



1 July 2026

Major Projects Assessment Team
NSW Department of Planning, Housing and Infrastructure
Attn: Jarrod Blane
Submitted via Major Projects Portal

Dear Jarrod,

Subject: SSD-76210271 Bluestone Hardrock Quarry Project - Objection

1 EXECUTIVE SUMMARY

This submission is provided on behalf of Belford Land Pty Ltd with technical inputs from Way Planning and Advisory and others, including REAP-certified planners.

As a long-standing primary stakeholder and major investor in the strategic growth, residential development and urban renewal of the Branxton sub-region, Belford Land welcomes the opportunity to provide feedback on the Bluestone Hardrock Quarry Project proposed at Elderslie and Glendon Brook, north of Branxton.

While the Environmental Impact Statement (EIS) attempts to frame the project as an insular, low-impact extractive resource operation, a critical review of the documentation reveals that the proposal systematically **externalises its structural, environmental, and economic costs onto the Branxton sub-region's community and public infrastructure**. The project represents an incompatible land use that directly threatens the safety of residential communities, undermines significant public and private investment in the Branxton Town Centre, ignores cross-LGA jurisdictional infrastructure frameworks, and compromises critical sub-regional growth corridor outcomes.

A technical review of the EIS and its supporting documentation (provided at **Appendix A**) establishes that the proposal is built upon fundamentally incomplete engineering documentation, missing data baselines, and internal contradictions, which collectively represent a systemic failure to evaluate localised impacts. Specifically, the proposal seeks to operate a high-impact, high-volume heavy transport operation over a local regional road network in a rural residential setting, effectively externalising its logistics and environmental costs onto public infrastructure, adjacent developers, and local ratepayers.

Most notably, the proposal's core commercial justification – that the quarry is a critical infrastructure enabler for the Anambah to Branxton Regionally Significant Growth Area – stands in direct conflict with the physical reality of its layout. In practice, the project's unmitigated heavy transport corridor will physically sever, devalue, and paralyse the adopted Branxton sub-regional planning directives within very growth corridor it claims to support.

Belford Land urges the Department to defer any decision until the proposal's deficiencies are fully resolved. Strategically, the application must be refused as, on balance, it is fundamentally

contrary to the public interest. However, if it should proceed, Belford Land have requested a series of consent conditions to mitigate anticipated adverse impacts to its interests within the Branxton sub-region, including Radford Park estate and Branxton's Town Centre.

2 GENERAL ASSESSMENT AND TECHNICAL DEFICIENCIES

A technical review of the application documentation is provided at **Appendix A**. This reveals several systemic issues with the proposal, largely because of:

1. Its reliance on a conceptual "Indicative Project Layout" rather than a fully engineered solution for the site, and
2. Gaps in certain sub-assessment scopes that effectively omit potential impacts arising from its haulage route.

This lack of definitive detail leaves the performance claims of multiple sub-assessments underpinning the application unable to be validated, creating several environmental and compliance gaps that must be resolved prior to determination.

Crucially, the proposed quarry pit directly intersects the physical alignment of the Queensland-Hunter Gas Pipeline Project, creating a significant strategic infrastructure conflict. The EIS treats this critical risk as an 'unresolved' issue reliant on an unexecuted route change request with Santos, reflecting a potentially prohibitive dependency.

The scale of additional information, structural redesign, and expanded modelling required to rectify the omissions identified in **Appendix A** will constitute a material amendment to the project and Belford Land would welcome the opportunity to provide feedback to another comprehensive re-exhibition of the updated application, specifically in relation to the following matters:

- **The commercial and social viability of Branxton's Town Centre**, given the project's haulage route bisects its functional service catchment.
- **Noise impacts along the entirety of the haulage route**, particularly for the rural residential and peri-urban interfaces along Elderslie Road.
- **Highway / Motorway feeder network performance standards**, particularly where these coincide with local community and commuter traffic.
- **Single-route emergency (bushfire) evacuation risks**, given the project is relying on a performance-based solution.
- **Cross-jurisdictional road maintenance impacts and funding mechanisms** that reflect the true impacts of the anticipated haulage volumes across both Singleton and Cessnock's asset bases.

The remainder of this letter contextualises these issues as they relate to the planned future of the wider Branxton sub-region, drawing specifically on adopted local strategic planning frameworks and Belford Land's longstanding experience and investment in the locality.

3 SUB-REGIONAL PLANNING OMISSIONS AND CONFLICTS

3.1 STRATEGIC PLANNING CONTEXT

In 2013, the opening of the Hunter Expressway effectively bypassed the Branxton Town Centre, triggering a cross-jurisdictional planning effort by Singleton and Cessnock City Councils. The *Branxton Sub-Regional Land Use Strategy and Structure Plan* and the *Branxton Town Centre Master Plan*, adopted by both Singleton and Cessnock Councils in 2016, collectively set out

clear strategic initiatives to support residential growth, strengthened physical connections, and town centre renewal across a physical footprint encompassing Branxton, Greta and Huntlee.

This planned sub-region sits within the Anambah to Branxton Regionally Significant Growth Area referenced several times within the project's documentation; however, the quarry project's assessment currently fails to account for the ongoing delivery of this adopted local planning framework, which envisages continued growth across several important precincts:

- **Branxton's Town Centre** - Serving as the historic sub-regional commercial hub, the Branxton Town Centre is a designated Heritage Conservation Area focused on main-street retail, community services, and a growing tourism trajectory. The Joint-Council masterplan and supporting public domain plan and implementation plans are designed to restore economic vitality and strengthen its pedestrian identity with the aim of reinstating its role as a central service and social core for surrounding and growing residential catchments, including East and North Branxton.
- **East Branxton** – East Branxton is an established, growing residential enclave that is physically separated from Branxton's Town Centre by flood prone land associated with Anvil Creek. The locally adopted joint-planning framework envisages East Branxton as a safe and connected residential area, with improved walking and road connections to Miller Park, Branxton Town Centre and the Hunter Expressway.
- **North Branxton** – Directly adjoining East Branxton and extending northward to Rusty Lane, North Branxton is earmarked to continue offering a range of lifestyle (large-lot) housing in an attractive rural setting, supported by improved connections and direct paths to Branxton's Town Centre.
 - **Radford Park Residential Estate** – Within North Branxton, Radford Park is a premium, master-planned large-lot residential estate positioned approx. 1.5km north of Branxton's Town Centre. The estate, designed and delivered by Belford Land, is deliberately characterised by an open, rural-residential lifestyle aesthetic that relies entirely on the Elderslie Road corridor for physical entry and exit. Because of this single-route configuration, this growing estate represents a highly sensitive residential frontage with a critical exposure to any intensive changes in the local transport network.

Subsequent planning strategies adopted separately by Singleton and Cessnock Council and endorsed by DPHI continue to support growth and renewal across these precincts. For example,

- **Singleton's Local Strategic Planning Statement and Local Housing Strategy** collectively provide in-principle support and a strategic planning pathway for the investigation and release (rezoning) of additional residential land around Branxton's Town Centre, which effectively encompasses North Branxton and surrounds.
- **Cessnock's Urban Growth Management Plan and Local Housing Strategy** collectively support the residential intensification of East Branxton, in principle, as an area that is well supported by infrastructure and services. The *Housing Theme Review Discussion Paper* exhibited in 2025, also proposes to review and possibly extend a medium-density zoning around Branxton's town centre, which may include part or all of East Branxton.

More recently, Belford Land has continued to engage with strategic policy and planning through the tri-Council structure planning initiative for the Anambah to Branxton Regionally Significant Growth Area. Whilst precinct demarcations and supply delivery procedures may change, the

underlying demand for growth in this area is unquestionable. Given the quarry project's anticipated 30-year lifespan, the strategic planning framework for its impact footprint must be more fully considered through its underpinning sub-assessments and ultimate determination.

