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**TOOWOOMBA**  
**REGIONAL COUNCIL**

22 January 2026

The Chief Executive Officer  
Toowoomba Regional Council  
PO Box 3021  
**TOOWOOMBA QLD 4350**

**Attention: James Leader**

Dear James,

**RESPONSE TO PUBLIC SUBMISSIONS – DEVELOPMENT APPLICATION - MATERIAL CHANGE OF USE - HIGH IMPACT INDUSTRY AND ENVIRONMENTALLY RELEVANT ACTIVITIES (ERA) – ERA 19, ERA 29 (1)(D) & ERA 62 (1)(A) – TOOWOOMBA CECIL PLAINS ROAD, WELLCAMP – PART OF LOT 10 ON SP296105 & EMT A ON RP835801** (Council Ref: MCUI/2025/5156 Our Ref: 2024-601)

I act on behalf of the applicant, GM Steel Pty Ltd, in respect of the above matter.

I refer to the public submissions received by Toowoomba Regional Council during the public notification period in relation Development Application for a Material Change of Use for High Impact Industry and Environmentally Relevant Activities (ERA) – ERA 19, ERA 29 (1)(D) and ERA 62 (1)(A) at Toowoomba Cecil Plains Road, Wellcamp described as part of Lot 10 SP296105 and Easement A RP835801.

It is noted that Council has granted various extensions to the applicant's response period for submissions pursuant to section 68(2) of the *Planning Act 2016*. The most recent extension was until 22 January 2026 as confirmed in Council's correspondence dated 14 January 2026.

### **1.0 SUMMARY OF SUBMITTER ISSUES AND RESPONSES**

A review of the submissions for this application reveals that seven (7) properly made submissions were received during the public notification period between the 25 November 2025 and 16 December 2025. All submissions objected to the proposed development.

For the purpose of preparing a response to the submissions and noting that some of the submitters have raised similar concerns, the matters raised have been grouped into five (5) categories with individual responses provided below. The categories include: (i) potential off-site environmental impacts, (ii) infrastructure requirements, (iii) land use/rural character, (iv) amenity and (v) other matters.

#### **1.1 Potential Off-site Environmental Impacts**

The majority of submitters have raised concerns about potential off-site environmental impacts arising from the development, these include (i) air-quality, (ii) noise, (iii) external lighting, (iv) water quality, (v) microclimate, (vi) threatened fauna and (vii) bushfire.

### 1.1.1 Air Quality

Six (6) of the submissions have raised concerns about potential air-quality impacts arising from the development and associated health concerns for residents and livestock. Potential air-quality impacts were assessed and considered as part of the combined development application for a Development Permit for Material Change of Use and Environmental Authority for Environmentally Relevant Activities.

These assessments comprised an Air Quality Assessment and Greenhouse Gas Assessment prepared by Virid AU and also formed part of the Environmental Assessment and Site Based Management Plan prepared by Range Environmental Consultants. This included documentation submitted with the original development application as well as responses to information requests.

The management of potential offsite environmental impacts including air-quality and greenhouse gas abatement, is primarily regulated through an Environmental Authority issued and administered by the Department of Environment, Tourism, Science and Innovation (DETSI) for the environmentally relevant activities included in this application. Reference is made to the Environmental Authority P-EA-100943025, dated 8 January 2026, issued by DETSI for the following Prescribed Environmentally Relevant Activities for this development:

- ERA 19 - Metal forming - Hot forming a total of 10,000t or more of metal in a year.
- ERA 29 - Metal Foundry Operation - 1 (d) - Producing, in a year, the following quantity of ferrous metal castings - more than 10,000 tonnes.
- ERA 62 - Resource recovery and transfer facility operation - 1 (a) - Operating a facility for receiving and sorting, dismantling, baling or temporarily storing scrap metal, non-putrescible waste or green waste only.

Specific reference is made to conditions relating to air-quality and the greenhouse gas abatement plan.

A copy of this Environmental Authority is included with the State Assessment and Referral Agency (SARA) Referral Response dated 21 January 2026 for the development attached at **Appendix A**.

