

30 June 2026

The Assessment Manager
Toowoomba Regional Council
PO Box 3021
TOOWOOMBA QLD 4350

RECEIVED
30/06/2026
TOOWOOMBA
REGIONAL COUNCIL

Attention: Ms Alice Pai
By Email: Alice.Pai@tr.qld.gov.au

Dear Alice

RESPONSE TO INFORMATION REQUEST – SECTION 68, PLANNING ACT 2016 & CHAPTER 1, PART 3, SECTION 13, DEVELOPMENT ASSESSMENT RULES – DEVELOPMENT APPLICATION - MATERIAL CHANGE OF USE – MEDIUM IMPACT INDUSTRY- RIELLY STREET, TORRINGTON – LOT 1 SP349893
(Council Ref: MCUI/2026/3818; Our Ref: 2025-153)

I act on behalf of the applicant, Clearspan Building Solutions, in respect of the above matter.

I refer to Toowoomba Regional Council's (**Council**) Information Request, dated 9 June 2026, in respect of a Development Application for Material Change of Use for Medium Impact Industry on land at Rielly Street, Torrington, being that land described as Lot 1 SP349893.

The following advice provides a response to the matters raised in Council's Information Request. For ease of comprehension, each item raised in the Information Request has been reproduced in bold print followed by the associated response.

ISSUES AND RESPONSES

1. SITE OPERATIONS AND ASSOCIATED IMPACTS

1.1. Issue: ERA Activities

The Planning Report states that the proposed operations on the site include the manufacture and sale of reinforcement materials, including reinforcement bars, mesh, prefabricated cages and accessories. However, no details have been provided regarding the scale and nature of reinforcement material production, including whether the process involves welding and/or hot metal works, or is limited primarily to the shaping and bending of reinforcement materials

Further, it is unclear whether the proposed operations trigger any Environmentally Relevant Activities (ERAs), including ERA 19, 29 or 30 as no annual production volumes have been specified.

Information Required:

Provide:

- (a) **Details of the scale, nature and processes involved in the production of reinforcement material; and**

(b) Confirmation of the proposed maximum production volumes per annum.

Response

The proposed facility will be occupied by ARC and will involve the production and sale of steel reinforcing materials such as reinforcing bars, reinforcing mesh, prefabricated reinforcing cages and accessories. Reinforcing bars and mesh will be delivered to site prior to either being on-sold or utilised to manufacture processed reinforcing bar, cages and mesh products/solutions. Manufacturing activities will involve the cutting, bending and welding of reinforcing bars and mesh only. The development will not involve any metal forming, foundry or smelting activities. ARC currently process approximately 7,000 tonnes of product through their existing Toowoomba facility per annum, whilst it is noted that this application seeks approval for up to 10,000 tonnes per annum to cater for future growth.

The proposed development is therefore considered to be correctly defined as a Medium Impact Industry and is not an Environmentally Relevant Activity (ERA) under the *Environment Protection Regulation 2019*.

1.2. Issue: Noise Impact Assessment

The proposed development involves a range of activities that are likely to generate noise emissions that may impact on the surrounding sensitive receptors. In addition, the proposed operational hours are 24 hours a day, 7 days a week. No Noise Impact Assessment has been provided to demonstrate whether the development can comply with PO8 of the Environmental Standards Code.

Information Required:

Provide an Acoustic Impact Assessment, completed by a suitably qualified person, that includes at minimum the following:

- (a) Description of all site activities and related noise sources that includes:***
 - (i) operational activities and relevant noise sources,***
 - (ii) vehicle movements;***
 - (iii) regulated noise devices integral to site operations.***
- (b) Location of sensitive receptors relative to the proposed development;***
- (c) Monitoring of background noise from surrounding land uses;***
- (d) Assessment criteria for compliance including day, evening and night time limits for clearly defined normal operating hours for each component of the development;***
- (e) Modelling of cumulative impacts from the proposed Medium Impact Industry on existing and proposed sensitive receptors;***
- (f) Model results should be presented in both noise contour plots and tabulated summaries for identified receptors;***
- (g) Descriptions of specific mitigation treatments, management methods and procedures that will be implemented to control noise during site activity and operations;***
- (h) A complaints management procedure that must include the following:***
 - (i) a contact person with whom complaints can be lodged;***
 - (ii) a clearly defined procedure for responding to and investigating complaints; and***
 - (iii) a notification protocol to all complainants of the outcome of complaint investigations.***

