18 November 2025

South Burnett Regional Council
PO Box 336
Kingaroy QLD 4610

Dear Sam,

RE: FULL RESPONSE TO INFORMATION REQUEST – MCU25/0032 – DEVELOPMENT PERMIT FOR A MATERIAL CHANGE OF USE FOR HIGH IMPACT INDUSTRY AND ERA 47(c) AND ERA 33

We refer to Council's Information Request of 28 October 2025 requesting further information to support the abovementioned development application. Please find below a complete response to the items raised.

Below and attached to this representation is a full response to the matters raised by Council. Please refer to the attached documentation:

- Attachment 1 – Traffic Information Request Response

This is a full response to Council's Information Request which now concludes Part 3 of the DA Rules.

ISSUES

1. Please confirm if the vehicle movements i.e. delivery to customers as referred to in the EMA are captured in the heavy vehicle movements listed in the submitted Traffic Impact Assessment (TIA) report.

Yes, this has been considered in the TIA. The traffic movements associated with the development were taken over a week period at 30,000 tonnes capacity and then extrapolated (i.e. doubled) to get the 60,000 tonnes capacity vehicle volumes. All traffic movements that occurred within the week, including customer deliveries, waste, imports and exports of timber, staff movements, misc deliveries etc. were captured in the surveys and subsequently extrapolated.

2. Please confirm if the vehicle movements i.e. delivery to customers as referred to in the EMA are captured Site Based Management Plan Hours of Operation.

The Site Based Management Plan and the Environmental Assessment include the same hours of operations, including light and heavy vehicle movements. The site will operate between the hours of 6am and 4pm, with the first hour (6-7am) being limited to only vehicle movements and no milling, woodchipping or maintenance. For the rest of the day (7am-4pm) full operations will take place which includes heavy and light vehicle movements. Please see below for the full explanation of the hours of operations, taken directly from the Site Based Management Plan.

Hours of Operation	The site operates from 6:00am to 4:00pm, Monday to Friday as follows: • Heavy vehicle and light vehicle access from 6:00am to 7:00am. No timber milling, woodchipping or maintenance works are undertaken during this period. • Full operations from 7:00am to 4:00pm. Site maintenance activities are undertaken on Saturdays between 7:00am and 4:00pm, depending on maintenance requirements. No operations at the site shall occur on Sundays or public holidays. Extended operating hours are not required to meet the increased production rate.

3. Please provide a Pavement Impact Assessment (PIA) of the existing pavement to assess its suitability, and recommend any upgrades required to accommodate the proposed traffic loadings. The PIA should include:

- An assessment of the existing pavement depth and material quality;

- An assessment of the pavement life (if any); and

- Improvements required to the pavement structure, and width to accommodate the proposed traffic loadings.

In response to Council PIA request, it is acknowledged that the sawmill has been in operation since the early 1900s before the road was sealed. No major issues have been identified with the road during the sawmill operation.

It should be noted that costs associated with road widening or pavement rehabilitation works for Old Esk Road will be cost prohibitive for the development and will outweigh the benefits. Further to this, the sawmill is not the only site that contributes heavy vehicles to Old Esk Road, with an equal amount of heavy vehicles utilising the section of Old Esk Road to the north of the site access, and additional truck movements associated with the neighbouring plantations to the east of the site.

Therefore, to address the SDRC IR, the pavement of Old Esk Road has been investigated and has determined the following:

- Costs associated with road widening or pavement rehabilitation works for Old Esk Road will be cost prohibitive for the development and will outweigh the benefits.
- A visual inspection indicates that the pavement is in good condition and the low development demands from the development is not expected to have an adverse impact on the structural integrity of the pavement.
- A pavement design comparison justifies the minimal impact as the change in estimated minimum pavement depth due to the development traffic is 18mm which represents a 4.3% increase in pavement depth. This is within the construction tolerance (i.e. ~20mm) and is not considered to be significant.
- A PIA was undertaken using the GTIA methodology using the latest Marginal Cost method. This assessment results in developer contributions for pavement impacts of approximately $5,250 per annum (for the ultimate milling rate of 60,000 tonnes per annum).
- It should be noted that the assessment is conservative as it assumes the site generates the maximum milling each year for 20 years. The milling rate depends on surrounding market conditions and is not expected to consistently peak at 60,000 tonnes per year. In addition to this the trucks are carting timber logs, dressed timber product and sawdust which are volumetrically loaded and not expected to exert maximum loading on the axles.

Therefore, from the above, it is recommended that the developer pay an annual contribution of $5,250 to offset the expected pavement impact that the proposed development has on Old Esk Road. No further upgrades or works are deemed required. Further explanation of the findings can be found in Attachment 1.

