

SARA reference: 2511-49169 SRA
Applicant reference: M2301
Council reference: MCU25/0072

25 November 2025

Queensland Resource and Recovery Pty Ltd
C/- Milford Planning
PO Box 5463
TOWNSVILLE CITY QLD 4810
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Attention: Sarah Jones

Dear Jones

SARA information request - 42386 Bruce Highway, Bluewater

(Given under section 12 of the Development Assessment Rules)

This notice has been issued because the State Assessment and Referral Agency (SARA) has identified that information necessary to assess your application against the relevant provisions of the State Development Assessment Provisions has not been provided.

State transport infrastructure	
1.	Pavement Impact Assessment <u>Issue:</u> A Pavement Impact Assessment is required to be submitted to demonstrate compliance with PO5 of the State Development Assessment Provisions (SDAP) - State Code 6: Protection of State transport networks. The proposed development, which will effectively increase heavy vehicle movements generated by the development compared to the existing approval by a factor of 5, has the potential to worsen the pavement condition of the state-controlled road. A Pavement Impact Assessment is required in accordance with Section 13 (Pavement) of the Guide to Traffic Impact Assessment and to demonstrate that the development which involves haulage exceeding 10,000 tonnes per year does not damage the pavement of a state-controlled road <u>Action:</u> A Pavement Impact Assessment should be prepared and certified by a RPEQ in

	accordance with the Guide to Traffic Impact Assessment. This should include: a) identifying the number of types of vehicles that will be generated by the development during both construction and operational phases b) identifying the sections of the state-controlled road network where pavement assessment is required based on the standard axle repetitions (SAR) thresholds c) identifying the expected pavement life of each impacted section of the state-controlled road d) mitigating pavement impacts through provision of: - o extra pavement width (for example, to prevent edge degradation) - o a change in surfacing type of pavement thickness - o sealing an unsealed pavement o increasing maintenance, and/or the need for unscheduled pavement rehabilitation or construction of new pavement - o provision of monetary contributions required to offset pavement impacts throughout the life of the operations. Existing and proposed development traffic demands should be considered on a like-for-like basis (i.e. the only changes should be the tonnes per annum and potentially the design vehicles). Further guidance on preparing a pavement impact assessment is available in the Guide to Traffic Impact Assessment and via the Pavement Impact Assessment Practice Note online at: https://www.tmr.qld.gov.au/business-industry/Technical-standards-publications/Guide-to-Traffic-Impact-Assessment.
Environmentally Relevant Activity	
3.	Receiving waters environmental values – landfill cell liners <u>Issue:</u> The 'Change Application Report' states that the waste cells included in the landfill area include clay liners that ensure there is minimal percolation of leachate into groundwater and stormwater networks. No further information has been included on the liner systems and whether any changes to the liners are proposed as a result of the increased waste disposal rate to ensure further protection of water and groundwater environmental values. It cannot be determined that the proposed increase to the activity thresholds can sufficiently achieved PO4 of the SDAP State code 22 – Environmentally Relevant Activities, ensuring that the development is suitably located and designed to avoid or mitigate environmental harm to the receiving waters environment. <u>Action:</u> a) Describe how the current cell liner is appropriate and ensures that leachate is prevented from being released to land and waters and the subsurface migration of landfill gas is also prevented from the landfill unit. b) As part of the proposal, describe if any additional landfill lining is proposed to ensure that environmental values are protected from the disposal of waste within the landfill cells.
4.	Receiving waters environmental values – Stormwater management

	<u>Issue:</u> The 'Change Application Report' Page 18, states that stormwater that filters through the waste cells of the landfill is collected in a 'detention area' adjacent to the landfill sites, where it is then pumped to a designated leachate pond. The 'Stormwater Management Plan' prepared by Langtree Consulting Engineers provides information on the catchment areas onsite and mitigation and management measures for the sediment basins onsite. No information has been provided on how the leachate (that has filtered through the waste within the landfill cell) is directed to the 'detention area' and how the leachate within the leachate pond is managed to ensure leachate is not released to the environment. The application material has not determined whether there will be an increase in leachate generated onsite as a result of the increase in the waste disposal rate and how any increase will be managed. It cannot be determined that the proposed increase to the activity thresholds can sufficiently achieved PO4 of the SDAP State code 22 – Environmentally Relevant Activities, ensuring that the development is suitably located and designed to avoid or mitigate environmental harm to the receiving waters environment. <u>Action:</u> - Describe the leachate collection system within the landfill cells which directs leachate to the 'detention area' to ensure leachate is not percolating through the cell capping. - Describe the 'detention area' including the size of the area, where it is located onsite and how it is designed and lined. Describe how the site ensures that leachate is contained in this area and not released to the environment. - Explain how often leachate is pumped to the leachate ponds and if the pumping is a manual operation. - Describe how the leachate pond and collection system is managed, and any mitigation measures in place, to ensure there is always sufficient capacity within the pond and that leachate is not released to the environment. - Describe how stormwater runoff from catchment area 1 (that has not come into contact with waste) is directed away from the leachate pond to ensure capacity is maintained. - Determine the increase in leachate generated within the landfill cells as a result of the increase in the waste disposal rate at the site and provide information on whether the site has capacity to manage the increase in leachate generated onsite.
5.	Receiving waters environmental values – Ground water <u>Issue</u> The 'Change Application Report' page 24, states that a report was prepared addressing groundwater matters as part of the development approval assessment (D33/03). The report from the previous development approval determined that the high chloride and low sulphate content of the groundwater sampled at the site and the fact that the landfill leachate typically has elevated sulfate content, chloride sulfate ratios could be a useful indicator for leachate impact at the site. No further information has been provided on the current groundwater monitoring program in place at the site. Information including the current groundwater monitoring results and bore monitoring network has not been provided. The application has not explained if the current groundwater monitoring program is sufficient to monitor for the increased risk of potential impacts to groundwater as a result of the increase in activities and waste disposal at the site.