Response

As detailed in response to item 1.1 above, the nature and scale of the operations are considerably less than was likely expected by Council in preparing this Information Request. The development primarily involves the cutting, bending and welding of reinforcing bars and mesh. All cutting and bending activities are undertaken by machines, with no hand-held grinders or cutting devices being utilised by workers.

The development will utilise two (2) machines, as detailed below. The average and maximum noise generations from these machines are also provided below, based on manufacturers details and other facilities currently being operated by ARC. It is noted that the noise levels do not consider the construction materials of the shed, and accordingly, these levels would be expected to be reduced when considering this.

Machine	Description	Location	Average Noise Level	Maximum Noise Level
Syntax Line 28	Syntax Line	Northern End of Shed	91.8 dB	130 dB
Mini Syntax 16	Mini Syntax 16 HS & 16	Middle of Shed	85.6 dB	130 dB
Welders	-	Throughout Shed	80 dB approx.	95 dB approx.

Based on the Inverse Square Law, the proposed development would likely result in the following noise emissions at existing and proposed sensitive receptors.

Source Location	Receptor Location	Direction	Distance (approx.)	Average	Average w/ Acoustic Barrier ***	Average Noise Level Above Background Noise Levels *	Compliance **
Western Site Boundary	Robson-Hursley Road	West	137.5m	49 dB	N/A	Day: 4 dB	Yes (-1 dB)
						Evening: 9 dB	No (+4 dB)
						Night: 17 dB	No (+6 dB)
Western Site Boundary	Eastern Boundary of Proposed Residential ***	West	177.5m	46.8 dB	31.8 dB	Day: -13.2 dB	Yes (-18.2 dB)
						Evening: -8.2 dB	Yes (-13.2 dB)
						Night: -0.2 dB	Yes (-11.2 dB)
Western Building Façade	Eastern Boundary of Proposed Residential ***	West	192.5m	46.1 dB	31.1 dB	Day: -13.9 dB	Yes (-18.9 dB)
						Evening: -8.9 dB	Yes (-13.9 dB)
						Night: -0.9 dB	Yes (-11.9 dB)
Western Building Façade	Closest Existing Residential Boundary	South-West	215m	45.2 dB	N/A	Day: 0.2 dB	Yes (-4.8 dB)
						Evening: 5.2 dB	No (+0.2 dB)
						Night: 13.2 dB	No (+2.2 dB)

Southern Building Façade	Closest Existing Residential Dwelling	South	310m	42 dB	N/A	Day: -3 dB	Yes (-8 dB)
						Evening: 2 dB	Yes (-3 dB)
						Night: 10 dB	Yes (-1 dB)

* Background noise levels are 45dB during Day Time (7am to 6pm), 40dB during Evening (6pm to 10pm) and 32 dB during Night Time (10pm to 7am) as measured in the Alpha Acoustics report prepared in support of the nearby residential development.

** Compliance is considered by assuming that external noise at the sensitive receptors can be up to 50dB during Day Time (7am to 6pm), 45dB during Evening (6pm to 10pm) and 43 dB during Night Time (10pm to 7am) in order to ensure internal noise criteria are achieved.

*** For the proposed residential development to the west, it is assumed that the proposed 3.6m-high acoustic barrier will reduce noise impacts by approximately 15 dB.

Based on the above, the applicant contends that the proposed development will not result in adverse noise impacts on existing or proposed nearby sensitive receptors. The above calculations do not consider that activities will be undertaken within a building or the future development of the surrounding industrial premises. Therefore, when considering these additional parameters, potential noise impacts on nearby residential premises will be further reduced. Accordingly, the development does not propose or require any noise mitigation measures or installations.

