

Submission: Bluestone Hardrock Quarry Project (SSD – 76210271)

Personal background: I own and reside on a 130acre grazing property which is located on both sides of Stanhope Road, Stanhope.

I have lived in my current home, which is located on a wind exposed ridgeline and is 5.2km (as the crow flies and the prevailing winds blow) from the site of the proposed Bluestone Hardrock Quarry, for 18 years enjoying the beauty and tranquillity of the area as well as the abundant native wildlife.

My domestic water source is roof collected rainwater and my property has several stock dams.

I am an avid gardener, grow most of my own vegetables and spend much of my day outside.

I use the first thirteen kms of the proposed haulage route associated with this Project to drive into Branxton, Huntlee, and Greta a minimum of four times each week, mostly on weekdays between the hours of 9am and 4pm, to access the local shops, medical centre and veterinary clinic, Post Office and other services or to access the Hunter Expressway to travel to Newcastle, Sydney and beyond

Position: I object to this project

My objections are in relation to:

1. The proposed Haulage Route and multiple failures to meet the SEARs..
2. Failure to address the cumulative impacts of the Queensland Hunter Gas Pipeline, as required by both the NSW SEARS of 16/10/2024 and 26/06/2025 and the Supplementary SEARS for MNES dated 22/04/2026.
3. The environmental impacts of the project and failure to even attempt to meet the Supplementary SEARs for MNES.

4. Failures to conduct baseline studies (as per the SEARS General Requirements) to fully account for: local wind and weather conditions, the current local particulate pollution burden, and the impacts of the additional dust and GHG and diesel emissions the Project will generate.
5. Failure to conduct adequate baseline studies [as per the SEARs General Requirements] to assess and fully address the potential Noise Pollution and Impacts of both the quarrying operations and haulage activities on all sensitive receivers.
6. Failures and shortcomings of the Community Engagement process.
7. **Concerns** regarding a potential future application for a modification to expand the quarrying footprint if the project is approved.

1. The Proposed Haulage Route and multiple failures to meet the SEARs:

Summary of Evidence for Objections:

- A. The Traffic and Transport Assessment does not detail the full impacts the extra HV vehicle movements generated by the Project will have on the capacity, condition, safety, and efficiency of the local and State Road network, including a road safety audit as required by the SEARs [7 Traffic and Transport] E.G. The impacts of an unknown number of extra HV generated by the Project, using the New England Highway to access Lochinvar, Rutherford, Maitland and beyond and Wine Country Drive to access Cessnock plus the Hunter Expressway to access both east and west located destinations have not been assessed as required.**
- B. The section of the proposed haulage route encompassing Springvale, Stanhope and Elderslie Roads is not currently an approved HV Route.**
- C. No inbound access route has been described as required by the SEARs. To ensure that unsuitable non NHV Routes are not**

used a Condition should be included in any subsequent approval for the Project that only approved NHV Routes should be used for all incoming movements of HV associated with the Project, either those HV contracted directly or contracted by end users.

- D. No Traffic and Transport Assessment, including impacts on capacity, condition, safety assessment (including crash data), and efficiency has been included for the entirety of the Wine Country Drive/Greta Hunter Expressway Interchange or entry of exiting in both west and east bound directions, or the New England Highway travelling towards Maitland nor the entirety of Wine Country Drive towards Cessnock. Both of these roads and the entirety of the Interchange could be used for deliveries to concrete batching manufacturers located at Rutherford, Maitland, Singleton, and Cessnock. This is in direct conflict with the requirements of the SEARs [7 Traffic and Transport].
- E. No emergency nor longer term detour route has been described if the proposed haulage route is closed due to major bridge repairs (Elderslie Bridge) or for an extended period due to a serious traffic accident.
- F. Photographic evidence included in the Integrated Transport Assessment is considered misleading as it does avoid showing sections of damaged road pavement and edges on a blind curve on a hill section on Stanhope Road and downplays the extent of the lack of road edge marking on Elderslie Road.

This could be viewed as conflicting with the signed REAP Declaration at the beginning of the EIS.
- G. The traffic movement data for Stanhope Road is inaccurate and only purportedly covers the Eastbound haulage route. The data provided for Site 6 is inconsistent whilst local 'lived experience' and also conflicts with other data found within the Integrated Transport Assessment. In addition, a diagram purporting to show the Elderslie Road and New England Intersection has erroneously included non-existent dedicated left and right hand turning lanes and failed to include Maitland Street.

This could be viewed as conflicting with the signed REAP Declaration at the beginning of the EIS.

- H. The 10-year limitations of the Integrated Transport Assessment provide no certainty regarding the suitability of the proposed haulage route for the entire 30 years (or potentially 50 years), the Project proposes to operate for.
- I. The content and findings of Safety Audit of Elderslie Bridge at the end of the Integrated Transport Assessment is not reflected in in the body of the Assessment.
- J. The Integrated Transport Assessment has failed to account for any cumulative impacts as required by the SEARs [7 Traffic and Transport] that Queensland Hunter Gas pipeline construction period might cause on the proposed haulage route or to even mention it, instead concentrating on one new housing development on Elderslie Road, but failing to account for numerous others which are located on the 'unofficial' haulage routes.
- K. The proponent has failed to address all community concerns raised with them via telephone calls, emailed correspondence and during interactions at the two information drop-in sessions conducted in February 2026.

EVIDENCE:

A. The official proposed haulage route is not fully described per the explanations used.

- Mapped version of Haulage Route: At the beginning of the EIS Summary [Fig 6 Page 26], the official haulage route is described as including only Springvale Road, Stanhope Road from the junction with Springvale Road to the Elderslie Road intersection, and then Elderslie Road to the intersection with the New England Highway (AKA Maitland Street). From there it is stated to include the New England Highway to the intersection with Wine Country Drive and then proceeding onto the Hunter Expressway Interchange roundabout but with no defined direction of travel from that point. [See map below]

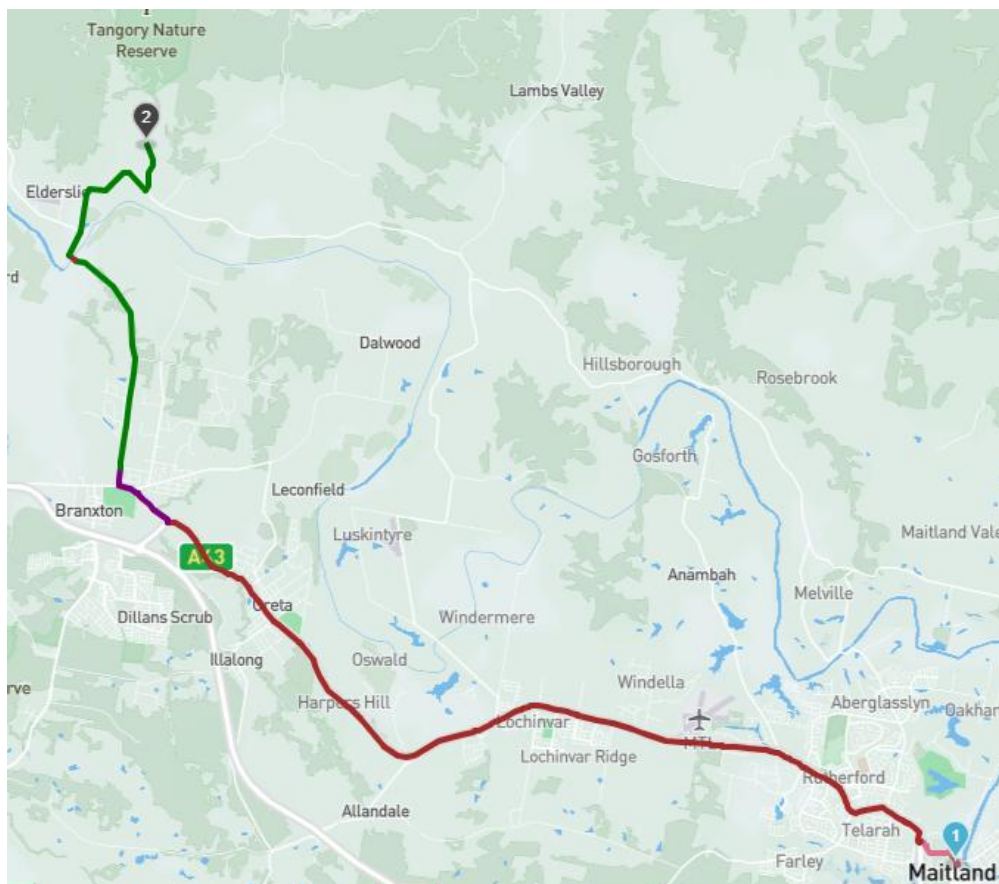


- Unassessed supplementary haulage routes: Within the Integrated Transport Assessment [6.7.2] mention is made of an unknown number of trucks turning continuing on the New England Highway, presumably through the townships of Greta and Lochinvar (where there is a school zone extending approximately 1km plus two signalised pedestrian crossing), to enact deliveries to the numerous housing developments occurring between Greta and Anambah and to concrete batching companies in Rutherford and Maitland. It is recognised that the New England Highway is a recognised NHV Route.
- No mention is made of any despatch vehicles that may use the Hunter Expressway Interchange roundabout on Wine Country Drive to then proceed Southward towards concrete batching plants located in Cessnock via the entirety of Wine Country Drive,
- No mention is made of any despatch vehicles that may enter the Hunter Expressway via the roundabout to travel Westbound towards Singleton.
- This has resulted in the Traffic and Transport Assessment not meeting the requirements of the SEARs [7 Traffic and Transport] which requires a detailed assessment of potential traffic impacts on

the capacity, condition, safety, and efficiency of (both) the local and State Road network, including a road safety audit.

