



Your ref: SSD-10398
Our ref: DOC25/1043093-17

Principal Planning Officer
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2150

Attention: Ms Melanie Hollis

Dear Ms Hollis

RE: Tweed Sand Plant Expansion – Amendment Report, Cudgen, Tweed LGA (SSD-10398)

Thank you for your notification on the NSW Major Projects Portal dated 5 December 2025 about the proposed amendment for the Tweed Sand Plant Expansion at Cudgen seeking comments from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water. I appreciate the opportunity to provide input.

CPHR has reviewed the Amendment Report prepared by Elkn dated 5 November 2025 and associated documents.

We understand the amendment includes changes to the project footprint, removal of the unnamed road reserve from the project area, phasing of the project and changes to the final landform.

We note the revisions to associated documents are generally numerical, for example, the footprint is now 234 ha (previously 236 ha), and rehabilitation covers 44.33 ha (previously 39.24 ha).

The Amendment Report provides a summary of changes made since project lodgement but does not address any of the issues raised and recommendations provided in our previous letter to the Department of Planning Housing and Infrastructure (DPHI) dated 1 July 2025 (DOC25/451692-12).

Regarding coastal processes and hazard matters, the Amendment Report and associated documents has not addressed the issues raised and recommendations provided in our letter to DPHI dated 1 July 2025.

Attachment 10 Flood Modelling advice prepared by Martens dated 29 September 2025 (Figure 1 below) highlights the pathways for connection between the proposed site to the estuary during a design storm that comprises a 20% catchment event and a 1% Tailwater. The specific water level heights for these events are not provided within the report.

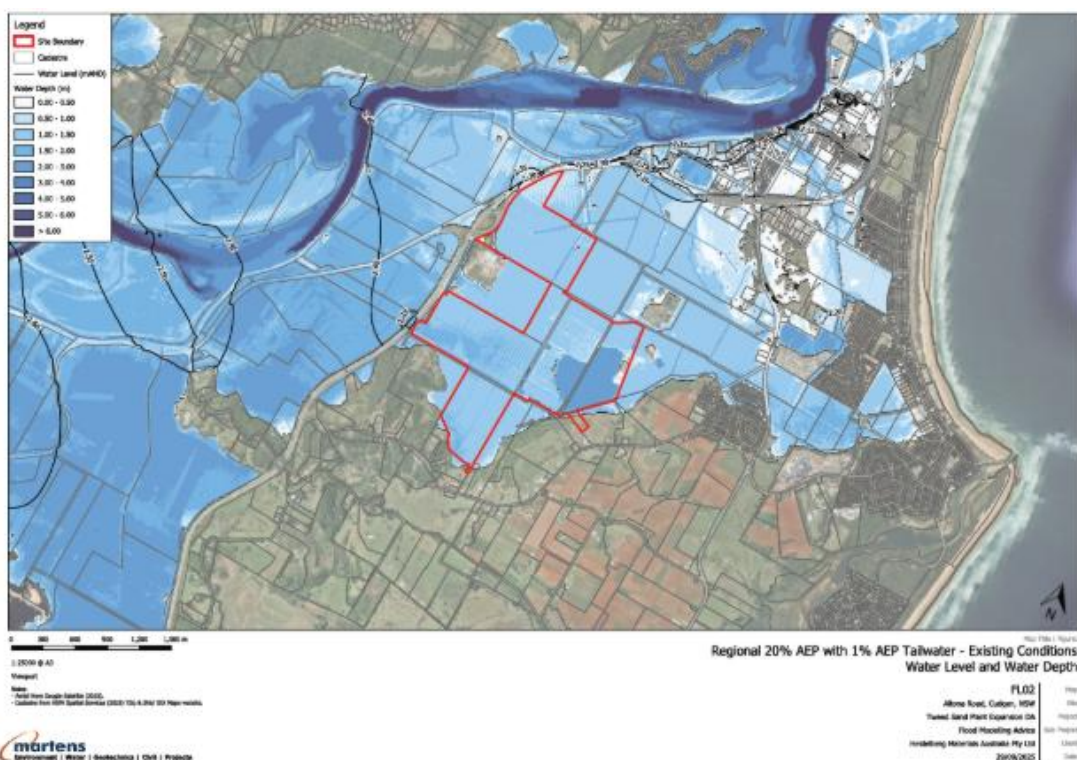


Figure 1 Attachment A of Attachment 10 Flood Modelling Advice

The amendments described in the revised reporting do not address any of the issues raised relating to coastal processes and hazard matters in our letter dated 1 July 2025.

In summary, CPHR recommends that:

1. Further information, including a response table indicating the relevant section of the revised report, be provided to address the specific issues and recommendations raised in the CPHR letter dated 1 July 2025 (DOC25/451692-12).
2. Information be provided that addresses relevant State Environmental Planning Policy (Resilience and Hazards) 2021 matters, with a particular focus on whether the proposed development is likely to cause:
 - a. an increased risk of coastal hazards on the subject land or other land, and providing measures to avoid any increased risks
 - b. an adverse impact on the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment
 - c. an adverse impact on the coastal environmental values and natural coastal processes.

If you have any further questions about this issue, please contact Mr Dimitri Young, Senior Conservation Planning Officer North East, CPHR, on 6659 8272 or at dimitri.young@dcceew.nsw.gov.au.

Yours sincerely

TROY NORTHEY
A/ Director North East Branch
Conservation Programs, Heritage and Regulation

19 December 2025