# Submission in Opposition to the Bluestone Hardrock Quarry Project (SSD-76210271)

**To:** NSW Department of Planning, Housing and Infrastructure
**Re:** Bluestone Hardrock Quarry Project (SSD-76210271)
**Location:** Elderslie and Glendon Brook, Singleton Shire

I object to the proposed Bluestone Hardrock Quarry Project and respectfully request that the Department refuse approval of the development in its current form.

While I acknowledge the importance of construction materials to support housing and infrastructure growth, the proposed quarry would impose significant and long-term impacts on local communities, rural land uses, the natural environment and the regional road network that outweigh the claimed benefits.

## 1. Traffic and Road Safety Impacts

One of the most significant concerns is the increase in heavy vehicle traffic associated with the extraction and transport of up to 1 million tonnes of hard rock per annum for up to 30 years. The proposed haulage operations will place substantial pressure on local roads, especially Elderslie Road and the associated intersection, that were not designed to accommodate high volumes of heavy trucks.

Key concerns include:

- Increased risk of vehicle accidents involving residents and travelling school buses.
- Reduced safety for local families, cyclists and pedestrians on this narrow road with no footpaths and excessive vegetation on either side of road
- Accelerated deterioration of local roads and associated maintenance costs to taxpayers.
- Reduced amenity for residents due to constant heavy vehicle movements.

The cumulative impacts of quarry traffic, existing mining-related traffic and regional freight movements have not been adequately addressed.

## Traffic, Road Safety and School Bus Risks

The most concerning aspect of this proposal is the significant increase in heavy vehicle movements on an already constrained rural road network.

The roads surrounding the proposed development are currently used daily by local residents, agricultural businesses, school buses, commuters and emergency services. Many of these roads are narrow, have limited shoulders, deteriorating pavement conditions and require ongoing maintenance simply to remain safe for existing traffic volumes.

Local residents are already familiar with the condition of these roads and the need for regular repairs. Introducing a substantial increase in heavy truck movements over a 30-year period will inevitably accelerate road degradation, increase maintenance requirements and create additional hazards for all road users.

Of particular concern is the interaction between quarry haulage vehicles and public or school buses transporting children throughout the district at the Maitland Road and Elderslie Road intersection.

School buses routinely travel these roads during morning and afternoon peak periods, often stopping frequently to collect and drop off students, especially at Radford Park and Maitland Road. Children are required to wait at roadside pick-up locations and in many cases must cross the roads used by passing vehicles, where no pedestrian crossings exist.

The introduction of a large heavy vehicle fleet into this environment significantly increases the consequences of any driver error, visibility issue or road condition event leading to a fatality which can be avoided.

While heavy vehicle operators may comply with road rules and operating procedures, the reality remains that:

- School buses are larger, slower-moving vehicles that require increased stopping distances.
- Children can behave unpredictably around bus collection points.
- Heavy vehicles create reduced sight distances and larger blind spots.
- Increased truck traffic increases overall exposure to road safety risks.

Even a low probability event can have catastrophic consequences when children are involved.

## Existing Road Conditions

The local road network is not equivalent to a modern freight corridor.

Residents regularly experience:

- Pavement deterioration and edge break.
- Ongoing maintenance and repair works.
- Variable road widths.
- Limited overtaking opportunities.
- Uneven road surfaces.
- Narrow shoulders and recovery areas.

Elderslie Road has undergone numerous repairs in the last 5 years, with repeat works on several sections of the road. The road subgrade was not engineered to withstand anything but light traffic and will not sustain high volume and high bearing pressures applied by the proposed quarry truck movements.

The Environmental Impact Statement and associated Traffic reports appears to place significant reliance on modelling and engineering assumptions. However, those assessments do not fully replicate the day-to-day conditions experienced by local road users and are clearly based upon incorrect assumptions.

Road safety should be assessed not only on theoretical compliance with standards but also on the practical realities of rural road use over three decades of operation.