CONCLUSION

This is a full response to Council's Information Request which now concludes Part 3 of the DA Rules. Public Notification, Part 4 of the DA rules will now commence. Thank you for reviewing this material. Should you require anything further, please do not hesitate to contact the undersigned on 0448 855 274 or email scott.h@i-p.au

Regards,

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Associate Director

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Our Ref 251114 24E-0202 TRA RFI Response 01

Contact Adam Gwatking

14 November 2025

Pro Pine Pty Ltd
256 Old Esk Road
Taromeo QLD 4314

Attention: Geoff Walton

Dear Geoff,

Project Name: Pro-Pine Sawmill - 256 Old Esk Road | Taromeo
Project No: 24E-0202

RMA Engineers has been engaged by Pro Pine Pty Ltd to provide engineering advice in relation to the expansion of the existing timber milling facility located at 256 & 258 Old Esk Road, Taromeo (the subject site). The expansion includes increasing the current operation of 30,000 tonne milling per annum to 60,000 tonne milling per annum.

This letter has been prepared in response to the traffic and transport items raised in the South Burnett Regional Council (SBRC) Information Request (IR) dated 28 October 2025, SBRC reference MCU25/0032. More specifically, this letter responds to Items 1 and 3. The information request correspondence is included at Enclosure 1.

In this response, reference is made to the traffic impact assessment (TIA) report dated 7 March 2025 by RMA Engineers, which was previously submitted to Council as part of the development application.

The IR item and associated responses are detailed in the following sections.

Council IR response

Item 1 – EMA vehicle movement confirmation request

Issue
Environmental Management Assessment (EMA) waste:

- The submitted material mentions the stockpiling of waste streams in particular trim waste (sawdust product), ground wood and wood waste.

Site Based Management Plan (SBMP):

- The submitted plan stipulates the hours of operation in particular, heavy vehicles will be restricted to 6am to 7am Monday to Friday.

Information Required

1. Please confirm if the vehicle movements i.e. delivery to customers as referred to in the EMA are captured in the heavy vehicle movements listed in the submitted Traffic Impact Assessment (TIA) report.

Figure 1 - Council Information Required - Item 3 – PIA request

Response:

Yes, this has been considered in the TIA. The traffic movements associated with the development were taken over a week period at 30,000tonnes capacity and then extrapolated (i.e. doubled) to get the 60,000tonnes capacity vehicle volumes. All traffic movements that occurred within the week, including customer deliveries, waste, imports and exports of timber, staff movements, misc deliveries etc. were captured in the surveys and subsequently extrapolated.

Item 3 – PIA request

Issue
The proposed development will increase output from 30,000t per year to 60,000t per year. It is unclear if the pavement on the proposed transport route along Old Esk Road is adequate to accommodate the loadings proposed, and damage to the route may result from the additional heavy vehicles.

Information Required

3. Please provide a Pavement Impact Assessment (PIA) of the existing pavement to assess its suitability, and recommend any upgrades required to accommodate the proposed traffic loadings. The PIA should include:
   - An assessment of the existing pavement depth and material quality;
   - An assessment of the pavement life (if any); and
   - Improvements required to the pavement structure, and width to accommodate the proposed traffic loadings.

   Comment: It is noted that the Traffic Impact Assessment (TIA) refers to a special rate charge for road maintenance per the pre lodgement discussions. The special rate charge is only an option that Council may consider and does not negate the need the possibility of road upgrades, hence the request for a PIA.

Figure 2 - Council Information Required - Item 3 – PIA request

Response:

In response to Council PIA request, it is acknowledged that the sawmill has been in operation since the early 1900s before the road was sealed. No major issues have been identified with the road during the sawmill operation.

It should be noted that costs associated with road widening or pavement rehabilitation works for Old Esk Road will be cost prohibitive for the development and will outweigh the benefits. Further to this, the sawmill is not the only site that contributes heavy vehicles to Old Esk Road, with an equal amount of heavy vehicles utilising the section of Old Esk Road to the north of the site access, and additional truck movements associated with the neighbouring plantations to the east of the site.

Therefore, to address the SBRC IR, the pavement of Old Esk Road has been investigated as follows:

1) The current situation – consideration of the current pavement quality and impact of the proposed development expansion on the pavement
2) Future maintenance responsibilities – consideration of future maintenance contributions of the development to mitigate any ongoing impacts

These are discussed further below.

