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19 December 2025

Planning and Assessment Division
Department of Planning, Housing and Infrastructure
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By email: melanie.hollis@planning.nsw.gov.au

Attention: Melanie Hollis

EPA Advice on Amendment Report for the Hanson Tweed Sand Plant Expansion (SSD-10398)

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Amendment Report for the Hanson Tweed Sand Plant Expansion (Application SSD10398) at Altona Road, Cudgen NSW. Documents considered as part of this review included:

- ELKN PTY LTD - *Hanson Tweed Sand Plant Expansion* - Amendment Report - 21130 - AR No.1 Rev B - dated 1 November 2025.
- Gilbert & Sutherland (G&S) - Letter to Heidelberg Materials Australia, Re: Impact assessment letter for the proposed Tweed Sand Plant Expansion - dated 1 October 2025.
- ATP Consulting Engineers - Letter to Hanson Construction Materials Pty Ltd. Re: Hanson Tweed Sand Plant (HTSP) Expansion at Altona Road, Cudgen - dated 27 October 2025.
- Katestone Environmental Pty Ltd – Letter to Heidelberg Materials Australia, Re: Tweed Sand Plant Expansion Project - AQ Review Memo - dated 26 September 2025.

The project entails the proposed expansion of the existing Hanson Tweed Sand Plant (HTSP) in Cudgen NSW. The project name is Hanson Tweed Sand Plant Expansion Phase 5 to Phase 11.

Based on the information provided the proposed modification represents a reduction in the overall extraction footprint, a reduction in soil and water interference and provides increased opportunities for the creation of riparian zones and revegetated areas.

There are changes to the project description and potential impacts, mitigation measures & residual impacts. These are summarised below.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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Project Description

Under the amended version of the project, the proposed expansion footprint reduced from approximately 190ha to 188ha. Thus, the resulting total footprint for HTSP reduced from approximately 236ha to 234ha. The site will be subject to progressive rehabilitation resulting in a naturalised final landform. Total rehabilitation area under the amended version of the project increased from approximately 38.21 to 44.33 hectares, or over 18% of the site (previously 16%).

Water (Flooding)

Under the amended version of the project, some changes occur to peak flood levels. These comprise:

1. In the regional 20% AEP event with 20% AEP tailwater conditions:
 - a. There are large areas of water level decrease (up to 70 mm) on and offsite due to Phase 11 conditions.
 - b. Water levels at the northern portion of the Road Reserve are increased by up to 20 mm, however this increase is considered insignificant in comparison to existing flood depths at this location (up to 620 mm) and would not impact vehicle trafficability (already not trafficable in existing conditions).
 - c. Overall, there are no material water level increases offsite.
2. In the regional 20% AEP event with 1% AEP tailwater conditions (refer to Map FL06):
 - a. Water level differences are immaterial (primarily within ± 10 mm difference) and there are no material water level increases offsite. The proposal results in negligible offsite flood impacts.

Biodiversity

Under the amended version of the project, some changes occur to residual impacts on biodiversity.

There remains progressive removal of 2.3ha of vegetation, less than the 3.82 ha of vegetation previously required. Less land will also be required to be rehabilitated, 1.19ha, previously 2.06ha. This 3.49ha loss (previously 5.72ha) will also be offset via the progressive rehabilitation of approximately 44.33ha (previously 38.21ha) of land on the project site.

The Rehabilitation Management Plan prepared by JWA Ecological Consultants was updated to October 2025 (previously May 2024).

Conclusion

The change in footprint has been considered against the outcomes and conclusions of the previous impact assessments. As the proposed modification represents a reduction in the overall extraction footprint, the development area is correspondingly smaller than previously assessed. Overall, the changes in the phasing plans for the expansion of the HTSP does not present a material difference to the investigations, findings, and recommendations presented in the reports prepared as part of the overall Environmental Impact Statement (EIS) prepared previously.

Previous advice provided by EPA in respect of the requirements for the environmental assessment for the project, continues to be applicable, and the findings of the assessment remain valid for the updated site plans. The change does not alter the nature or extent of potential impact pathways previously assessed, nor does it introduce new considerations requiring additional mitigation. Accordingly, no changes to the outcomes or conclusions of the previous assessments are required.

The Proponent should be made aware that any commitments made in the EIS may be formalised as approval conditions and may also be established as formal licence conditions.

If you have any questions, please contact Benjamin Garrett on 02 6640 2558.

Yours sincerely

A handwritten signature in black ink, appearing to be 'LD' with a horizontal line extending from the bottom.

Luke Davison
Unit Head Operations North Coast
NSW Environment Protection Authority