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22 July 2026

Assessment Manager
Burdekin Shire Council
PO Box 974
AYR QLD 4807
Via: planning@burdekin.qld.gov.au

Attention: Planning and Development

Dear Sir/Madam,

Re: Response to Submission Received
Development Application seeking a Development Permit for Material Change of Use – High Impact Industry (Horticultural Product Processing Facility) on land described as Lots 12, 13 and 14 on SP250536 and located at 457, 459 and 461 Trent Road, Alva

On behalf of the Applicant, Milford Planning refer to the abovementioned development application and to the submission received during the recently completed public notification period.

To assist in Council's assessment of the development application and submission received, we hereby provide our response to the items raised in the submission as detailed in **Table 1** below.

Table 1 – Response to Submissions Received

Item Raised	Response
Item 1 Traffic generation and safety	This item raised that insufficient information on volume, frequency and timing of vehicles has been provided for Council to assess the proposal. In response to this item, it is first important to note that the submitter's dwelling, whose impact is the concern of this submission, is located approximately 60 m from the boundary of Lot 13 on SP250536 (access handle) and on a large rural property used for cropping. The submission centres around the resuming of vehicle traffic relating to a processing facility located more than two kilometres to the north. The submission suggests that traffic generated by the proposal requires new technical assessment be prepared.



Table 1 – Response to Submissions Received

Item Raised	Response
	It is important to reiterate what is occurring. A former facility used to dry and process algae into a powdered product, is now proposed to dry and process horticultural produce (such as tomato) into a powdered product. No external changes are occurring, no change to the approved access arrangement is occurring, and no increase in parking is occurring. Regarding proposed traffic, less than 10 light vehicles (staff) and a small delivery truck will access the site during the pilot stage. It is safe to assume that this is of a less intense nature than the previous processing use and is of a nature consistent with the Rural Zone. In terms of the maximum capacity, staff vehicles will be limited to 10, which is the number of marked parking spaces already provided at the facility, therefore no increase to approved parking is proposed. Regarding heavy vehicle traffic, the maximum foreseeable weight of inputs (produce) coming onto the site on any given day is 22 tonne (which is equivalent to a B-Double Truck). It is not anticipated that this would occur daily (determined by produce supply), however, this is the maximum anticipated. Outputs (powder) are of a substantially lower weight and so pick-up will be either less frequent or of a smaller vehicle size. The transport of this weight of agricultural products is not unanticipated in the Rural Zone. Regarding the submitter's concern for the road network, Trent Road currently services cropping land (sugarcane) and a large prawn-farm. Proposed traffic is not of a quantity or quality that exceeds the capacity of this road, which was appropriate to service the facility previously. The approved access is considered appropriate for use, noting that the development does not increase the scale of the existing facility.
Item 2 Dust generation	This item raised that the operation of the facility would cause dust generating impact to the submitter's dwelling. In response to this item, it is reiterated that re-commencing like-activities within this facility, and therefore driveway, does not introduce a new impact and does not constitute the requirement for new technical reporting to understand dust impacts. The proposed use will operate within the confines of existing infrastructure, and the short section of road that is at the nearest 60 m from the submitter's dwelling, is not considered to be adversely impacted upon by the resuming of vehicle traffic on this road, as it does not present as an intensification. Moreover, proposed traffic, both quantity and size, are not considered to be out of place in this locality or the Rural Zone generally. Surrounding private land, including the submitter's, is cropping land that would be frequented by agricultural machinery and would see significant dust generating activity during harvest, burning and planting of sugarcane. Moreover, a large scale prawn farm is located to the east of the site, which would see substantial heavy vehicle use, including on unsealed private access roads and Trent Road. The generation of vehicle dust is a reasonably understood expectation within rural land. A maximum of four heavy vehicle movements daily (likely less) during the peak season along a private access in the Rural Zone is a reasonably expected outcome. Vehicle speeds on private land are not legislated, and it is noted that the rural nature and condition of the track does not allow for excessive speeds, particularly by heavy vehicles. Notwithstanding, vehicle speed can be conditioned to prevent unnecessary dust pluming, if required.



Table 1 – Response to Submissions Received

Item Raised	Response
	It should also be noted that the development will be bound by the quality provisions of the <i>Environmental Protection (Air) Policy 2019</i> , which will not be waived or overwritten by any approval.
Item 3 Operational intensity	This item raised that insufficient operational detail was provided to assess the impacts of the proposal. In response, it is confirmed that the proposed changes to the facility are negligible. The purpose of establishing this activity at this facility was because it was highly compatible with what was required, both in terms of design and equipment. The site plan provided with the application, as well as description of how the facility will operate, provides the information necessary to understand how the facility operates. Storage rooms, laboratory space, cold-storage rooms and a drying room will be re-utilised. No expansion of the facility is proposed. Equipment, such as a commercial drying machine which was left at the facility is being re-used. The submitter's dwelling is located more than two kilometres from the facility and is not proximate to any activity within the lease area that could impact the sensitive land use, such as loading noise or drying. There is sufficient operational detail provided in the application for Council to assess the development.

Proceeding

We trust the above information assists and is sufficient to allow Council to assess the development application. If Council requires any additional information to assist in its assessment or to address the submission received, we request the opportunity to meet to discuss further.

It would be appreciated if Council could provide draft conditions for review and discussion in advance of the matter being considered by Council.

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

Yours sincerely,

MILFORD PLANNING


Electronic

Henry Wells
GRADUATE TOWN PLANNER