

Director, Minerals & Quarry Assessments
Planning Group, Department of Planning and Environment
4PSQ, 12 Darcy Street
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Ms Melanie Hollis, Principal Planning Officer

Dear Ms Evans

RE: Revised BDAR Spatial Data –Tweed Sand Plant Expansion, Cudgen Tweed LGA (SSD-10398)

Thank you for your request dated 27 June 2022 to review the revised spatial data and provide further comment about the proposed Tweed Sand Plant Expansion at Cudgen seeking comments from the Biodiversity and Conservation Division (BCD) of the Biodiversity, Conservation and Science Directorate in the Environment and Heritage Group of the Department of Planning and Environment. I appreciate the opportunity to provide further input.

As noted in our response dated 3 June 2022, we were unable to undertake a thorough review of the Biodiversity Development Assessment Report (BDAR) as the spatial data provided did not align with the revised BDAR Vegetation Zones. We did receive revised spatial data, however not in time to meet our response deadline.

We have now reviewed the revised spatial data and identified some minor discrepancies in the impact areas as described in detail in **Attachment 1**. We recommend the BDAR calculations be reviewed and rectified. However, we consider this should only be done once all our previous recommendations have been fully addressed as they will affect the final extraction footprint and the extent of the rehabilitation areas.

We continue to reiterate our position that the proposed Tweed Sand Plant Expansion proposal has some significant issues as outlined in our letter dated 3 June 2022 and we look forward to our meeting on 19 July 2022 when we will be able to discuss these issues in detail.

In the meantime, if you have any questions about this advice, please do not hesitate to contact Ms Rachel Lonie, Senior Conservation Planning Officer, at rachel.lonie@environment.nsw.gov.au or 6650 7130.

Yours sincerely



6 July 2022

DON OWNER
A/Senior Team Leader Planning, North East Branch
Biodiversity and Conservation

Enclosure: Attachment 1: Detailed BCD Comments – Revised Spatial Data Tweed Sand Plant Expansion, Cudgen

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The Biodiversity and Conservation Division has reviewed the revised spatial data (vegetation zones, site boundary and the impact staging layers) provided by Mr Adam McArthur via email dated 3 June 2022.

We have compared the areas identified to be impacted by the proposed extraction with the descriptions of the final landform in the End Use Plan and Concept Rehabilitation Phasing as described in the Biodiversity Development Assessment Report (BDAR). As we have previously noted, the staged rehabilitation plans are presented at too large a scale and are too diagrammatic to be able to adequately comment on them. However, we note there are discrepancies in some impact areas identified in the BDAR.

As described in Figure 1 below, some of the Approved Riparian Rehabilitation Area has not been identified as a loss despite the proposed expanded sand extraction area extending into it during the Phase 6 works.