3.2 RADFORD PARK – PROTECTING SAFETY AND AMENITY

Radford Park launched its first stage release in 2014. Since then, the rural outlook with urban amenities offered within the estate have proven extremely popular, already supplying over 140 lots to date. Its physical footprint was expanded in 2025 to enable the creation of an additional 170-220 lots, which means any quarry project assessments should apply a baseline maximum future residential population of 900 – 1,200 when considering critical issues such as access, road service performance levels, emergency evacuation, noise and amenity. Given the recency of the rezoning to expand the estate, these figures are unlikely to be reflected in the proposals current modelling and assessments.

Land surrounding Radford Park's existing zoned footprint is within the 'concept urban buffer' anchored by Branxton's Town Centre as identified by Singleton Council, which provides in-principle support for additional growth to occur through future rezonings. The expanded estate has been designed to enable this continued growth and additional rezonings will be strategically timed in line with supply consumption. Based on historical sales trends, future rezonings are anticipated within the proposed quarry project's 30-year lifespan, putting the quarry project directly in conflict with the planned residential growth envisaged by adopted local strategic planning frameworks.

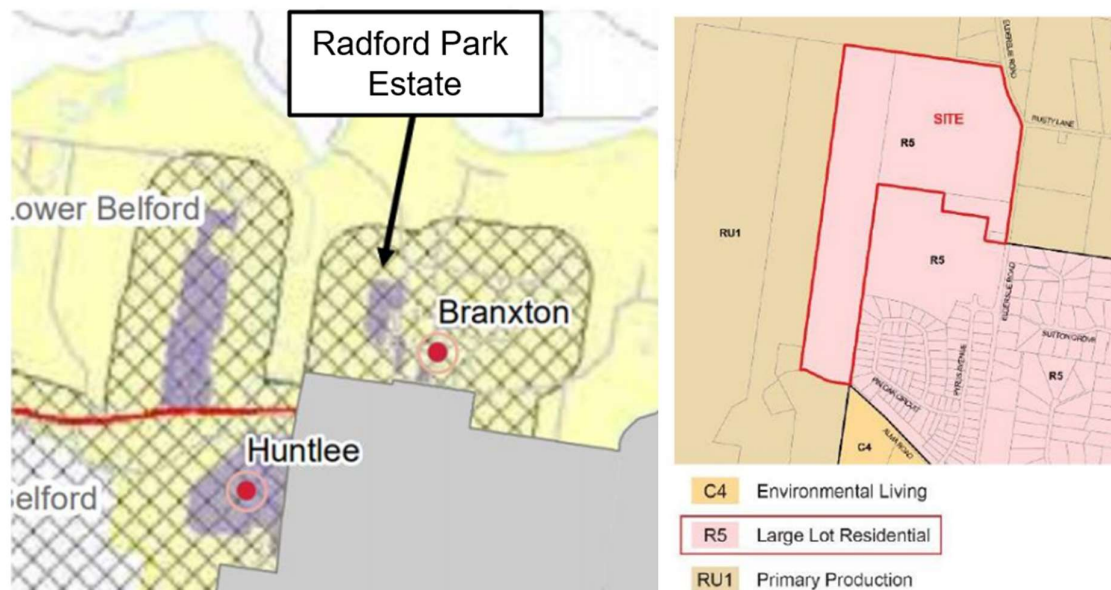


Figure 1: Left: Radford Park within Branxton's 'conceptual urban buffer'. Right: 2025 expansion footprint.

The estate currently relies on a single point of access via Elderslie Road; however, future growth is likely to require a second access point to maintain appropriate servicing levels. The introduction of 30-40 heavy vehicle movements per hour during peak operating periods will introduce a severe bottleneck for current and future residents, the majority of whom turn right when exiting the estate. This constraint potentially becomes a public safety hazard during bushfire emergencies, where evacuating residents may be forced to compete for restricted road space with multi-axle industrial combinations operating under the quarry project's

proposed performance-based emergency egress protocol. The project documentation does not currently provide any scenario-based testing of this protocol to provide an understanding of how it will impact existing residential areas, including Radford Park.

Radford Park's expanded footprint also has a 2.1km direct frontage to Elderslie Road, with 25 residential existing lots already backing directly onto the quarry's proposed haulage route and capacity for further lots to be created through additional delivery stages. As illustrated in **Figure 2**, these lots are deliberately designed with minimal, low-profile post-and-rail timber fencing and soft, grassy landscaping to protect the open, rural character of the estate. There are no structural acoustic barriers to shield these properties, which leaves them completely exposed to the unquantified and unmitigated impacts of the proposed quarry's haulage corridor.

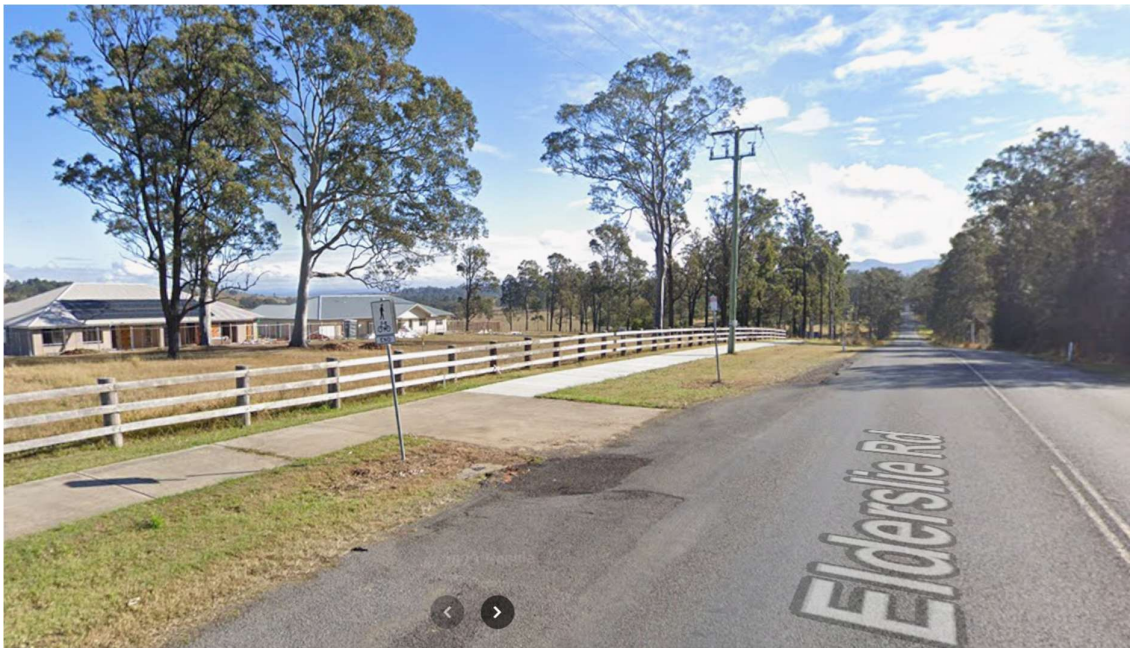


Figure 2: Unmitigated proposed haulage road interface risks at Radford Park (Source: Google Streetview)

When it was established, Belford Land was required to construct a shared footpath along the full (then) 1.5km Elderslie Road frontage (shown in **Figure 2**). This concrete path presently serves as a school bus pick-up point, as well as an active recreational space for residents, which predominantly include young families. This shared footpath was provided with the expectation that it would be continued to Branxton's Town Centre through joint efforts by Singleton and Cessnock Councils. To date, the continuation of this footpath has not been operationalised, forcing walkers and cyclists to utilise the road verge or road carriageway for the remainder of the 1km journey southwards towards Maitland St.



Figure 3: Physical reality of the Elderslie Road environment creates the potential for public safety risks
(Source: Google Streetview)

The continuous imposition of heavy truck noise, exhaust emissions, and low-frequency vibrations strips away the acoustic and environmental amenity central to the estate's identity and only formal active recreational area. This represents a profound and sustained degradation of the local living environment – both real and perceived – that will directly suppress market demand and erode the long-term property values established by substantial private investment. The quarry project's documentation, specifically including its noise impact study, currently omits any modelling or mitigation measures for this part of the haulage corridor. The potential for significant environmental and amenity impacts here warrant further investigation prior to determination.