Reference is also made to the Air-quality and Noise Assessment Advice provided by Virid AU dated 22 January 2026 attached at **Appendix B**. In their advice, Virid AU confirm that air quality impacts from the proposed development have been comprehensively assessed in the Air Quality Impact Assessment submitted with the application which demonstrated compliance with the applicable ambient air quality objectives under the *Environmental Protection (Air) Policy (EPP (Air))* for both routine and non-routine operations.

The original documentation and supplementary advice provided in responses to information requests, has been reviewed by Council and the State Assessment and Referral Agency (SARA)/DETSI. SARA subsequently issued a Referral Response on 21 January 2026 that included the Environmental Authority P-EA-100943025, issued by DETSI, dated 8 January 2026 (EA) referred to above. Virid AU have confirmed the administering authority would not have issued the EA unless they were satisfied that the development achieved the relevant air quality objectives and environmental values prescribed under the EPP (Air). Virid AU note that Condition A3.0 of the EA prescribes enforceable pollutant discharge concentration for the Furnace Treatment Plant (FTP) which are aimed at protecting environmental values under the EPP (Air). Virid AU have listed the air quality objectives under the EPP (Air) which include protecting the health and biodiversity of ecosystems, being conducive to human health and wellbeing, protecting the aesthetics of the environment and agricultural use of the environment. Virid AU also note that while equine health is not specifically identified in the EPP (Air), compliance with objectives may also be broadly considered protective of livestock and equine health.

Virid AU have confirmed that based on the outcomes of the Air-Quality Impact Assessment, regulatory review and enforceable conditions of the EA, air quality amenity and health outcomes in the surrounding environment are not expected to be adversely affected, provided the facility operates in accordance with the approved conditions.

### 1.1.2 Noise

Some of the submissions raise concerns about potential noise impacts arising from the development. Potential noise impacts were assessed and considered as part of the combined development application for a Development Permit for Material Change of Use and Environmental Authority for Environmentally Relevant Activities.

These assessments comprised a Noise Impact Assessment prepared by Virid AU and also formed part of the Environmental Assessment and Site Based Management Plan prepared by Range Environmental Consultants. This included documentation submitted with the original development application as well as in responses to information requests. Similar to air-quality, noise impacts are primarily regulated through the Environmental Authority issued and administered by DETSI for the environmentally relevant activities included in this application; refer to **Appendix A**. Specific reference is made to conditions relating to noise management.

Reference is also made to the Air-quality and Noise Assessment Advice provided by Virid AU dated 22 January 2026 attached at **Appendix B**. In their advice, Virid AU confirm that the Noise Impact Assessment submitted with the application was based on best practice methodologies and considered worst case scenarios and operations. Noise monitoring was conducted as part of the assessment and monitoring results confirmed ambient noise levels in the project area are high. Consequently, the more conservative Acoustic Quality Objectives of the *Environmental Protection (Noise) Policy 2019* (EPP (Noise)) for used for the assessment. The Noise Impact Assessment was reviewed by Council and the State Assessment and Referral Agency (SARA)/DETSI and all subsequent comments and concerns were addressed.

Specifically, with respect to the receptor located at 5 Hanrahan Road, Virid AU have made the following comments:

*"It is noted that one residential receptor, located at 5 Hanrahan Road, was omitted from the assessment. A review of the noise modelling results indicates that under worst case conditions and for a worst-case scenario, during the night period and with windows partially open, a marginal exceedance of up to 3 dB(A) may be expected at this receptor. Similar minor exceedances are also predicted at receptors R1, R6, and R11, as detailed in Appendix C of the NIA, October 2025 prepared by Virid AU which is attached to this memo and identifies the residential building at 5 Hanrahan Road. The noise contours indicate that the residence at 5 Hanrahan Road would experience similar noise levels to those predicted at receptors R1, R6 and R11.*

*In accordance with DETSI Noise measurement manual<sup>4</sup>, a 3 dB(A) change in noise level is just perceptible and leads to no to little community reaction.*

*The NIA, October 2025 has been reviewed by the Council and SARA and no further information was requested, and no outstanding concerns were raised by the assessment authorities with respect to noise assessment outcomes. Permit for the facility would not have been granted unless the administering authority was satisfied that the proposed operations can comply with the relevant noise objectives and environmental values prescribed under the EPP (Noise).*

*Condition N2.0 and N2.1 of the approved EA, prescribes enforceable noise limits for day, evening and night and these noise limits are aimed at protecting the environmental values prescribed under the EPP (Noise)."*

Virid AU have confirmed that based on the outcomes of the Noise Impact Assessment, regulatory review and enforceable conditions of the EA, noise amenity in the surrounding environment is not expected to be adversely affected, provided the facility operates in accordance with the approved conditions.

