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7 October 2025

**Submission: Application for a Development Permit for a Material Change of Use and Reconfiguring a Lot (MCUI/2025/2877 and RAL/2025/2878)**

Dear Mr Forbes-Mitchell,

I refer to the abovementioned development application currently undergoing public notification in accordance with the *Planning Act 2016* (Qld).

Holcim (Australia) Pty Ltd (Holcim) operates its Toowoomba Quarry (the Quarry) at 68 Drayton Wellcamp Road, Glensvale, on land described as:

- Lot 698 on A34452;
- Lot 699 on A34452;
- Lot 1183 on A342684;
- Lot 1 on RP157339;
- Lot 2 on RP157339;
- Lot 1190 on A342648;
- Lot 10 on RP208160; and
- Lot 8 on RP208160.

The Quarry is located within the Glensvale Key Resource Area (KRA). Operations commenced in the 1970s and, as outlined in the KRA description, the Quarry is of regional significance to the Toowoomba urban area and the eastern Darling Downs markets.

The purpose of KRAs is to protect important extractive resources from incompatible land uses. Encroachment of new, sensitive land uses on existing, legitimate industrial, extractive or other uses leads to pressure on the existing operation to curtail its activities regardless of compliance. There is a clear and strong need to manage the interfaces between industry and sensitive land uses such as residential, and protect industry from reverse amenity impacts that could reduce business viability and create conflict in the community.

Holcim's Toowoomba Quarry operates in accordance with its statutory approvals and environmental obligations, however there is a risk that even compliant operations can be subject to reverse amenity impacts including complaints and conflict from nearby sensitive land uses.

The proposed development poses significant risk to Holcim's existing extractive industry operation through the introduction of a significant number of new, sensitive residential lots in proximity to the Quarry, the closest being located approximately 850m from the eastern boundary of the KRA Resource/Processing Area (i.e. that numbered 27 on Plan AU14570-15 Rev A). A number of recreation facilities, including open air activities such as a swimming pool and sports courts, are proposed within the KRA Separation Area. While the proposed plans of development indicate residential lots will not be located within the KRA Separation Area, its close proximity to extractive industry must be appropriately addressed.

Further, the proposed development plans do not illustrate the KRA Transport Route Separation Area. Comparison to the Qld Globe KRA mapping indicates at least 66 proposed residential lots (i.e. those numbered 1-66 on Plan AU14570-15 Rev A) will be located within the KRA Transport Route Separation Area.

As outlined below, a review of the development application documents indicates that the proposal has not adequately addressed reverse amenity nor the protection of the Glensvale KRA.

#### ***Inadequacy of noise survey data***

The *Traffic and Mechanical Noise and Industry Noise Assessment* (Alpha Acoustics Pty Ltd, September 2025) (Noise Assessment) submitted as part of the applicant's response to Council's request for information indicates that a noise survey of the KRA Transport Route, being Euston Road, was undertaken between Monday 9th December 2024 and Thursday 19th December 2024 (weekdays only). The Noise Assessment states, at Section 2.4, that '...the current (KRA) haulage operations were measured during the traffic noise assessment.' Holcim confirms that there was no haulage of quarry products offsite from its Toowoomba Quarry during this period.

It is noted that the Noise Assessment does not consider noise sources from the Toowoomba Quarry itself (i.e. within the KRA Resource/Processing Area), including those associated with the blasting, processing or movement of quarry products internal to the site.

Therefore, the noise survey measurements are not reflective of the KRA operation nor the acoustic environment of the proposed development site, and cannot be used to inform an adequate assessment of the potential reverse amenity impacts of the proposed development.

#### ***Inadequacy of proposed noise mitigation measures***

The Noise Assessment recommends a solid acoustic barrier to mitigate noise impacts associated with the KRA Transport Route on the 25 residential lots immediately adjacent to Euston Road (i.e. those numbered 3-27 on Plan AU14570-15 Rev A). No mitigation measures, such as building treatments to residential lots or recreational buildings, nor any measures for open air recreational areas, have been recommended.

Given the noise survey did not measure traffic associated with KRA operations (as no heavy vehicle haulage was undertaken during the survey period) or operational noise associated with the KRA, nor has it considered all 66 proposed residential lots within the KRA Transport Route Separation Area, the Noise Assessment is considered inadequate and cannot be relied upon to recommend appropriate mitigation measures for the proposed development.

***Closing comments***

Extractive resources are site specific, limited in occurrence by geological conditions and finite. Such resources are located close to the communities they supply to minimise the social, environmental and economic costs of excessive transport distances. As per the State Planning Policy, extractive industry operations are essential to support development and construction activities and the delivery of infrastructure. The ongoing protection of extractive industry from encroachment of sensitive land uses is integral to support the economic benefits the industry provides to Queensland and the contribution to our quality of life.

Any proposal to introduce new, sensitive land uses in proximity to a KRA Resource/Processing Area or KRA Transport Route, whether or not within their respective Separation Areas, must clearly demonstrate that reverse amenity impacts can be appropriately mitigated. The documentation submitted to Council in relation to the proposed development is inadequate and the potential for significant impacts to the ongoing operation of Holcim's Toowoomba Quarry remains.

Therefore, the proposed development, in its current form, is inconsistent with the State Planning Policy and Toowoomba Regional Planning Scheme, and must not be approved.

Holcim requests that Council refuse the development application unless the proposed development can be adequately assessed in relation to the potential for reverse amenity impacts on the operation of the KRA Resource / Processing Area and KRA Transport Route during peak operations, and appropriate mitigation measures be implemented in an amended proposal.

Should you require any further information or wish to discuss this submission, please contact me on 0408 192 921 or [victoria.musgrove@holcim.com](mailto:victoria.musgrove@holcim.com).

Yours sincerely,

Victoria Musgrove  
**National Planning Manager**