Crucially, the physical reality of the road environment (shown in **Figure 3**) also makes the proposed intensive haulage corridor a significant risk to public safety. The existing road carriageway is narrow and bounded by unsealed verges. When a multi-axle heavy vehicle configuration, such as the proposed 50-tonne truck-and-dog combinations, traverse this corridor, there is a high potential for conflict with other road users, including residential / commuter traffic, school buses, walkers and cyclists. The proposed haulage hours of operation (6:30am – 4pm Monday to Friday) coincide with local road user peak times, including both school pick-up and drop-off and morning commuter (right-turn, outbound) traffic.

The quarry proposal currently offers no consideration for managing road safety along the haulage corridor, particularly in high local use areas. Instead of addressing these localised deficits, the proposal currently seeks to shift the burden, explicitly stating any substandard road geometry (e.g., narrow verges or restricted sight lines) to be exclusively the responsibility of asset owners (EIS, p. 90). Given the rural context of the area and the potential for 30-40 truck movements per hour (or one truck every 1.5 to 2 minutes), the 'low' impact categorisation and externalisation of project impacts adopted by the assessment documentation should be rejected. An accurate evaluation of localised safety performance levels for the entire haulage route is critical prior to determination, along with a comprehensive Traffic Management Plan and binding Drivers Code of Conduct, to maintain a clear and direct nexus with the proposal.

3.3 BRANXTON TOWN CENTRE – PROTECTING VIABILITY AND RENEWAL

Branxton began developing as a roadside settlement in the 1830s and 1840s, serving as a vital coaching stop and river valley service hub along the Great North Road for agricultural and timber movements. Throughout the 20th century, the township transitioned to function predominantly as a residential and commercial hub heavily tied to the regional coal mining industry, supporting generations of commuting workers, supply chains, and engineering trades. Following its bypass by the Hunter Expressway in 2013, the Town Centre has functioned as a designated Heritage Conservation Area undergoing strategic civic renewal, shifting its focus toward main-street retail, spillover tourism from the Vineyards District, and integrated residential connectivity.

Branxton Town Centre’s local service area catchment (shown in **Figure 4**) largely draws from the wider Branxton village, East Branxton, and North Branxton, including Radford Park, along with visitors to the nearby Hunter Valley vineyards district.

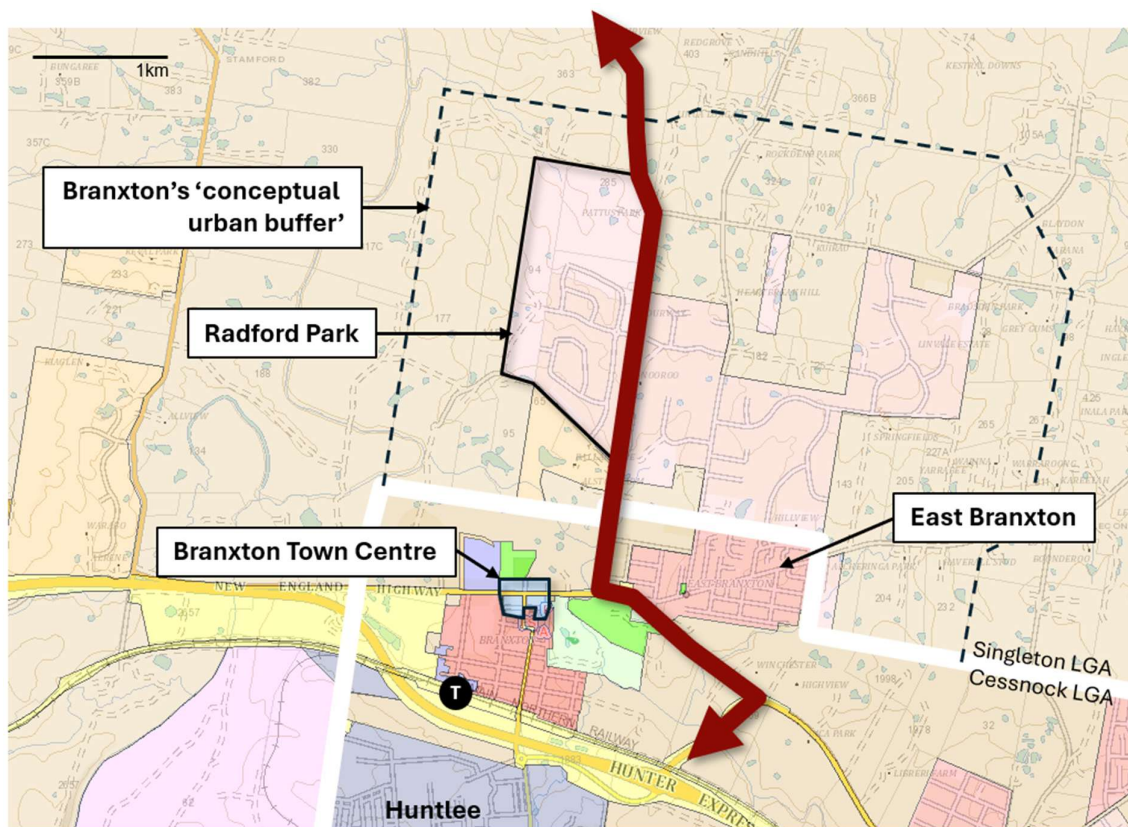


Figure 4: The proposed haulage route severs Branxton Town Centre’s functional service catchment

Guided by the 2016 joint planning strategies, a sequence of coordinated public and private initiatives has been progressively operationalised to support the Town Centre’s ongoing viability and renewal, an effort that relies heavily on preserving and enhancing direct, safe, attractive connectivity with its residential catchments:

- **Sub-Regional Active Transport Infrastructure:** Cessnock Council secured \$1.95m of grant funding and is co-contributing \$650,000 to deliver a dedicated off-road, shared cycleway between Branxton and Greta along the northern frontage of the New England Highway. This infrastructure asset was delivered explicitly to foster sustainable

mobility, active lifestyles, and safe neighbourhood connectivity. Stages 1 and 2 were completed in 2021 and 2022 respectively. Stage 3 is subject to additional grant funding.

- **Town Centre Streetscape and Main Street Upgrades:** Targeted public capital works have focused on public domain enhancements within the core Heritage Conservation Area, specifically aimed at stabilising local retail velocity and repositioning what was previously a regional thoroughfare into a pedestrian-friendly tourist threshold. The projects were largely grant-funded (approximately \$1.5m in total) with co-contributions provided by Cessnock Council.
 - Stage 1 (completed 2022) Created a 240m² shared zone along Church Street, from the intersection at Maitland Street, including new kerb and guttering, a road upgrade with concrete pavement, associated signage and provision for future works.
 - Stage 2 (completed 2026) Delivered new footpaths and kerbs, upgraded drainage, pedestrian crossing, trees and gardens, parking including wheel stops, a median island on Maitland Street, extra seating and bins, and the installation of a heritage sign are among the improvements.
- **Cross-Jurisdictional Strategic Growth Alignments:** Cessnock City Council is currently evaluating expansions to the R3 Medium Density Zone surrounding the Town Centre to encourage residential intensification in East Branxton. Simultaneously, Singleton Council's adopted local planning frameworks establish a 'conceptual urban buffer' directly to the north (as illustrated in **Figure 4**) to facilitate long-term master-planned expansions.

Due to the constrained financial positions of both local authorities, the realisation of these critical revitalisation and connectivity projects relies entirely on competitive state/federal grant funding or private sector works-in-kind arrangements. Belford Land has worked actively in partnership with Councils for over a decade to deliver on this vision by supporting grant applications, directly investing in the public domain, repurposing historical structures, and attracting new commercial operators to the village core.

