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Planner

NSW Department of Planning, Housing and Environment

Ref: Application No. SSD-76210271 – Bluestone Hardrock Quarry Project

I am writing in response to the State Significant Development Application currently being advertised for establishing a greenfield hard rock quarry located at 253 Stanhope Road, Elderslie and Blind Creek Road, Glendon Brook (Legal Description: Lot 65 DP752473, Lot 903 and 904 DP 1061259, Lot 5 DP 1102521).

This submission formally objects to the proposed development on the basis that the proposal will result in significant and unacceptable adverse impacts to the amenity, function and viability of the Elderslie, Stanhope and Glendon Brook communities.

Key adverse impacts include:

- Saturation of hard rock resources and reserves in the hunter valley
- Traffic impact from the proposed development
- Noise impact from the proposed development
- Air quality and Greenhouse gas emissions impact from the proposed development
- Biodiversity impact from the proposed development

An approval of this nature would represent a failure from the Department of Planning to consider the cumulative impacts the quarry imposes on these communities for the next 30years, destroying the very fabric of the rural environment.

Existing Resource and Reserves

The Hunter region already contains a substantial number of approved and operating hard rock quarries that supply construction materials to local and regional markets, including Sydney. In this context, the proposed Bluestone Hardrock Quarry would contribute to an increasing concentration of quarrying activities within the region, resulting in further cumulative impacts on local communities, sensitive receivers, and the natural environment without demonstrating a compelling strategic need for an additional greenfield quarry development.

Several major quarry operations are already established within the Hunter region and have recently received approvals that secure long-term supply capacity. These include:

- Boral Seaham Quarry – approved extension providing up to 30 million tonnes per annum for a further 30-year operational period (approved 23 December 2025).
- Heidelberg Materials Brandy Hill Quarry – approved production capacity of 2.2 million tonnes per annum (approved 16 July 2020).

In addition, a number of hard rock quarry developments have recently been approved throughout the region, including:

- Stone Ridge Quarry – 1.5 million tonnes per annum for 30 years (approved 22 August 2025).
- Liverpool Range Quarry – 700,000 tonnes per annum (approved 25 November 2025).
- Dolwendee Quarry – 6.5 million tonnes over 26 years (approved 25 November 2025).
- Eagleton Quarry – 600,000 tonnes per annum for 30 years (approved 8 July 2024).

There are also several quarry developments currently under assessment or seeking approval, including:

- Teralba Quarry – 1.2 million tonnes per annum for 25 years.
- Hillview Quarry – 1.5 million tonnes per annum for 30 years.
- East Quarry Extension, Hebden – 500,000 tonnes per annum for 25 years.
- Dalswinton Sand and Gravel Quarry – 500,000 tonnes per annum for 25 years.

Furthermore, the region already supports numerous established and operational quarries, including:

- Allandale Quarry, Lovedale;
- Buttai Quarry, Buchanan;
- Ardglen Quarry, Ardglen;
- Black Hill Quarry, Black Hill;
- Karuah East Quarry, Hunter Quarries; and
- Raworth Quarry Products.

The significant number of existing, approved quarries demonstrates that the Hunter region is already a major supplier of quarry resources. Importantly, these operations are already established, meaning substantial production capacity already exists.

Given the extensive quarrying footprint already present across the region, strategic land-use planning should prioritise the optimisation and expansion of existing quarry operations rather than the approval of additional greenfield quarry developments. Approving new quarries in previously unaffected rural areas unnecessarily expands the geographical spread of quarry-related impacts, including heavy vehicle movements, blasting, dust emissions, noise, biodiversity loss and landscape degradation.

The Hunter region is already heavily impacted by large-scale extractive and mining industries, particularly coal mining. The cumulative effect of continually approving new

extractive developments places increasing pressure on biodiversity values, rural landscapes, community amenity and the long-term sustainability of rural communities. The proposed development would further contribute to these cumulative impacts without adequately demonstrating that existing approved quarry resources are insufficient to meet future market demand.