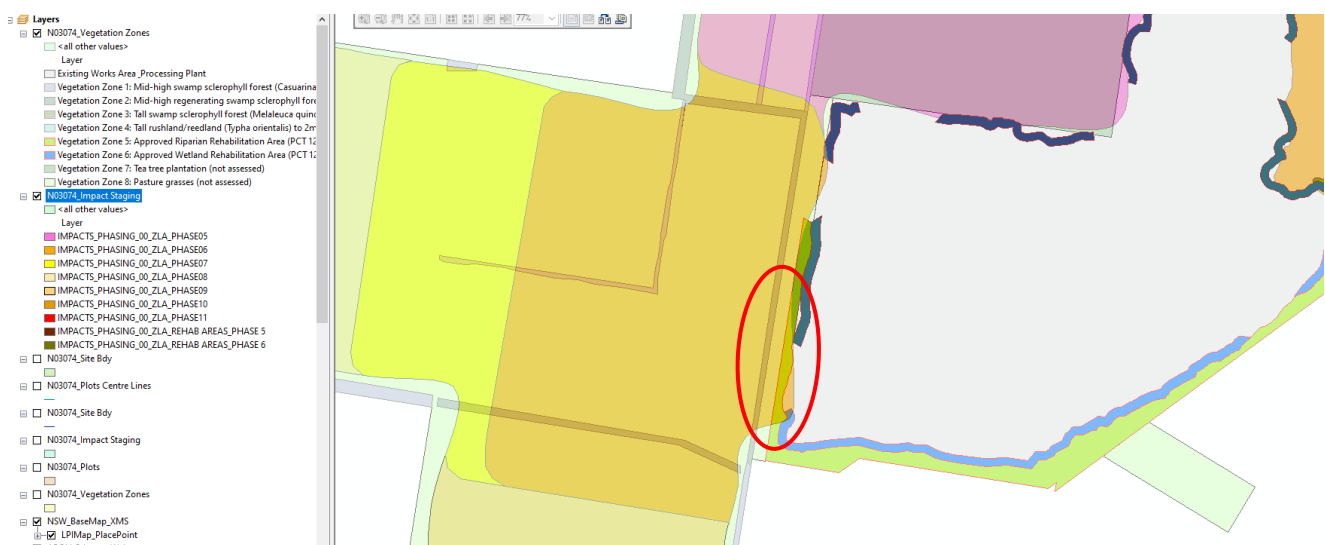


Figure 1. Area circled in red (Approved Riparian PCT 1235 within Phase 6 works) has not been included in the BDAR Direct Impacts on Vegetation calculations.

We also note discrepancies with the extent of rehabilitation areas as mapped in the End Use Plan in the *Concept Rehabilitation and Landscape Management Plan* (April 2022 JWA) compared to the mapping of retained Approved Riparian PCT 1235 and Approved Wetland PCT 1290 communities as shown in Figure 2 below.



Figure 2. Approved Riparian PCT 1235 (green polygon outlined in red) and Approved Wetland PCT 1290 (blue polygon outlined in red) mapping compared to rehabilitation areas as described in the End Use Plan.

There are also areas that have not been included as a loss however they appear to be unlikely to be retained. For example, areas of Vegetation Zone 1 that are adjacent to the proposed haul road are not included in the loss calculations. Also, the strip of Vegetation Zone 2 appears likely to be

impacted by the future building and wash plant as shown in Figure 3 below and would also require protection and ongoing management.

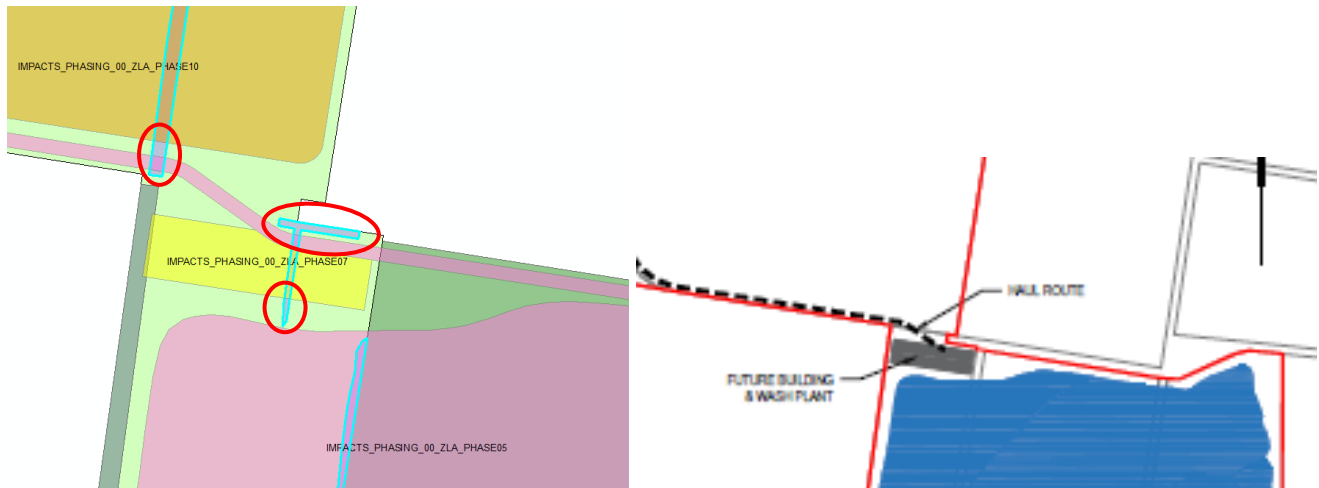


Figure 3. Small areas of Vegetation Zone 1 adjoining the proposed haul road have not been calculated in the losses (circled in red). Also, the strip of Vegetation Zone 2 on the western boundary appears likely to be impacted by the future building and wash plant.

While these are relatively small discrepancies, we consider the calculation of losses need to be reviewed and revised in the BDAR. This should only be done once our previous recommendations have been fully addressed as they will affect the final extraction footprint. For example, our previous recommendations regarding the final landform and rehabilitation widths will alter the areas that will be impacted and should result in a reduced credit obligation.

BCD Recommendation

The BDAR calculations should be reviewed and rectified once all our previous recommendations have been fully addressed as the implementation of our recommendations will affect the final extraction footprint.