### 1.1.3 External Lighting

Some of the submissions raises concerns about potential external lighting impacts arising from the development. Potential external lighting impacts were assessed and considered as part of the combined development application for a Development Permit for Material Change of Use and Environmental Authority for Environmentally Relevant Activities.

These assessments formed part of the Environmental Assessment and Site Based Management Plan prepared by Range Environmental Consultants. External lighting impacts are regulated in part under the Environmental Authority issued by DETSI for the environmentally relevant activities included in this application; refer to **Appendix A**. Specific reference is made to conditions relating to environmental harm or environmental nuisance. External lighting is also regulated by Council as part of its assessment of the Material Change of Use development application in accordance with relevant Australian Standards. Reference is also made to the Environmental Response prepared by Range Environmental Consultants dated 22 January 2026 attached at **Appendix C** including the following extract with respect to external lighting (i.e. lighting and amenity):

- *"The Site Based Management Plan states that outdoor lighting at the site shall comply with Australian Standard AS4282:2019 Control of the Obtrusive Effects of Outdoor Lighting. This Standard sets out requirements for the control of the obtrusive effects of outdoor lighting on nearby residents (e.g. of dwellings such as houses, hotels, hospitals), users of adjacent roads (e.g. vehicle drivers, pedestrians, cyclists) and transport signalling systems (e.g. air, marine, rail), and on astronomical observations.*
- *Lighting at the site that complies with this Australian Standard will minimise the risk of nighttime amenity loss/light pollution at sensitive receptors as far as reasonably practicable."*

This advice confirms the development will be designed in accordance with applicable Australian Standards to ensure the development does not generate environmental harm in terms of lighting.

### 1.1.4 Water Quality

One of the submissions raises concerns about potential impacts on groundwater arising from the development. These impacts were assessed and considered as part of the combined development application for a Development Permit for Material Change of Use and Environmental Authority for Environmentally Relevant Activities. These assessments were collectively considered in the Environmental Assessment and Site Based Management Plan prepared by Range Environmental Consultants and the Conceptual Stormwater Management Plan prepared by Kehoe Myers Consulting Engineers. This included documentation submitted with the original development application and in response to information requests.

Stormwater management for the development as described in the Conceptual Stormwater Management Plan confirms that stormwater quantity and quality management will utilise a system of on-site detention and bio-retention basins and will not result in adverse impacts on downstream drainage or ground water supplies.

Groundwater impacts are regulated in part under the Environmental Authority issued by DETSI for the environmentally relevant activities included in this application; refer to **Appendix A**. Specific reference is made to conditions relating to environmental harm and water.

The management of groundwater supplies is also regulated by Council as part of its assessment of the Material Change of Use development application in accordance with relevant policies and standards.

Reference is made to the Environmental Response prepared by Range Environmental Consultants dated 22 January 2026 attached at **Appendix C**, in particular, comments on groundwater and surface water impacts raised by one of the submitters at 5 Hanrahan Road, Wellcamp.

With respect to potential groundwater impacts, Range Environmental Consultants have confirmed the recharge area for the relevant aquifer for the registered bore at 5 Hanrahan Road, Wellcamp is located to the east of the submitter's premises and the development site area is located approximately 600 metres to the south-east of these premises. Given the nature and location of the development, Range Environmental Consultants have confirmed the development presents a low risk to groundwater recharge and water supply for the registered bore at 5 Hanrahan Road, Wellcamp.

With respect to surface water quality, Range Environmental Consultants have made the following comments:

*"The Site Based Management Plan for the proposed development outlines controls for the protection of surface water quality. Broadly, the key controls to protect surface water quality include:*

- *Spill and incident response procedures.*
- *Stormwater quality treatment systems.*
- *Storage of slag and other materials that may present a potential water quality risk out of contact with rainfall and stormwater.*
- *Capture, treatment and reuse of water from the scrap steel storage area.*
- *Controls such as impervious surfaces, liners and bunding to prevent leaching or release of potential water contaminants.*

*The implementation, maintenance and monitoring of environmental controls will reduce the risk of the proposed development to surface water quality in the Dry Creek catchment to as low as reasonably practicable."*

This advice together with the previous groundwater and stormwater management assessments undertaken to date, confirm the development will be managed in accordance with applicable standards to ensure the development does not generate environmental harm in terms of water quality.