B. Use of a currently unapproved HV Route for a haulage route for the Project.

- The sections of both Elderslie and Stanhope Roads and the entirety of Springvale Road, which are being sought by the Proponent for approval as a haulage route for a period of 30 years (and potentially 50 years), are not currently approved as an HV haulage route per the NHVR website [See map below]



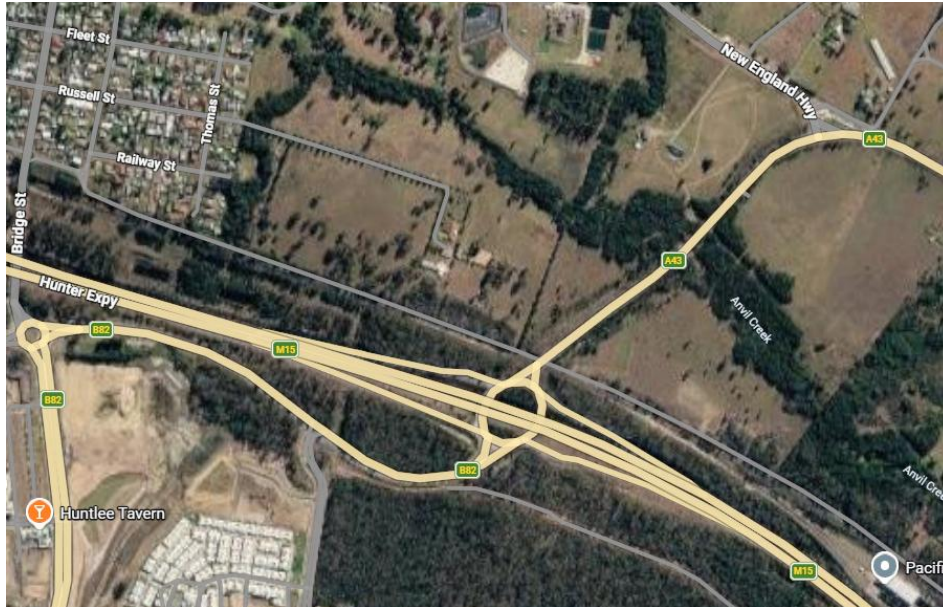
- The argument used by the Proponent that Elderslie Road (including Elderslie Bridge) was previously used as a haulage route by the Great Greta Colliery to transport coal to the Braxton Rail Coal Loder should not be considered a valid argument to support the proposed haulage route for the Project.

- The Great Greta Colliery ceased operations and haulage activities 29 years ago and its past haulage movements were vastly smaller, and more regulated regarding the times when Elderslie Bridge could be crossed and the haul route used, so the Proponent's argument based on historic use of this section of the haulage route, should not be given any weight against the current importance of both Elderslie Road and Elderslie Bridge, both of which serve as a vital connection between numerous growing rural communities north of the Hunter river and Branxton, Greta south of the River where local vital services, schools, shops are located and the main road network commences.
- Even when the Great Greta Colliery was operational, the vastly smaller number of time regulated truck movements still created conflicts with the other significantly lower number of road users.

C. There is no incoming HV access route described as required by the SEARs.

- Whilst the outgoing haulage route (laden trucks) is described, there is no described route to be used by contract truck drivers, either working for the proposed quarry project or for end users, for travelling to the proposed quarry site.
- The SEARs specified [7 Traffic and Transport] that the Traffic and Transport Assessment include a description of existing and proposed **access** roads. I.E. Specific description of the INCOMING existing and proposed route to access the Project site.
- The Integrated Transport Assessment [11 Traffic Distribution - Impact of Traffic From this Development] only states that 'all heavy vehicles to follow defined haul route **from** the site to the Hunter Expressway' I.E. Outgoing movements.
- E.G. A map of the 'official' haulage route (which does not include the supplementary New England Highway to Rutherford/Maitland route) fails to describe the use of the Branxton/Wine Country Drive off ramps from the Hunter expressway and the interchange roundabout to reach Branxton and the junction with Elderslie

Road and hence the proposed quarry project in Springvale Road, via Stanhope Road. [Compare the 'official' Haulage Route Map in point A with the map of the Hunter Expressway interchange on Wine Country drive below]



- There is no explicit guarantee anywhere within the EIS that contracted truck drivers, especially those not contracted directly by the quarry operator, but by end users, will not use 'alternative' routes to save time and avoid the heavier traffic on the New England Highway, when traveling to the proposed quarry site.
- In the absence of any guaranteed dedicated inbound route for the 110 inbound movements per day, including haulage contractors' initial trip to the project site, being provided by the Project proponent, there are **serious concerns that incoming trucks will use local rural roads that are not listed on the NHVR Route website**. E.G.s Luskintyre Road, Maitland Vale Road via Aberglaslyn Road and Melville Ford Road, Stanhope Road (eastern end), and Elderslie Road towards Glendon Road and beyond. All these roads form parts of known, shorter, routes to the proposed quarry site that avoid the increasingly congested New England Highway.
- Any extra heavy vehicle movements on these local roads will dramatically increase the risks of collisions both with other vehicles and straying livestock and even livestock being herded across the road where graziers own grazing land on both sides of the road as

in our personal experience truck drivers on a time schedule are notorious for not stopping when livestock are being moved across the road, despite 'cattle on road' warning signs being prominently displayed, creating a dangerous situation for the livestock owners and other road users.

- In addition, there is the risk of collisions between heavy vehicles using Maitland vale Road and other drivers. Heavy trucks are often encountered drifting over the white dividing line into the oncoming traffic lane when navigating some bends on rise causing oncoming driver to need to serve onto the very narrow grass verge to avoid a potentially fatal crash. This situation has been experienced by many local road users/residents (as well as me on at least two occasions).

D. Failure to include all potential haulage route roads in the Integrated Transport Assessment in key sections, including important safety data as outlined in the SEARs.

- The Traffic and Transport Assessment has not meet the requirements of the SEARs [7 Traffic and Transport]
- Omitted Traffic Impacts, Suitability Assessments, Cumulative Impacts and Crash Data: The section of the unofficial haulage route that is described to continue along the New England Highway from Branxton, for an unspecified number of HV has not been assessed for suitability within the Integrated Transport Assessment, no other development (including numerous planned housing developments) has been considered in any cumulative impact assessment and no has any crash data been supplied for this section of the New England Highway..
- NOTE: This section of the New England Highway is experiencing increased traffic build ups and delays, mainly due to the numerous new housing developments that have been completed. Many more are currently being built or planned.to be built.
- Omitted Traffic Impacts, Suitability Assessment, and Crash Data: Neither the Hunter Expressway off ramp to Branxton/Wine Country Drive, nor the East bound on ramp to the Hunter Expressway, or the

West bound on ramp towards Singleton, or the off ramp from the East on to the interchange roundabout has been included in the traffic movements data nor the crash data for the period stated, being 2019 - 2025.

- **NOTE:** In 2023 that roundabout was the scene of a tragic hire bus accident in which twenty-three persons lost their lives and a few weeks later a heavy truck overturned whilst negotiating the turn off the roundabout to enter the on ramp for the Eastbound Hunter Expressway.
- Omitted Traffic Impacts, Suitability Assessment and Crash Data: The potential supplementary haulage route along the entirety of Wine Country Drive (from the New England Highway Intersection) and including the roundabout at the roundabout intersection of Wine Country Drive, Bridge Street and Toll Bar Avenue (Huntlee), to reach concrete batching plants located near Cessnock plus other types of end users has not been assessed in the Traffic and Transport Integrated Assessment as required by the SEARs [7 Traffic and Transport] for potential impacts.
- Whilst it is recognised that Wine Country Drive is an approved haulage route per the NHV Route website, the areas of Huntlee/North Rothbury and Pokolbin, which Wine Country Drive passes through, are all experiencing the impacts of the major Huntlee Development. Projected final figures is for 7,500 homes and includes Green Ridge Retirement Village, a new Kindergarten, Primary and High School and includes a new shopping precinct and commercial area developments, all of which have resulted in a significantly increased number of local traffic movements and Wine Country Drive is a known **black spot** for vehicle accidents. In addition, no Cumulative Impacts have been considered for this potential 'unofficial' section of the haulage route.

E. Failure to provide an emergency (medium or long term) detour route plan for the haulage route.

- If any part of the haulage route is closed for an extended period (E.G. A major accident or the closure of the Elderslie Bridge for safety reasons or major repairs) there is no indication that any alternative route has been assessed as suitable to allow the quarry to continue to despatch product to and users and enable return trips.
- The comment on page 15 [Alternate Transport Mode] of the Integrated Transport Assessment, that **the road network is suitable to be used as a haulage route** has raised concerns that **other routes may be used for both incoming and outgoing** heavy vehicles as emergency and longer term detour routes which may include both the eastern section of Stanhope Road (a rural road) and potentially either Luskintyre Road (also a rural road) to access Lochinvar across the Heritage listed Luskintyre Bridge (Built 1904 and that is weight restricted to 23 tonnes), and back to the Hunter Expressway via the New England Highway through via Greta and then for returning trips, or use of Maitland Vale Road (a rural road) to access the New England Highway through to Rutherford and Maitland via Melville Ford and Aberglaslyn Roads and back. All these roads are entirely unsuitable for use as a haulage route, even in the short term. In addition, the use of Elderslie Road (a rural collector road), through Elderslie Village to provide access for deliveries to and return trips from Singleton is also of concern to many local residents and road users.
- The EIS [Page 73 6.6.3 Mitigation Methods] references the State Significant Becker Bridge (over Webbers Creek) as a potential future part of an alternative haulage route but whilst it clarifies that no assessment for its suitability as a haulage route for heavy vehicle movements has yet been conducted it also states that an assessment would need to be conducted if HV contractors wanted to use it to deliver to end users in the future. However, confusingly, the EIS [Heritage Page] also states that Becker Bridge will **not be used** to traverse Webbers Creek, which is located north of the Project.

F. Misleading photographs of Stanhope Road and misleading information regarding Elderslie Road used to support its suitability as part of the proposed Haulage route.

- The two photographs of Stanhope Road in the Integrated Transport Assessment [Figs 5 & 6] misrepresent the current condition of the road surface on the combined blind corner and crest just before a winding and steep section of the road just east of the Springvale Road junction. Plate five was taken looking back towards the Springvale Road intersection which is just beyond the curve of the road.
- The road pavement condition on the section of Stanhope Road in the opposite direction, which commences approximately .50km from the Springvale Road Intersection, is regularly potholed and suffers from crumbling road edges (a condition it was in when the Integrated Transport Assessment Report was prepared prior to recent repairs by Singleton Council).
- This particular section of Stanhope Road, including the road surface and edges, will likely be even further impacted by 220 heavy vehicle movements Mon – Fri (1100 per week).
- Plate six shows a newly constructed section (to address flooding issues), but even that clearly show the overtaking section that ceases for southern bound vehicles prior to another crest, with the junction with Elderslie Road being located just beyond it. If a photograph had been included looking in the opposite direction at this point, it would have shown the acute bend just prior to a steep section of Elderslie Road up to the blind corner and crest.
- The Integrated Transport Assessment states that Elderslie Road ‘is edge marked (in places)’. This is misleading. The **majority** of Elderslie Road has no edge markings.
- I strongly suggest that the photographs presented in the Integrated Traffic and Transport Assessment are misleading regarding the current condition (flawed base line assessments?) of a potentially dangerous section of Stanhope Road and of the current road markings (or rather lack of) on Elderslie Road.