	It cannot be determined that the proposed increase to the activity thresholds can sufficiently achieved PO4 of the SDAP State code 22 – Environmentally Relevant Activities, ensuring that the development is suitably located and designed to avoid or mitigate environmental harm to the receiving waters environment. <u>Action:</u> a) Provide an interpretation of the most recent groundwater monitoring results (for at least the last 2 years of monitoring) from each of the groundwater bores at the site, including graphical representation, by an appropriately qualified person. b) Provide information on the current groundwater monitoring program and how all aspects of condition 1-WT7 of the environmental authority have been considered and included within the program. Include a description of the current groundwater monitoring network including a map of all upgradient and downgradient monitoring bores in relation to the site. c) Provide a determination by an appropriately qualified person, as to whether the current groundwater monitoring program is sufficient to monitor for and identify the increase of potential impacts and risks to groundwater as a result of the increase in waste disposal activities at the site.
6.	Air environmental values <u>Issue:</u> The 'Change Application Report' states that the hours of operation will remain Monday to Saturday 6:30am-7pm and that the number of truck movements to and from the facility will be between 30 to 50 per day (with a worse case of 60-70), where historically it has been 36 trucks per day. The report also states that dust emissions from the waste management and recycling activities are expected to be minimal but may occur as a result of screening and crushing activities of concrete, concrete stockpiling activities, and waste particles from the landfill. The application material has not considered the potential increase in impacts to air environmental values as a result of the increase in not only these screening and crushing activities, but also the increase in other activities associated with the operation of the landfill and resource recovery facility as a result of the proposal. It cannot be determined that the proposed increase to the activity thresholds can sufficiently achieved PO2 of the SDAP State code 22 – Environmentally Relevant Activities, ensuring that the development is suitably located and designed to avoid or mitigate environmental harm to the air environment. <u>Action:</u> a) Identify all the potential risks and impacts to air environmental values (dust and odour) from the site, as a result of the increase in proposed activities e.g. increase in waste deliveries, vehicle movements, machinery operating on tipping face and compacting waste, mechanically reprocessing waste and waste storage areas onsite etc. b) Conduct an air impact assessment to determine if the predicted air emissions from the proposed increase in activity at the site, will impact nearby sensitive receptors (residential and commercial) and whether the predicted air emissions will comply with the air quality objectives within the Environmental Protection Policy Air 2019 (EPP Air) at sensitive receptors. The assessment must take into consideration an increase in activities and potential impacts described in (a). c) Identify specific mitigation measures that will be put in place to manage and minimise

	any adverse impacts to environmental values and sensitive receptors to ensure the air quality objective of the EPP Air are met.
7.	Acoustic environmental values <u>Issue:</u> The 'Change Application Report' states that the activities undertaken at the facility do not generate significant amounts of noise and that the main noise generating activities are from the operation of machinery onsite. The report comments that these activities are undertaken infrequently and as required. However, with the significant increase in the operations at the site, and waste disposed to the landfill onsite, it is likely there will be a significant increase in noise generated onsite. The application material does not quantify the potential increase in noise generated from the site as a result of the proposal or describe how this could potentially impact nearby sensitive receptors. It cannot be determined that the proposed increase to the activity thresholds can sufficiently achieved PO1 of the SDAP State code 22 – Environmentally Relevant Activities, ensuring that the development is suitably located and designed to avoid or mitigate environmental harm to the acoustic environment. <u>Action:</u> a) Identify all the potential risks and impacts to noise environmental values as a result of the increase in proposed activities e.g. vehicle movements, deliveries, compaction of waste in landfill cell, waste sorting and other machinery operations and mechanical waste reprocessing within the RRA etc. b) Conduct a noise impact assessment to determine if noise from the activity at the site, taking into consideration the proposed increase in activities, will impact nearby sensitive receptors. Determine whether the acoustic quality objectives of the Environmental Protection Policy Noise 2019 (EPP Noise) will be met at sensitive receptors as a result of the increase in activities. c) The assessment must take into consideration and evaluate the increase in all the activities with the potential to increase impacts to noise environmental values identified in point (a). d) Identify specific noise mitigation strategies that will be implemented to avoid, minimise or manage the impact of noise from the proposal to ensure the acoustic quality objective of the EPP Noise are met.