However, this fragile, generation-long revitalisation process is directly threatened by the quarry proposal's haulage route. As demonstrated in **Figure 4**, the quarry project's proposed haulage route cuts directly through the centre of the Town Centre's catchment, inserting an intensive, high-frequency heavy industrial barrier that physically bisects Branxton Town Centre from its primary northern residential service catchments.

Beyond this structural severance, the proposed haulage route also directly conflicts with the civic identity and tourism trajectory of the Branxton Heritage Conservation Area, situated only 200m to the west of Elderslie Road. Strategically positioned as a historic northern gateway, Branxton is optimised to capture high-yield spillover tourism from the adjacent Vineyards District.

As currently anticipated by the identified haulage route, the constant presence of 50-tonne truck-and-dog configurations idling, braking, and accelerating at the town's immediate threshold poses a potential risk to the historic streetscape character, visual gateway value, and acoustic peace required to attract and retain visitor foot traffic, outdoor dining and community events. However, the EIS fails to anticipate the multiple haulage route realities of an operational quarry, including:

- **Western Access.** It is highly plausible that quarry material will be required for major industrial projects located in the Singleton and Muswellbrook areas, or that trucks will arrive to the site from the West.
- **Branxton Truck Rest Area.** Irrespective of the destination, drivers are highly likely to access truck rest facilities, located less than 2km to the west of the Elderslie Road – Maitland Street intersection.

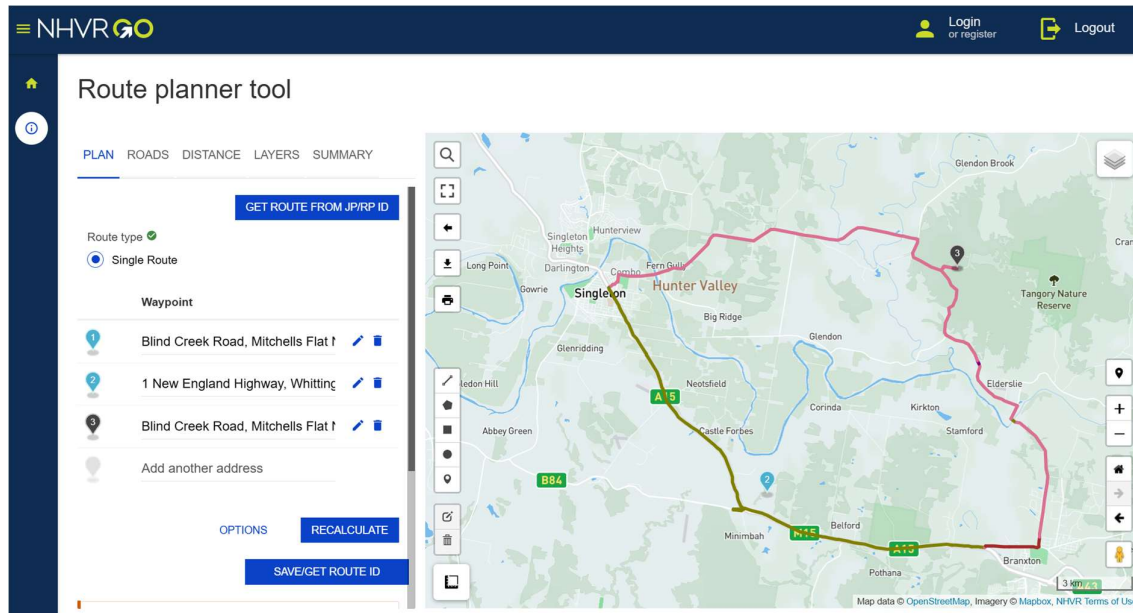


Figure 5: Westerly Supply Haulage Route Alignments (Source: National Heavy Vehicle Route Planner, <https://www.service.nhvr.gov.au/#page=informationHub/routePlannerTool>)

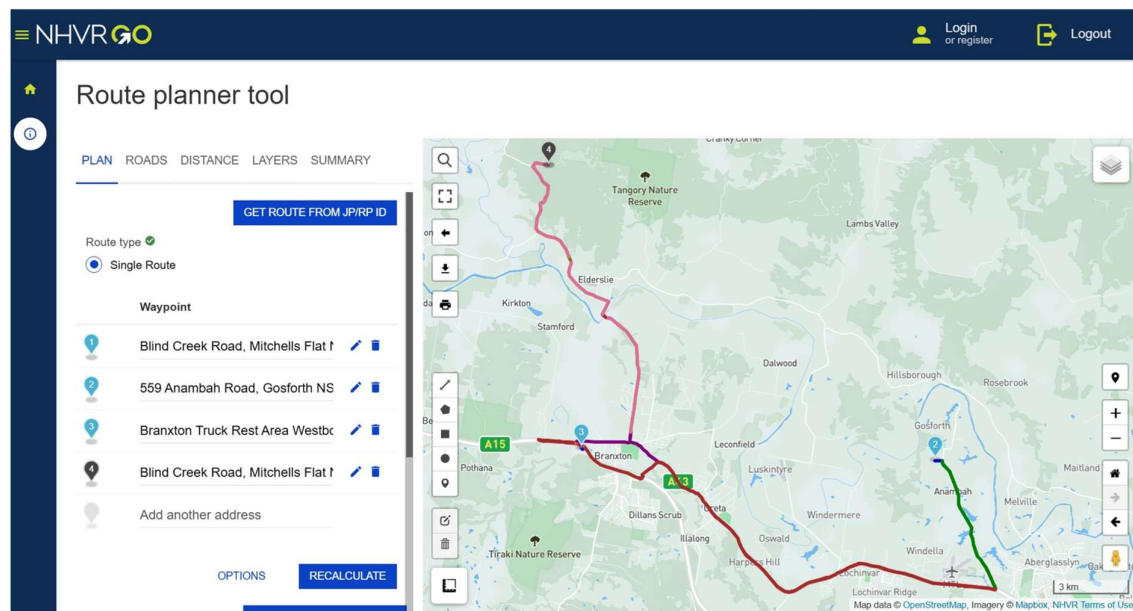


Figure 6: Branxton Truck Area Access Route Alignments (Source: National Heavy Vehicle Route Planner, <https://www.service.nhvr.gov.au/#page=informationHub/routePlannerTool>)

Figure 5 and **Figure 6** illustrate that either of these operational realities would force heavy vehicle traffic directly through Branxton Town Centre's main street. This creates an immediate and direct conflict with the millions of dollars of public and private investment efforts injected over recent years to create a pedestrian and outdoor dining environment.

By completely ignoring these critical micro-economic linkages, the proposal's technical assessments devalue over a decade of joint-Council efforts. Sacrificing a designated heritage conservation precinct and delaying broader Town Centre renewal outcomes for another 30 years to secure an individual operator's logistical supply chain represents a profound distortion of the public interest balance. The proposal must be thoroughly updated prior to determination to reflect these real-world transit pathways, with appropriate mitigation and structural offset measures provided to protect Branxton Town Centre's ongoing viability and renewal should the project be supported to proceed.

Proposed mitigation – an alternative transport route to Branxton's Town Centre

As previously identified, Belford Land was required to install a 1.5km shared footpath along Radford Park's Elderslie Road frontage in 2014, which is now a public asset that has still not been continued to provide residents with a direct, continuous active travel link to Branxton's Town Centre. To resolve this, Belford Land has been actively investigating alternative options to deliver an alternative off-road link utilising private land situated between Radford Park and Branxton Oval. The sole purpose of these investigations is to expedite delivery and provide current and future residents with the safe and attractive pedestrian and cycle link promised over a decade ago.

As illustrated by the dashed investigation area in **Figure 7**, the investigation area to provide a completely separated transport alignment involves only three properties.