G. Omitted (or potentially inaccurate) traffic movement data supplied for Stanhope Road:

- The traffic movements data [Integrated transport Assessment 25 Appendix A Traffic Survey], supplied for Stanhope Road only provides movements numbers travelling Eastbound (I.E. Proposed haulage route to be used by outgoing trucks is Westbound).
- Additionally, these Eastbound figures **do not match local experiences**. The Eastbound figures given would better match Westbound traffic numbers to account for the high numbers of mineworker using Stanhope Road to return home after completing their shifts, although the lack of 'mirroring' between the am numbers and the pm numbers is concerning as the am movements are known to be, via local experience, considerably higher..
- The 'combined movement data' in the second chart clearly shows a definite peak period for Eastbound traffic movements between 4pm and 6pm which should have been mirrored during in Westbound movements in the am period. I
- The apparent lack of mirrored (Westbound) traffic movement data, being the direction of the proposed Haulage route, between 5am and 9am is extremely concerning.
- To highlight this concern further , the measurements of traffic movements over a 6-day period for 60 minute periods in both the am and pm (times unspecified) , recorded at Site 101, which studied traffic flows at the Elderslie and Stanhope Road intersection, and was also included in the Integrated Traffic and Trasport Assessment documentation, clearly indicates that Stanhope Road Eastbound, had an hourly AM hourly average of 73 movements and a hourly PM average of 60 movements and that Stanhope Road Westbound (direction of the proposed haulage route) had an hourly AM average of 47 movements and a PM hourly average of 98 movements ,
- These figure for Site 101 recorded for merely 6 days for one-hour period in both the morning and afternoon, suggest very

strongly that the Traffic Survey Data figures gained at Site ^ equipment located just outside a property gate on Stanhope Road)) may either have been corrupted or misrepresented.

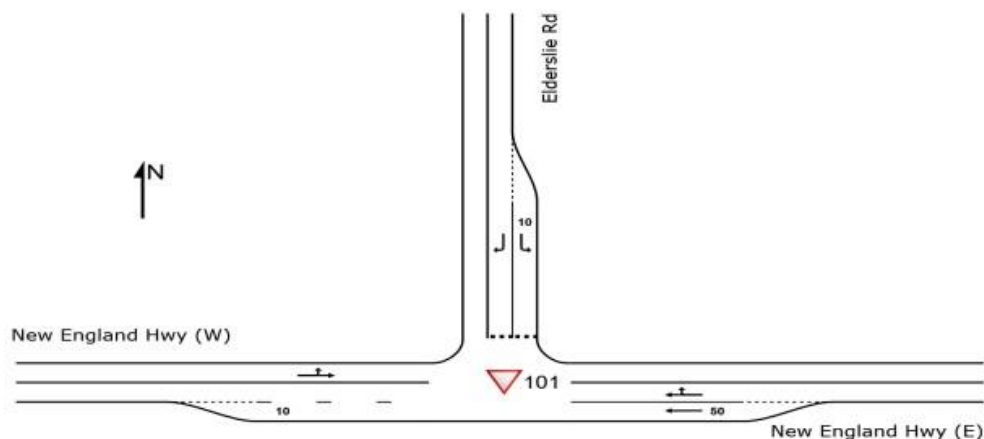
- **It is strongly suggested that the high numbers of (locally experienced) Westbound movements from about 5am until 9am have not been shown, and therefore not accounted for, and that the entire 2 piece data set for this location (Site 6) is incorrect and provides an inaccurate/incomplete record of traffic movements on Stanhope Road between the Springvale Road junction to the junction with Elderslie road.**
- The diagram of the intersection between Elderslie Road and the New England Highway (AKA Maitland Street) included in the Integrated Traffic and Transport Assessment is inaccurate and misleading.
- It does not show the side street ,which is the remaining section of the original Maitland Street, and there is currently no dedicated left and right turning laned at the end of Elderslie Road as shown. [See included diagram below compared to the current Google Maps satellite map].

SITE LAYOUT

▽ Site: 101 [NEH & Elderslie Rd_2025_AM_Base (Site Folder: General)]

New England Hwy & Elderslie Rd, Branxton
Site Category: (None)
Give-Way (Two-Way)

Layout pictures are schematic functional drawings reflecting input data. They are not design drawings.





H. Integrated Transport Assessment limited to a 10-year period.

- The limitation of the Integrated Transport Assessment to only account for the use of the Haulage Route for a ten-year period, when the proposed quarry is seeking a 30-year approval with the potential to apply to extend that period by another 20 years, is extremely concerning.
- For example, the Assessment for the use of the 136 year old, Heritage listed, single lane Elderslie bridge (built in 1890 to connect the communities and service the needs of Stanhope, Elderslie and Branxton), that states that the bridge will be suitable, **if regularly maintained**, for the next ten years, provides no comfort for the hundreds of local residents who rely on it to provide their only direct link to the nearest shops, schools, and services and also the major road network.

I. Failure to acknowledge the information within the Safety Audit Report conducted on the use of Elderslie Bridge as part of the proposed haulage route within the overall assessment of the bridge's use in the Integrated Transport Assessment.

- The Integrated Transport Assessment contains a Safety Audit conducted on Elderslie Bridge [F Road Safety Audit – Existing Condition] which clearly outlines numerous safety concerns if it is used as a haulage route for large heavy trucks with dogs. However, the Executive Summary states that Elderslie Bridge is entirely suitable (implying safe), to be used as part of the proposed Haulage route [6.7.2] for the next 10 years, as long as it is maintained.
- This is in direct conflict with the information provided by the content of the Safety Audit which includes numerous concerns about road/bridge signage, the safety barriers, problems with visual lines of sight for vehicles approaching from the west detect vehicles already travelling on the bridge and safety issues regarding the western approach to the bridge.
- Local experiences using Elderslie Bridge are that not all vehicles approaching from the east stop to give way to vehicles on the western approach ramp, sometimes resulting in vehicles travelling in opposite directions needing to either pass on the bridge or one to back up and that some vehicles travelling from the west purposefully speed up if they see a vehicle, or several vehicles about to enter the bridge from the east, to try to ‘beat them’ onto the bridge. Instances like these have cause many arguments between road users that have often take place on the bridge itself during ‘standoff’ situations where one driver refuses to reverse.

J. Failure to include the cumulative vehicle impact of the construction period of the 2009 Approved Queensland Hunter Gas Pipeline as directed in the SEARs.

- The SEARs [7 Traffic and Transport] clearly requires assessment of cumulative traffic impacts regarding any other proposed development (in the locality).
- It is presumed that this includes cumulative impacts of the proposed haulage route.

- The Integrated Transport Assessment [20 Cumulative Impacts of Other Developments], certainly outlined the projected Cumulative Impacts on the proposed Haulage Route of an approved future housing development located next to Elderslie Road and suggested that a significant reduction in the speed limit to either 60km or 50km per hour for an additional 2 kilometres of Elderslie Road as a potential road safety mitigation method, but then failed to account for other new and proposed housing developments on other 'unofficial' sections of the haulage route.
- BUT The Integrated Traffic and Transport Assessment also failed to account for the cumulative impacts of the QHGP project . This will involve extra hv movements for the transportation of long sections of 500m diameter pipeline, plus the transportation of pipeline construction machinery by the local roads and State road network to nearby locations such as Glendonbrook, Elderslie, Stanhope and beyond as well accessing the proposed quarry location, during the construction period of the Queensland Hunter Gas Pipeline.
- QHGP construction traffic movements, as outlined in the EIS for the Queensland Hunter Gas Pipeline, will continue for a minimum of 3 months in each local area, and involve up to 26 heavy vehicle movement per day on the local road network , some of which will involve the transportation of 18 m long sections of pipeline by road, which will result in traffic delays, and also the movements of buses and other vehicles transporting workers to the worksites on a daily basis. It is not envisaged that Elderslie bridge will be used to transport the 18m long pipe sections despite the loaded mass weight being only 26tonnes, due to the acute turn at the western end. This means that Elderslie Road, from the west, Cranky Corner Road South, and Stanhope Road, in both directions, will likely be used for the QHGP construction transportation needs.
- Clearly the Proponent has not discussed these local road usage details with the proponent of the QHGP yet, despite the clear conflict between the QHGP construction period needs and the proposed Projects haulage route usage.

K. Failure to provide satisfactory, or non-provision of , mitigation measure in response to multiple residents' concerns raised at the two drop-in sessions in February 2026:

- I. Additional traffic noise for those living adjacent to the proposed haulage route.
 - The Noise Assessment does not address concerns raised by residents of Stanhope, Elderslie, and Branxton, living adjacent to the proposed haulage route regarding excess noise from 1100 heavy vehicle movements Monday to Friday.
- II. Concerns raised by those living on the haulage route in Stanhope, Elderslie, and Branxton with obscured or recessed property access and egress .
 - The EIS [Page 90 Impact Assessment] suggests that the concerns raised about the additional impacts of the proposed haulage route on the safe accessing or exiting of properties, even where there is clear line of sight concerns for other road users, is the responsibility of the 'asset owner'.
 - Alternatively the Integrated Transport Assessment [21 Proposed Mitigation Measures], when discussing the cumulative impacts of both the proposed haulage route and an already approved new housing development adjacent to Elderslie Road, suggested that reducing the speed limit to between 50km and 60km south of Rusty Lane would assist in resolving these particular concerns without recognising the actual property locations of those that raised nor that these concerns raised were about the extra 220 hv vehicle movements associated with the proposed quarry project..
- III. Concerns raised by those concerned with the potential hazards associated with risk taking by other frustrated road users.
 - Despite numerous concerns raised about a potential increase in risky driving or speeding behaviours (especially by those following heavily laden trucks on long stretches of both Stanhope and Elderslie Roads where overtaking is prohibited), the only response to date has been to state that all road users should

abide by the road rules without including anything in the EIS in response to these concerns.

IV. Concerns raised about the 'dangerous' intersection between the New England Highway and wine Country Drive.

- Whilst the Integrated transport Assessment [19 Traffic Impacts of Proposed Development: Traffic Efficiency] also rates this intersection as problematic the only solution offered in the EIS [6.7.2 Impact Assessment] was that Cessnock Council should intervene to remedy the situation.

V. Concerns raised regarding pedestrians, cyclists and E Scooter riders (including school aged children) being forced to use the road pavements at the end of Elderslie Road (towards the New England Highway/Maitland Street intersection).

- These concerns were raised by numerous persons due to the lack of a complete footpath, the subsequent narrowing road and thick impassable road verge vegetation.
- The proponent has 'buck passed' this issue [EIS 6.7.2 and the Integrated Transport Assessment 17 Impacts on Pedestrians] to Cessnock Council with the suggestion that grant monies, that have already been allocated to another pedestrian pathway project, could be used to complete the pedestrian pathway to the corner of Elderslie Road and the New England Highway.

VI. Concerns about risks for school buses and their passengers due to Stanhope and Elderslie Roads and the New England Highway (an 'unofficial' supplementary haulage route extension) being significant school bus routes.