Current pavement situation

Visual inspection undertaken as per the TIA indicates that the current geometry, form and width of Old Esk Road is suitable for the proposed development. Section 9.4.1 of the TIA also specifies that through a visual inspection, the sealed pavement and gravel shoulders are in good condition without any adverse deficiencies identified. Given the age of the pavement (approximately 20 years), and that the development has been in operation since the early 1900s, the road is deemed to be adequate to cater for the traffic demands.

In addition, the site is expected to generate low traffic demands on the external road network, conservatively consisting of approximately 9 additional heavy vehicles per day. This is considered to have a minimal pavement impact due to the low volumes generated, and the relatively low background traffic volumes. It is expected that the construction of the existing road and associated maintenance activities include contingency to cater for such a low number of vehicles.

To further support this, as an alternative approach, the change in pavement design requirements resulting from the development traffic is detailed below. This approach has been undertaken due to the lack of available data with regards to the current pavement construction, depth, material and structure. Undertaking detailed geotechnical testing along the length of the road is deemed onerous and costly, and not considered to be reasonable for the developer during early planning stages of the project, especially given that this road is also impacted by others.

For the pavement design comparison assessment, the following assumptions have been made:

- An estimated subgrade CBR of 4.0.
- No growth applied to the background traffic (conservative) over 20 years.

A comparison of the design traffic and associated minimum pavement depth with and without development traffic is summarised as follows.

Table 1: Old Esk Road pavement design comparison –south of site access

Road	Analysis period	Scenario	Design traffic ESAs (20 years)	Estimated minimum pavement depth (mm)
Old Esk Road	20 years	Background	669,425	423.32mm
		Background with development	966,113	441.32mm
		Difference	**+296,688**	**+18.00mm**

The change in estimated minimum pavement depth due to the development traffic is 18mm which represents a 4.3% increase in pavement depth. This is within the construction tolerance (i.e. ~20mm) and is not considered to be significant.

Therefore, from the above, the development is expected to have minimal pavement impact on the surrounding road network, and no action is required for pavement upgrades for the development.

It is noted that this assessment is considered conservative as it assumes the site generates the maximum milling each year for 20 years. The milling rate depends on surrounding market conditions and is not expected to consistently peak at 60,000 tonnes per year. In addition to this the trucks are carting timber logs, dressed timber product and sawdust which are volumetrically loaded and not expected to exert maximum loading on the axles.

Future maintenance responsibilities

An investigation has been undertaken regarding the pavement impacts of the proposed development on Old Esk Road. The investigation includes the following:

- Discussion of applicable methodology for undertaking the pavement impact assessment (PIA).
- Identification of the development traffic loadings, in standard axle repetitions (SAR4s) for Old Esk Road.
- Calculation of applicable monetary contributions for the development impact on the pavement of Old Esk Road.

The outcomes of the above investigation are discussed in the relevant sections below.

Pavement Impact Assessment methodology

A number of Council's use the older and outdated Department of Transport and Main Roads (DTMR) methodology for the assessment of development pavement impacts. This includes the Guidelines for Assessment of Road Impacts of Development (GARID) released in 2000 and the subsequent Hicks methodology released in 2012. This was presented in a form of a MS Excel spreadsheet which calculates the maintenance and rehabilitation costs for the road segment based on both 'background' scenario and 'background with development' scenario.

The old methods have issues with outdated costings (supplied as 2007 values adopted for State Controlled roads) and are also inconsistent in the approach to calculating routine maintenance costs (Jones, B. and Waskiw, P. (2013)). These older methods are also data intensive in which SBRC has not supplied specific roughness, maintenance and rehab costing data for Old Esk Road.

It was identified that the older methods can produce a widely varied and unrealistic pavement contribution results just by differences in the background traffic volumes and unchanged development volumes (i.e. a recent example in Rockhampton resulted in $24 million versus $3 million total cost over the pavement life for different background volumes of less than 50 heavy vehicles per day – Note: these values were based on a number of initial assumptions/inputs).

Therefore, due to the above, the latest, updated PIA process has been adopted from the DTMR Guide to Traffic Impact Assessment (GTIA). This updated process was released in 2017 and uses the Marginal Cost methodology which calculates pavement contributions based on costs per standard axle repetitions for road-wear. The contribution amount is calculated from the Freight Axle Mass Limits Investigation Tool (FAMLIT) and is arguably the most realistic economic theory for estimating the cost of pavement impacts due to development traffic (Jones, B. 2018). This method doesn't rely on background traffic and the developer pays a set amount per standard axle repetition (SAR4).

Therefore, the PIA for Old Esk Road has been undertaken using the latest GTIA Marginal Cost method.

Pavement Impact Assessment

An assessment of the pavement impacts resulting from the development traffic has been carried out for Old Esk Road, at the ultimate opening year (2036). It is evident from the low background traffic volumes that the development traffic exceeds 5% background axle loadings.

