range environmental consultants

TOOWOOMBA
Office A, 189 Hume St,
Toowoomba QLD 4350

BRISBANE
Units 7-8, 200 Evans Rd,
Salisbury QLD 4107

(07) 4588 6711

RECEIVED
29/10/2026
TOOWOOMBA
REGIONAL COUNCIL

Richard Stewart
Development Manager
Wagner Corporation
PO Box 2005
Toowoomba QLD 4350

Our Reference: J002916_V2
Date: 27 October 2026

REVERSE AMENITY ADVICE LETTER FOR A PROPOSED VETERINARY CONTRACT RESEARCH ORGANISATION, WELLCAMP

Dear Richard,

Range Environmental Consultants Pty Ltd (Range Environmental) was engaged by Wagner Corporation on behalf of Invetus to prepare this reverse amenity advice letter for a proposed Veterinary Contract Research Organisation (CRO) located on Proposed Lot 26 (hereafter 'the site') at Road 3, Wellcamp across a portion of a land parcel formally described as Lot 8 on Plan SP329720 (Figure 1).

The site is located within an Extractive Resources Separation Area under the Toowoomba Regional Planning Scheme (TRPS) 2012 (v28) due to its proximity to Boral's Wellcamp Downs Quarry and Wagners Wellcamp Quarry (Figure 1). The site is located approximately 366 m south-west of the Wellcamp Downs Quarry and approximately 783 m south-west of the Wellcamp Quarry. A response to Performance Outcomes 2 (PO2) and PO4 of the Extractive Resources Overlay Code has been provided below at Table 1.

Version 2 of this advice letter has been updated to address the requirements of Item 2 of the Toowoomba Regional Council (TRC) Information Request (Reference: MCUI/2026/6891) dated 20 August 2026. It is understood that all other items of the Information Request will be addressed by others.

Key Documents

The following key documents were utilised to prepare this letter:

Boral's Wellcamp Downs Quarry Technical Assessments

- Wellcamp Downs Quarry Blasting Impact Assessment prepared by Saros (International) Pty Ltd (Reference: BRQ32, dated 14 December 2022, and dated 30 May 2016 (Reference: BRQ20) for fly-rock assessment only).
- Expansion of Boral Wellcamp Quarry Assessment of Environmental Noise Impact prepared by Acoustics RB Pty Ltd (Reference: 14-551.R08, dated 26 May 2023).

- Wellcamp Quarry – Air Quality Assessment prepared by Katestone Environmental Pty Ltd (Reference: D21137-4 V1.0, dated 14 December 2022).

Wagners Wellcamp Quarry Technical Assessments

- Noise Assessment Extractive Industry Wellcamp prepared by MWA Environmental (Reference: 17-034, dated 24 May 2017).

It is noted that blasting and air quality impact assessments were not available for review on the TRC Development.i database for applications associated with the Wagners Wellcamp Quarry. However, it was considered that impacts from the Wagners Wellcamp Quarry on the proposed development would be comparable, if not a lower risk, than the Boral's Wellcamp Downs Quarry as both quarries are approved for the same operational thresholds, however, the Wagners Wellcamp Quarry is located further from the subject site.

Technical Assessments prepared for the Proposed Development

- Noise Impact Assessment for Environmentally Relevant Activity prepared by Noise Measurement Services (Reference: 8154_1, dated 19 October 2026).

