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1 September 2026

Matthew Coleman
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Dear Matthew

THIRD PARTY ADVICE – DEVELOPMENT APPLICATION MCUI/2026/6891

We refer to Council's Request for Third Party Advice dated 20 August 2026 inviting comment from Boral Resources (Qld) Pty Ltd (Boral) on the above application. Boral operates the Wellcamp Downs Quarry at 1215 Toowoomba Cecil Plains Road, Wellcamp, which adjoins the subject land. The applicant's own material places the proposed facility approximately 366 metres from the quarry, wholly within the Extractive Resources Separation Area under the *Toowoomba Regional Planning Scheme*.

Boral objects to the proposed development and suggests that the application, as currently proposed, cannot be supported by Council for the reasons set out below.

In summary, the Wellcamp Downs Quarry is a State Designated Key Resource Area, so that the proposal seeks to introduce a sensitive receptor, including the permanent keeping of animals, into a separation area. As you would be aware, the very purpose of a Separation Area is to protect the ongoing operation of a Key Resource Area. Further, the reverse amenity assessment relied on by the applicant is assessed against a superseded operational baseline and, even on that superseded material, concedes exceedances of the relevant amenity criteria at the site. Our reasons for our objection are articulated in more detail below.

1. The Wellcamp Downs Quarry and its current approvals

The Wellcamp Downs Quarry is a long-established extractive operation in a State designated Key Resource Area and operates under Environmental Authority EPPR00714113. On 5 July 2024, Council issued a Negotiated Decision Notice approving a significant extension to the quarry (Extension to Extractive Industry, approval reference MCUC/2023/537/A). That approval authorises a substantially expanded extraction footprint and was supported by the following relevant technical assessments prepared for the expanded operation, being:

- Wellcamp Downs Quarry Blasting Impact Assessment, Saros (International) Pty Ltd, reference BRQ32, December 2022, which models ground vibration and air overpressure contours for both the existing and ultimate pit;
- Assessment of Environmental Noise Impact, Expansion of Boral Wellcamp Quarry, Acoustics RB Pty Ltd, report 14-551.R08, December 2022; and
- Wellcamp Quarry Air Quality Assessment, Katestone Environmental Pty Ltd, reference D21137-4, December 2022, which models particulate concentrations and dust deposition for the existing and ultimate pit.

These documents form part of Council's records for approval MCUC/2023/537/A. They supersede the assessments prepared in 2016 for the pre-expansion operation.

2. The reverse amenity assessment is carried out against a superseded baseline

The Reverse Amenity Advice Letter prepared by Range Environmental Consultants (reference J002916, dated 15 July 2026) responds to Performance Outcome PO4 of the Extractive Resources Overlay Code solely by reference to assessments prepared in 2016 (Saros BRQ20, dated 30 May 2016; Acoustics RB 14-551.R04, dated 1 June 2016; and Katestone D14060-10, dated 26 May 2016). Each of those documents was prepared for the quarry as it was configured a decade ago and each has been superseded by the December 2022 assessments listed above.

The advice letter makes no reference to the 2024 extension approval or to any of its supporting assessments. The consequence is that the impacts of the approved ultimate pit at the proposed development site, including revised ground vibration and overpressure contours, revised noise predictions, revised dust deposition modelling and any revised fly rock exclusion zone derived from the expanded extraction area, are entirely unassessed.

This deficiency was readily avoidable. The extension approval is a matter of public record on Council's own file, and the applicant's town planning consultant also acted for Boral on that application. Council has correctly identified the same deficiency at Item 2.2 of its Information Request dated 20 August 2026, and Boral endorses that request.

3. Even on the superseded material, the assessment concedes exceedances at the site

Taking the advice letter at its highest, it concedes that at the proposed development site:

- ground vibration from blasting is predicted to exceed the 5 mm/s human comfort criterion recommended under the Queensland Guideline on Noise and Vibration from Blasting (ESR/2016/2169);
- the site falls within the 120 dB(L) air blast overpressure contour, above the recommended 115 dB(L) limit for nine out of ten consecutive blasts;
- the site is wholly within an area identified as non-developable in the 2016 noise assessment because predicted noise emissions exceed the derived noise level limits; and
- maximum monthly dust deposition rates are predicted to exceed the Environmental Protection (Air) Policy limit at the site, with acknowledged potential for nuisance.

Notwithstanding these findings, the advice letter concludes that the potential for adverse impact is low and that the development is compatible with the quarry. That conclusion is contradictory with the letter's own content and cannot reasonably be relied upon by Council.

4. The supporting reasoning does not withstand scrutiny

The matters relied upon to bridge that gap do not constitute a proper assessment. The claimed absence of complaints from users of the Wellcamp Business Park carries no evidentiary weight for a future sensitive use in a business park that remains largely under development, and it says nothing about the response of animals housed permanently on the site. A single ambient noise logging exercise undertaken in April 2025, approximately 160 metres south of the site and for a different application, reflects quarry activity on particular days only. It is not a predictive assessment of the approved operating envelope, and the quarry is not yet operating at the intensity or in the pit configuration authorised by the extension approval.

Further, and as Council has identified at Item 2.1 of its Information Request, neither the planning report nor the reverse amenity advice assesses the sensitivity of the animals to be kept permanently on the site to blasting vibration, air blast overpressure or noise, nor any mitigation proposed to manage those responses. This is a fundamental omission.

5. Reverse amenity consequences for a state-significant resource

The purpose of the Separation Area is to protect the ongoing operation and optimisation of an identified state-significant resource from encroachment by incompatible uses. If approved, the development would place people and permanently housed animals in a location where the applicant's own material identifies exceedances of the applicable human comfort and amenity criteria. The foreseeable consequence is complaint, and with it pressure to constrain lawful blasting and quarrying operations, compliance exposure under Environmental Authority EPPR00714113 and constraint on Boral's ability to realise the approved extension. That outcome is contrary to Performance Outcomes PO2 and PO4 of the Extractive Resources Overlay Code and to the resource protection intent of the State Planning Policy.

We also note the site sits within the cumulative Key Resource Area affecting both the Wellcamp Downs Quarry and the adjacent Wagners Wellcamp Quarry, which was itself recently extended (approval MCUC/2024/6760, dated 16 April 2026). The advice letter does not assess cumulative impacts from both operations at all.

6. Boral's position

For the reasons above, the application does not demonstrate compliance with the Extractive Resources Overlay Code and should be refused as currently proposed.

We would welcome the opportunity to discuss this advice with Council's officers. Please direct any queries to me at matt.ceccato@boral.com.au.

Yours sincerely,

Matt Ceccato
Planning and Approvals Manager – QLD, NT, WA