1.3. **Issue: Waste Management Plan**

Insufficient information has been provided regarding the location and size of the refuse storage area, the quantity and size of bins required to service the site, and the location of waste collection. In addition, the types and quantities of waste likely to be generated by the development remain unclear.

Information Required:

Provide a Detailed Waste Management Plan that demonstrates that the development can comply with Performance Outcome PO28 of the Environmental Standards Code. The Waste Management Plan must include the following information:

- (a) Calculation of waste generation rates for the proposed use, split into quantifiable streams;***
- (b) The location and size of refuse storage areas;***
- (c) The size, mix and capacity of any bins that are needed to accommodate the type and quantity of waste likely to be generated from the development;***
- (d) All the operational waste sources and types of operational waste likely to be produced; and***
- (e) The frequency of collection and location of the collection point/s***

For further advice, please refer to Council's Technical Guidelines for New Developments Waste Storage and Collection Requirements.

Response

In response to the above item, waste generated by the proposed development will be stored and collected in accordance with Council's Technical Guideline for waste storage and collection. The development will be provided with general, recyclable and metal waste bins which will be collected by suitably qualified contractors. Bins will be appropriately stored on-site to ensure they can be sufficiently screened from public spaces and adjacent to vehicle manoeuvring areas for ease of collection. The applicant is agreeable to Council conditioning that waste must be stored, screened and managed in accordance with Council's Technical Guideline.

1.4. Issue: Site Based Management Plan

The ongoing use of the site will require appropriate management practices. Limited information has been provided in relation to mitigation measures proposed to minimise impacts from emissions generated through the production processes on the site and how waste by-products generated on site will be managed.

Information Required:

Provide a Site Based Management Plan that considers and reports on the following site specific issues:

- (a) Location of the site, including physical address, lot on plan and relevant scaled maps*
- (b) Description of the site (infrastructure and features on or near the site and those requiring protection)*
- (c) Contact details and responsibilities for site representatives*
- (d) Description of activities to be conducted on site and other relevant supporting information including:*
 - (i) Location of activity areas;*
 - (ii) Employee, patron and vehicle numbers;*
 - (iii) Operating hours;*
 - (iv) Activity descriptions including plants and equipment to be used on site; and*
 - (v) When relevant, prohibited activities and prohibited areas.*
- (e) Site Plans clearly showing where proposed activities will occur, along with adequate notes for proposed environmental management measures that will be built into the site.*
- (f) Strategies to Manage Environmental Impact:*
 - (i) Air Quality and Dust Management;*
 - (ii) Noise Impact Management;*
 - (iii) Water Quality;*
 - (iv) Waste Management;*
 - (v) Hydrocarbon, Chemical and Dangerous Goods Management; and*
 - (vi) Any other relevant topics.*
- (g) Complaints management procedure, including processes for recording details of and addressing complaints*
- (h) Emergency procedures;*
- (i) Document Control and review procedures – internal review every 2 years or following any significant change or incident on site.*

Response

As detailed in response to item 1.1 above, the nature and scale of the operations are considerably less than was likely expected by Council in preparing this Information Request. The development primarily involves the cutting, bending and welding of reinforcing bars and mesh. Accordingly, the applicant contends that a Site Based Management Plan is not required in this instance. All activities undertaken on the site will ensure compliance with the relevant environmental legislation and guidelines to ensure it does not result in adverse off-site impacts. Reference is also made to the responses to items 1.2 and 1.3 above.

SUMMARY

Pursuant to Section 68(1) of the *Planning Act 2016* and Chapter 1, Part 3, Section 13 of the *Development Assessment Rules*, we hereby confirm that this response provides a response to all of the items included in the Information Request. Having regard to the information provided, we request that Council proceed with the assessment of the application.

Should you require any additional information or clarification please do not hesitate to contact the undersigned on phone 07 4632 2535, mobile 0481 127 412 or by email at james@precinctplan.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "James Williams", is written over a thin horizontal line.

James Williams
Precinct Urban Planning