The property is subject to direct oversight by the owners, who reside nearby, regular professional cleaning, and management by a nominated house captain who has resided at the property throughout the operational period. The accommodation is also

**Table 1 – Response to Submission 1**

Item	Response
	provided in accordance with the requirements of the Palm Island Workers Scheme and associated government standards. Importantly, the concerns raised regarding future disruptive behaviour are speculative and are not supported by the operating history of the accommodation and should not be given any weight by Council when formalising the assessment of the application. Furthermore, there is no evidence that the use to date has resulted in significant adverse impacts on neighbouring properties or the broader community. Regarding the concern raised around 'precedent', each development application is assessed by Council on its merits against the relevant planning framework, site characteristics, operational arrangements, and supporting information. Council's support for this application will not automatically confer their support for any similar development applications, nor will it remove Council's obligation to independently assess future applications in accordance with the planning scheme and applicable legislation. The development application seeks to formalise an established accommodation arrangement that has operated without detriment to the local community for the past three years. There are no changes to the physical character of the property or demonstrated adverse impacts on the locality because of the proposed development. The number of workers will be limited to ten and there are reasonable and relevant conditions that can be drafted to restrict the number of workers permitted to stay in the established accommodation. Further, the maximum number of workers for a business under the Palm Island Workers Scheme is ten. The above response addresses this item of Submission 1.

Table 2 – Response to Submission 2

Item	Response
Item 1 Non-compliant with the Planning Scheme	In response to this item, whilst it is acknowledged that a non-resident workforce accommodation use is not anticipated in the Rural Residential Zone, the proposed development involves the reuse of an existing building, with no changes proposed and a maximum capacity of ten workers, which is low scale. There will be no change to the streetscape because of the proposed development. There are instances, which is the case for the proposed development, where rural uses are well established and are now on land identified as being within the Rural Residential Zone or other zones. The non-resident workforce accommodation is strategically located for the occupants and their place of work. As the owner of a local business, the Applicant relies on access to a stable and reliable workforce. Without suitable accommodation options, employers may experience increased difficulty attracting and retaining workers necessary, which may have a detrimental impact on business operations. The property continues to present as a residential dwelling and maintains the appearance and character of surrounding residential properties. Importantly, the accommodation arrangement has been operating for

**Table 2 – Response to Submission 2**

Item	Response
	approximately three years without alteration to the physical character of the site or surrounding area. The application seeks to formalise an existing use rather than introduce a new built form into the locality. As outlined in the Strategic Framework of the planning scheme, the primary use of land in the Rural Residential Zone is for residential purposes, but home-based businesses and some, generally domestic scale, rural uses may occur where they would not significantly disrupt the amenity and character of the surrounding area. The built form of the proposed non-resident workforce accommodation is consistent with other housing on Mount Kelly Road and is compatible with the surrounding residential amenity with all associated activities and parking are accommodated within the site. Given the established operating history of the accommodation, the absence of physical changes to the property, and the demonstrated lack of adverse impacts on the surrounding locality, it is considered that the proposed development can coexist with the rural residential character of the area. The above addresses this item of Submission 2.
Item 2 Non-compliant with the ECONOMIC DEVELOPMENT QUEENSLAND – PDA guideline for non-resident workers accommodation	This item raised concerns that the proposed non-resident workers accommodation does not comply with the ECONOMIC DEVELOPMENT QUEENSLAND – PDA guideline for non-resident workers accommodation In response to this item, the Economic Development Queensland Guideline for Non-Resident Worker Accommodation (Guideline) does not apply to the assessment of this development application. The Guideline specifically relates to Non-Resident Worker Accommodation (mining camps) in a Priority Development Area (PDA), the subject site is not in a PDA. The above addresses this item of Submission 2.
Item 3 Unacceptable Noise, Disruption and Waste	This item raised concerns that the scale of the proposal and the nature of the workforce and their potential visitors will create more noise and disruption. The number of occupants proposed will increase the waste with the likelihood of overflowing, odour, vermin and wind-blown litter impacting adjacent residential properties and the area. In response to this item, the development application seeks to reuse an existing permanent dwelling as non-resident workforce accommodation for a maximum of 10 workers. The Applicant it is not seeking approval for a worker's camp with a capacity for 50 + workers. The proposed development will accommodate the same capacity of occupants that the existing dwelling could accommodate, meaning no additional noise and disruption based on the number of occupants. The proposed development will continue to accommodate participants associated with the Palm Island Workers Scheme. For approximately the past three years, the accommodation has operated without any demonstrated pattern of noise nuisance, waste management issues, littering, vermin infestations, or other impacts on neighbouring properties. The accommodation will continue to be actively managed through established operational arrangements, including a nominated house captain who has occupied the property and fulfilled that role for the past