- These concerns were 'brushed off' within the EIS via stating that despatch of product would cease at 4pm, insinuating that therefore truck pm movements would not impact the school bus timetables.
- There was no consideration for morning school bus timetables nor bus timetables that would coincide with the afternoon despatched trucks on the haulage route, including on the New England Highway between Branxton and Rutherford.
- The only mitigation measure stated was that all quarry truck drivers would be required to abide by the road rules and to take care when encountering school busses [See EIS 6.7.3].

- VII. Concerns about how fellow road users or residents on the haulage route could lodge complaints regarding haulage contractor's road behaviours.
- Other than being advised at one of the drop in sessions that complaints about haulage contractors driving behaviours could be lodged with the quarry operator, no guidance has been cited within the EIS and as it is believed that the despatch contractors will not be driving 'badged' vehicles, the ability to cite a quarry driver as being associated with the Bluestone Hardrock Quarry when making such a complaint, will be impossible.
- VIII. Concerns about potential collisions with wildlife and stock on both Stanhope and Elderslie Roads.
- This concern has been ignored despite the proponent themselves knowing that both roads are used by graziers to move their stock from one side to the other and that straying livestock on the road or road verges, occur from time to time.
 - Both Stanhope Road and Elderslie Road are also prone to wildlife vehicle strikes, but again this hazard has been overlooked.
- IX. Concerns about visibility hazards during seasonal weather conditions such as fog or heavy rain events.
- This known local hazard, especially when it occurs near the Hunter River (Elderslie Bridge) has not been addressed in the EIS.
- X. Concerns about the risks associated with farm management practices.
- Farm management practices can involve tractors, often with machinery attached, harvesters and round bale movements navigating along and across both Stanhope and Elderslie Roads between sections of properties. .
 - These 'typical rural road risks' have not been addressed anywhere in the EIS.
- XI. Concerns about airborne diesel exhaust emissions and silica dust particulates
- There is a known relationship with respiratory illness, including silicosis (caused by silica) and childhood developmental delays (caused by exposure to diesel exhaust fumes), which is

concerning for those who live within 5kms of the project location and for those living in proximity to the haulage route. .

- These concerns have not specifically been addressed anywhere within the EIS.
- Silica dust only received a brief mention [Page 8 4.4 Respirable Crystalline Silica] of the Air Quality Impact and GHG Assessment, but the only mitigation methods offered for truck hauled rock product (and the resulting dust) was to cover the loaded trucks with no guarantee that incoming trucks would also cover their empty load beds on which rock dust would still be present and to cease quarrying operations in windy and hot, dry conditions or ensure exposed, dusty materials were kept dampened down with no actual assurance that this step could be enforced to ensure it was adhered to..
- Only CO2 GHG emissions via the 220-truck movement Monday to Friday were discussed in the Dust and GHG report with no recognition of the other harmful elements extruded by diesel exhaust emissions, which can negatively impact those with respiratory problems and increase the chances of developmental delays in young children exposed to it on a regular basis, such as playing outside in their back garden, next to a busy haulage route during the summer holidays.

XII. Concerns about the impacts on local hospitality and visitor accommodation venues and other businesses located on, or near to the haulage route that could lead to loss of income as well as current employment and future employment opportunities for locals.

- This concern has not been fully addressed in the EIS only recognised as a concern but also dismissed these concerns by promoting the mitigation methods cited under (Health and Wellbeing that the proponent argues (both confusingly and conflictingly) would “**make a minor impact significant improvement.**” [6.11.4]
- **These concerns are especially significant for the owner/operator of the Hunter Pet Motel located at the far end of Springvale Road** (which has 12 employees) as they have already advised that they will have to close their business, which

is also relied on by many in the surrounding communities, due to the dust and noise impacts from the proposed quarrying operations and the impacts of the extremely closely located haulage road. This heavily used, award winning business has also just recently completed construction of a pet hydrotherapy pool and is also the sole provider of a pet pick up and delivery service at Newcastle Airport. This service, which will also be lost due to the businesses closure, will impact any pet owners who move interstate to or away from to the surrounding region and requires air transport for their pets out/onto Newcastle Airport.

XIII. There were widespread concerns raised about impacts on property values ,due to the reduced human amenity perceived by potential buyers because of proximity to the quarry itself or the haulage route, which could ultimately spread within the region.

- Many newer residents on Elderslie Road, who had purchased land and built substantial family homes adjacent or close to the proposed haulage route, had zero expectation that a quarry haulage route generating an extra 220 heavy vehicles movements Mon to Fri would be proposed.
- Many of those homes, located in both Radford Park and Bellevue Estate, have extensive back yard entertainment areas, children's play areas and swimming pools that face directly onto Elderslie Road, plus there are other new homeowners elsewhere on Elderslie Road. whose owners never anticipated the proposed haulage route when they purchased .
- This concern has not been addressed in the EIS.

2. Failure to address the cumulative impacts of the Queensland Hunter Gas Pipeline, as required by both the NSW SEARS of 16/10/2024 and 26/06/2025 and the Supplementary SEARS for MNES dated 22/04/2026.

Summary of Evidence for Objections:

The proponent has failed to either account for nor discuss the cumulative impacts of the QHGP Project as required by the SEARs and the Supplementary SEARs and presented non-factual

arguments for the realignment of the proposed QHGP route information, potentially due to not understanding the QHGP 2009 Approval Conditions.

This could be viewed as conflicting with the signed REAP Declaration at the beginning of the EIS.

EVIDENCE:

A. Within the NSW SEARs, dated 16/10/2024, and those dated 26/06/2025, the proponent was directed, in General Requirements, to 'consider the potential cumulative impacts due to other developments in the vicinity (completed, underway or proposed)'. They were also directed [8 Land Resources] to assess the compatibility of the Queensland Hunter Gas Pipeline (QHGP) and to engage with the proponents off the QHGP.

Within the Supplementary SEARs for MNES, dated 22/0/2026 [Assessment Requirements General a)] the Proponet is clearly required to 'discuss the potential interaction between the proposed action and the approved QHGP, which intersects the project area.'

NOTE: Whilst the Proponent has provided consultation details with the proponents of the Queensland Hunter Gas Pipeline there is no resolution to the conflict between the Approved Queensland Hunter Gas pipeline and the unapproved Quarry project to date...

The Traffic and Transport Impact Assessment, though directed in the SEARs [7 Traffic and Transport] to assess all developments that could have a cumulative impact does not identify the QHGP as a cumulative traffic impact during the pipeline construction period. It does not mention the QHGP project at all.

- The Integrated Transport Assessment **does not identify** the Queensland Hunter Gas Pipeline as a potential cumulative local traffic impact (during the construction period). It does not mention the Queensland Hunter Gas Pipeline project at all.

NOTES Re the significant conflict, reported interactions between the QHGP and the proposed project and the

arguments presented by the Proponent for Santos/HGP Pty Ltd to move the proposed pipeline easement location:

- 2.4 within the EIS confirms that the construction of the Queensland Hunter Gas Pipeline had commenced in December 2023.
- It also notes that the indicative proposed pipeline (easement) corridor (which is located within the 2009 approved 200m wide Survey Corridor and impacts all four Project properties) has, to date, no easement registered by Santos/HGP Pty Ltd on the Certificate of Title and that no other interest (such as a voluntarily signed Access to Survey or Access to Land) exists. Currently the 18-month Authority to Survey, granted to Santos/HGP Pty Ltd. in January 2023 and later extended for a further 18 months, has lapsed and is still currently being reviewed following an extension application by Santos/HGP Pty Ltd in March 2023.
- Any Voluntary Access to Survey Agreement, if obtained by Santos/HGP Pty Ltd, from the Proponent/Landholder would also allow extensive Environmental Field Studies and Surveys as well as geological surveying, soil testing, and other studies to support a future application for the Pipeline Licence to construct and operate the pipeline.
- **NOTE:** The lack of a registered easement is not of note, as no easements have yet been registered on the route of the Queensland Hunter Gas Pipeline on any property.
- The registration of the final pipeline easement is not enacted until after the pipeline construction is completed although currently Santos/HGP Pty Ltd are seeking a Temporary Construction Easement of 50m in width from impacted landholders in which to locate the final pipeline easement.
- The two 2009 Conditions of Approval for the Queensland Hunter Gas Pipeline, as shown by the Proponent, do not apply, as the Proponent is claiming, to prove that the planned pipeline easement location can be moved so that the two projects can 'coexist'. [See link to QHGP Conditions of Approval below]

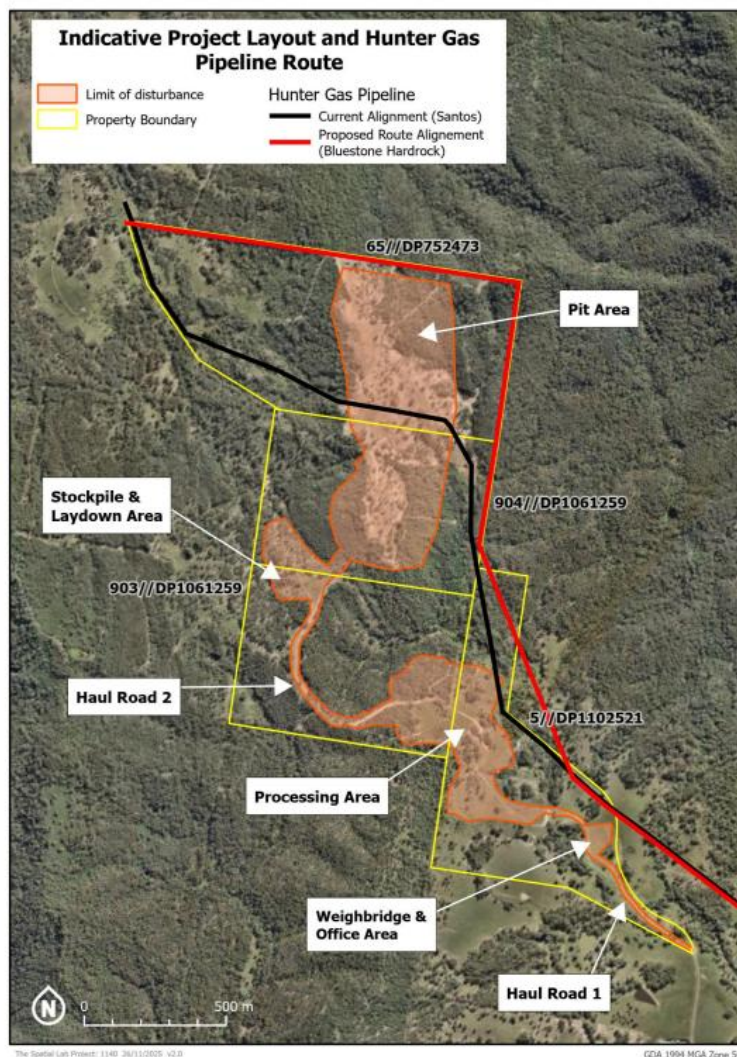
https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=MP06_0286-MOD-1%2120200317T214746.103+GMT

- **Approval Condition 2.3:** This relates entirely to companies and titleholders of petroleum and mineral resource licences (I.E. PELS and Coal Mining Leases), not owners of rock quarries, either proposed or approved.
- **Approval Condition 2.4:** All three combined sections of this condition must be met before any consideration is given by the NSW Department of Planning to allow the pipeline easement to be realigned outside of the 2009 Approved 200m wide Survey Corridor.
- Neither part a) or b) of Approval Condition 2.4 can be satisfied via the Quarry Proponents proposed alternative pipeline location route/s, as outlined in Appendix V of the EIS as not only will this involve the clearing of even more native bushland and habitat vegetation but will also involve the QHGP proponent facing even greater geological and/or topographical constraints.
- In addition, there must be consultation (and potentially agreement sought) with affected landholders (other than the Landholder/Proponent of the quarry) who would be affected by any realignment of the pipeline easement (E.G. NSWPWS: Tangory Nature Reserve).
- The proponent has either not understood these facts or is disingenuously trying to redefine both of these conditions meanings to support their claim that Santos is acting unreasonably by not agreeing to move the location of the proposed pipeline easement.