Accordingly, it is submitted that the proposed Bluestone Hardrock Quarry is not justified from a strategic resource planning perspective and would result in an unnecessary expansion of quarrying impacts within the Hunter Valley. This should weigh strongly against approval of the development.

Traffic, Road Safety and Infrastructure Impacts

I strongly object to the proposed Bluestone Quarry Development Application on the basis that the development will result in unacceptable traffic, road safety and infrastructure impacts on the local road network and to the communities of Elderslie, Stanhope, Branxton and surrounding rural areas.

While the Integrated Transport Assessment (ITA) concludes that the existing road network has sufficient capacity to accommodate quarry-related traffic, this conclusion is largely based on theoretical traffic modelling and intersection performance analysis. Capacity alone does not determine the suitability of a road network to accommodate a major extractive industry. The assessment fails to adequately consider the practical realities of introducing up to 110 laden daily truck movements by 19-metre truck-and-dog combinations carrying approximately 37 tonnes of material through a constrained rural road network that was never designed to operate as a freight corridor.

Incompatibility with the Existing Rural Road Network

The fundamental issue is not simply the number of vehicle movements generated by the proposal, but rather the nature and scale of those movements.

The proposed quarry would introduce a significant volume of heavy freight traffic onto Stanhope Road, Springvale Road and Elderslie Road. These roads primarily serve local residents, agricultural enterprises, school transport services and rural businesses. They are characterised by narrow pavement widths, limited shoulders, constrained geometry, restricted sight distances and numerous direct property accesses.

The introduction of large quarry trucks at the proposed frequency is inconsistent with the existing function and character of these roads. Heavy vehicles of this scale occupy a disproportionate amount of road space, require greater stopping distances, are less manoeuvrable and create increased conflict with other road users. While traffic modelling may demonstrate that level-of-service standards can be achieved, it does not address the reduced safety, increased risk and loss of amenity experienced by residents who use these roads daily.

The proposal effectively seeks to transform local rural roads into an industrial freight route for the next several decades, imposing the impacts of the quarry on surrounding communities long after approval is granted.

Elderslie Bridge Represents a Critical Constraint

A major flaw in the application is its reliance on Elderslie Bridge as the primary crossing point along the proposed haulage route.

Elderslie Bridge is a constrained and ageing piece of infrastructure that effectively operates as a single-lane crossing under give-way conditions. Although the ITA suggests that some vehicles may be able to pass simultaneously under certain circumstances, the practical experience of local residents is that motorists regularly slow, stop and give way before crossing. The bridge already presents operational constraints and has been subject to maintenance requirements and temporary closures.

The proposal would significantly increase the frequency of heavy vehicle usage over this bridge, with loaded quarry trucks regularly crossing throughout the day over the life of the project.

Despite this reliance, the application fails to provide sufficient evidence demonstrating that Elderslie Bridge is capable of accommodating sustained quarry haulage operations for decades. In particular, the assessment fails to provide:

- A detailed structural capacity assessment;
- An independent bridge fatigue analysis;
- A life-cycle assessment of cumulative heavy vehicle loading;
- An evaluation of long-term maintenance and rehabilitation requirements;
- An assessment of quarry-attributable maintenance costs;
- Analysis of bridge failure, restriction or closure scenarios; and
- Consideration of the impacts on local communities should the bridge require major repairs or replacement.

Without this information, there is no adequate basis to conclude that Elderslie Bridge can safely and sustainably accommodate the proposed quarry traffic.

The conclusion that no bridge upgrades are required is not supported by sufficiently robust engineering evidence. At a minimum, an independent and comprehensive structural assessment should be completed before any determination is made on the application.

Given the scale, frequency, and duration of the proposed haulage operation, the full cost of any new bridge construction or necessary upgrades should be borne by the proponent as a condition of consent and funded upfront, rather than placing the financial burden on local government or the community.