Further advice

SARA advises that your development application has not adequately demonstrated compliance with the State Development Assessment Provisions.

SARA has reviewed your application material the following issue(s) with the proposed development have been identified:

State transport infrastructure	
1.	Dust concerns and state controlled road safety <u>Issue:</u>

	The site access road is sealed for approximately 19m from the edge of the Bruce Highway, however, it appears that dust/gravel is still being tracked onto the Bruce Highway from the unsealed portion of the site access road. This could present a traffic safety hazard and could compromise PO1 of SDAP Sate code 6, as disturbed dust may reduce visibility, and gravel on the pavement surface may reduce the available friction. <u>Action:</u> Provide a dust management plan for the operational component of the development. Ideally, a wheel wash/shaker grid should be provided within the site along with sealing of the site access road across the rail corridor and up to the existing seal.
Environmentally Relevant Activity	
2.	Waste disposal <u>Issue:</u> The 'Change Application Report', prepared by Milford Planning, dated October 2025, states that you are proposing to increase the threshold of waste that the facility can receive, sort and dispose of from 10,000 tonnes per annum to up to 50,000 tonnes of waste per annum. The application report states that the existing footprint of the facility will remain the same. However no further information has been provided on why you are seeking an increase in the waste disposal threshold and where the additional waste is sourced from. Information on the landfill design, including how much space is available within the current cells to support the proposed disposal rate has also not been provided. <u>Action:</u> a) Provide information on the landfill space available for the disposal of waste within the landfill cells. b) Explain why the increase in the waste disposed to the landfill onsite is required and where the waste is sourced from. c) Provide information and an updated site plan identifying the progressive landfill cell stages and explain how staged rehabilitation will be undertaken within the cells. d) Provide details on if the final landform design or rehabilitation plans for the site are proposed to change as a result of the increase in disposal activities.
3.	Resource recovery activities <u>Issue</u> The 'Change Application Report' states that the applicant is proposing to increase the threshold of waste that the facility can receive, sort and dispose of from 10,000 tonnes per annum to up to 50,000 tonnes of waste per annum. However, no information has been provided on the potential increase in resource recovery activities, or how much additional waste will likely be mechanically reprocessed and stored onsite as a result of the increased waste receipt. Further information is required to be provided on the increase of waste recovered and or mechanically reprocessed at the site and the potential impacts to environmental values as a result. <u>Action:</u> a) Describe the increase in the amount of waste that will be received in total at the site. b) Explain the proposed increase in the scale of mechanical waste reprocessing that will be conducted onsite in the RRA, including how much additional waste is proposed to be received, sorted and stored or mechanically reprocessed per year in tonnes.

	c) Provide information on any increase in stockpile sizes at the site and include the maximum proposed dimensions of all stockpiles onsite or proposed maximum amount in tonnes of waste that will be stored within the RRA at any one time. d) Describe the purpose of the laydown area identified in Appendix 5 of the 'Change Application Report' and describe if any wastes are stockpiled in this area. If so, which waste types and how much of each waste type is stored onsite at any one time
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How to respond

You have three months to respond to this request and the due date to SARA is 25 February 2026. You may respond by providing either: (a) all of the information requested; (b) part of the information requested; or (c) a notice that none of the information will be provided. Further guidance on responding to an information request is provided in section 13 of the [Development Assessment Rules](#) (DA Rules).

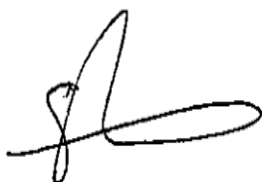
It is recommended that you provide all the information requested above. If you decide not to provide all the information requested, your application will be assessed and decided based on the information provided to date.

You are requested to upload your response and complete the relevant tasks in [MyDAS2](#).

As SARA is a referral agency for this application, a copy of this information request will be provided to the assessment manager in accordance with section 12.4 of the DA Rules.

If you require further information or have any questions about the above, please contact Kirsty Geaney, Principal Planning Officer, on 47583414 or via email NQSARA@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Carl Porter
A/ Manager Planning

cc Townsville City Council, developmentassessment@townsville.qld.gov.au

Development details	
Description:	Development permit Material change of use for Change Application (Other) to Development Approval M33/03 for a Waste Disposal and Recycling Facility
SARA role:	referral agency
SARA trigger:	- Schedule 10, Part 5, Division 4, Table 2, Item 1 (10.5.4.2.1) - Environmentally relevant activity - Schedule 10, Part 9, Division 4, Subdivision 1, Table 1, Item 1 (10.9.4.1.1.1)- Development impacting on state transport infrastructure - Schedule 10, Part 9, Division 4, Subdivision 2, Table 4, Item 1 (10.9.4.2.4.1) - Material change of use of premises near a state transport corridor or that is a future state transport corridor.
SARA reference:	2511-49169 SRA
Assessment criteria:	State Development Assessment Provisions (SDAP): - State code 6: Protection of State transport networks - State code 2: Development in a railway environment - Sate code 22: Environmentally Relevant Activities