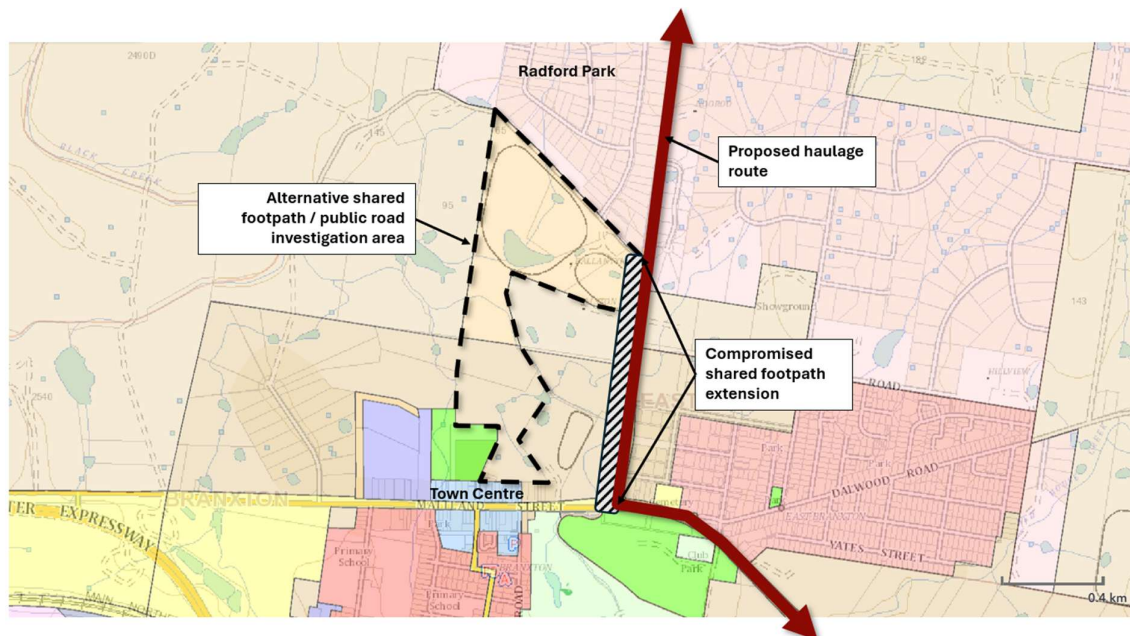


Figure 7: Proposed alternative approach to providing direct safe and attractive links to Branxton's Town Centre

Should the quarry project be supported to proceed, the severe road safety and amenity impacts along the Elderslie Road haulage corridor establish a direct infrastructure nexus. This nexus warrants a binding mitigation measure to provide financial contributions, which could be

directed towards formalising the planning, design and delivery of this link – in lieu of the highly compromised public link previously proposed along the exposed Elderslie Road verge – in partnership with both Singleton and Cessnock Councils. Crucially, this alternative alignment could also potentially be dedicated and upgraded to public road status, providing a vital local link to services including the Town Centre, train station and Vineyards District that completely bypasses the haulage road corridor and eliminates the need for hazardous right-turn movements out of the Radford Park estate.

4 RECOMMENDATIONS

Based on the full technical review provided in Appendix A and additional strategic context provided in the letter above, Belford Land would like to make several requests for consideration by the consent authority. Belford Land's requests are itemised below based on planning approval milestones to separate actions requested prior to determination from conditions requested should the project be approved to proceed, however, Belford Land believe that, once the project's impacts are quantified in full, the project should be refused as, on balance it is not in the public interest.

Belford Land acknowledges that these requests are not comprehensive to ensuring a fully compliant application (e.g., the proposal needs to be anchored to a fully engineered solution rather than an Indicative Project Layout).

4.1 PRE-DETERMINATION RECOMMENDATIONS

The consent authority cannot legally or responsibly determine this application until the proponent updates the EIS to include the following, and the nature of the matters to be addressed warrant re-notification of the updated application for public review.

1. **Structural Dilapidation Report and Base Asset Valuation:** The proponent should be required to provide an independent, comprehensive structural dilapidation and pavement baseline report for Springvale, Stanhope, and Elderslie Roads prior to any determination. This study should explicitly quantify the current structural capacity of the pavement and identify existing geometric and structural deficits. This baseline documentation is warranted prior to determination so that the consent authority and asset owners (Singleton and Cessnock City Councils) can accurately calculate the true capital cost of immediate and ongoing road remediation measures. Deferring this assessment prevents an accurate calculation of the project's true economic net benefit and risks shifting massive, unquantified infrastructure liabilities onto public road authorities and local ratepayers.
2. **Comprehensive Independent Acoustic Audit:** A full peer review and independent audit of Appendix H (Noise Impact Assessment) is warranted prior to determination. This audit must explicitly establish specific residential receiver points along the entirety of the haulage route, including the current and future Radford Park lots exposed along Elderslie Road. It should verify whether the noise modelling accurately factors in real-world heavy haulage operational realities, including empty trucks rattling over degraded pavement, the low-frequency impact of engine braking at key intersections, and the exact micro-topography of the un-shielded residential receptors fronting the route.
3. **Traffic Management Instruments and Inter-Agency Endorsement:** Prior to any determination or consent being issued, a comprehensive Traffic Management Plan (TMP) and a legally binding Drivers Code of Conduct must be fully prepared, finalised, and re-notified for public input. To ensure cross-boundary infrastructure security, these

instruments must be jointly reviewed and formally approved by both Singleton and Cessnock City Councils.

4. **Comprehensive Bushfire Evacuation Simulation:** To fully validate the proposed Performance Based Solution, the proponent should be required to submit a micro-simulation evacuation study modelling a worst-case bushfire scenario. This study should evaluate the real-world safety impacts when quarry heavy vehicles, emergency services, and full residential evacuations (accounting for the planned future expansion of Branxton North, including the Radford Park estate) simultaneously attempt to utilise the single-access Elderslie Road corridor.
5. **Branxton Town Centre Impact Modelling:** The proponent must be required to provide a revised Social and Economic Impact Assessment alongside a comprehensive Heritage Impact Assessment that explicitly model the cumulative impacts of the project's actual haulage routes on Branxton Town Centre's viability and renewal. Backed by NHVR routing data (refer to **Figure 5** and **Figure 6**), these studies must evaluate the inevitable physical and economic severance of pedestrian linkages between the Town Centre and its northern residential catchments, alongside the direct heavy vehicle impacts within the Town Centre's core. This must include a quantified projection of localised retail expenditure loss, risks to historical facades, and a risk assessment of reduced tourist stop-overs from the Vineyards District due to the degradation of the designated Heritage Conservation Area's amenity.
6. **Strategic Regional Infrastructure and Biodiversity Opportunity Cost Study:** A comprehensive independent study should be requested to evaluate the opportunity cost presented by the quarry's potential impacts. This should consider issues such as intersection servicing levels (e.g., New England Highway and Wine Country Drive), housing supply conflicts along the proposed haulage route, and ecological clearing in the context of the wider urban and critical energy infrastructure priorities of this designated Regionally Significant Growth Area. Quantifying the spatial opportunity costs in the context of wider strategic planning directives and priorities is vital to determining the balance of public interest for this proposal.

4.2 REQUESTED CONDITIONS OF CONSENT

Should the consent authority move toward approval despite the planning and public safety conflicts identified, Belford Land requests that the following strict, non-deferred conditions be mandated.

1. **Ongoing Pavement Maintenance Bond and Bank Guarantee:** Backed by the pre-determination baseline data, the proponent must fund a mandatory, ongoing bank guarantee or maintenance bond held jointly by, or apportioned equitably between, Singleton and Cessnock City Councils. This legally binding financial instrument will ensure immediate, proactive rectification of acute pavement failures caused by high-frequency heavy axle loads, completely bypassing lagging annual developer contribution cycles.
2. **Haulage Curfews and High-Impact Operation Restrictions:** Strict operational curfews must be enforced, completely prohibiting quarry heavy vehicle movements along the haulage route during peak local commuter and school bus drop-off and pick-up hours (7:30 AM – 9:00 AM and 3:00 PM – 4:30 PM, Monday to Friday). Additionally, heavy vehicle haulage and quarry operations must be entirely prohibited on weekends to

preserve the premium rural-residential lifestyle character, tourist economy, and property values within the sub-region.