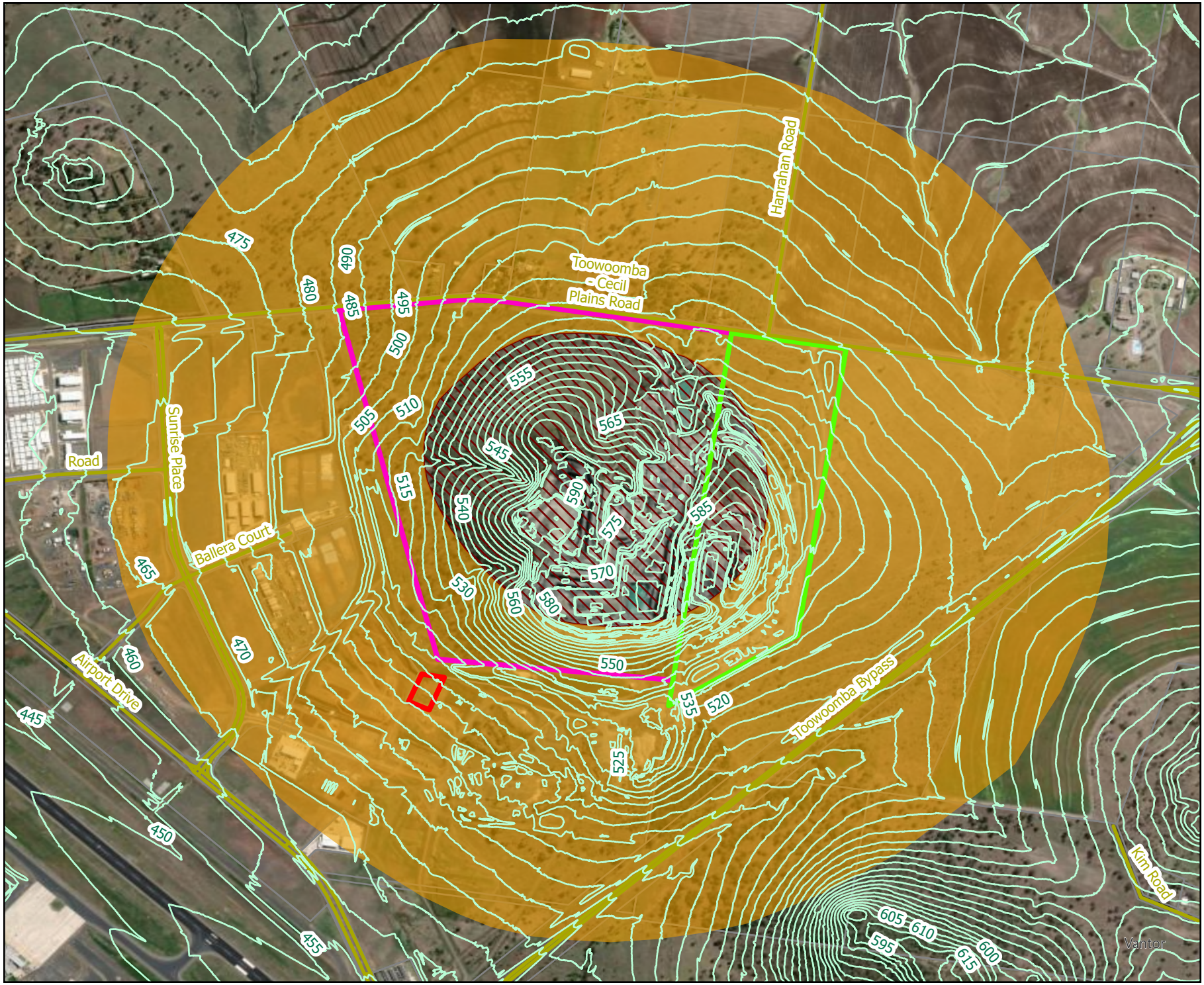


Figure 1
Site locality

Project: Reverse Amenity Advice Letter

Client: Wagner Corporation

Project No.: J002916

Compiled by: MJW Date: 27/10/2026
Approved by: LMT Date: 27/10/2026

Metres
0 210 420

Legend

- Cadastre
- Roads
- 5m Contours
- Site Boundary
- Boral's Wellcamp Downs Quarry
- Wagners Wellcamp Quarry

TRC Extractive Resources Overlay

- Extractive Resource
- Separation Area

The content of this document includes third party data. Range Environmental Consultants does not guarantee the accuracy of such data.

Source: Cadastral data sourced from DNRME (2026). Aerial imagery sourced from NearMap (2026).

N

range environmental consultants

Table 1 Extractive Industry Overlay Code – TRPS 2012 (v29)

Performance outcomes	Acceptable outcomes	Response

PO2 Development for a use other than an extractive industry is compatible with the operation of the extractive industry and does not introduce or increase other uses sensitive to the impacts of extractive industry in the area.	AO2.1 The numbers of people working or congregating in the overlay area are not increased as a result of non-extractive industry uses.	The proposed development complies with PO2 and PO4 as outlined below.
		