This issue is particularly significant because the bridge provides a critical transport link and is the primary access route south of the Hunter River. Any reduction in its capacity, reliability, or safety would have substantial impacts on local residents, businesses, and the broader regional community.

Existing Road Safety Issues Will Be Intensified

The road safety audit acknowledges a number of existing deficiencies within the haulage network, including constrained sight distances, intersection limitations, alignment issues and other safety concerns.

These risks exist under current traffic conditions. Increasing heavy vehicle movements by up to 110 laden truck trips per day will inevitably increase both the likelihood and severity of traffic incidents.

Particular concern exists at:

- The Stanhope Road and Springvale Road intersection;
- The Elderslie Road and Stanhope Road intersection; The approaches to Elderslie Bridge; and
- Narrow and constrained sections of the proposed haul route.

The Stanhope Road and Springvale Road intersection is especially problematic due to restricted visibility caused by existing vegetation, road geometry and sight distance limitations. The introduction of frequent truck movements at this location significantly increases potential conflict points and creates unacceptable safety risks for local motorists.

Similarly, heavily loaded quarry trucks approaching the Elderslie Road-Stanhope Road intersection will inevitably increase the risk of vehicle conflicts, particularly southward direction to the intersection where a 37 tonne trucks are supposed to give way on a downhill to motorists along Elderslie Road.

The application does not adequately demonstrate how these risks will be managed to an acceptable standard. It does not know the local issues faced by residents on a daily basis. There is a high likelihood a quarry truck of this nature coming from the quarry will eventually cause an accident at this intersection.

Inadequate Assessment of Pavement and Road Infrastructure Impacts

The ITA repeatedly concludes that local roads are capable of accommodating the proposed traffic. However, these conclusions appear largely based on visual inspections rather than detailed pavement engineering analysis.

Heavy vehicle traffic is widely recognised as having a disproportionate impact on pavement deterioration. Even relatively small increases in heavy freight activity can significantly accelerate road wear and reduce asset life.

Local residents have already experienced substantial public expenditure on maintaining and upgrading sections of the local road network. It is unreasonable for ratepayers and local government to bear the costs associated with infrastructure degradation caused primarily by a private quarry operation and the daily truck movements.

Without a detailed pavement assessment, the applicant has failed to demonstrate that the existing road network can support sustained heavy haulage for the life of the project without significant adverse consequences.

Unacceptable Community Impacts

The application also fails to adequately consider the cumulative impacts on residents living along the haulage route.

The proposed quarry traffic will increase:

- Traffic noise;
- Engine braking noise;
- Dust generation;
- Vehicle vibration;
- Delays and travel time impacts;
- Difficulties entering and exiting private properties;
- Conflicts with school buses;
- Interactions with agricultural machinery; and
- Overall loss of rural amenity.

The haul route traverses an established and growing rural residential area where residents have chosen to live based on the existing rural character and relatively low traffic volumes.

The transport assessment gives insufficient weight to the day-to-day impacts that quarry traffic will impose on these communities. The cumulative effect of frequent heavy vehicle movements over a period of several decades will fundamentally alter the character, safety and amenity of the local area.

The proposed introduction of up to 110 laden daily movements by 19-metre, 37-tonne quarry trucks is fundamentally incompatible with the existing rural road network and represents an unacceptable impact on local infrastructure, road safety and community amenity.

For these reasons, the proposal is not in the public interest and should be refused. The Martins Creek Quarry Project (Dungog) was refused in 2023 for the exact same reasons that this application presents to the community. The NSW Independent Planning Commission found that the road transportation of just 450,000 tonnes per year of hard rock quarry products over 25 yrs would have unreasonable and unacceptable impacts

for the communities along the haulage route. Including impacts to Paterson, Bolwarra, and Bolwarra heights.

This application proposes 1Mtpa for 30yrs and along a similar haulage route affecting similar communities of Stanhope, Elderslie, Dalwood, Branxton and for Local region. This would be an even greater impact to the local community than the refused Martin Creeks Quarry Project. Approval of the application would be a contradictory to standards the commission has set in protecting local communities from unreasonable and unacceptable impacts.