#### 1.1.5 Microclimate

The submitter that resides at 5 Hanrahan Road, Wellcamp has raised concerns that the scale of the proposed industrial development will generate adverse micro-climate issues in the vicinity of their premises. Reference is made to the Environmental Response prepared by Range Environmental Consultants dated 22 January 2026 attached at **Appendix C** including the following extract with respect to microclimate (wind) issues:

*"A comment in one (1) submission was made regarding the potential impact of the buildings for the proposed steel mill on the easterly and south easterly winds received at the dwelling at 5 Hanrahan Road, Wellcamp. This dwelling is located approximately 600 m north west of the closest point of the proposed steel mill building. As noted by the ViridAU air quality impact assessment report, prevailing winds are dominantly easterlies with contribution from northeast and southeast vectors. The proposed development presents a low risk of impacting the cooling effect of easterly and south easterly winds received at the dwelling at 5 Hanrahan Road because:*

- *Given the location of the dwelling with respect to the proposed steel mill buildings, only the sub-dominant south-easterly winds are at risk of potential impact. The proposed steel mill buildings would not impact the effect of the dominant easterly winds at the dwelling.*

- The wind profile will normalise as the shelter effect weakens farther downwind from a building (Oke, 1987). The downstream shelter effect typically dissipates at a distance that is 10 times the height of the building (Li and Jiang, 2022).
- Roof heights for the proposed steel mill range from 20 – 35 m based on building elevation plans. This suggests a potential downwind influence on local wind conditions from the steel mill buildings of about 350 m. There is a low risk of adverse impacts to local winds at the dwelling under southeasterly conditions as it is located 600 m from the proposed steel mill buildings which is beyond the likely extent of any downstream shelter effects.
- Based on the relative positioning and separation distance of the dwelling at 5 Hanrahan Road from the proposed steel mill buildings, there is a low risk of impact on local winds under southeasterly conditions and their cooling effect at this dwelling.

This advice confirms the development is unlikely to generate adverse microclimate issues for nearby residential premises.

#### 1.1.6 Threatened Fauna

Some of the submissions raises concerns about potential impacts on the surrounding ecology particularly with respect to threatened fauna species. Potential impacts on areas of environmental significance including fauna and flora, have been assessed and considered as part of the Ecological Assessment Report prepared by Range Environmental Consultants submitted with the original application.

Reference is made to the Environmental Response prepared by Range Environmental Consultants dated 22 January 2026 attached at **Appendix C** including the following extract with respect to threatened fauna:

- "Range Environmental's Environmental Assessment (Reference: J002248, dated 14/11/2025) correctly details that a search of the Wildlife Online database identified that threatened fauna species had been previously recorded within a 5 km buffer of the site.
- The site is not mapped within a koala habitat area. Fauna habitat within the site was of limited complexity and typical of a modified (cleared) non-remnant grazing paddock (sparsely scattered trees).
- An ecological assessment of the site and completion of a likelihood of occurrence assessment for listed species identified that the site was unlikely to provide suitable habitat for State and Commonwealth listed fauna species due to its previous disturbance history and limited habitat values.
- Additionally, the site was not identified as providing important landscape connectivity for fauna species as the site does not contain remnant or regrowth vegetation, the broader landscape has been largely fragmented due to agricultural and industrial use and development, and numerous high order roads traverse the landscape which create barriers for fauna populations.
- The proposed development was not identified as having a Significant Residual Impact (SRI) on threatened fauna or their habitat."

This advice confirms the development is unlikely to generate adverse impacts on threatened fauna populations.

### 1.1.7 Bushfire

One of the submitters raises concerns in relation to the potential for bushfire hazard risk generated by the development. It is noted the development site area is not located in a mapped bushfire hazard area and Council did not request a bushfire management plan be prepared for the application as part of pre-lodgement advice. Regardless the development makes adequate provision for on-site fire-fighting water supply as confirmed in the Engineering Infrastructure Report prepared by Kehoe Myers Consulting Engineers submitted with the original development application.