Table 2 – Response to Submission 2

Item	Response
	three years, regular professional cleaning approximately every ten days, and direct oversight by the property owners who reside nearby. The submitter's concerns regarding visitors are also speculative. No evidence has been provided to demonstrate that visitors associated with the accommodation have created or will create nuisance or amenity impacts during the period the property has been operating as non-residence workforce accommodation. The use has established within the community without any adverse impacts in terms of noise, odour, litter and no complaints While the accommodation may generate waste consistent with its occupancy levels and those of a similar sized dwelling household, waste collection and management arrangements have been successfully operating throughout the existing use of the property. There is no evidence that the accommodation has resulted in overflowing bins, odours, vermin, wind-blown litter, or other waste-related impacts on adjoining properties during the past three years. The actual operating history of the accommodation demonstrates that the concerns raised regarding noise, disruption and waste have not materialised despite the use being established for several years. Accordingly, it is submitted that these concerns should be afforded limited weight in the assessment of the application. No complaints relating to noise, waste management, litter, vermin or property maintenance have been received by the owners during the approximately three years the accommodation has operated. The above addressing this item of Submission 2.
Item 4 Water Usage and Pressure Impacts	This item raised concerns that the number of occupants proposed would most likely double the water usage for the property. We therefore have concerns about the network pressure reductions this will cause. In response to this item, the development application seeks to reuse an existing permanent dwelling as non-resident workforce accommodation for a maximum of 10 workers. The existing dwelling has the capacity to house ten people, so the water usage and pressure impacts will be the same as if the dwelling house use continued. The proposed development will not result in increased water usage or a decrease in water pressure. The above addressing this item of Submission 2.
Item 5 Multiple Applications for Non-Resident Accommodation	This item raised concerns that if this proposal is approved more applications for a similar form of accommodation will be put forward to Council and it will have a negative impact on the submitter's property value. In response to this item, each development application is assessed by Council on its merits and against the relevant planning framework, site characteristics, operational arrangements, and supporting information. Council's position in relation to this application does not set a precedent for other development applications for non-resident workforce accommodation. Council must assess all future applications based on the merits of the proposed development and in accordance with the provisions of the planning scheme and applicable legislation. The development application seeks to formalise an established accommodation arrangement that has operated without detriment to the



Table 2 – Response to Submission 2

Item	Response
	local community for the past three years. There are no changes to the physical character of the property or demonstrated adverse impacts on the locality because of the proposed development. The number of workers will be limited to ten and there are reasonable and relevant conditions that can be drafted to restrict the number of workers permitted to stay in the established accommodation. Further, the maximum number of workers for a business under the Palm Island Workers Scheme is ten. Potential impact on property values is not a valid planning grounds to object to a development application, as such Council should not give any weight to this item of concern in their assessment of the development application. The above response addresses this item of Submission 2.

Proceeding

We trust the above and attached information is sufficient to allow Council to assess the development application. If Council is of the view that the response does not appropriately address the Information Request, we request the opportunity to meet to discuss further.