3. **Mandatory Heavy Haulage Exclusion Zone (Town Centre Protection):** To align with adopted strategic planning frameworks and safeguard millions of dollars in recent public domain and streetscape investments, the final Traffic Management Plan must include a legally binding, permanent exclusion zone prohibiting any project-related heavy vehicles from transiting through the Branxton Town Centre Heritage Conservation / Renewal Ares. Measures should also be identified to ensure strict operational compliance and remove the enforcement burden from the community.
4. **Reversible, Non-Intrusive Residential Acoustic Mitigation:** To protect the exposed residential lots fronting the Elderslie Road haulage corridor, any required acoustic mitigation measures must utilise low-profile, landscaped, or architecturally sensitive 'least-intrusive' treatments that preserve the open, rural-residential character of the estate. Standard, high-impact industrial concrete sound walls or solid Colourbond barriers along the road frontage must be explicitly prohibited. Furthermore, any installed acoustic structures must be bound by a strict removal condition within the Quarry Closure and Rehabilitation Plan, ensuring they are fully dismantled and the natural landscape restored at the cessation of quarry operations.
5. **Bushfire Risk Operation Restrictions:** Backed by the pre-determination Bushfire Evacuation Simulation, the conditions should consider the absolute cessation of all quarry operations and heavy vehicle haulage the moment a "Very High" or greater fire danger rating is declared for the area, ensuring the single-access corridor remains functional for civilian evacuation.
4. **Local Infrastructure Expansion & Catchment Access Funding:** The proponent must enter into a binding Voluntary Planning Agreement (VPA) to provide upfront, fully indexed capital funding toward an update of the *Branxton Town Centre Masterplan / Catchment Access Strategy*. This must explicitly include:
 - a. The immediate funding and construction of a grade-separated or highly engineered safe pedestrian/cycling solution connecting Radford Park to the Branxton Town Centre to directly mitigate the severe safety and economic severance caused by the haulage route.
 - b. A dedicated capital contribution to fund any public domain upgrades, heritage preservation visual screening, and structural acoustic barriers along the New England Highway/Elderslie Road intersection corridor to safeguard the newly built Branxton-Greta cycleway link and protect the entry experience of the Heritage Conservation Area
5. **Mandatory Real-Time Acoustic and Air Quality Monitoring Dashboard:** Permanent, real-time directional noise and particulate matter monitoring stations must be installed at the boundary residential areas (including Radford Park) facing the haulage route. Live, unedited data from these stations must feed into a publicly accessible digital dashboard to ensure immediate compliance tracking, removing the burden of proof from residents for operational exceedances like un-tarped loads or defective tailgates.

5 CONCLUDING REMARKS

Belford Land appreciates the opportunity to provide this submission for the Department's consideration.

The sub-regional planning framework for the Branxton locality represents a fragile, decade-long cross-jurisdictional renewal effort that balances housing supply targets with heritage preservation and pedestrian active transport links. The introduction of an unmitigated, high-frequency heavy freight corridor directly across the threshold of the historic township threatens to unravel this coordinated public and private investment.

It remains abundantly clear that the Bluestone Hardrock Quarry Project, in its current form, relies on deficient data baselines and an unacceptable externalisation of its operational impacts to the detriment of the wider sub-region. No decision should be made until these critical issues are resolved.

Belford Land remains deeply committed to collaborating with both Singleton Council and Cessnock City Council to achieve a vibrant, safe, and prosperous future for the region. Should the project be deferred or structurally amended to address the critical deficiencies identified herein, Belford Land welcomes ongoing engagement to ensure that long-term civic revitalisation and community safety are not sacrificed for short-term private commercial gain.

Sincerely,



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APPENDIX A: GENERAL ASSESSMENT AND TECHNICAL DEFICIENCIES

A.1 PROJECT DOCUMENTATION – INSUFFICIENT DETAIL AND ASSESSMENT

The EIS does not provide the basic level of detailed visual and engineering documentation required to lawfully determine an SSDA of this scale. The proposal and its entire suite of technical appendices are anchored to a broad, highly conceptual 'Indicative Project Layout' (EIS p. 5), whereas a comprehensive, scaled set of engineering plans is needed to facilitate legitimate public and regulatory scrutiny. Specifically, the current project layout fails to comprehensively identify, locate, and specify for assessment purposes:

- The exact engineering design of the quarry pit, including progressive and final bench layouts, bench heights/widths, quarry depth, and the exact staging sequence;
- Detailed operational and civil layouts for critical operational zones, including the stockpile and laydown area, processing area, and the weighbridge and office area;
- Fixed spatial locations for key project elements, including light and heavy vehicle parking, equipment workshops, maintenance/servicing areas, and designated bunded storage points for hazardous or potentially hazardous materials; or
- Architectural and structural plans for any proposed on-site buildings, including the primary administration building.

Largely due to this lack of detail, the application contains technical and logical interdependencies and unresolved environmental and statutory impacts that must be addressed to support a lawful determination. These include the following, *in addition* to the matters detailed in the sub-sections below:

- **Queensland – Hunter Gas Pipeline Project conflict:** The proposed quarry pit directly conflicts with the physical alignment of the Queensland–Hunter Gas Pipeline Project approved in 2009. The EIS (p. 48) notes this critical risk as ‘unresolved’ and reliant on an un-executed ‘Route Change Request’ with Santos. This structural conflict creates a severe dependency; if the Route Change Request is rejected, the project design, pit extents, and haulage road alignment must undergo a material layout change, rendering nearly every environmental impact model in the current EIS completely invalid.
- **Land Use Conflict Risk:** Given the low-intensity rural-residential and agricultural nature of the immediate environment, the risk of land use conflict is high. The complete omission of a specialist Land Use Conflict Risk Assessment (LUCRA) means the application fails to satisfy the mandatory provisions of the *State Environmental Planning Policy (Resources and Energy) 2021* and the explicit requirements of the SEARs. This core conflict invalidates the performance claims of the sub-assessments below, each of which meets the statutory threshold requiring formal project amendment and re-exhibition:
 - **Air Quality:** The modelling lacks baseline accuracy due to the omission of detailed equipment and activity coordination on-site. For transparency and rigorous public scrutiny, the assessment must feature an explicit sensitive receiver matrix detailing exact distances to the quarry footprint and haulage route juxtaposed against a consolidated compliance criteria table.
 - **Blasting (Fly Rock, Overpressure and Odour).** The proposal lacks a quantified, specialist Blast Impact Assessment. The potential for flyrock exiting the property boundaries introduces an unmitigated public safety hazard that directly impacts the Tangory Nature Reserve, surrounding rural properties, and users of Springvale Road. The proposal fails to detail whether the project relies on joint

