

13 August 2026

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

Attention: Ms Emily Hinchcliffe
By Email: Emily.hinchcliffe@tr.qld.gov.au

RECEIVED
13/08/2026
TOOWOOMBA
REGIONAL COUNCIL

Dear Emily,

RESPONSE TO INFORMATION REQUEST – SECTION 68, PLANNING ACT 2016 & CHAPTER 1, PART 3, SECTION 13, DEVELOPMENT ASSESSMENT RULES – CHANGE APPLICATION (OTHER CHANGE) - MATERIAL CHANGE OF USE - HIGH IMPACT INDUSTRY - 1 MARY STREET, CLIFTON – LOT 13 SP162658, EASEMENT C RP912787, EASEMENTS D & E SP162635, EASEMENT EMT RP 87473 & EASEMENT F SP162658 (Council Ref: MCUI/2019/1350/E) (Our Ref: 2023-151)

I act on behalf of the applicant, Ridley Agriproducts Pty Ltd, in respect of the above matter.

I refer to Toowoomba Regional Council's (**Council**) Information Request, dated 20 August 2024, in respect of a Development Application for Change Application (Other) for High Impact Industry on land at 1 Mary Street Clifton, being that land described as Lot 13 SP162658, Easement C RP912787, Easements D & E SP162635, Easement EMT RP 87473 and Easement F SP162658.

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. NOISE IMPACTS

1.1. Issue: Noise Impact Assessment

The existing Development Approval requires compliance with the Acoustic Quality Objectives listed in Schedule 1 of the Environment Protection (Noise) Policy 2019 when measured at any sensitive receptor. The Noise Impact Assessment report submitted for this change application includes monitoring data that, when extrapolated to sensitive receptors in Section 2.3 and Table 12, shows the site does not currently comply with these noise limits. The noise modelling of the proposed expansion of operations to 1000t/day also does not comply with these limits (refer Table 16).

The summary of existing noise sources on site included in Table 10 is accepted as noise from plant and equipment onsite. The proposed drawings indicate that to accommodate increased production rates, a second pelletiser line will be introduced in the mill building, increasing the number of noise sources on site.

Modelling was undertaken using the existing plant noise from Table 10. Section 2.4.1 notes the facility will undertake a series of equipment upgrades which are outlined in Table 14 to increase production efficiency and to reduce both noise and dust emissions. Despite this, the report does not include the following information:

- 1) Demonstration that the current operations comply with the existing noise levels;*
- 2) Details of the expected reduction in noise levels for each plant / equipment once upgraded;*
- 3) Timing of equipment installation / upgrades; and*
- 4) Details of the reporting that would be prepared and submitted to Council to validate that noise reduction targets and overall compliance with noise limits is achieved.*

It is noted that existing Condition 49 requires that a Noise Reduction Program is prepared and then submitted to Council for endorsement. A report was endorsed by Council on 11/03/2021, however evidence of progress and reduction in operating noise levels against this noise reduction program – including site improvement works – has not been received since its endorsement or detailed within the submitted material.

Information Required:

The application material demonstrates that the site under its current operations does not comply with the existing noise limits. An Amended Noise Impact Assessment is required to be submitted demonstrating compliance and including the following information:

- a) Include the noise compliance criteria as per Condition 44 and show the noise exceedances at receptors in Tables 12, 15 and 16;*
- b) Outline what noise level reductions are required for each of the equipment listed in Table 10 to achieve compliance at receptors; and*
- c) Provide clearly defined timing for upgrades and if applicable, prioritise which land and equipment will be upgraded / replaced first.*

Response

In response to the above item, a Noise Impact Assessment has been prepared by Virid Ardent AU (VAAU) and is enclosed as **Appendix A**.

The key outcomes of the Acoustic Impact Assessment confirm:

1. That the site does not currently demonstrate compliance with the adopted noise criteria under all assessed scenarios. Exceedances are presently predicted at several residential receptors, including night-time fixed plant exceedances and daytime/evening exceedances under the current and proposed peak-hour operating scenarios.