In addition, reference is made to the following comments provided by Range Environmental Consultants in their Environmental Response attached at **Appendix C**:

- *"The development site is not mapped as a bushfire hazard area, but it adjoins land to the west that is mapped as a bushfire hazard area. The bushfire hazard mapping does not accurately reflect the current condition of the land to the west which is heavily disturbed by quarrying activities and contains limited hazardous vegetation.*
- *The proposed steel mill is located downgradient and upwind (based on prevailing easterly winds) from the mapped bushfire hazard area which places the steel mill at a lower risk of fire attack from land to the west.*
- *Fire prevention and management controls will be implemented at the proposed steel mill development in accordance with the National Construction Code and Queensland Development Code to minimise the risk of a fire incident that could potentially spread to adjacent properties.*
- *In the event of a fire incident, the site would be attended by the Queensland Fire Department (QFD). The closest QFD station is at Charlton which is a 5.7 km drive from the site via O'Mara and Toowoomba Cecil Plains Road."*

This advice confirms the development is unlikely to generate a bushfire hazard risk.

## 1.2 Infrastructure Requirements

Submitters have raised concerns about infrastructure requirements, in particular, traffic volumes and associated impacts on the existing road network. Council has also advised that enquiries from submitters raised concerns about water supply for the development.

### 1.2.1 Traffic

A number of submitters have raised concerns about infrastructure requirements, in particular, anticipated traffic volumes and associated impacts on the existing road network. Traffic impacts associated with the development have been assessed and considered in the Traffic Impact Assessment submitted with the original development application and supplementary traffic advice submitted in response to information requests. The development takes access via Toowoomba Cecil Plains Road which is a State-controlled road and triggered referral for State transport matters.

The application sought approval for a new access to Toowoomba Cecil Plains Road which has been assessed as part of the Traffic Impact Assessment. As part of the response to the information request issued by the State Assessment and Referral Agency (SARA) on behalf of the Department of Transport and Main Roads (DTMR), the applicant's traffic engineering consultants, HIG prepared a pavement impact assessment to determine the current standard of the road network and the extent of annual contributions required for the upgrade of this road to accommodate traffic generated by the development.

Approval of the new access and the requirement to pay annual contributions have been subsequently conditioned as part of the Referral Response issued by the State Assessment and Referral Agency (SARA) on 14 January 2026; refer to **Appendix A**. In this regard, Conditions 3 and 4 grant approval for the new access and Condition 5 requires the annual contributions at the following rates: (i) \$0.08/tonne of material hauled on the Toowoomba Second Range Crossing and (ii) \$0.011/tonne of material hauled on Toowoomba Cecil Plains Road. This equates to an annual contribution for the development of \$32,490.43 over 20 years. Also included in the SARA Referral Response at **Appendix A** is a Decision Notice for a Permitted Road Access Location pursuant to section 62(1) of the *Transport Infrastructure Act 1994*, issued by the Department of Transport and Main Roads (DTMR) on 5 December 2025.

The traffic impact assessments undertaken to date, together with the SARA Referral Response conditions of approval, ensure appropriate management of traffic generated by the development and adequate maintenance of State transport infrastructure servicing the site.

### 1.2.2 Water Supply

In terms of water supply for the development, reference is made to the information provided in the Engineering Infrastructure Report, prepared by Kehoe Myers Consulting Engineers submitted with the original development application and summarised in the following extract from the Planning Report section 3.0:

*"The development will be connected to all urban infrastructure networks, reference is made in this regard to the Engineering Infrastructure Report prepared by Kehoe Myers Consulting Engineers attached at Appendix E. This report confirms that wastewater requirements for the development will be divided into two categories, employee wastewater and industrial wastewater. Employee wastewater will be removed from the site via a connection to the Wellcamp Business Park wastewater network. Industrial wastewater will be discharged to the development's proposed on-site tertiary reverse osmosis system for water re-use.*

*The Engineering Infrastructure Report explains in detail the proposed water consumption requirements divided into potable water for staff, industrial water, fire-fighting and landscaping water requirements. Potable water will be provided via a connection to the Wellcamp Business Park's water supply network. All other water requirements will be provided via a combination of on-site recycle water supplies (tertiary reverse osmosis system) and non-potable supplies from within the Wellcamp Business Park, noting the latter will not draw on the Toowoomba Bulk Water Supply servicing the Wellcamp Business Park."*

This demonstrates the development will rely heavily on water re-use and includes appropriate treatment systems for water quality. This in turn reduces the burden of the development on external water supplies including groundwater.