NOTES Re: The Proponent's suggested pipeline easement realignment route/s:

See following map of the proposed relocated pipeline easement route [from Appendix V] as suggested by the Quarry proponent:

Figure 1 - Project Layout and Pipeline Interaction Plan



- The proponent's suggested realignment of the QHGP route, to follow the northern and eastern boundaries of the proposed quarry project before rejoining the original QHGP route through the lower, less heavily treed section of the Tangory Nature Reserve, would vastly increase impacts on the native habitat on both sides of the boundary with the Tangory nature Reserve due to the now required 50m wide temporary Construction Easement as well as the permanently cleared final 30m wide Pipeline Easement.
- That level of clearing of native bushland was not accounted for within the QHGP 2009 Approval nor the decision to allocate that project a "Not a Controlled Action" Status.
- The suggested realigned route along the boundary with Tangory nature Reserve lands would also create greater topographical

challenges for the construction of the pipeline and result in greater impacts on several major tributary (seasonal) creeks that flow into Dutton's, then Stanhope Creek and ultimately the Hunter River.

- The suggested second plan (also stated in Appendix V) to located the pipeline (via directional hydraulic drilling) over 110m underground but within the quarry pit footprint would not only create major geological constraints and difficulties for the QHGP construction process but also create a major pipeline operational risks and hazard (vibration damage impacts are a major hazard and risk for buried High pressure Gas transmission Pipelines) which could threaten the integrity of the pipeline.
- The quarry proponent, and owner of the four properties the QHGP 2009 Approved Survey Corridor intersects, also states that they have “consulted with all proponents of the pipeline since its (QHGP) inception in 2008”.
- What they fail to mention is that at least one, and potentially two, of the 2008 owners of HGP (Definitely Hilton Grugeon and potentially Duncan Hardie) sold the 4 impacted properties to the quarry proponent in 2005 at a time when their company, then Hunter Energy Pty Ltd, were in the early QHGP Survey Route planning stages.
- The quarry Proponent also fails to inform that they denied access in 2008 to HGP Pty Ltd to conduct Environmental Field Studies within the four properties impacted by their proposed 200m wide Survey Corridor.
- The company contracted by HGP Pty Ltd to prepare the Environmental Impact Report had, in 2007, **identified a potential major wildlife movement corridor within these four properties** via desktop study and had also noted a potential construction constraint as a result. However, due to denial of admittance by the property owner had failed to complete any environmental fauna and flora field studies to clarify their finding prior to obtaining the 2009 Approval.

B. Within the Supplementary SEARs for MNES, dated 22/04/2026, the proponent was required, as the Project as designated a Federally Controlled Action under the Biodiversity Conservation Act 1999, to “Discuss the potential interaction between the proposed action and the approved (Queensland) Hunter Gas Pipeline which intersects the project area”.

- The proponent **has failed to do this** in both the BDAR- Appendix F and the MNES Assessment – Appendix G. The QHGP project is in the MNES Assessment but only to repeat information supplied elsewhere in the EIS [See Appendix V] regarding efforts made by the proponent to have the route realigned outside of the 2009 Approved Survey Corridor to avoid active quarrying operations.
- However, the MNES Assessment does contain a criticism of the QHGP receiving a ‘Not a Controlled Action Status, both in 2008 and during the 2023 reconsideration of that status, by advising that a Central Hunter Valley Eucalyptus Forest and Woodland Critically Endangered Ecological Community (CEEC) existed within the QHGP Approved Survey Corridor that intersects the Quarry project footprint but was not listed either in 2008 nor 2023 by HGP Pty Ltd. This appears to be a case of ‘sour grapes’ on the part of the Proponent due to the quarry project being designated a Controlled Action for the same CEEC, in part, but also due to the suspected presence of particular native fauna and its proximity so close to the Tangory Nature Reserve which has recorded over 200 vulnerable, threatened, endangered and protected fauna and flora species of high conservation value. Within its boundaries and which, presumably, also exist on surrounding private landholdings where native bush land is still present.
- **NOTE: The potential impacts on the Approved QHGP if Santos/HGP Pty Ltd gain approval to move the proposed 30m wide Pipeline Easement.**
- If Santos/HGP Pty Ltd did manage to gain approval to move both the 30m wide pipeline easement and the NOW required 20m

wide Temporary Construction Easement outside the 2009 Approved Survey Corridor to meet the quarry proponent (and landholders) location preferences, due to the extra land clearing of native habitat in a previously unapproved area that this will include, especially of Central Hunter Valley Eucalyptus Forest and Woodland CEEC (a CHV TEC), will likely trigger a 'Controlled Action' being imposed on the ENTIRE route of the QHGP from Wallumbilla in Queensland to the new terminating point in Millers Fores, NSW.

3. Environmental Impacts of the Proposed Project and failure to even attempt to meet the Supplementary SEARs for MNES.

A. Failures of the field survey studies and the subsequent EPBC Act Supplementary Assessment Report [Appendix G - MNES Assessment] produced for the EIS conducted on behalf of Bluestone Hardrock Quarry.

AND

Failure to conduct any new suitable surveys for species specified in the Supplementary SEARS for MNES under the designated Controlled Action Status.

B. Failure to meet the NSW SEARs and the Supplementary SEARs for MNES in relation to conflict of the proposed Project with the Queensland Hunter Gas Pipeline Conflict and the cumulative impact between the retention of a proposed buffer zone as outlined by the Proponent and their suggested realigned route for the QHGP Project.

C. The rehabilitation plan presented is primarily aimed at increasing cattle grazing capabilities and not at retaining or restoring the native woodland species that will be cleared for the Project.

Summary of Evidence for Objections:

- A. Despite the clearly stated EPBC Act Requirements for the Controlled Action, dated March 2026, to conduct further surveys and analysis to determine whether the species listed are likely to be significantly impacted no further surveys were conducted post November 2025 for any species and especially not for Koalas (Endangered/Protected) or Spotted Tailed Quolls (Vulnerable).

This could be viewed as conflicting with the signed REAP Declaration at the beginning of the EIS.

- B. A clear cumulative impact of the QHGP project in relation to the proposed 'buffer' area was not accounted for nor were the edge impacts of either the Project operations or the QHGP Project on any retained native habitat.
- C. The rehabilitation plan for the project site is predominately aimed at increasing grazing pasture rather than to reestablish native vegetation and offers no protection for any reestablished native vegetation or native fauna foraging areas to be protected from grazing livestock.

EVIDENCE:

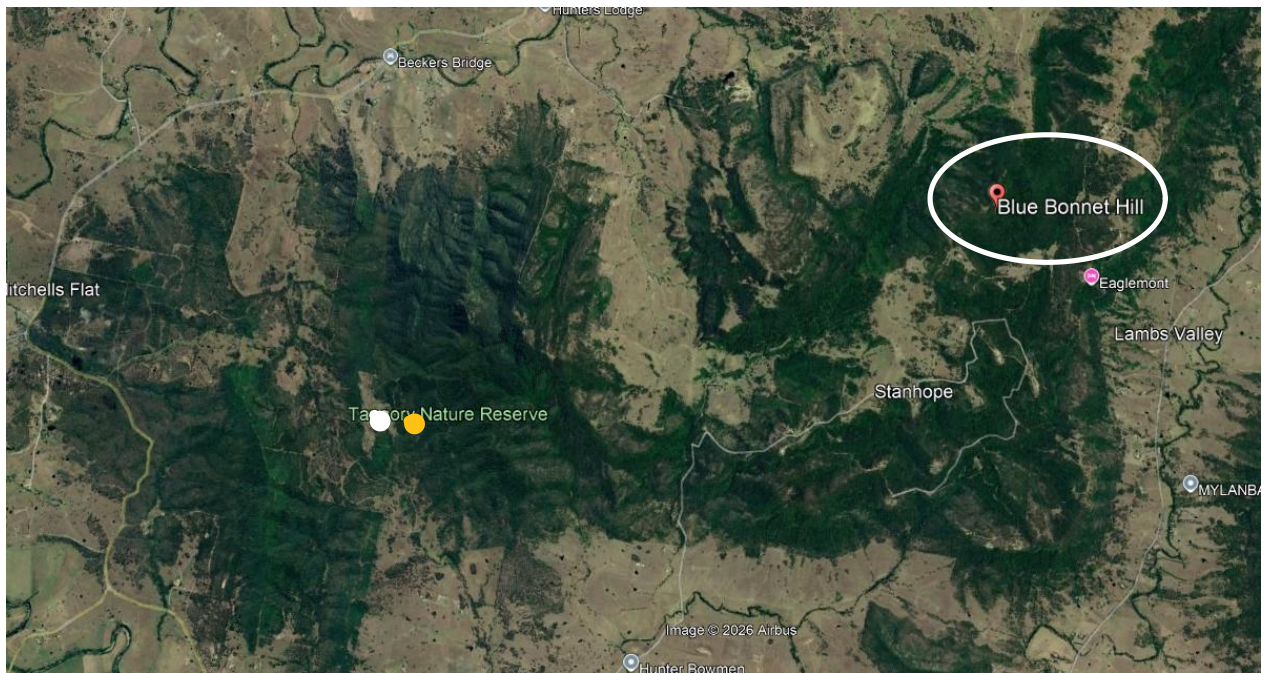
- **NOTES:** Within the EPBC Act Controlled Action Supplementary Assessment [Appendix D – MNES Assessment], the author clearly states [EPBC Act Consideration] that there would be no further surveying or field studies undertaken in response to the Supplementary SEARs for MNES.
- The reasoning provided as that those fauna species listed in the Controlled Action Requirements were not previously listed in the NSW BDA Requirements and that prior surveying and field work had not provided any evidence of their presence within the Project footprint.
- In response to a personal query made to the Proponents Environmental Assessment representative at the Elderslie drop-in session in February 2026, asking why field surveying work had

not commenced in early to mid-Spring, being peak breeding season for two of these species, I was informed that a prior team, contracted to conduct the fauna studies had been 'fired' by the Proponet and that a new team had been brought in at short notice causing the resulting gap in the 2025 fauna surveying period I.E. Active fauna surveying was not conducted in September or October 2025.

