

8 February 2018

Hanson Construction Materials Pty Ltd
Tweed Sand Plant
Altona Road
Cudgen NSW 2487

Attention: Mr Phil Cole

Dear Sir,

Re: Cudgen Lakes Sand Quarry Modification No.2 of PA 05_0103B, Gales-Kingscliff Pty Ltd – Hanson Construction Materials Submission

Hanson Construction Materials (HCM) instructed Gilbert & Sutherland Pty Ltd (G&S) to provide initial advice relating to a Modification Application made by Gales-Kingscliff Pty Ltd (Gales). This advice was to be made in respect of HCM's operations at its Tweed Sand Plant (TSP), Cudgen, New South Wales. This letter constitutes that advice.

Background

Gales has submitted a Modification Application ('the Application') to the Department of Planning and Environment and HCM has instructed G&S to provide this advice. G&S not only provides advice to HCM but has, in the past, provided advice to Gales to support its 2009 approval on the relevant property.

Advice to HCM

In its Application, Gales has relevantly applied to:

- decrease lake batters from 1:5 to 1:3
- develop land to the north of a newly combined extraction area as soon as possible

HCM should ascertain from Gales that the form of the development to the north of the extraction area will not engender conflict given the use of Altona Road for both Gales' and TSP sand product deliveries.

There should be no impact to HCM with the proposed re-alignment providing there are no cost implications for HCM and that TSP access is maintained at all times. In respect of the responsibility for any intersection works at Altona Road/Crescent Street and Crescent Street/Tweed Coast Road, HCM should submit that it remains content with the current

arrangements, where Gales would fund the required changes. We note that Gales delivery hours differ from those at TSP. We note further that;

- In comparison to HCM's EA prepared for TSP MOD1, there is an apparent lack of technical detail in the Application to support the conclusions that have been reached.
- It is not clear whether the application forms a 'Major Modification' or otherwise. We note that both MODs are classed as having a 'Part 3A Mod' assessment type on the DPE major projects planning portal.
- The exhibition period is listed between 24 January to 8 February 2018. The site is possibly a 'State Significant Development' (DG's Assessment normally cites this as a 'Major Project'). If it is a 'State Significant Development', the minimum exhibition period is 30 days. Indeed, this was the case for the TSP MOD1.
- No modelling has been presented that supports the conclusions concerning comments around changes air quality, noise and groundwater impacts. The TSP MOD1 necessarily included air quality, noise and traffic modelling to support the findings as DPE demanded quantitative modelling for noise and air quality be completed.
- With respect to noise impacts, the dredge would operate in closer proximity to the northern receptors, but the Application does not acknowledge this nor demonstrate that the dredge noise would not exceed the Consent conditions.
- Similarly, the proposed new alignment of Altona Road moves it closer to those two receptors on Tweed Coast Road (east of Bore 5), therefore there is the potential for increased traffic noise from Altona Road. Section 4.3 (noise) of the Application is silent on this.

We trust this is acceptable. Please do not hesitate to contact this office should you require any further details or elaboration.

Yours sincerely,



Erin Holton
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BEnvSc MEng(Env)



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Your Reference

By ☐ Courier ☒ Email ☐ Facsimile ☐ Post

Enclosures – Nil