### 1.3 Land Use and Rural Character

Submitters have raised concerns about whether the industrial use is appropriately located on the subject land and the impacts the development will have on the rural character of the area.

The proposed development is defined as "High Impact Industry" under the *Toowoomba Regional Planning Scheme 2012* (Planning Scheme) as confirmed by Council during pre-lodgement advice. The development site area is located within the Charlton Wellcamp Enterprise Area Local Plan and in the following zones under the Planning Scheme: High Impact Industry Zone (Quarry Precinct) and Medium Impact Industry Zone (General Industry Precinct).

The following outcome of the Charlton Wellcamp Enterprise Area Local Plan Code under the current Planning Scheme is noted:

*“(3) The purpose of the code will be achieved through the following overall outcomes:*

- (a) Charlton Wellcamp Enterprise Area is a regionally significant employment hub, serving as a major business and employment area for the Toowoomba, Surat Basin Energy Province and broader Darling Downs Region. Intended to accommodate more than 10,000 employees, it is recognised as an important asset to the broader South-East Queensland and Queensland economies.*
- (b) Charlton Wellcamp Enterprise Area accommodates a mix of regionally significant business and industry activities that capitalises on the area's strategic location and competitive strengths, particularly proximity to regional transport networks and surrounding agricultural, energy and extractive industry activity. Accordingly, Charlton Wellcamp Enterprise Area will provide for transport and logistics and innovative major, high-impact and special industries providing high value-adding uses and employment opportunities.”*

Overall outcome (3)(b) confirms the intent of the Local Plan is to accommodate innovative high-impact industries providing high value-adding uses and employment opportunities. This includes uses such as the low emission steel mill proposed by this application. The development seeks to co-locate with other high impact industries including the two (2) extractive industries, one of which is a Key Resource Area (KRA) quarry i.e. Wellcamp Downs Quarry. The use is also consistent with the intent of the High Impact Industry Zone and Medium Impact Industry Zone Codes of the Planning Scheme. To the extent there is any inconsistency with planning provisions applicable to the site and development, assessment of the application revealed there are “other relevant matters” as described under section 45 of the *Planning Act 2016*, that justify the planning merits of the proposed development and accordingly warrant its approval subject to the imposition of reasonable and relevant conditions; refer to section 5.2 of the Planning Report submitted with the application.

It is acknowledged the land has been englobed industrial land for an extended period and historically used for grazing purposes. Regardless, the land has been located in an Industry Zone and part of the Charlton Wellcamp Enterprise Area since the introduction of the current Planning Scheme (i.e. *Toowoomba Regional Planning Scheme 2012*) as well as under the Superseded Planning Scheme (i.e. *Jondaryan Planning Scheme 2005*). This confirms Council's long term policy direction for the area to be developed for industrial purposes. The development site area is bounded by two State-controlled roads and extractive industries. It is appreciated the scale of the industrial development is large which is why it has been accommodated in the Wellcamp Business Park within the Charlton Wellcamp Enterprise Area and seeks to co-locate with other large scale high impact industry uses e.g. extractive industry.

#### **1.4 Amenity**

Collectively, submitters have raised concerns about potential impacts generated by the development on their amenity and the rural amenity of the area. Some of the amenity concerns have been addressed in the preceding responses particularly with respect to air-quality, noise, external lighting, water quality, microclimate, bushfire hazard, traffic, water supply, land use and rural character.

In terms of concerns raised in relation to impacts on visual amenity, reference is made to the preceding response on land use that confirms the intent of the local plan and associated industry zones that apply to the development site area, seek to accommodate innovative high-impact industries providing high value-adding uses and employment opportunities. This includes the proposed low emission steel mill which will be co-located with other higher impact industries, i.e. two large scale quarries.