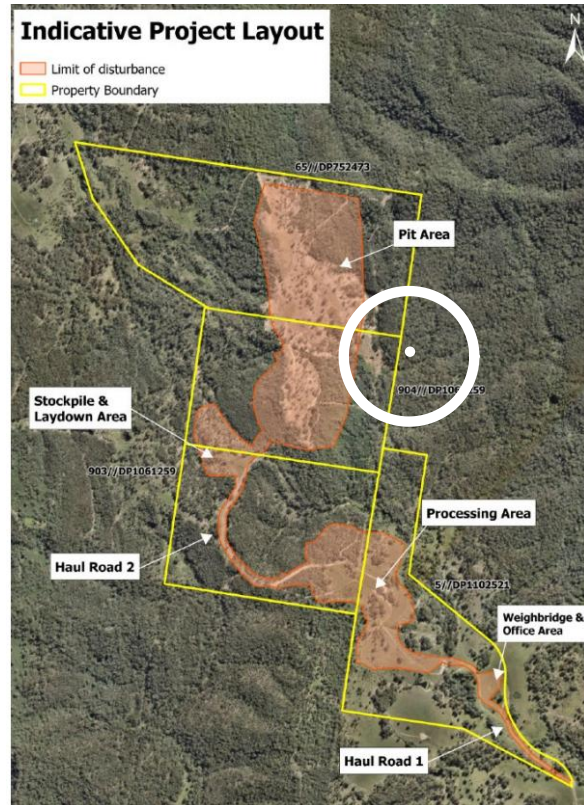
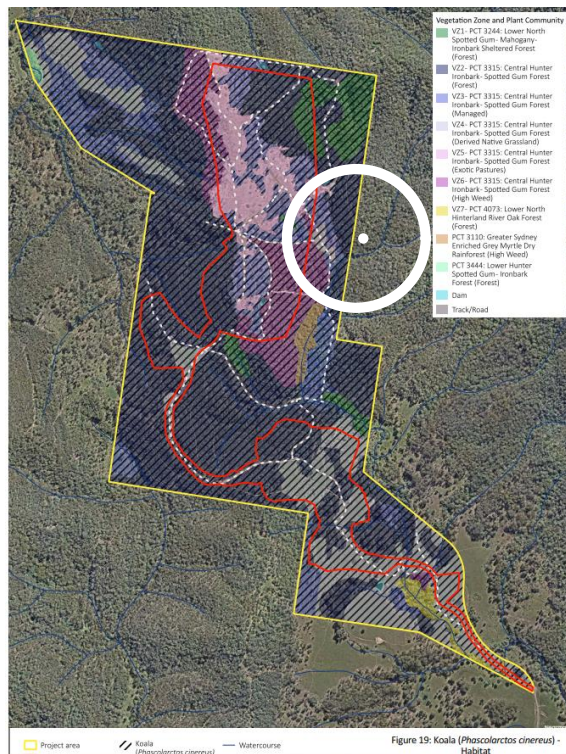
1. Koala (Endangered and Protected) Survey efforts were recommended [3.2.4 Koala] to include **thermal detection drones** and recorded call playbacks. and spotlighting efforts.

- NOTE: Peak koala breeding season occurs **between September and January. No surveying efforts for this species as conducted during this period.**
- Habitat survey assessment was conducted in April, July and November 2025 with the study extending for 2-minute time periods of the areas surrounding a minimum of thirty potential koala foraging trees. This is outside of koala peak breeding season.
- Nocturnal (multi species) spotlighting activities conducted on 6 nights for one hour each night between March and April 2025. This is outside of koala peak breeding season.
- Forty-four remote cameras were installed at a height of three meters for approximately 4 weeks between 12th March and 14th April to look for multiple unspecified arboreal species. This is outside of Koala peak breeding season.
- There was zero use of recommended thermal detection drones, and I can find no record of call back recordings, nor audio recordings for extended periods being conducted during peak breeding season when males can be heard calling to females over quite long distances.
- The conclusion that there were no koalas present within the 'disturbance footprint' was made based on not detecting any koalas (outside of their peak breeding season) and judging the area to be 'unsuitable microhabitat' due to the presence of exotic pasture grass and the absence of large trees.

- I can only conclude that no specific attempt was made to meet the EPBC Act Supplementary requirements as set out in March 2026 and no further attempts to survey for koalas was undertaken and that the. MNES Assessment relied only on past field studies and previously conducted surveying efforts.
- No allowances were made for koalas requiring to traverse the project area to reach other food trees or potential mates to the west of the projects footprint and that current movement corridors may be impeded by the fully fenced quarry properties that may negatively impact their free movement within an establishing home range and the long term survival of any emerging colonies.
- Despite claiming that no evidence of koalas as found the Assessment records that 41.28ha of potential koala habitat and foraging area will be lost if the Project is approved, whilst also confirming that a koala had been recorded '5kms away'.
- **NOTE:** Santos/HGP Pty Ltd Environmental Field Studies, concluded in September 2024, recorded an male koala calling (during breeding season) in a location very close to the quarry project boundary fence within the Tangory Nature Reserve (a fact which the proponents response in the MNES Assessment recognised BUT that they placed far further away, at 5kms, from the project footprint) in addition an emerging koala colony has been known to exist for some years in an area to the east, outside of the Tangory Nature Reserve, known as Blue Bonnet Hill (identified within white oval), some 8km distant but directly connected to Tangory Nature Reserve and the surrounding retained native habitat beyond. See satellite image of area below with location of both the proposed Project indicated via a white dot and the location here the male koala was recorded within Tangory Nature Reserve indicated via a yellow dot.



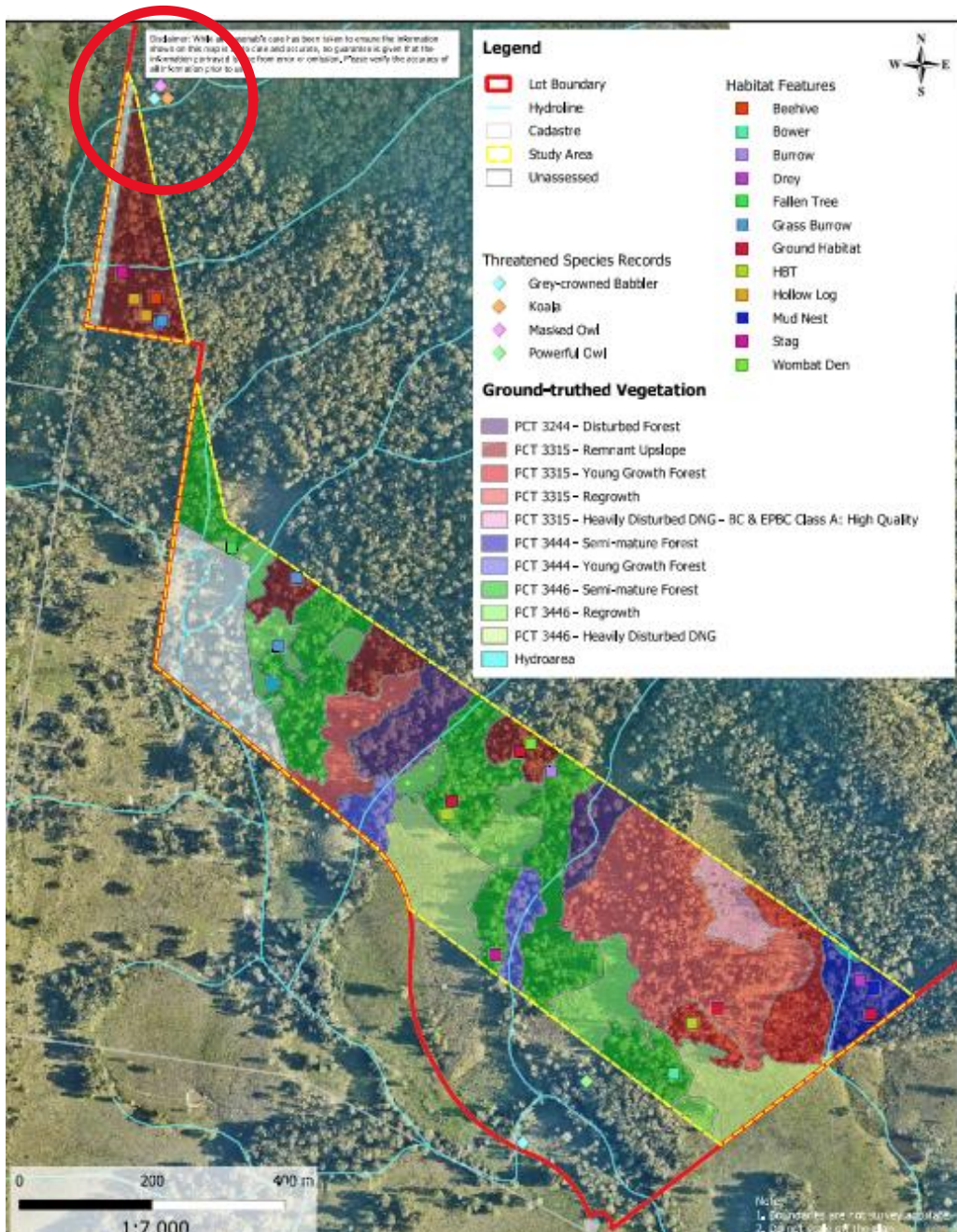
- See following Koala habitat map from Appendix G - MNES Assessment and a map of the Indicative Project Layout (Limit of Disturbance), both showing the location of where the recording of the male koala was taken in 2024 via a circled white dot and compare with the map (sourced from NSWNPWS in January 2026) showing the location (inside the red circled area) where the recording of the male koala was made in 2024.
- The distance from the Project Disturbance footprint is just over half a kilometre – not 5kms away, as claimed in the Projects MNES Assessment.



Link to the Appendix G – MNES Assessment below.

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-76210271%2120260507T032607.996+GMT>

- See the following map from the Santos/HGP Pty Ltd fauna survey effort (supplied by NSWNPWS), showing where the location of the recording of the male Koala as taken in 2024 within a red circle.



