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REGIONAL COUNCIL

29 October 2026

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

Attention: Ms Sophie Spencer
By Email: sophie.spencer@tr.qld.gov.au

Dear Sophie,

RESPONSE TO INFORMATION REQUEST – SECTION 68, PLANNING ACT 2016 & CHAPTER 1, PART 3, SECTION 13, DEVELOPMENT ASSESSMENT RULES – DEVELOPMENT APPLICATION - MATERIAL CHANGE OF USE - RESEARCH AND TECHNOLOGY INDUSTRY (VETERINARY RESEARCH) – 1511 TOOWOOMBA CECIL PLAINS ROAD, WELLCAMP - LOT 8 ON SP329720 INCLUDING EMT H ON SP272154 & EMT V ON SP329720 & LOT 800 ON SP296105 INCL. EMTS AA & H ON SP272154, EMTS N & P ON SP296105 & EMT V ON SP329718 (Council Ref: MCUI/2026/6891) (Our Ref: 2025-160)

I act on behalf of the applicant, Wagner Corporation Pty Ltd, in respect of the above matter.

I refer to Toowoomba Regional Council's (**Council**) Information Request, dated 20 August 2026, in respect of a Development Application for Material Change of Use for Research and Technology Industry (Veterinary Research) on land at 1511 Toowoomba Cecil Plains Road, Wellcamp, described as Part of Lot 8 on SP329720 including Easement H on SP272154 and Easement V on SP329720; and Lot 800 on SP296105 including Easements AA and H on SP272154, Easements N and P on SP296105 and Easement V on SP329718.

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. DETAIL ON PLANS

1.1. Issue:

The proposed facility relates to a portion of Lot 8 SP329720, with access via International Drive (Lot 800 SP296105) and an internal roadway. The internal roadway is completed up to the approved Ecogrowth facility (Approval MCUC/2025/4658/A) as Environmental Drive, with the remainder of the roadway to be constructed to the proposed facility.

The Engineering Report states the internal roadway will be a two lane private road designed as 14m industrial access road. The Site Plan Drawing No 1081.DA.00.002 shows the ultimate design of the internal roadways Road 3 and Road 9, however submitted plans do not show the proposed roadway up to the proposed facility and whether a temporary turnaround is to be provided at the end. The roadway provides public access to development, and is required to have similar infrastructure to public roads including pedestrian pathways, street trees, street lighting and such.

Information Required:

Provided conceptual engineering plans of the internal roadway providing access to the proposed facility, including necessary roadway infrastructure such as the pavement width to accommodate a 26m B-Double design vehicle, pedestrian pathway, shade trees, street lighting, and temporary turnaround facility.

Response

In response to the above item, reference is made to the following plans included with this correspondence at **Appendix A**:

- Dwg No 1081.DA.00.003: Part Locality Plan, Rev B, prepared by Wagner Corporation Pty Ltd and dated 28/08/2026; and
- Dwg No C1819120 RD05: Roadworks Layout – Sheet 5, Issue P5, prepared by Kehoe Myers Consulting Engineers and dated 14/07/26.

The Part Locality Plan illustrates the location of the development site area and confirms access to the site will be via Environmental Drive, Road 09 and part of Road 03. The Roadworks Layout Plan confirms the standard of road construction for Road 09 and the relevant section of Road 03. This includes dimensions for road reserve width, pavement width, verge width and footpath location. The roads will include a pavement width of 14 metres which is equivalent to an Industrial Collector Road standard as illustrated in the *Toowoomba Regional Planning Scheme 2012* (Planning Scheme), Schedule 6, SC6.2 – PSP No. 2 – Engineering Standards – Roads and Drainage Infrastructure. This road standard will be adequate for the scale of service vehicles accessing the proposed development.

Additional road construction matters including street trees, street lighting and a temporary turnaround facility will be provided in response to external roadworks conditions for this development in the event the application is approved.

1.2. Issue:

The Works and Services Code includes benchmarks to ensure earthworks, including batters, are structural stable and do not unduly impact on amenity.

Transport Access and Parking Code PO19/AO19.1 requires all carparks and vehicle manoeuvring areas to be imperviously sealed. This is reinforced in the Environmental Standards Code PO20/AO20.1 that requires all frequently used areas for vehicular purposes are imperviously sealed.

The Site Plan includes colours and hatching to infer surface treatment, e.g. grass/landscaping, seal, gravel, however these indicators are not confirmed in a legend or labelled. The brown hatched area used for refuse vehicle manoeuvring is unclear. Furthermore, the treatment and slope of the batter to be relocated along the eastern side is unknown. The Site Area schedule identifies the batter (1,630m2 and 24%) under Greenspace however the intended treatment/surface is unclear.

Information Required:

Provide an updated site plan identifying the proposed treatment of all surfaces (e.g. by legend), ensuring this aligns with the Site Area calculations, and indicate the slope and treatment of the proposed batter. Ensure all areas used for vehicle parking and manoeuvring are shown as imperviously sealed, and that the proposed batter would meet the Works and Services Code benchmarks for stable earthworks and visual aesthetics.