If you have any questions regarding this correspondence, please contact the undersigned on TEL: (07) 4724 0095.

Yours sincerely,

MILFORD PLANNING



Sarah Jones

SENOWN PLANNER

Encl: Attachment 1: Submission 1
Attachment 2: Submission 2

Attachment 1

From: Connie Elton <connie.maree.elton@gmail.com>
Sent: Friday, 22 May 2026 3:07 PM
To: RES - Mailbox - Planning
Subject: MCU26/0008 - Objection to Proposed Non-Resident Workforce Accommodation

Dear Planning Department,

RE: Proposal / Objection to Proposed Non-Resident Workforce Accommodation – Mount Kelly Community

To Whom It May Concern,

I am writing to formally object to the proposed development of non-resident workforce accommodation within the Mount Kelly community (Lot 6 on RP733798). Mount Kelly is a rural–residential area characterised by lifestyle properties, strong community values, and a growing number of young families who choose this location for its safety, privacy, and peaceful environment. The proposal is inconsistent with the established character of the area and raises several significant concerns for residents.

1. Incompatibility With Rural–Residential Character

Mount Kelly has experienced substantial residential growth and rising property values due to its appeal as a safe, family-oriented lifestyle area. The introduction of high-density, transient workforce accommodation does not align with the existing planning intent or the expectations of current residents.

This type of development risks altering both the visual and social character of the community, potentially creating an appearance similar to a temporary accommodation park rather than a rural–residential neighbourhood.

2. Limited Integration With the Local Township

The proposed site is geographically isolated from the township. As a result:

- Non-resident workers are unlikely to participate in local community activities
- There is reduced opportunity for social integration
- Local businesses may not receive the economic benefit typically associated with workforce accommodation located closer to town

This means the development will bring **no meaningful economic return** to the community while introducing **significant local impacts**.

3. Safety Concerns for Families and Children

Mount Kelly attracts families specifically because of its reputation for safety and low-risk living. A **transient, unsupervised** workforce population introduces several concerns:

- Lack of community connection or accountability
- Increased potential for antisocial behaviour
- Higher risk associated with alcohol use, drug use, or unsafe driving (particularly unsafe if commuting from in-town back to Mount Kelly)
- No established support measures to manage issues if they arise

The area currently has limited police presence and limited Council responsiveness, which heightens the risk if problems occur. Item 6 expands on these concerns.

4. Road Safety and Traffic Risks

Seasonal and non-resident workers are often unfamiliar with:

- Rural road conditions
- Cane haul-outs
- Cane trains
- Harvesting machinery
- Slow-moving agricultural equipment

Mount Kelly roads already experience routine incidents during peak seasons. Increasing the number of inexperienced drivers significantly elevates the risk of accidents for residents, children, and local farmers.

5. Impact on Property Values

The introduction of high-density, transient accommodation in a lifestyle-property area is likely to:

- Depreciate surrounding property values
- Reduce the desirability of the area for families
- Undermine long-term investment made by existing residents

Residents have chosen Mount Kelly for its rural lifestyle, privacy, and safety. This development is inconsistent with those values.

6. Precedent and Existing Concerns

Council has already permitted residents to live in caravans and temporary structures in the area, which has raised concerns regarding:

- Compliance
- Oversight
- Long-term planning integrity
- The emergence of “spotter-style” behaviour with no formal monitoring of properties
- Limited pathways for residents to seek timely support when issues arise

Introducing a large non-resident workforce population may intensify the challenges the community is already experiencing. Even a single instance of disruptive behaviour can have a noticeable impact on a small rural area. Approval of this development may also set a precedent for other vacant landowners to pursue similar proposals in the future.

Conclusion

The proposed non-resident workforce accommodation is not compatible with the established rural–residential character of Mount Kelly. It presents risks to safety, property values, and community cohesion, while offering no economic or social benefit to the local area. Mount Kelly residents have nothing to gain from this development.

