

Submission Objection to the Bluestone Hardrock Quarry Project (SSD-76210271)

To: Department of Planning, Housing and Infrastructure, NSW Government **Application:** Bluestone Hardrock Quarry Project SSD-76210271

Site: Lot 5 Springvale Road, Elderslie and Blind Creek Road, Glendon Brook, Singleton LGA

Date: June 25th 2026

Position: I OBJECT to this application and request that it be refused.

I am a resident of Tangory Rise, approximately 3.5 kilometres from the proposed quarry. As a directly affected resident, I object to this application. Having reviewed the exhibited Environmental Impact Statement (EIS, May 2026) and its technical appendices, my objection is that the EIS does not discharge the proponent's onus to demonstrate the impacts are acceptable: it destroys a critically endangered, federally listed ecological community and relies on contestable biodiversity conclusions; it routes heavy haulage over a one-lane heritage bridge and through an intersection already operating at the worst level of service; and it defers critical road works and their funding to agreements not yet made. The proposal is contrary to the public interest under the *Environmental Planning and Assessment Act 1979*.

My interest in this application is direct. The air-quality assessment concludes the project would meet the particulate and silica criteria, yet none of its eleven modelled receptors is my home, and the meteorological model behind those predictions did not meet the wind-direction benchmarks that govern where dust travels. The permanent loss of 59 hectares of native vegetation, and the degradation of the Tangory landscape my street is named for, are borne by my locality, not by the proponent. For the reasons set out below, I respectfully request that the Department recommend, and the consent authority determine, that **SSD-76210271 be refused**.

Grounds for objection

1. The project destroys a critically endangered, federally listed ecological community.

The Biodiversity Development Assessment Report (Appendix F) confirms the removal of 59.30 ha of native vegetation, including PCT 3315 (Central Hunter Ironbark - Spotted Gum Forest): about 39.7 ha is a threatened ecological community under the NSW Biodiversity Conservation Act 2016, and 32.67 ha is the Central Hunter Valley Eucalypt Forest and Woodland, listed as critically endangered under the EPBC Act. The Commonwealth determined the project a controlled action precisely because it is likely to significantly affect this community and two further critically endangered matters, the Regent Honeyeater and Swift Parrot (MNES Assessment, Appendix G). That assessment concedes the community will be "completely removed" within the disturbance footprint, then argues this is not a significant impact because it equals less than 0.09% of the community's national extent and will be offset. A comparison to a national total does not erase the loss of a good-condition occurrence the BDAR maps as directly connected to Tangory Nature Reserve; the 974

ecosystem credits this clearing requires cannot recreate it; and final EPBC approval which NSW cannot grant remains required. The proponent's "insignificance" case sits in direct tension with the Commonwealth's own determination.

2. An Endangered species loses 41 hectares of foraging habitat adjoining its breeding refuge. The BDAR records the Large-eared Pied Bat, Endangered under both the BC Act and the EPBC Act at four locations on the site, and the project removes 41.31 ha of its foraging habitat (offset by 1,521 species credits). The BDAR finds no serious and irreversible impact only because no breeding habitat lies within the site, the nearest being just over 500m away in Tangory Nature Reserve yet, on the BDAR's own mapping, the cleared habitat is directly connected to that reserve. Offset credits purchased elsewhere do not protect this local population from losing foraging range immediately adjacent to its breeding refuge, and whether a test that turns on the absence of on-site breeding habitat adequately captures that loss warrants independent scrutiny.

3. The favourable air-quality finding rests on a model that fails its own wind-direction test, and does not assess my property. The Air Quality Impact Assessment (Appendix I) concludes the project would not exceed the criteria for PM_{2.5}, PM₁₀, TSP, dust deposition or respirable crystalline silica at the assessed receptors. Three limitations qualify that conclusion. First, the meteorological model driving the predictions did not meet the NSW wind-direction performance benchmarks (gross error 36° against a ≤30° benchmark; bias 16° against a ≤±10° benchmark) wind direction governs where dust travels, and the site lies in complex valley terrain.