- management actions, exclusion zones, or temporary road closures, or whether a safe separation buffer is physically achievable relative to the nearest commercial receiver (the Pet Motel) during Phase 1 processing area extraction.
- **Elderslie Airport Operations:** The quarry footprint is located within 4km of Elderslie Airport, a facility actively utilised for low-altitude skydiving and parachuting operations. The EIS (p. 48) states that consultation with the airport operator remains unresolved and no analysis has been presented to evaluate how blasting, gas overpressure, or localised air quality visibility impairments will impact safe aviation transit paths.
 - **Water and Groundwater Management:** The proposal does not demonstrate a secure, legally compliant water balance or adequately model hydrogeological risks, introducing the following gaps that prevent an informed assessment prior to determination:
 - **Unverified Groundwater Interception and Licensing Adequacy:** The project will actively intercept groundwater tables. The EIS does not prove that the existing 60 ML Water Access Licence (WAL) allocation tied to the site is volumetrically adequate.
 - **Incomplete Geotechnical and Monitoring Well Network:** While Appendix M illustrates groundwater monitoring wells concentrated within and immediately adjacent to the northern 'pit area', the hydrogeological monitoring network omits the southern sector of the site. This is a critical technical failure given the EIS explicitly notes that heavy drilling and blasting will be undertaken to establish the southern 'processing area', yet background groundwater levels, pressure heads, and subterranean fracturing pathways remain unknown in this quadrant.
 - **Absence of Surface Water Infrastructure Spatial Mapping (EIS p. 66):** The main body of the EIS states that the precise locations of sediment dams, storage basins, and critical surface water management infrastructure are not depicted or mapped. Relying on un-localised, conceptual information prevents regulatory and public scrutiny from verifying whether the runoff, catchments, and discharge points are appropriately separated from local waterways and whether they pose down-catchment contamination risks.
 - **Wastewater Management:** The EIS provides conflicting directions regarding its structural sewage management, simultaneously claiming that amenities will be serviced via a septic tank system with pump-out (EIS p. 27) and an on-site wastewater treatment system (EIS p. 29). Detailed civil designs must be provided to determine if the proposed solution poses an environmental runoff risk to nearby watercourses and to establish lawful, ongoing monitoring protocols.
 - **Rehabilitation:** The Preliminary Rehabilitation and Closure Plan represents a conceptual, placeholders document due to its reliance on an Indicative-only layout and the absence of a post-closure monitoring program. Given the project's intensive 30-year operational life, the an informed determination requires an advanced, binding staging plan that enforces progressive rehabilitation to minimise localised visual and environmental degradation.
 - **Visual Impact:** The visual assessment lacks validity because it contains no visual simulations or montages based on actual engineered quarry highwalls, benches, or infrastructure placements during different operational phases. Visual montages are preferred for the community and regulators to accurately evaluate the true impact profile on properties sitting within the 'Zone of Theoretical Visibility' and to logically program progressive rehabilitation priorities.

A.2 TRAFFIC AND ROAD INFRASTRUCTURE – UNFUNDED EXTERNALISED IMPACTS

Freight Modelling Volume Discrepancies

The EIS and Appendix L Integrated Transport Assessment collectively contain material, irreconcilable discrepancies regarding its core freight traffic numbers, creating profound ambiguity around the actual environmental and operational footprint of the development.

Based on the maximum daily extraction rate of 7,000 tonnes / day and average 37-tonne capacity truck payload capacity, the site could theoretically generate around 190 laden trucks per day (380 total movements). If the quarry operates at its maximum daily extraction rate within the strict haulage window of 6:30AM to 4:00PM (9.5h/day), the hourly movement profile would be around 20 laden trucks per hour (40 total movements). However, the underlying technical appendices and environmental impact assessments systematically fail to reflect these theoretical maximum parameters, introducing severe logical gaps across multiple chapters:

- **25% deficit in Appendix K modelling:** Appendix L bases its core traffic calculations on a capped rate of 15 laden trucks per hour (30 total movements), which is a 25% reduction from the site's explicit maximum hourly capacity. The application provides zero justification or explanation for why its environmental and infrastructure impact modelling assumes a 25% lower operational intensity than the project's physical limits.
- **Hour-to-Day Calculation Deficit:** Appendix K further states that this hourly flow translates into an average of 110 laden trucks per day (220 total daily movements). This does not align mathematically with the haulage window: at a peak rate of 15 laden trucks per hour over 9.5 hours, the daily output would equal 143 laden trucks.
- **Transcription Errors and Erroneous Reporting:** The EIS presents multiple inconsistencies in presenting haulage movement data. The Executive Summary (p. xv) and Project Description (p. 22) echo the peak rate of 110 trucks per day in each direction (inferring 220 movements in total) but cite a maximum of 30 laden trucks per hour (inferring 60 total movements). However, the Traffic and Transport Impact summary (EIS p. 75) states that the project will increase traffic by "up to 110 vehicles per day or 15 vehicles per hour (in both directions)". This is an administrative error that mistakenly substitutes "both directions" for "each direction," potentially skewing the apparent traffic density presented for public and regulatory review.

The proposal also fails to provide a clear definition or description of the 'peak operating periods' upon which modelled volumes are based. By nature, quarries tend to operate on a highly variable supply basis tied to major infrastructure contracts. Without explanatory data within the project documentation, it is impossible to characterise haulage behaviour, meaning the consent authority cannot accurately evaluate the prolonged duration, frequency, or cumulative intensity of peak truck flows in the context of local logistics (e.g., rural residential and school bus).

Unmodelled Heritage Conservation Area and Urban Renewal Impacts

The proposal identifies a single haulage route to service the project. As currently presented, this anticipates all heavy vehicle movements to adopt a single route, travelling southward from the project site to connect with Maitland Street via Elderslie Road and then travelling eastward utilising either the New England Highway or the Hunter Expressway. The basis for this route is

the expectation that the quarry will be providing materials to construction projects located in the Anambah to Branxton corridor.

The reality is that the quarry will be capable of servicing projects anywhere, including projects located to the west of Branxton. Depending on delivery scheduling and driver fatigue management protocols, project-related heavy vehicle traffic is also highly likely to utilise the Branxton Truck Rest Area, located approximately 1.7km to the west of the Elderslie Road / Maitland Street intersection, and accessible to east bound and west bound traffic via the Hunter Expressway and New England Highway, respectively. Either of these scenarios would result in heavy vehicle traffic travelling through Branxton's Town Centre, which is a designated Heritage Conservation Area and current focus of urban renewal initiatives under adopted local planning frameworks.

Unqualified 'Low' Impact Classification of Haulage Volumes

The EIS's characterisation of 15 laden trucks per hour (30 movements) as a 'low' impact on localised traffic, including commuter, public transport and school bus routes is not supported by the data in Appendix L. Section 16 of the technical appendix does not provide any analytical modelling or localised hazard micro-simulations to justify this claim, instead using the unqualified characterisation of a 'low impact' to defer a Traffic Management Plan and Drivers Code of Conduct until after consent is granted.

Furthermore, the study's assertion that haulage trucks will not operate when afternoon school buses are on the road is directly contradicted by the stated haulage window operating until 4:00 PM, coinciding precisely with afternoon school commute windows. When layered against Appendix L's baseline traffic counts showing an existing heavy vehicle profile of just 1% on Stanhope Road, introducing a 25% surge in daily traffic and up to 30-40 movements per hour under maximum operating conditions represents a severe, unmitigated threat to public safety that has been systematically minimised across the project's documentation.

Unquantified and Unmitigated Road Network Impacts

The critical intersection performance and structural infrastructure constraints detailed within the Appendix L suggest the proposal is seeking to utilise a road network presently unsuited to heavy industrial haulage.

- **Pavement degradation.** The EIS fails to quantify or resolve the real-world structural and pavement degradation that will occur along Springvale Road, Stanhope Road, and Elderslie Road due to intensive heavy vehicle haulage. By omitting a quantified baseline asset life assessment, the application ignores how accelerating the lifecycle collapse of rural and sub-arterial flexible pavements inflicts structural damage on local road assets. This creates a massive infrastructure gap (discussed later), leaving the technical and structural requirements necessary to preserve these roads unaddressed
- **Wine Country Drive x New England Highway.** Appendix L explicitly admits that the right turn from the New England Highway onto Wine Country Drive - the primary feeder node for all traffic accessing the Hunter Expressway - is already performing at a completely failed Level of Service (LoS F). The applicant's assertion that adding 30-40 heavy vehicle movements per hour during maximum operating periods will have no material impact on these existing delays is a severe analytical failure. Introducing large, slow-accelerating truck-and-dog combinations directly into a gridlocked junction will compound existing delays, introducing significant queue-propagation hazards, and compromising the performance of the broader regional road network.