The development site area is setback approximately 230 metres from Toowoomba Cecil Plains Road to the north and approximately 30 metres from the Toowoomba Bypass to the south-east. The development is anchored by a low emission steel mill factory building that will have a gross floor area of approximately 4.6ha and generally has an overall height of between 18 and 34 metres noting the furnace stack has a height of 47 metres. This building will be setback the following approximate distances from road frontages: (i) 348 metres to Toowoomba Cecil Plains Road and (ii) 125 metres to the Toowoomba Bypass. In addition, the contour of the development site area ensures buildings will be partially screened to the north-west, west and south-west by the adjacent quarries. The development seeks to use neutral colours for buildings and extensive perimeter landscaping to further assist in reducing the visual impact.

On review of these matters, it is considered the development has sought to limit impacts on the amenity of the area as far as practical.

## 1.5 Other Matters

In addition to the preceding issues, submitters have also raised concerns in relation to other matters including: (i) potential impacts on Olympic facilities (ii) public notification of the application and (iii) impacts on land values.

### 1.5.1 Potential Impacts on Toowoomba's Olympic Facilities

Some of the submissions raise concerns about potential impacts on Toowoomba's equestrian facilities associated with the 2032 Olympics including: (i) visual impacts and (ii) equine health.

In terms of concerns raised regarding the visual impacts of an industrial development of this scale at a prominent location and the potential affect this has on the "Garden City" image for Toowoomba, reference is made to previous responses to land use concerns described in section 1.3 above. That is, the land has been located in an Industry Zone and part of the Charlton Wellcamp Enterprise Area since the introduction of the current Planning Scheme (i.e. *Toowoomba Regional Planning Scheme 2012*) as well as under the Superseded Planning Scheme (i.e. *Jondaryan Planning Scheme 2005*). This confirms Council's long term policy direction for the area to be developed for industrial purposes.

The visual appearance of the development will be partially improved through a combination of: (i) setback distances to road frontages, (ii) the use of neutral colours for buildings, (iv) the setting of the development site area below adjacent quarries and (iii) periphery landscaping that will be well advanced at the time of the Olympics in 2032. With respect to the latter, the landscape plans submitted with the application demonstrate the high quality screen landscaping proposed which will contribute to the "Garden City" image for Toowoomba.

In terms of air quality impacts on equine health, reference is made to the response provided at section 1.1.1 above in relation to air quality concerns and the Air-Quality and Noise Assessment, prepared by Virid AU attached at **Appendix B**.

### 1.5.2 Public Notification of the Application

Some of the submissions raise concerns that public notification of the application i.e. public notice signs on road frontages, was deceptive and not undertaken correctly. Reference is made to the applicant's Notice of Compliance dated 17 December 2025 that confirms public notification of the application was correctly undertaken in accordance with the requirements of the *Planning Act 2016* and the *Development Assessment Rules*.

This included placement of Public Notice signs on all road frontages, publishing a Public Notice in the Toowoomba Chronicle and issuing letters to adjoining owners by registered post. All public notification actions, including the preparation and placement of Public Notice signs on road frontages, were undertaken in accordance with the prescribed standards for public notification of development applications listed in the *Development Assessment Rules*. This was subsequently confirmed by Council's Senior Planner during discussions on 7 January 2026.

### 1.5.3 Impacts on Land Values

One of the submissions raised concerns that this industrial development will result in a decrease in land values in the area arising from the scale and nature of the development and potential off-site environmental impacts. Reference is made to preceding responses on land use and management of potential off-site environmental impacts that address these concerns.

Regardless, it is an established town planning principle that potential impacts on surrounding property values are not considered as part of the assessment of a development application.

## 2.0 SUMMARY

We request that the above responses to submitters' issues are considered in the finalisation of Council's assessment of the development application.

Should you require any additional information please do not hesitate to contact the undersigned on 0488 772 991 or (07) 4632 2535 or by email on [paul@precinctplan.com.au](mailto:paul@precinctplan.com.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "Paul Kelly".

**Paul Kelly**

**Precinct Urban Planning**

## **APPENDIX A – REFERRAL AGENCY RESPONSE**

### *State Assessment and Referral Agency*

**APPENDIX B – AIR-QUALITY AND NOISE ASSESSMENT ADVICE**  
*Virid AU*

## **APPENDIX C – ENVIRONMENTAL RESPONSE**

### *Range Environmental Consultants*