Second, the assessment models eleven nominated receptors (R01–R10, and the Pet Motel C01, the business Singleton Council expressly asked be assessed), none of which is my dwelling at Tangory Rise. Third, the silica result is not based on testing the rock's silica content but is derived by assuming the modelled PM_{2.5} increment is wholly crystalline silica so it is only as reliable as the dust modelling beneath it. These matters warrant independent NSW EPA scrutiny before the "no exceedance" conclusion is relied upon.

4. Groundwater and water-resource risks are managed, not eliminated. The Water Resources and Hydrogeological assessments (Appendices J and M) predict pit dewatering rising to 22 kL/day by year 30 and describe drawdown as "largely confined" to the pit. Given the site's position near the Mooki–Hunter Thrust and its connection to the Glendon Brook and Hunter River systems, State water resources under the *Water Management Act 2000*, the precautionary principle weighs against accepting "largely confined" predictions where the bores and rainwater supplies of surrounding properties and agriculture are at stake. Sediment controls and ongoing monitoring manage but do not eliminate this risk.

5. The haul route runs over a one-lane heritage bridge and through an already-failing intersection, and key findings depend on unenforced restrictions. Up to 220 truck movements a day of 50-tonne vehicles would use the single-lane Elderslie Bridge over the Hunter River, a local heritage item (LEP I14), and the New England Highway / Wine Country Drive intersection, where the right-turn already operates at Level of Service F, the worst rating. The Transport Assessment (Appendix L) asserts the quarry's added heavy-vehicle traffic has "no impact" on this failing movement, a conclusion warranting independent scrutiny. No structural assessment of that heritage bridge has been undertaken for sustained 50-tonne haulage; the proponent's consolidated mitigation schedule (Appendix D) records only that TfNSW "has not requested" one. Its favourable findings for the bridge

and for school buses also rest on operational restrictions, namely that haulage will avoid the afternoon peak and school-bus times, whose enforcement as binding, monitored conditions is essential but not yet secured.

6. Critical road works and costs are deferred to agreements not yet made. The Transport Assessment (Appendix L) concedes that about 300 m of Springvale Road must be widened for heavy vehicles under a Voluntary Planning Agreement, and that Section 7.11 contributions are only "understood" to provide sufficient funds to maintain and upgrade the haul route "if and when these works are required." None of this is secured or quantified, and maintenance is framed as reactive rather than guaranteed, leaving Singleton Council and its ratepayers exposed to any shortfall.

7. The gas-pipeline conflict is unresolved on the proponent's own evidence. The EIS asserts that Appendix V demonstrates the quarry can co-exist with the Queensland-Hunter Gas Pipeline. It does not. Appendix V, authored by the proponent, sets out its own "Unresolved Issues": the alignment conflict is undetermined, "no mitigation measures have been agreed," the Route Change Request put to Santos in July 2025 has drawn no formal response, and critically blasting exclusion zones and "vibration impacts on pipeline integrity" remain unresolved. No easement is registered. A blasting operation whose compatibility with a high-pressure gas corridor is, on the proponent's own admission, unresolved should not be approved on an assurance that these matters are merely "resolvable" later.

8. Need is asserted; the least-impact option is not demonstrated. The justification (Section 2.5 and Chapter 7) rests on regional housing and infrastructure demand, but does not demonstrate that existing or approved quarries cannot meet that demand, or that this site, adjoining a conservation reserve and clearing a federally listed community, is the least-impact location.

9. The 30-year application understates the true horizon. The EIS records a potential resource life of up to 50 years. The impacts assessed over 30 years foreshadow a longer operation and a likely future extension, whose cumulative effects are not before the consent authority now.

The claimed benefits do not alter this conclusion. The Economic Impact Assessment (Appendix R) supports up to 15 full-time jobs, a small benefit against externalised, long-tail costs the State and Council carry: the biodiversity offset liability, and the maintenance of the haul route and its one-lane bridge. The "secured local supply" rationale is undercut by the proponent's own assessment, whose greenhouse-gas calculation (Appendix I, Section 9.1) assumes an average 200 km return haul per load, markets far beyond the 30-minute local catchment the proposal emphasises. Charitable contributions, whatever their merit, are not a relevant planning consideration and cannot offset these impacts.

For the reasons above, I respectfully request that **SSD-76210271 be refused.**

Resident

Tangory Rise