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Aggregates - Qld

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3 July 2026

Development Permit Applications currently under assessment by Toowoomba Regional Council:

- **RAL/2025/8938 - Reconfigure 2 into 96 Lots**
- **RAL/2026/2049 - Reconfigure 1 into 2 Lots**
- **MCUI/2025/8504 - Combined MCU and RAL Preliminary Approval for a Variation Request and Reconfigure 1 into 2 Lots**
- **RAL/2026/6056 - Reconfigure 2 into 72 Lots**

Dear Mr Petrocchio,

I refer to the abovementioned development applications currently under assessment by the Toowoomba Regional Council (the Council).

Holcim (Australia) Pty Ltd (Holcim) operates its Toowoomba Quarry (the Quarry) at 68 Drayton Wellcamp Road, Glenvale, on land described as:

- Lot 698 on A34452;
- Lot 699 on A34452;
- Lot 1183 on A342684;
- Lot 1 on RP157339;
- Lot 2 on RP157339;
- Lot 1190 on A342648;
- Lot 10 on RP208160; and
- Lot 8 on RP208160.

Holcim wishes to raise a number of serious concerns with these proposals. Many of these concerns are consistent with those raised by Holcim in relation to a Development Permit (MCUI/2025/2877 and RAL/2025/2878) submitted in 2025, which was subsequently withdrawn by the Applicant in April 2026. This application proposed the introduction of a significant number of new, sensitive residential lots in proximity to the Quarry, the closest being located approximately 850m from the eastern boundary of the Quarry's approved operational area.

The abovelisted tranche of recent applications also propose to introduce a significant number of sensitive receptors in close proximity to the Quarry, the nearest being even closer at 630m (being Lot 1 on Plan SK102 Revision A under RAL/2026/6056).

Holcim has significant concerns that these development applications do not adequately address reverse amenity impacts on, nor the protection of, the Quarry.

Strategic Importance of Toowoomba Quarry

The Quarry is located within the Glenvale Key Resource Area (KRA). Operations commenced in the 1970s and, as outlined in the KRA description, the Quarry is of regional significance to the Toowoomba urban area and the eastern Darling Downs markets.

The purpose of KRAs is to protect important extractive resources from incompatible land uses. Encroachment of new, sensitive land uses on existing, legitimate industrial, extractive or other uses leads to pressure on the existing operation to curtail its activities regardless of compliance. There is a clear and strong need to manage the interfaces between industry and sensitive land uses such as residential, and protect industry from reverse amenity impacts that could reduce business viability and create conflict in the community.

Quarry products are essential inputs to the local economy and the delivery of the housing supply and infrastructure needed to support a growing population. Unlike many construction inputs, quarry materials are location-dependent, finite and cannot be economically substituted at scale. Their proximity to markets directly influences construction costs, infrastructure delivery, transport emissions and housing affordability.

Reverse Amenity Impacts

Holcim's Toowoomba Quarry operates in accordance with its statutory approvals and environmental obligations, however there is a risk that even compliant operations can be subject to reverse amenity impacts including complaints and conflict from nearby sensitive land uses.

The proposed development poses significant risk to the existing extractive industry operation and ongoing functioning of the KRA through the introduction of a significant number of new, sensitive residential lots in proximity to the Quarry, the closest being located approximately 630m from the eastern boundary of the KRA Resource/Processing Area (i.e. being Lot 1 on Plan SK102 Revision A). While the proposed residential subdivisions will not be located within the KRA Separation Area, their close proximity (as close at 630m) to extractive industry must be appropriately addressed.

When the operation of local quarries is impacted by the encroachment of sensitive land uses, for example through complaints regardless of compliance, construction materials must be sourced from increasingly distant locations, increasing costs across both public and private construction. Greater haul distances also increase heavy vehicle movements, fuel consumption, greenhouse gas emissions, road maintenance costs and community impacts.

Maintaining adequate, proximate supplies of construction materials is therefore fundamental to delivering infrastructure efficiently and supporting housing affordability.

Closing comments

Extractive resources are site specific, limited in occurrence by geological conditions and finite. Such resources are located close to the communities they supply to minimise the social, environmental and economic costs of excessive transport distances. As per the State Planning Policy, extractive industry operations are essential to support development and construction activities and the delivery of infrastructure. The ongoing protection of extractive industry from encroachment of sensitive land uses is integral to support the economic benefits the industry provides to Queensland and the contribution to our quality of life.

Introducing sensitive land uses such as residential within such close proximity to a heavy industrial operation creates an inherent land-use conflict. Any proposal to introduce new, sensitive land uses in proximity to a KRA Resource/Processing Area, whether or not within the defined Separation Areas, must clearly demonstrate that reverse amenity impacts can be appropriately mitigated. The documentation submitted to Council in relation to the proposed development is inadequate and the potential for significant impacts to the ongoing operation of Holcim's Toowoomba Quarry remains.

Holcim requests that Council refuse these development applications and any future proposals to introduce sensitive land uses in proximity to quarries and KRAs unless the proposed developments can be adequately assessed in relation to the potential for reverse amenity impacts on the ongoing extractive operations.

Should you require any further information or wish to discuss this submission, please contact me on 0408 192 921 or victoria.musgrove@holcim.com.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Victoria Musgrove', written in a cursive style.

Victoria Musgrove
National Planning Manager