Noise and Vibration Impacts

I object to the proposed development application on the grounds that the Noise and Vibration Impact Assessment does not provide sufficient evidence to demonstrate that the project's impacts on nearby residents, environmental receivers, and surrounding infrastructure have been adequately assessed or can be appropriately managed. The assessment relies heavily on assumptions, incomplete modelling, and unverified inputs, creating significant uncertainty regarding the true extent of the project's noise and vibration impacts.

Background Noise Monitoring

A significant weakness of the assessment is the absence of actual background noise monitoring at or near sensitive residential receivers. Instead, the assessment adopts assumed minimum Rating Background Levels (RBLs) permitted under the Noise Policy for Industry (NPI) and describes this approach as conservative.

There is no evidence that the adopted RBLs accurately reflect the existing acoustic environment. In a rural setting, background noise levels are often substantially lower than assumed values. If actual background levels are lower, the applicable projected noise criteria become more stringent, potentially resulting in exceedances that have not been identified in the assessment. The conclusions therefore rely on assumptions rather than measured site conditions. Further assessment is required to accurately portray real world data.

Incomplete Assessment of Operational Noise Sources

The assessment appears to focus primarily on in-pit processing activities and does not adequately address several potentially significant noise sources associated with quarry operations, including:

- Mobile crushing equipment;
- Secondary and tertiary crushing operations;
- Screening equipment;
- Trucks operating on haul roads;
- Idling heavy vehicles and plant;
- Simultaneous operation of multiple processing units.

The report does not clearly identify how many crushing and processing units may operate concurrently or whether the modelling reflects a realistic worst-case operational scenario. Without this information, there can be little confidence that predicted noise levels represent actual operating conditions.

Insufficient Consideration of Early Development Stages

The assessment provides limited consideration of noise impacts during the initial stages of quarry establishment. During these phases, topographic screening, quarry faces, bunding, and other noise attenuation measures may not yet be available.

As a result, nearby residents and ecological receivers may experience substantially greater noise impacts than those predicted for later stages of operation. The assessment does not adequately demonstrate that impacts throughout the full life of the project have been considered.

Incomplete Sleep Disturbance Assessment

The maximum noise event (LA_{max}) assessment appears to be based on a single source: material falling into an empty truck body.

Several other potentially intrusive noise events do not appear to have been assessed, including:

- Truck air brakes;
- Tailgate impacts;
- Loader bucket impacts;
- Reversing alarms;
- Engine starts;
- Gear changes;
- Vehicle interactions and movements on haul roads.

These noise events can be highly noticeable during early morning periods and may contribute significantly to sleep disturbance. Their omission raises concerns that the assessment underestimates community impacts.

Lack of Noise Monitoring and Compliance Commitments

The report states that operational monitoring and management measures are not required because modelled results indicate compliance with project noise criteria.

This conclusion is difficult to reconcile with other parts of the assessment that acknowledge the need for:

- Monitoring and reporting under the NPI;
- Construction noise management measures;
- Blasting management obligations;

- Further assessment relating to the nearby gas pipeline.

For a quarry expected to operate for decades, the absence of a formal noise monitoring and adaptive management framework is inappropriate. Ongoing monitoring is essential to verify whether actual impacts align with modelled predictions and to provide mechanisms for corrective action if required.

Marginal Construction Noise Compliance

The assessment predicts construction noise levels of 44 dBA at Receiver R01 against a criterion of 45 dBA, providing only a 1 dB compliance margin.

Given the inherent uncertainty associated with predictive modelling, such a narrow margin provides little assurance that compliance would be achieved under actual construction conditions. The report does not include a sensitivity analysis or discussion regarding variations in equipment use, site conditions, or operational practices that could result in exceedances.