For these reasons, I respectfully request that Council reconsider the proposal and prioritise developments that align with the long-term vision and values of the Mount Kelly community.

Can you please confirm receipt and acceptance of this objection by return email.

Regards,

Connie, Justin, Ryan, Lachlan and Charlotte ELTON.

Attachment 2

From: "Grethe Busch" <egsbusch1@bigpond.com>
Sent: Mon, 25 May 2026 20:10:19 +1000
To: "RES - Mailbox - Planning" <Planning@burdekin.qld.gov.au>
Subject: Objection to Application MCU26/0008
Attachments: Objection to 60 mount kelly drive.docx

Good evening

Please find enclosed our OBJECTION TO DEVELOPMENT APPLICATION – MCU26/0008

Regards,
Erik & Grethe Busch

Erik and Grethe Busch
131 Mt Kelly Drive
Mount Kelly QLD 4807
egsbusch1@bigpond.com
0407156534 0419631156

25th May 2026

The Chief Executive Officer
Burdekin Shire Council
PO Box 974
Ayr QLD 4807
planning@burdekin.qld.gov.au

RE: OBJECTION TO DEVELOPMENT APPLICATION

NO: MCU26/0008

PROPERTY: 60 Mt Kelly Drive, Mount Kelly – Lot 6 on RP733798

Dear Assessment Manager

We are writing to formally object to the Proposed Development Application for non-resident worker accommodation at the above-mentioned property.

As local residents whose property is located at 131 Mt Kelly Drive we believe this proposal will have a potential negative and undesirable impact to the Mt Kelly community.

Objection 1 – Non-compliant with the Planning Scheme

The Mt Kelly community is zoned Rural Residential. The vast majority of houses out here are owner occupied, house are occupied by couples and families with an average of 2-6 people per household. According to The Burdekin Shire Council Planning Scheme – the purpose of the rural residential zone is to provide for residential use and activity on large lots incl home based businesses that are at a scale consistence with the amenity and character of the surrounding area. There are no other workers accommodation at Mount Kelly so nothing of the same character.

Objection 2 – Non-compliant with the ECONOMIC DEVELOPMENT QUEENSLAND – PDA guideline for non-resident workers accommodation.

According to the ECONOMIC DEVELOPMENT QUEENSLAND – PDA Guideline for non-resident workers accommodation there are TWO OVERARCHING PRINCIPLES sought for this type of accommodation.

- Principle 1: non-resident worker accommodation is located and designed to be integrated within or on the edge of town
- Principle 2: non-resident worker accommodation adequately provides for occupants and has a high level of on-site amenity

We do not believe the property at 60 Mt Kelly Drive full fill any of these principles because;-

- a. The property is approx. 16 kilometres from town

- b. There are no shopping, food outlets or entertainment opportunities at Mount Kelly
- c. There are no public transport to and from Mount Kelly

Objection 3 – Unacceptable Noise, Disruption & Waste.

The scale of the proposal and the nature of the workforce and their potential visitors will create more noise and disruption.

The number of occupants proposed will increase the waste with the likelihood of overflowing, odour, vermin and wind-blown litter impacting adjacent residential properties and the area.

Objection 4 –Water Usage and Pressure Impacts.

The number of occupants proposed would most likely double the water usage for the property. We therefore have concerns about the network pressure reductions this will cause.

Objection 5 – Multiple applications for Non-Resident accommodation

We fear that if this proposal is accepted and granted more applications for this type of accommodation will be put forward to Council. This would completely change the feel, the nature and the values we as residents here at Mount Kelly have and was the reason we purchased our property here. We furthermore fear that it would have a negative impact on our property value.

For these reasons we urge Council to refuse the application.

Thank you for the opportunity to voice our concerns, we look forward to being kept informed of the progress.

Regards,

Erik & Grethe Busch

131 Mt Kelly Drive, Mount Kelly

egsbusch1@bigpond.com

Erik – 0407 156 564

Grethe – 0419 631 156