2. The source contribution review indicates that the exceedances are not controlled by a single source. Roof-level plant, particularly the roof cyclone fans, is a consistent contributor across multiple receptors. At the more affected receptors, predicted noise levels are also materially influenced by building breakout from the mill building, boiler house, grain intake, warehouse, meal intake and associated dust extraction systems. Truck movements should also continue to be managed through operational controls, including routing, speed management, idling controls and loading procedures.
3. The Acoustic Impact Assessment recommends the implementation of a staged and prioritised noise reduction and mitigation plan incorporating upgrades to mill design, plant machinery and acoustic treatment measures. Subject to detailed design development, feasibility assessment and budget approval processes, the recommended measures may be implemented progressively over an indicative period of approximately 18 months. The final required reduction for each source is receptor-dependent and governed by the combined contribution of multiple sources. The final mitigation package should therefore be confirmed through updated source-specific mitigation modelling prior to implementation.
4. We note that Condition 44 of the existing Material Change of Use Approval (MCUI/2019/1350/A) notes that noise associated with the use of the subject land must not exceed the Acoustic Quality Objectives except where operating under a Noise Reduction Program. We contend that on-going operations under the changes to conditions sought can occur under the noise reduction and mitigation plan proposed under the auspices of this condition.

The Ridley Feedmill makes a significant contribution to the local and regional economy as evidenced by:

- a) **Employment:** The mill provides direct employment for nineteen (19) staff and indirect employment within a range of local businesses involved in supplying goods and services to the mill, in mill maintenance, cleaning, equipment repair and engineering etc.
- b) **Grain Suppliers:** There are in excess of forty-six (46) local growers who sell and supply grain to the Clifton feedmill and an additional twenty-seven (27) whose grain is sold to the mill through a trader.
- c) **Direct Expenditure:** Direct company mill related expenditure into the local economy totalled \$1.136m over the last 12 months.
- d) **Reliant Customers:** The mill enables the local production for animal protein suppliers such as Darwalla/Golden Cockerill, Inghams, Baiada and several egg layer producers. These operations are expanding to support ongoing increases in consumption of poultry meat and eggs, however without the support of the Ridley Clifton Feedmill these operations would not be economically viable, and their ongoing operation and growth in the local region would be compromised or reconsidered.

In the medium to long term the acoustic performance of the mill and its economic viability depend on a significant investment in the plant and it's upgrading to enable production efficiencies to be realised and production volumes to increase through investment in new machinery, enclosing plant and the orderly expansion in facilities on site. The first stage of this expansion alone with require capital investment estimated to \$10 million.

The proposed changes to the existing approval sought under this application include:

- The continuation of 24 hour /7 day per week operation of the feedmill:

- An increase in the daily production limit from 600 tonnes of material /day to 1000 tonnes of material / day;
- Removal of the restriction that precludes the feedmill from operating on Public Holidays; and
- Removal of the restriction that prevents service vehicle movements (including loading and unloading) occurring between the hours of 10.00pm and 5.00am.

These changes are an essential prerequisite to the mill operating at a sufficient level of efficiency and production to justify the foreshadowed investment of capital essential to securing its on-going operation in the medium to long term. For Ridley Agrifoods, it is a commercial reality that the inability to secure the required production and operational changes, is likely to have a significant bearing on the decision of the company to invest further in the Clifton plant and associated infrastructure.

In that circumstance, the company will by necessity need to consider the ultimate closure and decommissioning on the plant in favour of moving production presently undertaken at the Clifton facility to a more profitable plant, most likely in Brisbane.

Advice: Number of Vehicles

The noise modelling undertaken utilised 2 heavy vehicles per hour for inbound meal and grain trucks and 1 heavy vehicle per hour for outbound products i.e. total of 5 vehicles per hour for 10pm to 5am period. Should this change application be approved, Council officers consider it reasonable to include conditions limiting vehicle movements in accordance with the noise report.

Furthermore, no changes should be anticipated to the noise limits conditioned in the current decision notice for the existing Development Approval. A response is not required and has been included as advice for information purposes only.

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 0427 737 526 or by email at andrew@precinctplan.com.au. Yours sincerely

A handwritten signature in blue ink, appearing to read "A Bullen", with a long, sweeping underline.

Andrew Bullen
Precinct Urban Planning