Inadequate Assessment of Ecological Impacts

The assessment states that blast overpressure effects on the nearby Tangory Nature Reserve would be negligible yet provides limited evidence to support this conclusion. There are no detailed calculations, ecological investigations, wildlife response studies, or supporting technical analyses presented.

Without this information, it is not possible for the community or consent authority to independently verify the conclusion that ecological impacts will be insignificant.

Risks to the Hunter Gas Pipeline

The assessment gives insufficient consideration to the risks posed by quarrying and blasting activities in close proximity to the Hunter Gas Pipeline. Given the potentially catastrophic consequences of a pipeline failure or gas explosion, particularly with the pipeline traversing the quarry site, this issue requires a much more comprehensive and detailed assessment.

Potential impacts associated with blasting-induced vibration, ground movement, rock fragmentation, and heavy equipment operations have not been adequately evaluated. Considering the significant safety, environmental, and operational risks involved, the interaction between quarry activities and the gas pipeline should be treated as a major safety risk and supported by a robust risk assessment, detailed engineering analysis, and appropriate mitigation measures.

Air Quality and Greenhouse Gas Emissions Impacts

I object to the proposed quarry development due to significant concerns regarding the adequacy of the Air Quality and Greenhouse Gas Assessment. While the assessment concludes that the project will comply with relevant environmental criteria, it relies heavily on assumptions, limited data sets and incomplete analysis, which substantially reduces confidence in the conclusions reached.

A key concern is the failure to adequately assess cumulative air quality impacts from other existing and approved industrial activities within the region. The assessment largely relies on background monitoring data rather than modelling emissions from nearby quarries, mines, transport corridors and industrial sources. In a region already subject to significant industrial activity, this approach does not provide confidence that the combined impacts on local air quality have been properly evaluated.

The assessment also relies on a single year of meteorological data to predict impacts from a quarry proposed to operate for approximately 30 years. Dust generation is heavily influenced by weather conditions, yet the assessment does not consider drought conditions, extreme wind events, bushfire years or future climate-related changes that may increase dust impacts. This raises concerns that the modelling does not represent realistic worst-case conditions.

Further concern exists regarding the assessment of dust and respirable crystalline silica (RCS). The report does not present site-specific silica testing, geological characterisation or mineralogical analysis of the resource despite the well-documented health risks associated with silica exposure from hard rock quarrying. In addition, background dust levels have largely been derived from assumed relationships rather than comprehensive site-specific monitoring, creating uncertainty regarding the accuracy of predicted impacts.

The assessment also provides limited analysis of off-site transport impacts, including truck-generated dust, diesel particulate emissions and impacts on residents along haulage routes. Given the scale and lifespan of the operation, these impacts warrant more detailed investigation.

Importantly, the modelling itself contains uncertainties, including meteorological validation results that do not meet recognised performance benchmarks for wind direction accuracy. As wind conditions are a critical factor in determining dust dispersion, these shortcomings reduce confidence in the reliability of the predicted outcomes. The report also contains a number of internal inconsistencies and data presentation errors that further undermine confidence in the assessment.

Despite the scale of the project and its proposed long-term operation, the assessment does not recommend a comprehensive ambient air quality monitoring program. Best-

practice quarry operations typically include dust deposition monitoring, PM10 monitoring, meteorological monitoring and community complaint response procedures to verify compliance and protect surrounding communities.

Finally, the greenhouse gas assessment appears limited in scope and does not adequately address broader emissions, long-term climate resilience or a clear pathway towards emissions reduction and alignment with net-zero objectives.

For these reasons, I believe there is insufficient evidence to conclude that the proposed quarry can operate without unacceptable impacts on air quality, public health, local amenity and the surrounding environment. I respectfully request that the consent authority require further site-specific investigations, a comprehensive cumulative impact assessment, silica testing, improved meteorological modelling and a robust air quality monitoring and management program before any approval is considered.

