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Jarrold Blane
Senior Environmental Assessment Officer
Energy, Resources and Industry | Planning and Assessment
Department of Planning, Housing and Infrastructure

April 2, 2026

Title:	SSD6519 Dolwendee Quarry Post Approval Matter: Blast Management Plan
Relevant Condition/s:	Schedule 3, Condition 9
Purpose:	Waive requirement for a Blast Management Plan

Dear Jarrod,

Upper Hunter Holdings (UHH) is the Applicant and operator for the approved Dolwendee Quarry (SSD6519). With MOD1 now approved Upper Hunter Holdings (UHH) is addressing post approval consent matters and preparing to commence construction.

This correspondence relates to one post approval matter required by the consent – a Blast Management Plan (BMP) (Schedule 3, Condition 9).

UHH has undertaken further investigation of the sandstone/conglomerate resource and determined that the relative strength and softness of the material make it suitable for extraction by conventional techniques like dozer ripping and unsuitable for blasting. Blasting is currently not proposed.

On the basis that blasting operations will not be undertaken at this time there are obviously no associated blasting risks. Common sense dictates that a BMP is not required if there is no blasting. UHH is seeking the Secretary's approval to waive the requirement for a BMP.

The relevant condition provides discretion to the Secretary through the words "*unless otherwise agreed by the Planning Secretary*". Sensible use of this discretion could align with a view that the BMP is not required under these circumstances. Such a view would not be inconsistent with the condition.

Specifically, clause (b) of Condition 9 states the plan must:

(b) be submitted to the Planning Secretary for approval prior to the commencement of quarrying operations under this consent, unless otherwise agreed by the Planning Secretary;

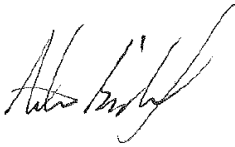
Furthermore, Condition 2 in Schedule 5 outlines Management Plan Requirements. The Note to this clause provides additional discretion to the Secretary to waive requirements that are unnecessary or unwarranted for particular management plans.

We would argue that better wording of the clause (b) of Condition 9 in Schedule 3, would be achieved by replacing the words "quarrying operations" with "blasting operations". It would then be clear that blasting could only be undertaken once an approved BMP is in place. Would the Department be in a position to make such an amendment to the condition ?

Though unlikely, if in the future the need for blasting arose, the Condition would obviously remain active and a BMP would need to be prepared prior to commencing any blasting.

We look forward to your response on the above matter.

Regards,



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On behalf of:



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