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Our ref: 406005

Date: 26 October 2026

The Chief Executive Officer
Mareeba Shire Council
PO Box 154
Mareeba QLD 4880

Attn: Carl Ewin

Dear Carl,

Bullaburra Creek Road
Response to Draft Conditions of Development Approval
Your Ref: MCU/26/0011

RPS acts on behalf of Pioneer North Queensland Limited (PNQ) in relation to the development application for Development Permit for Material Change of Use (Extractive Industry) over land located at Lot 99 Bullaburrah Creek Road, Dimbulah, described as Lot 99 on HG91. We refer to Council's draft recommendation and conditions and our meeting with Council Officers on 26 October 2026. To assist with the processing of the application we would provide the following for Council's consideration.

Proposed Development Summary

For the purpose of clarity and to better define the nature of the proposed development we wish to confirm that the proposed development for Material Change of Use (Extractive Industry), comprises the following:

- Proposal to extract a maximum of 65,000 tonnes of sand per annum;
- The proposed extraction site would comprise a total extraction area of approximately 22.27 hectares;
- The proposed extraction area is comprised of two part lots, dissected by Bullaburrah Creek Road. The northern portion of the site comprises an extraction area of approx. 13.54ha and the northern portion an extraction area of approx. 8.74ha;
- It is not proposed to haul from the site in period of inclement weather;
- It is expected that, based on the resource available, the period of extraction would be 2 years; however, to provide for inclement weather, it is proposed that the period of operation be 2.5 years from date of commencement;
- No screening of material would be undertaken on site;
- The proposed haul route would be via Wolfram Road;
- Crossovers would be provided to facilitate the crossing of Bullaburrah Creek Road, including the provision of signage to alert other road users of traffic crossing the road;
- Temporary on-site office and ablution facilities would be provided; and
- The proposed development is depicted in RPS Drawing No. 406005-4e, provided for reference as Attachment A.

In addition to truck drivers hauling material from the site, the proposed operation would comprise the following employees:

- One (1) excavator driver;
- One (1) loader driver;
- Operation of the water truck would be undertaken by the excavator driver during the loading of haul trucks.

Response to Draft Conditions

With respect to the draft conditions, PNQ seeks to amend the draft conditions to reflect the proposed extraction activity as detailed above.

In order to address concerns raised by Council Officers with respect to impact of the proposal on the road network, PNQ are prepared to accept Council conditions requiring:

- Material to be extracted is to be hauled from Wolfram Road only. Vehicle movements on Bullburrah Creek Road would be limited to vehicle crossing from southern part lot to northern part lot;
- Extraction volume must not exceed 65,000 per annum;
- Haulage of material is to cease during weather events that may result in adverse impact to Wolfram Road;
- During haulage times, a water truck shall be used on Wolfram Road to supress any dust;
- No haulage would occur during school bus times;
- The nominal extraction period of two (2) years with provision for an additional 6 months to allow for inclement weather events;
- Provision of access crossover between Wolfram Road and the development site and between Bullaburrah Creek Road for access solely between the two part lots. Access to be constructed in accordance with the FNQROC Development Manual standards;
- Maintenance of Wolfram Road to a standard consistent with the existing state of the road, including the requirement for the periodic grading of the road to maintain good order and safe repair for the life of the development;
- At the conclusion of the extraction, Wolfram Road would be inspected to ensure that it is at the same standard as it was prior to commencement of extraction. Where maintenance is required, PNQ are prepared to undertake the works; and
- To secure the maintenance of Wolfram Road, PNQ are prepared to provide a bond as security.

Transport / Traffic Generation

The applicant has conducted as assessment of the proposed development in relation to the anticipated traffic generation, which is detailed as follows:

- Extraction of 65,000 t per annum utilising a 27.5 t semi-trailer, which equates to approx. 45 trucks/week or 15 truck movements per day;
- Two (2) employees on the site equates to 4 light vehicle movements per day;
- This equates to a total of 19 vehicle movements per day generated by the proposal;
- Water truck usage for dust suppressions would be undertaken in addition to the above.

Based upon the above calculations, it is our considered opinion that traffic generation associated with the proposed extraction activity would not significantly impact the local road network. Furthermore, PNQ is agreeable to the imposition of the condition requiring that material must not be transported from the site during hours during which school buses utilise Wolfram Road.

We look forward to continuing working with you on this development. In the meantime, if you have any queries please contact the writer (contact details below).

Our ref: 406005

Yours sincerely,
for RPS AAP Consulting Pty Ltd



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enc: **Attachment A:** Proposal Plan – RPS Drawing No. 406005-4e

ATTACHMENT A

RPS Drawing No. 406005-4e