		Vibration & overpressure
		• A Blast Impact Assessment prepared by Saros (International) Pty Ltd for Boral's Wellcamp Downs Quarry (2022) predicted the following in relation to the location of the proposed development:
		  • Vibration levels from blasting activities would exceed the recommended 5mm/s limit at the site and would likely be noticeable to easily noticeable.
		  • Blasting activities at the Wellcamp Downs Quarry are undertaken approximately once every 4 weeks. Therefore, whilst vibration emissions from blasting activities are likely to be noticeable to easily noticeable, it would be limited to a short, instantaneous sensation that may be felt by staff about once per month. Blasting may cause a transient startle, fear or stress response in some dogs. Individual responses should be monitored, with advance warning, relocation indoors and appropriate animal-management measures implemented for scheduled blasts.
		  • 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

PO4 To the greatest extent practicable, development minimises the potential for adverse impact from extractive industries, having regard to noise, dust, ground vibration, or air blast overpressure from an existing or future extraction, processing and transportation of extractive materials.	No acceptable outcome is nominated.	

Performance outcomes	Acceptable outcomes	Response
		under Australian Standard *AS2187.2:2006 Explosives*. • The proposed development is within the 125 dB(L) overpressure contour, exceeding the recommended limit of 115 dB(L). However, overpressure from the Wellcamp Downs Quarry is not expected to cause structural damage. Any short-term nuisance or comparable effects on staff or animals should be managed using the same measures proposed for vibration. • The available documents do not specify the blasting frequency at Wagners Wellcamp Quarry. Accordingly, a frequency similar to Wellcamp Downs Quarry (approximately once per month) has been assumed. Given its greater separation from the proposed site, vibration and overpressure impacts from Wagners Wellcamp Quarry are expected to be lower. • There have been no complaints regarding vibration emissions or air-blast overpressure from the Wellcamp Downs Quarry or Wagners Wellcamp Quarry from any users of the Wellcamp Business Park. • Vibration emissions or air-blast overpressure from the Wellcamp Downs Quarry and Wagners Wellcamp Quarry are not anticipated to adversely impact the safe use of the site for the proposed development with the adoption of appropriate animal management measures as required. It is recommended that a communication protocol is established between the Wellcamp Downs Quarry and the Wagners Wellcamp Quarry and the site to receive advance notice of blasting activities so that the dogs can be moved into the indoor areas prior to scheduled blasts, where practicable.

Performance outcomes	Acceptable outcomes	Response

		Fly-rock
		• A Blast Impact Assessment prepared by Saros (International) Pty Ltd (2016) for Boral's Wellcamp Downs Quarry predicted that the site did not occur within the 170m fly-rock exclusion zone.
		• The greater separation between Wagners Wellcamp Quarry and the proposed development is expected to result in a lower risk of fly-rock impact.
		• Fly-rock emissions from the Wellcamp Downs Quarry and Wagners Wellcamp Quarry are not anticipated to adversely impact the safe use of the site for the proposed development.
		Noise
		• Due to the existing topography of the local area, the proposed development will not have direct line of sight of the Wellcamp Downs Quarry. Additionally, the proposed development will provide the following "natural" screening (Noise Measurement Services, 2026):
		  ◦ The proposed infrastructure will be cut into the natural ground, with an approximately 5 m high earth batter along the north-eastern boundary of the site which will provide additional screening of the site from the Wellcamp Downs Quarry.
		  ◦ The north-eastern façade of the proposed building, which faces the Wellcamp Downs Quarry, is a solid clad wall (i.e., no openings).
		  ◦ The proposed building will provide additional screening to outdoor play areas, particularly those on the north-western elevation.