Response

In response to the above item, reference is made to the following plan included with this correspondence at **Appendix A**:

- Dwg No 1081.DA.00.002: Site Plan, Rev H, prepared by Wagner Corporation Pty Ltd and dated 28/08/2026.

The Site Plan includes colours and hatching to confirm surface treatment including landscaped areas along the front and side boundaries, earth batter along the rear boundary, turfed areas including the location of shade trees, sealed access, parking and manoeuvring areas and sealed pedestrian paths.

The road base area indicated at the end of the internal driveway will be used for refuse collection vehicle manoeuvring and the batter along the rear boundary will be stabilised using a turfed treatment.

2. IMPACT ON QUARRY / KRA SEPARATION AREA

2.1. Issue:

The development site is located in the separation area of the Extractive Resource Overlay. PO2 of the Overlay Code requires development to show how the proposed development is compatible with the operation of the extractive industry and does not introduce uses which would be sensitive to the impacts of extractive industry in the area.

The use will introduce both people and dogs to site, which are likely to be affected by noise, vibration and overpressure impacts from quarry operations. There was no discussion in the Planning Report or Reverse Amenity assessment about the compatibility of dogs being located in close proximity to the quarry operation, or what mitigation measures may be required. The use itself requires housing of animals permanently on site. The Reverse Amenity assessment has indicated the site falls within areas which are above the compliance/ amenity limits (for people) that the quarry is required to operate under. This may be exacerbated with regard to animal keeping.

Information Required:

The applicant is requested to demonstrate how the proposed animal keeping and animal research activities can operate in conjunction with the existing quarry use on adjoining land, having regard to existing use rights, the environmental conditions and operational impacts associated with the quarry. Where the proposed development is expected to experience impacts from quarry operations, as identified or inferred through the Reverse Amenity Assessment, provide details of any design measures, management practices, operational procedures or other mitigation strategies that will ensure the ongoing viability of the proposed use. Where mitigation measures are not proposed, provide an assessment of how the proposed activities, including the keeping and management of animals, can function effectively within the existing environment and why the anticipated level of impact is considered acceptable for the intended use over the long term.

The response should clearly demonstrate whether that the proposed use can operate effectively and sustainably in the environmental conditions generated by the adjoining quarry use and that any potential reverse amenity implications have been appropriately considered in the design and operation of the development.

Amend the Site Based Management Plan and Site Plans where mitigation requires.

2.2. Issue:

The development site falls within the KRA of the Boral Quarries Wellcamp and to a lesser degree the Wagners Wellcamp Quarry. Both are adjacent to each other and the KRA overlay is cumulative for both sites. Both of these quarries have had recent MCU's approved for expanded operations:

- *Boral Quarries Wellcamp – MCUC/2023/537/A - Extension to Extractive Industry – approved 05/07/2024*
- *Wagners Wellcamp Quarry - MCUC/2024/6760 - Extension to Extractive Industry – approved 16/04/2026*

The applicant submitted a Reverse Amenity Advice Letter, prepared by Range Environmental and dated 15/07/2026. The letter acknowledges that the site is located within an Extractive Resources Separation Area due to its proximity to Boral's Wellcamp Downs Quarry. The letter responds only to PO4 of the overlay code as it relates to noise, dust, ground vibration, or air blast overpressure from an existing or future extraction.

The advice letter refers to several reports written in 2016:

- *Blast Impact Assessment, prepared by Saros (International) Pty Ltd (Reference: BRQ20, dated 30 May 2016)*
- *Assessment of Environmental Noise Emission prepared for Boral's Wellcamp Downs Quarry by Acoustics RB Pty Ltd (Reference: 14-551.R04, dated 1 June 2016)*
- *Air Quality Assessment prepared for Boral's Wellcamp Downs Quarry by Katestone Environmental Pty Ltd (Reference: D14060-10 V1.2, dated 26 May 2016)*

The following impacts were noted, based on these 2016 reports:

- *Vibration*
  - *Vibration levels from blasting activities would exceed the recommended 5mm/s limit at the site*
  - *Blasting activities at the Wellcamp Downs Quarry are undertaken approximately once every 4 weeks*
  - *Vibration emissions from the Boral Quarry Wellcamp Downs are not predicted to result in minor or cosmetic building damage at the proposed development as the estimated vibration levels at the site do not exceed the 50mm/s limit for reinforced or framed structures under Australian Standard AS2187.2:2006 Explosives.*
- *Overpressure*
  - *The proposed development will fall within the 120 dB(L) overpressure contour*
- *Fly Rock*
  - *The site did not occur within the Wellcamp Downs Quarry 170m fly rock exclusion zone*
- *Noise*