Biodiversity Impacts

I object to the proposed quarry development on the basis that the Biodiversity Development Assessment Report (BDAR) does not provide a sufficiently robust or precautionary assessment of the likely impacts on biodiversity. While the report may satisfy the procedural requirements of the Biodiversity Assessment Method (BAM), it relies heavily on assumptions, modelling and incomplete survey data, creating a significant risk that biodiversity values and ecological impacts have been underestimated.

A key concern is the adequacy of the biodiversity surveys undertaken to support the assessment. The BDAR acknowledges limitations in survey access, timing and coverage, including areas that were not effectively surveyed due to dense weed infestations. Despite these limitations, the report assumes many of these areas are unsuitable habitat and concludes that threatened species are absent. The absence of recorded species should not be relied upon as evidence of absence, particularly given the scale of native vegetation proposed to be cleared.

The assessment also relies extensively on modelled data, database records and habitat assumptions to determine the likelihood of species occurrence. Species have frequently been excluded based on regional filters, habitat assumptions and distribution modelling rather than comprehensive field verification. This approach introduces a bias towards lower biodiversity values and reduces confidence that all threatened species and ecological communities have been adequately identified.

Further concerns arise from acknowledged data quality issues, including a GPS failure during field surveys that required manual reconstruction of survey transects. Combined with the absence of independent quality assurance or verification of ecological mapping, these issues create uncertainty regarding the accuracy of the survey results and impact calculations.

The BDAR focuses primarily on direct vegetation clearing but gives insufficient consideration to indirect and cumulative impacts associated with long-term quarry operations. Noise, blasting vibration, dust deposition, habitat fragmentation, edge effects, weed invasion, increased traffic and long-term habitat degradation are acknowledged but not comprehensively quantified or incorporated into offset calculations. These impacts have the potential to affect biodiversity well beyond the disturbance footprint and may significantly alter habitat quality and ecological connectivity over time.

There are also concerns regarding the adequacy of the proposed biodiversity offsets. While the report identifies substantial offset requirements, it does not demonstrate that the offsets will genuinely replace lost ecological function, maintain local populations of threatened species or compensate for the permanent loss of habitat. The offset strategy appears numerically compliant with the BAM framework but does not convincingly establish ecological equivalence.

Of particular concern is the treatment of the Large-eared Pied Bat and other threatened fauna. The conclusion that serious and irreversible impacts are unlikely appears to rely on narrow assumptions regarding breeding habitat while giving insufficient weight to the importance of foraging habitat and landscape connectivity.

Given the survey limitations, reliance on modelling, data quality concerns, underestimation of indirect impacts and uncertainty surrounding offset effectiveness, the BDAR does not provide sufficient confidence that the true ecological impacts of the development have been identified or adequately mitigated.

Accordingly, I request that the consent authority require additional targeted biodiversity surveys, independent verification of ecological data and mapping, a more comprehensive assessment of indirect and cumulative impacts, and a demonstrated evidence-based assessment of offset effectiveness before any determination is made. Until these matters are satisfactorily addressed, the environmental impacts of the proposed quarry remain uncertain, and the development should not be approved in its current form.

Conclusion

For the reasons outlined in this submission, the proposed Bluestone Hardrock Quarry has not demonstrated that it is in the public interest, strategically justified, or capable of operating without causing unacceptable impacts on local communities and the environment. The application relies heavily on assumptions, modelling and incomplete assessments across key disciplines, including traffic, noise, air quality, biodiversity and long-term community impacts.

The proposal would introduce a major industrial development into a rural area for at least 30 years, resulting in significant increases in heavy vehicle traffic, road safety risks, noise, dust, greenhouse gas emissions, habitat loss and cumulative environmental impacts. Importantly, these impacts are being proposed in a region that already contains substantial existing and approved quarry resources, with no compelling evidence that additional greenfield extraction capacity is required.

Accordingly, I respectfully submit that the adverse impacts of the proposal outweigh any claimed benefits and that the development has not been demonstrated to be ecologically sustainable, strategically necessary or compatible with the surrounding rural community. For these reasons, Application SSD-76210271 should be refused.