- The loss of not only potential koala habitat so close to the location where this male koala was recorded calling as well as the potential source of a noise and dust pollution and extensive human activity associated with the development and operations of the Project may result in a potentially emerging new koala colony, either within the Tangory nature Reserve, or on nearby landholdings, failing to establish or, if established already to be driven away.

- If thermal detection drones and recorded playbacks had been deployed, as recommended within the Supplementary SEARS – MNES, there is a high likelihood that further koalas could have been found (per the unexpectedly high number of koalas found to be present on Mt. Sugarloaf, 40 kilometres south east of the Project site, recorded via the use of thermal drones), however this technology was not deployed and no further surveying work completed.
- If koala surveying had been conducted during their peak breeding season there is a strong likelihood that koalas may have been detected within the Project disturbance areas or at a minimum within the borders of the four properties that the Project is located within.
- As a result, the final MNES Assessment that there were no koalas within the 43.1ha of potential koala habitat relied only on previous scat searches around a minimal thirty mature trees and spotlighting efforts all completed outside of the species peak breeding season.
- This should be deemed an unacceptable response to the requirements laid out in the Supplementary SEARS – MNES.

2. Spotted Tailed Quoll (Vulnerable): Survey efforts were recommended [3.2.8 Spotted Tailed Quolls] to include: Daytime searches, including in lantana growth; searching for scats and latrines; that searches occur for a two hour period for each one hectare in a subject site of up to 5 hectares; that hair funnel surveys baits use a mixture of sardines, tuna oil and flour as an attractant and that they be set for a minimum of 14 consecutive nights with fourth widely spaced hair tubes within a 100 hectare sampling unit.

- NOTE: The peak breeding season for Spotted Tailed Quolls is April to July during which time their distinctive mating noises can be heard
- Remote cameras were used in conjunction with hair funnels over 32 nights between 12th March and 15th April 2025 but using oats, peanut butter, treacle, vanilla essence, and truffle oil mixture as well as honey water sprayed on tree trunks, not the bait

recommended for Spotted Tailed Quolls. This was also part of a multiple species survey for terrestrial mammal and occurred just short of Spotted Tailed Quolls peak breeding season.

- No recommended daytime searches were recorded as being completed nor the recommended bait used.
- No audio recording equipment was used to try to detect their mating cries [potentially because surveying work was conducted outside their peak breeding season]
- That no specific attempts to survey for Spotted Tailed Quolls were conducted after the surveying recommendation were received in March 2026 via the Supplementary SEARs - MNES [despite the MNES Assessment stating that a quoll had been recorded approximately 5km away from the surveying effort sites] and that the MNES Assessment relied only on generalised species surveying efforts outside of Spotted tailed Quoll peak breeding season indicates strongly that actual attempt was made to ascertain if Spotted Tailed Qualls were present within the project footprint.
- NOTE: Spotted Tailed Qualls are known to be present, at particular times of the year, on numerous surrounding grazing properties in Elderslie, Stanhope, and Glendonbrook. Their 'noisy' mating is often heard on local properties from mid-autumn until mid-winter and local chicken owners have witnessed them 'raiding' their chicken coups at other times of the year, but 'remarkably' none were found within the Project lands following the directive from the Federal Government to conduct surveying efforts for them. NOTE: They have not, to date, been recorded within the Tangory Nature Reserve.
- However, the MNES Assessment also states that potential Spotted Tailed Quoll Foraging habitat of 41.3 ha will be lost if the quarry project proceeds.
- Spotted Tailed Quolls require connected landscapes because they roam several kilometres at night so are vulnerable to habitat fragmentation, they require diverse forest structures, as well as adjacent open country and farmlands to hunt, all of which the four Project properties currently provide

- This means that if the Project is approved this (vulnerable) species may lose a direct corridor to its preferred denning sites (rock shelters and small caves) nearer to, or just within the boundaries of the Tangory Nature Reserve from where they would also follow creek lines to hunting areas in other surrounding properties.
- NOTE: Spotted tailed Quolls have not, to date, been recorded within the Tangory Nature Reserve.
- The approval of this Project has the potential to negatively impact the continued local presence of the Spotted Tailed Quolls, that the Project declined to conduct any further targeted searches for despite being directed to do so within the Supplementary SEARs - MNES .
- This should be deemed an unacceptable response to the requirements laid out in the Supplementary SEARS – MNES.

3. Brush tailed Phascogale (Vulnerable): Survey efforts found this species and its potential foraging habitat in the project footprint.

- However, its presence and the existence of foraging habitat within the project footprint have not been noted as significant despite it never being recorded in Tangory Nature Reserve, to my knowledge, although it has been seen on surrounding properties in Glendonbrook, Elderslie, and Stanhope
- The BDAR Assessment also noted that whilst the micro habitat was unsuitable for this species that it uses exotic grassland as a temporary refuge (from predators) when moving between areas of habitat.
- Despite this the Brush Tailed Phascogale will lose, per the BDAE Assessment, 42.3ha of potential suitable habitat if the Project is approved.
- This particular species **has not been recorded in the neighbouring Tangory Nature Reserve** which may indicate that both the 4 properties that Project site encompasses, plus other surrounding properties may be key breeding and foraging habitat for this species, which prefers dry open forests and woodlands with a sparse understory cover of shrubs, grasses

and leaf litter, a habitat that is likely not in great supply within the closest sections of the Tangory Nature Reserve but is more abundant within the properties associated with the Project.

- Any further loss of this species females 20-70ha foraging and nesting territory as well as the current 'exotic' (pasture) grass it uses as a refuge when moving between areas of habitat (as outlined in the Projects BDAR Assessment), could impact the continued local presence of this small (Vulnerable) creature.

Additional Concerns : The loss of both projected foraging and potential foraging habitat areas and the local species it could impact:

- × Squirrel Gliders (Vulnerable) Area 41.4ha a total loss of 26.47% of their current suitable habitat. This species is recorded within the project footprint.
 - × Large Eared Pied Bat (Endangered); Area 61.63ha a loss of 31.305 of their current suitable habitats. This species was recorded within the Project footprint.
 - × Brush Tailed Phascogale: (Vulnerable); Area 41.3ha a total loss of 26/47% of their current suitable habitat. This species was recorded within the Project footprint.
 - × Spotted Tailed Quoll: (Endangered); Area 41.3ha a loss of 26.47% of their current suitable habitat. No quolls were recorded within the Project footprint.
 - × Koala (Endangered/Protected) Area 41.29ha a loss of 26.47% of their current suitable habitat. No koalas were recorded within the Project footprint.
-
- The loss of this foraging habitat, for all five of these species, could put pressure on the available resources of the neighbouring Tangory Nature Reserve especially due to a bushfire or drought event occurring.
 - NOTE: The Huntlee property parcels that were declared as Tangory Nature Reserve in 2022 were devastated by a major bushfire in 2013 resulting in many species of native wildlife becoming reliant on foraging in retained bushland (and even

lawns and gardens) within surrounding properties for some months following the bushfire.

- Tangory Nature Reserve comprises 503.84ha (including large sections of very steep, heavily treed rock escarpments) and there may already be communities of these species within the Reserve that are already reliant on the existing foraging habitat such as the other 2 colonies of Large Eared Pied Bats.
- Increasing competition for food and nesting resources due to the loss of a neighbouring areas of native habitat and flora species, if this Project is approved, could in turn impact the long term survival of these and other species that all rely on the same type of habitat and food resources and those food resources could also be at risk from the dust impacts created by the Project as well local diesel exhaust fume pollution from the Project machinery and larger vehicles.

B. Inconsistencies between the proposed 50m wide buffer zone between the resource extraction area and the Tangory nature reserve and the proposed relocated route (suggested by the quarry proponent) of the 50m wide combined Queensland Hunter Gas Pipeline pipeline easement and Temporary Construction easement resulting in further cumulative impacts that had not been acknowledge within the EIS per the SEARs. .

EVIDENCE:

- 3.2.3 Habitat Connectivity clearly states that the vegetation within the project site is part of a larger patch of vegetation directly connected to extensive areas of forested habitat within Tangory Nature reserve and adjacent areas around Glendonbrook, Mitchells Flat (Marwood Spur0 and Stanhope.(Mt Durham).
- 7 Avoid and minimise Impacts within Appendix F – BDAR states that fragmentation will not be likely to occur as the Disturbance Footprint as it is surrounded on most sides by connective habitat I.E. A Wildlife Movement Corridor. .

- It also states that a 50m wide buffer will be established around resource extraction sites to align with the aims of the Developments adjacent to NPS lands and narrower buffer zones will be maintained around the Processing Area and the Office area.
- How will this 50m wide buffer be established if the fully cleared and permanently cleared thirty wide pipeline easement and the temporarily cleared Temporary Construction easement (50m wide in total) are also to be located on the inside of the northern and shared fence line with the Tangory Nature Reserve very close to the quarry pit?
- Additionally, there is no mention of the impacts of dust generated by quarrying and processing activities on any nearby retained vegetation buffer zones) , nor wind or solar radiation impacts (I.E. Edge effects)
- Dust coating, in the absence of natural rainfall (During periods of drought) can cause new growth to fail and die back to occur which could have a major impact on any remaining and surrounding native habitat, foraging, and nesting areas.

Rehabilitation Plan concerns:

- The EIS [Page 102 Post-Extraction Land Use] implies very strongly that most of the land cleared or modified for quarry operation purposes will be reestablished as improved grazing land with unspecified areas of native vegetation (species also unspecified) used to stabilise slopes rather than reestablish the cleared woodland .species.
- There is no plan discussed to protect any areas of reestablished native vegetation from grazing livestock not any retained native habitat areas .
- This content uses Singleton Council s SLEP 2013 to justify this approach to rehabilitation of the 43.1ha rather than prioritising reestablishing the lost woodland CEEC species areas and other native habitat, Including foraging plants.

4. Failures to conduct baseline studies as per the SEARS conditions to fully account for: local wind and weather conditions, the current local particulate pollution burden, and the impacts of the additional dust and GHG and diesel emissions the Project will generate.

Summary of Objections:

The SEARs requirements for adequate baseline studies have not been met for both current dust and particulate pollution as a base line for any future dust complaints due to quarrying operations, especially potential future silica dust pollution.

AND

The SEARs requirements for 'adequate baseline studies' have not been conducted at any sensitive receiver location, both close to the project and in proximity to the haulage route, nor any form of future monitoring discussed to address any future dust or excessive diesel.