- ***the site is wholly located within an area identified as 'non-developable' as predicted noise emissions at the site exceeded the derived noise level limits (50- 60 dB(A) during the daytime period).***
- ***However, noise logging undertaken approximately 160m south of the site in April 2025 as part of the preparation of a noise impact assessment for a proposed development proximate to this site (Reference: MCUC/2025/4658/A) determined that the ambient noise levels at this location were well below the derived noise level limits (35 dB(A) LAeq during the daytime period, with a maximum hourly LAeq recording of 49 dB(A)) (Noise Measurement Services, 2025).***
- ***These recorded noise levels also comply with the Acoustic Quality Objectives (AQOs) for commercial receivers under the Environmental Protection (Noise) Policy 2019 (EPP Noise) which outlines a limit (measured at the façade) for the daytime period of 55 dB(A) LAeq.***
- ***Noise emissions from Boral's Wellcamp Downs Quarry have been measured to be well below the predicted noise levels at the development site. Ambient noise levels measured near the site in April 2025 were below the relevant noise assessment criteria for a commercial receptor.***

- ***Air / Dust***
  - ***Ground-level concentrations of PM10 did not exceed the EPP Air limit at the site.***
  - ***Maximum monthly dust deposition rates did exceed the EPP Air limit at the site. This may result in nuisance being caused at the proposed development site by dust settling on surfaces.***

It is not clear why more recent reports (circa 2022) were not used to determine the reverse amenity impacts. The approved operational footprint of both quarries has changed since 2016 and more recent modelling and monitoring data is available.

Information Required:

Update the Reverse Amenity Assessment letter to include a review of information submitted in relation to both Extension to Extractive Industry approvals – Approvals MCUC/2023/537 and MCUC/2024/6760. The review should ensure that any newer reports confirm the level of impact anticipated at the proposed development site and how development will minimise any adverse impact that arises from both quarries.

Response

In response to the above items, reference is made to the Reverse Amenity Advice Letter, prepared by Range Environmental Consultants, dated 27 October 2026 and attached at **Appendix B**. This correspondence includes a plan illustrating the location of the development site area with respect to the Planning Scheme's Extractive Industry Overlay including the Wellcamp Downs (KRA) Quarry and provides an assessment against the relevant sections of the Planning Scheme's Extractive Industry Overlay Code. The assessment also makes reference to the revised Noise Impact Assessment, prepared by Noise Measurement Services, dated 19 October 2026 attached at **Appendix C**

These assessments confirm the development can operate at this location within acceptable amenity levels acknowledging the potential off-site amenity impacts of the adjacent quarrying activities. These potential offsite amenity impacts will be ameliorated through a combination of design and operational matters. These measures comprise the design of the development which relies on a substantial cut resulting in a 5 metres high earth batter along the rear north-eastern boundary as well as recommendations on building design including insulation and operational requirements.

3. NOISE IMPACTS OF THE DEVELOPMENT

3.1. Issue:

The applicant submitted a Noise Impact Assessment, Rev 0, prepared by Noise Measurement Services and dated 15/06/2026. The scope of the report includes noise impacts from the proposed development on receptors and does not relate to reverse amenity issues.

Further information is required on the following:

- ***Section 4.1 states that a source noise level of 90 dB(A) was used to derive an internal kennel noise level of 81 dB(A) Leq,15min. Provide further information detailing the methodology, assumptions and calculations used to derive the adopted internal kennel noise level, including clarification as to whether the 90 dB(A) value represents a sound power level (Lw) or sound pressure level (Lp). Provide sufficient information to enable Council to verify the acoustic model inputs and resulting noise predictions, including assumptions on spacing and volumes of the building.***
- ***Confirm that the point source "Dogs x 10" in the outdoor pens (red dots) in Plate 1 is taken to be 90dB at each point, as per the measurements taken and scribed in Section 4.1. Table 4.1 does not include the "Dogs x 10"***

Information Required:

Address the issues noted above and submit a revised report when changes are required to the results, modelling or conclusions.

Response

In response to the above item, reference is made to the preceding response to items 2.1-.2.2 and the revised Noise Impact Assessment, prepared by Noise Measurement Services, dated 19 October 2026 attached at **Appendix C**.

4. CAR PARKING

4.1. Issue:

The proposed development is subject to the Performance Outcomes outlined in the Transport, Access and Parking Code.

The submitted plans show 13 proposed parking spaces, including one PWD space. The Transport Access and Parking Code does not include a parking rate for Research and Technology Industry, and as such a parking analysis is required to justify the proposed carparking numbers. No such parking analysis is provided. The plans refer to the Animal Keeping carparking rate with no explanation.

Information Required:

Provide a Parking Analysis prepared by a suitably qualified professional to justify the number of proposed parking supply is likely to accommodate the anticipated parking demand generated by the development, and provide amended plans where necessary.

Response

In response to the above item, the applicant has confirmed the development will employ 5 x full-time-equivalent (FTE) staff and will require 5 x additional car parks for visitors and customers. The development makes provision for 13 x on-site carparks (including 1 PWD space) which exceeds the carparking requirements for the development.

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 0488 772 991 or by email at paul@precinctplan.com.au.

Yours sincerely



Paul Kelly
Precinct Urban Planning

APPENDIX A – AMENDED PLANS

- *Wagner Corporation Pty Ltd*
- *Kehoe Myers Consulting Engineers*

APPENDIX B – REVERSE AMENITY ADVICE LETTER

Range Environmental Consultants

APPENDIX C – NOISE IMPACT ASSESSMENT

Noise Measurement Services