- **Elderslie Bridge.** The haulage route entirely on the use of Elderslie Bridge to cross the Hunter River. The proposed volume of traffic constitutes a nearly continuous stream of maximum-tonnage freight across a single-lane local bottleneck, which represents an intense and hazardous operational imposition. The project documentation notes that the maximum mass restriction of Elderslie Bridge is 50 tonnes and subsequently confirms that the quarry's fully laden haulage vehicles will weigh up to exactly 50 tonnes. Operating heavy vehicle configurations at a literal zero-percent margin of dynamic structural safety poses a severe, unmitigated threat to public safety and infrastructure integrity. Despite generic commentary in the EIS claiming that Transport for NSW has verbally advised that the structural capacity is acceptable, a formal, transparent, and detailed structural engineering review from the state asset owner is an absolute statutory prerequisite to determination.
- **Road Geometry.** While the Social Impact Assessment engagement clearly highlights significant and reasonable community concerns regarding heavy truck speeding, overloading, and dangerous driving along the route, the main body of the EIS dismisses these hazards. In response to identified deficits, including substandard road geometry, narrow road verges, poor sight lines, and 'hidden' residential driveways, the proponent shifts these issues to be the exclusive "responsibility of asset owners" (EIS p. 90). The proponent cannot responsibly introduce a high-frequency heavy vehicle footprint to a substandard local network while declaring its physical deficits to be the legal and financial problem of local government or individual private landholders.

Collectively, these unmitigated transport impacts represent an unacceptable externalisation of the project's logistics costs. By relying on a haulage route with a failed highway intersection, a bottlenecked single-lane bridge, and local pavements unable to withstand heavy axle flows, the proponent is effectively demanding that the public, local government, and adjacent developers subsidise their private supply chain.

Administrative, Funding, and Cross-Jurisdictional Gaps

The EIS presents insufficient detail regarding the specific operational road impacts that must be funded and the precise mechanisms required to secure that funding. Instead of establishing a comprehensive framework, the application proposes two highly limited Voluntary Planning Agreements, strictly confined to a 300m road widening of Springvale Road with Singleton Council and a developer contribution rate of \$0.090/t/km with Cessnock City Council. This funding protocol lacks any resolution for the localised pavement degradation and other externalised costs to the wider road network identified above.

Consequently, the proposal currently lacks a unified, legally binding, cross-LGA statutory mechanism capable of managing and funding the genuine impacts of its haulage footprint across municipal boundaries. This administrative failure leaves local ratepayers, council budgets, and adjacent strategic developers completely exposed to unmitigated infrastructure deterioration without an established path for financial remediation or structural asset renewal.

Crucially, unlike Crown-owned resources such as coal, structural aggregates are privately owned minerals, meaning their extraction yields zero royalty revenue to the State of NSW. Consequently, there is no broader state revenue justification to counter the severe localised financial burden and acute safety risks shifted onto Singleton and Cessnock City Councils, their ratepayers, and adjacent developers. This constitutes a profound imbalance of private commercial gain versus public asset risk and requires rigorous scrutiny prior to determination.

A.3 NOISE – METHODOLOGICAL DEFICIENCIES AND HAULAGE ROUTE OMISSIONS

Conceptual Assessment Profile

Because the Noise Assessment (Appendix H) underpinning the EIS is anchored to an "Indicative Project Layout" rather than a detailed site plan, the localised positioning, structural shielding, and operational tracking of high-impact crushing, screening, and drilling equipment remain unverified. This major structural gap is further compounded by a lack of specific monitoring details, leaving the location, frequency, and regulatory enforcement of ongoing acoustic tracking unaddressed.

No Assessment of Haulage Route Noise Impacts

The application does not account for the extensive off-site acoustic footprint of its haulage corridor:

- **Omission of Residential Receivers on the Haulage Corridor:** While the technical documentation establishes an acoustic tracking network for properties near the physical pit footprint, the assessment fails to identify or evaluate the residential receivers fronting the 6.3km haulage corridor, including the established residential areas along Elderslie Road.
- **Unmitigated Morning Shoulder Sleep Disturbance:** The proposal seeks statutory approval for heavy road haulage operations to commence at 6:30 AM, Monday to Friday, a window that directly coincides with the highly sensitive morning shoulder sleep period. The acoustic assessment claims that sleep disturbance from transient operational events (e.g., empty truck beds slamming or tailgates rattling) will remain compliant with standard guidelines. This finding is invalid for the project's full impact footprint, as no acoustic testing, background ambient logging, or peak transient modelling was performed for the properties directly fronting the entire haulage route.
- **Failure to Model Pavement Degradation Noise Feedback Loops:** The transport noise assessment relies heavily on standard, idealised *Road Noise Policy* (RNP) criteria, which assume a well-maintained, smooth bitumen surface. This idealised modelling fails to account for the severe acoustic feedback loops that will inevitably occur as high-frequency, fully laden trucks progressively damage and fracture road surfaces.

A.4 BUSHFIRE – UNTESTED PERFORMANCE-BASED SOLUTION

The project's strategic position adjacent to heavily vegetated terrain introduces severe, unresolved safety risks that have not been adequately reconciled with localised evacuation protocols.

The Bushfire Assessment (Appendix O) explicitly establishes that the quarry layout cannot comply with the standard, deemed-to-satisfy acceptable solutions mandated under current *Planning for Bush Fire Protection* guidelines. Instead, the proposal relies on a Performance-Based Solution to justify its emergency egress and structural asset protection zones. This lack of baseline compliance introduces a potentially unacceptable layer of risk by relying on concessions rather than additional safety parameters.

The project documentation highlights recommendations for safe worker and firefighter transit along the haulage road network, prescribing minimum road widths and targeted turning bays.

This further emphasises the insufficiency of the local road network, with the entire heavy industrial operation relying on a restricted, "one way in, one way out" access design.

The EIS fails to evaluate the potential public safety dynamics that would occur during an acute bushfire event. Specifically, the modelling omits any simulation of a worst-case scenario where evacuating residents, quarry workers, heavy 50-tonne haulage trucks, and arriving emergency response vehicles simultaneously converge within this single, constrained corridor. By omitting consideration of how this concentrated gridlock would physically impact the single-access evacuation routes utilised by existing and future residents along the corridor, the application relies on a deficient emergency risk framework.

A.5 SOCIAL, ECONOMIC AND HERITAGE – BRANXTON TOWN CENTRE OMISSION

The commercial and social viability of the Branxton Town Centre is heavily compromised by the project's externalised logistics footprint. The Economic Impact Assessment (EIA) (Appendix R) and Social Impact Assessment (SIA) (Appendix Q) collectively fail to define, model, or consider the project's direct impacts on the functional service catchment of Branxton's Town Centre. The SIA structurally isolates its social locality data into separate data points for Branxton Town Centre, Radford Park and East Branxton, while the EIA relies on a macro-regional SA3 economic model. In doing so, both technical reports overlook the vital functional micro-economic connections between the expanding residential areas of Radford Park and East Branxton to the commercial core of Branxton.

No assessment is provided for potential impacts to the Branxton Heritage Conservation Area, located only 200m from the proposed haulage route, as identified. The operational reality for the project also suggests heavy vehicle traffic would be forced through Branxton's Town Centre to provide westerly access or where drivers utilise the Branxton Heavy Vehicle Rest Area.

Introducing a high-frequency, heavy vehicle freight route across the town's threshold or directly through its core will introduce an intensive industrial barrier that physically severs the village from its primary northern catchments and conflicts with adopted urban renewal frameworks. By failing to identify Branxton Town Centre's catchment or acknowledging the plausible potential for through-traffic to occur, the proposal currently provides no modelling to evaluate how heightened transit risks, heavy vehicle emissions, and severe intersection queuing will discourage or physically restrict residents from traveling into the Town Centre for daily services, or utilising the Town Centre for socialising and community events.

This oversight is particularly relevant to the extensive, joint-Council efforts to support the Town Centre's renewal after it was bypassed by the Hunter Expressway in 2013. The *Branxton Sub-Regional Land Use Strategy and Structure Plan* and the *Branxton Town Centre Master Plan*, adopted by both Singleton and Cessnock Councils in 2016, collectively set out clear strategic initiatives that seek to establish a pedestrian-orientated environment within the Town Centre and to intensify residential development and improve residential connections across its residential service footprint.