The development traffic includes both B-Double vehicles (Class 10) and Semi-trailers (Class 9). It should be noted that the assessment is conservative as it assumes the site generates the maximum milling each year for 20 years. The milling rate depends on surrounding market conditions and is not expected to consistently peak at 60,000 tonnes per year. In addition to this the trucks are carting timber logs, dressed timber product and sawdust which are volumetrically loaded and not expected to exert maximum loading on the axles.

Table 2 below illustrates the development traffic volumes, and traffic loadings in standard axle repetitions (SAR4s) for Old Esk Road.

Table 2: Development HV volumes and SAR4s along Old Esk Road

Trip type	Vehicle class	Loaded			Unloaded			Total SAR4
		Yearly demand	SAR4 per vehicle	SAR4 per year	Yearly demand	SAR4 per vehicle	SAR4 per year	
Imports	Semi	1,209	4.93	5,960	1,209	0.51	617	6,577
Exports	B-Double	1,209	6.30	7,617	1,209	0.53	641	8,257
							Total yearly SAR4	**14,834**

Table 3 illustrates the total annual development contribution for the pavement impacts on Old Esk Road.

Table 3: Development annual contribution for Old Esk Road

Development SAR4 (total) per annum	Marginal Cost (cents per SAR-km)	Route length (km)	Total annual contribution cost
14,834	13.6	2.6	$ 5,245.00

From Table 3, the PIA assessment results in developer contributions for pavement impacts of approximately **$5,250 per annum** (for the ultimate milling rate of 60,000 tonnes per annum).

Note: In the absence of Council maintenance data, the marginal cost used is the average cost for the granular pavements of the State Controlled Road (SCR) network, as per the GTIA Practice Note: *Pavement Impact Assessment December 2018* (Section 2.3). This is illustrated in Figure 3 below.

2.3 Network statistics

Table 6 provides a summary of the SCR network by pavement type. The vast majority of the sealed SCR network is constructed with GN pavement. The average marginal cost for GN is significantly higher than AC and CS. This is due to the wide variation in the structural capacity of GN pavements, with measured strength values being lower and more variable, and environmental effects.

Table 6: SCR network overview

Type	Length of pavement network	% of network	Average marginal cost	Damage unit
Sealed roads with granular pavement (GN)	24,886 km	82%	13.60 cents / SAR-km	SAR4
Sealed roads with asphaltic concrete pavement (AC)	2,523 km	7%	4.87 cents / SAR-km	SAR5
Sealed roads with cement stabilised pavement (CS)	2,761 km	8%	3.69 cents / SAR-km	SAR12
Sub total	30,171 km	88%	11.94 cents / SAR-km	-
Unsealed roads	4,277 km	12%	14,84 cents / LU-km	LU
Total	34,448 km	100%	-	-

Figure 3 – PIA Marginal Cost Data

Conclusion

The following has been determined from the pavement investigation:

- Costs associated with road widening or pavement rehabilitation works for Old Esk Road will be cost prohibitive for the development and will outweigh the benefits.
- A visual inspection indicates that the pavement is in good condition and the low development demands from the development is not expected to have an adverse impact on the structural integrity of the pavement.
- A pavement design comparison justifies the minimal impact as the change in estimated minimum pavement depth due to the development traffic is 18mm which represents a 4.3% increase in pavement depth. This is within the construction tolerance (i.e. ~20mm) and is not considered to be significant.

- A PIA was undertaken using the GTIA methodology using the latest Marginal Cost method. This assessment results in developer contributions for pavement impacts of approximately **$5,250 per annum** (for the ultimate milling rate of 60,000 tonnes per annum).
- It should be noted that the assessment is conservative as it assumes the site generates the maximum milling each year for 20 years. The milling rate depends on surrounding market conditions and is not expected to consistently peak at 60,000 tonnes per year. In addition to this the trucks are carting timber logs, dressed timber product and sawdust which are volumetrically loaded and not expected to exert maximum loading on the axles.

Therefore, from the above, it is recommended that the developer pay an annual contribution of **$5,250** to offset the expected pavement impact that the proposed development has on Old Esk Road. No further upgrades or works are deemed required.

We trust the above adequately covers the issues raised. Please contact the undersigned if any further information is required.

Yours sincerely,

Adam Gwatking
Associate | Principal Engineer (Traffic | Transport | Civil)
BE (Civil), RPEQ 15158, CPEng
RMA ENGINEERS PTY LTD

Enclosures:

1. *SBRC IR correspondence*

Enclosure 1 – SBRC IR Correspondence