EVIDENCE:

- **No baseline studies** have been conducted locally **to ascertain local wind direction patterns and speed either within the project footprint nor at neighbouring properties**, instead data has been used from Cessnock Airport which is located approximately 23km south and surrounded by entirely different topography.
- The Air Quality and GHG Assessment [3.2 Existing Environment] provides contradictory prevailing wind directions using both Cessnock and Maitland Airport data.
- Local residents know that the local wind directions, wind currents and speeds are changeable and unpredictable due to the impacts of the local topography. The differences provided between Cessnock and Maitland Airport data confirms this.

- **No base line studies** have been conducted to ascertain exactly **the current levels of dust particulate pollution impacting the properties surrounding the proposed project**. Instead, data from S. Singleton and Beresfield has been extrapolated to produce an estimated dust and particulate burden for the properties surrounding the project site.
- Local residents already **experience elevated levels of particulate pollution from coal mines**, the nearest of which is over 25km to the west. This particulate pollution already enters local domestic water tanks from roof gathered rainwater and coats outdoor furniture and the walls and flyscreen of residences. The current particulate pollution also impacts stock dams and troughs.
- The Air Quality Impact and GHG Assessment provides **no estimate of silica dust levels** that could be produced by quarrying, rock processing and the filling of truck beds and trailers at the project site.
- The Air Quality and GHG Assessment [4.4 Respirable Crystalline Silica] presumes that silica dust produced within the project footprint will meet the NSW EPA criteria **without any evidence provided to support this**.
- There is no risk assessment relating to windborne silica dust, generated by the quarry operations, being deposited on roofs and outdoor facilities of nearby downwind residents, nor on their grazing pasture, free range fowl pens, fruit trees, and vegetable gardens.
- The only dust mitigation methods provided within the EIS are to a) Cover loaded trucks b) Reduce dust pollution by water spraying of internal unsealed roads, quarrying and rock processing sites, and stockpile sites and c) watch weather conditions closely and restrict or halt quarry operations when conditions would be conducive to producing excess dust.
- This last mitigation method [outlined in Table 8-1 Potential Dust Mitigation Measures], would require the complete cessation of both quarrying and rock processing operations, stoppage of all internal vehicle and machinery movements, as well as ceasing truck loading, in some cases, based on local weather experienced during periods of drought or heatwave conditions this could result in being required for a period of days.. This would have profound impacts on

the viability of the proposed quarry project and there are serious concerns that this mitigation method would not be met.

- There is also no allowance made for extreme drought conditions for the watering down of various components of the quarrying operations for extended periods, especially if water sources via dams and sediment ponds evaporate. As licensed potable water carters would be the only other source this could result, as it has in the past during extensive local road works during a long period of drought., with local residences finding they are on an extended waiting list for water from our dwindling number of local water carters, for their domestic needs due to them being 'booked out' by a dust suppression contract.
- **No data was provided for anticipated diesel exhaust emissions from 220 truck movements** (1100 per week) only CO 2 GHG emission and no base line study conducted to ascertain the current levels of diesel exhaust pollution along various sections of the haulage route that are near to residences.
- In the absence of anticipated diesel exhaust emissions data to be generated by 220 HV movements Monday to Friday, and the non-completion of current baseline studies of the same, there will be no ability to lodge any complaints about excess diesel exhaust emissions experience by sensitive receivers in the future.

5. Failure to conduct adequate baseline studies {as per the SEARs General Requirements] to assess and fully address the potential Noise Pollution and Impacts of both the quarrying operations and haulage activities on all sensitive receivers.

Summary of Objections:

Failure to conduct baseline studies to assess and fully address the potential future Noise Pollution and Impacts of both the quarrying operations and haulage activities on all sensitive receivers.

AND

The SEARs requirements for ‘adequate baseline studies’ have not been conducted at any sensitive receiver location, both close to the project and in proximity to the haulage route, nor any form of future monitoring discussed to address any future noise complaints.

EVIDENCE:

- **No baseline data obtained to ascertain current noise levels** for residences near to the project site.
- The only anticipated cumulative noise levels described (in decibels) was for the project construction phase.
- **No cumulative noise levels (in decibels) provided for the quarry operational phase** when multiple types of machinery will be operating, and multiple vehicle activity will be occurring including movements along the internal unsealed haulage route and the loading of trucks.
- **No baseline noise studies conducted to ascertain current traffic noise**, via day and time, experienced by all sensitive receivers who reside adjacent to or in proximity to residents on Springvale, Stanhope, and Elderslie Road.
- No monitoring system has been discussed to address any future noise complaints, which will be extremely hard to prove as there have been no pre haulage route base line studies completed for comparison purposes. .

6. Failures and shortcomings of the Community Engagement Process.

Summary of Objection:

The outline provided by the proponent regarding Community Engagement fails to recognise multiple complaints of non-receipt of the Introductory Letters, does not provide numbers of participants for either the online survey nor the in person interviews conducted, nor the locations where those in person interviews were conducted

and the days (both on weekdays) and timings for the two drop-in information sessions were not suited to all who may have wished to attend.

EVIDENCE:

- **Project Introduction Letter effort:** I challenge the statement in the EIS [5.3 Community Stakeholder Engagement] that the Project Introduction Letter (dated November 2025) was ‘distributed to approximately 2,354 properties surrounding the project site and to people living or working nearby, in Braxton or along the haulage route’.
- When our group distributed over 1,700 letters into mailboxes of residences throughout Glendonbrook, Elderslie, Stanhope, Lambs Valley and East Braxton a mere 2 month later in January 2026 to advise details of a community meeting to discuss the Project and the Haulage Route, we discovered that multiple residents who reported that had never received the Project Introduction Letter, or that their neighbours had not received it.
- **Online Survey effort:** Only those who had received and responded via a phone call or email to Social Impact participated in the online survey.
- **Project Website effort:** Only those who had received the Project Introduction Letter were aware that there was a project specific website.
- **(Door to Door) Interview effort:** There is no record of how many people were interviewed, how they were selected or where they were located although we do know that some residents of Radford Park received an unsolicited, in person visit from an interviewer.
Note: The use of even a semi-structured format using a list of pre-determined questions can result in the person answering to choose basic yes or no answers to basic questions such as “Do you think that the Quarry will create employment opportunities?” This type of survey would explain why the last two items (out of 15) on the listed on the Community Feedback [5.7 Issues Raised During Stakeholder Engagement] appeared positive versus the thirteen negative views/concerns listed.

- **Community ‘drop-in’ information sessions effort:** These two sessions were held during weekdays at times when many people were either at work or on their way home from work or would have had to bring along their children if attending after 3.30pm. Though later in the EIS there are claims there were about 80 attendees, in total, most of those attendees learnt about the ‘drop-in’ session via local community Facebook groups opposing the Project, rather than newspaper ads placed by the proponent, or visits to the project website, or the 135 emails sent by Social Aspect only to those on their mailing lists, and most went to voice their concerns and objections. It was also the opposition groups that ensured that the drop-in session received prominent levels of media coverage.

7. Concerns regarding a potential future application for a modification to expand the quarrying footprint if the project is approved.

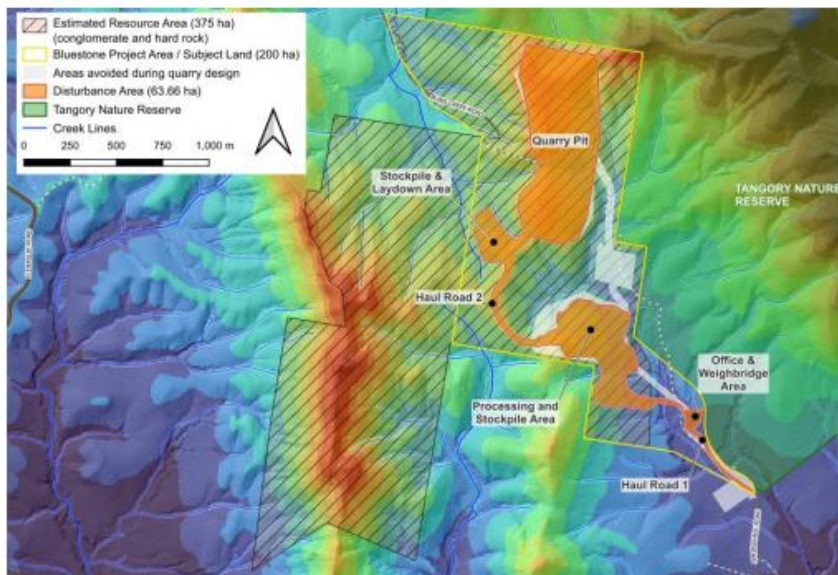
Summary of Objection:

It is believed that there is a strong likelihood that the proponent, or any future owner of Bluestone Hardrock Quarry, if the project is approved, may later apply to expand the area to be quarried into this other, already mapped resource area, creating further local environmental losses and associated impacts and potentially increasing the number of movements on the haulage route.

EVIDENCE:

- On Page 60 Appendix D – MNES Assessment there is a map that also appeared in the 2024 Scoping Report.
- The map shows the ‘estimated resource area’ on several properties owned by the proponent. In the Scoping Report, however not all are included in the Project application.
- There are major concerns that at some point in the future, if this project is approved, that a modification for an expansion to the

project's footprint will be applied for by the proponent or any future owner of the approved project.



- The area within the additional resource area is almost equal in size to the proposed project and encompasses a very heavily treed area of native habitat bordered by Both Blind Creek to the East and Stewarts creek to the west.
- If this areas of later were included as a quarry extension via a modification application the local environmental impacts would be disastrous.
- In addition, any future expansion of the quarry may result in more truck movements on the (approved) proposed haulage route, increasing the impacts on both other road users and those living in proximity to it.

CONCLUSION:

- The Proponent of the Project claims that the quarry is necessary to provide aggregate and other rock products for future developments, coal mining blasting, and government projects, both locally and within wider NSW. I question this claim.
- The Proponent further claims that the proposed quarry's location would reduce emissions as the product would be used by local end users

within a 30km radius of the quarry therefore reducing HV trip lengths. Yet the Proponent also states that the rock product will be transported to Western Sydney.

- I am, however, aware that there are a number of other new, or expanded, hard rock quarries in NSW, most in the surrounding regions, which are currently being proposed or have recently received approval, whose proponents made, or are making, similar claims. Most of these other projects are far closer to current approved HV Routes than the proposed Project and with direct access to end users such as concrete batching plants and they are also located close to other current rock quarries.
- But this project would be located in a very quiet rural area where commercial rock quarrying has never occurred, directly next to the Tangory Nature Reserve and would also result in three local roads (two of which are designated rural roads) and a heritage listed bridge becoming part of a 30-50 year HV haulage route, impacting property owners and residents who never anticipated a large quarry being established nearby nor a haulage route running past their residences.
- Therefore, based on the objections, reasons, and evidence I have presented, I respectfully ask that SSD – 76210271: Bluestone Hardrock Quarry, (and its associated haulage route) not be approved.