Performance outcomes	Acceptable outcomes	Response

		• The Assessment of Environmental Noise Impact prepared for Boral's Wellcamp Downs Quarry identified that the site is located within an area identified by the noise contour diagrams as experiencing predicted noise emissions between 31-35 dB(A) L_{Aeq}. These noise levels 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) L_{Aeq}[1].
		• The Noise Assessment prepared for Wagners Wellcamp Quarry identified that the site is located within a maximum 29 dB(A) L_{Aeq} noise contour.
		• The Noise Impact Assessment prepared by Noise Measurement Services (2026) for the proposed development predicted the following:
		  • The measured noise levels at the site would not significantly exceed the outdoor AQOs in terms of level or duration.
		  • The internal AQOs can be readily achieved with the implementation of the following standard insulated and lined construction methods:
		  – The external walls and roof of the proposed kennel shall include insultation and an internal lining such that the building

[1] The internal AQO has been converted to an external value assuming 10 dB(A) of attenuation through open windows as per Locher et al., "Differences between Outdoor and Indoor Sound Levels for Open, Tilted, and Closed Windows", International Journal of Environmental Research and Public Health, 2018.

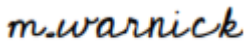
Performance outcomes	Acceptable outcomes	Response
		envelope achieves a minimum weighted sound reduction index of Rw 29. – Openings between the indoor and outdoor spaces are capable of being closed. – Any natural ventilation openings are acoustically treated or located on the south-western elevation away from the Wellcamp Downs Quarry. • Overall, the proposed development can operate effectively and sustainably within the existing acoustic environment and is compatible with the ongoing operation of the quarries. • Further, the maximum measured external noise levels outlined in the Noise Impact Assessment (Noise Measurement Services, 2026) are well below the level (85dB+) of noise identified across multiple studies as having an impact (i.e., decline in hearing ability) on kennelled dogs (Raghy, Jacob and Tamizhkumaran, 2023; McCann; 2026). The recommended maximum safe sound level for dogs is identified as between 45-55 dB (Coren, 2022; Stern, 2025). Therefore, the ongoing operation of the quarries is unlikely to cause stress, anxiety, or behavioural issues for the dogs kept on site. • There have been no complaints regarding noise emissions from either quarry from any users of the Wellcamp Business Park. • Noise emissions from the quarries are not anticipated to adversely impact the safe use of the site for the proposed development.

Performance outcomes	Acceptable outcomes	Response
		Air quality • An Air Quality Assessment prepared for Boral's Wellcamp Downs Quarry identified that the maximum monthly ground-level concentrations of dust deposition, annual ground-level concentrations of TSP, annual and 24-hour ground-level concentrations of PM_{10}, and annual and 24-hour ground-level concentrations of $PM_{2.5}$ did not exceed the EPP Air limits at the site. • The greater separation between Wagners Wellcamp Quarry and the proposed development is expected to result in a lower risk of impact on air quality. • There have been no complaints regarding air quality (dust) emissions from the Wellcamp Downs Quarry or the Wagners Wellcamp Quarry from any users of the Wellcamp Business Park. • Air emissions from the Wellcamp Downs Quarry and the Wagners Wellcamp Quarry are not anticipated to adversely impact the safe use of the site for the proposed development. **Transport** • Traffic associated with the operation of the Wellcamp Downs Quarry and the Wagners Wellcamp Quarry has the potential to cause dust or noise nuisance at receptors. • Traffic to and from the quarries is via Toowoomba Cecil Plains Road located approximately 1.3 km north of the site. • The site is shielded from the internal access roads at the quarries by the natural terrain of the area and physical separation distances.

Performance outcomes	Acceptable outcomes	Response
		• As described above, noise and dust emissions from the quarries are not expected to adversely impact the proposed development at the site. • Traffic to and from, and within, the quarries will not adversely impact the safe use of the site for the proposed development. **Summary** The proposed development complies with PO2 and PO4 as: • The proposed development is compatible with the ongoing operation of the extractive industries as no adverse impacts have been predicted in relation to vibration, overpressure, fly-rock, noise or air quality. • The proposed development can operate effectively and sustainably within the existing operational environment of the two (2) quarries without an unacceptable risk of adverse impact to people, animals or infrastructure. • Staff of the facility shall monitor quarry blasting schedules and prepare, as far as reasonably practicable, to minimise impacts to animals.

We trust that the information provided within this letter is sufficient for your purposes. If you should have any questions on the contents of this letter, please do not hesitate to contact me on 0482 951 463 or at maddy.warnick@rangeenviro.com.au.

Yours sincerely,



Maddy Warnick
Professional Ecologist
Range Environmental Consultants