The cumulative impact of thousands of additional heavy vehicle movements over the life of the project will place substantial stress on roads that are already subject to maintenance challenges.

## Fog and Reduced Visibility

An additional concern that appears to be underappreciated is the prevalence of fog throughout the district, particularly during autumn and winter months.

Local residents know that heavy fog can significantly reduce visibility during early morning periods when:

- School buses are operating.
- Students are travelling to school.
- Commuters are travelling to work.
- Agricultural machinery is using local roads.

Under these conditions, visibility can be severely compromised.

The combination of heavy vehicles, school buses, local traffic and reduced visibility creates an unacceptable road safety risk.

The Department should carefully consider whether it is appropriate to substantially increase heavy truck traffic on Elderslie Bridge which is regularly impacted by fog and poor visibility conditions, which will lead to unintended interactions between school buses, local traffic and heavy vehicles hauling quarry materials.

It is also likely highly likely overloading of the Elderslie Bridge will occur by accident and impatient driver behaviors when poor visibility leads to traffic entering the bridge from both directions, as there exists no active traffic control.


Figure: Elderslie Bridge during foggy conditions with poor visibility conditions

In addition, at the existing Radford Park estate, the current entrance and new proposed entrance to support its future extension, is currently within a 80km/hour zone, as are the designated school bus stops.

The estimated stopping distance for a 30T B-Double, inclusive of reaction time, is 130 meters in dry conditions and 240m in wet conditions on a flat level road. The existing and proposed entrances to Radford park do not provide sufficient and clear visibility in both direction, especially in foggy or poor weather conditions.

This will eventually lead to a potential fatal incident and the probability increases at the Maybon Close, Alma Road and George Street interactions which are on a steep decline for a fully loaded truck.

## Community Safety Must Take Priority

The economic benefits claimed by the project do not outweigh the potential consequences of a serious road incident involving a school bus, child pedestrian or local resident.

Once approved, this development would expose the community to increased heavy vehicle traffic for up to 30 years. Any road upgrades proposed by the applicant cannot completely eliminate the risks associated with:

- Increased heavy vehicle volumes.
- School bus interactions.
- Existing poor road conditions.
- Ongoing road deterioration.
- Fog and reduced visibility.
- Rural road safety constraints.

Given these factors, the precautionary principle should be applied. Where there is a credible risk to public safety, particularly the safety of school children, the burden should rest with the proponent to demonstrate beyond doubt that these risks can be effectively managed over the entire life of the project.

I do not believe that burden has been met.

## 2. Noise Impacts

The project would introduce ongoing noise from:

- Drilling and blasting operations.
- Crushing and processing activities.
- Heavy equipment operation.
- Truck movements.

These activities are likely to significantly alter the quiet rural character that currently defines the Elderslie and Glendon Brook area.

Although modelling may demonstrate compliance with statutory limits, many residents will still experience a substantial reduction in their quality of life due to continuous industrial noise over a 30-year period. The most unfavourable aspect is the noise from unladen trucks travelling Elderslie Road heading North and fully laden trucks heading South utilising engine braking. Most developments of this nature would require the installation of noise barriers and/or window glazing to affected properties.

## 3. Dust and Air Quality Concerns

Quarry operations inevitably generate dust through:

- Extraction activities.
- Crushing and screening.
- Stockpiling.
- Heavy vehicle movements on internal roads and public roads.

Dust can adversely affect:

- Human health.
- Agricultural productivity.
- Water quality.
- Native vegetation.
- Residential amenity.

Local weather conditions, particularly wind events and drought periods, may exacerbate dust dispersion well beyond the quarry boundary.

The long-term health implications for nearby residents warrants a precautionary approach. Recent legislation changes regarding the inhalation of respirable silica dust have not been addressed in this development application, especially the containment of this dust from trucks leaving site.

## 4. Impacts on Rural Character and Lifestyle

The proposed development represents a major industrial activity in an area that has traditionally been characterised by:

- Rural land uses.
- Agricultural production.
- Small communities.
- Scenic landscapes.

The industrialisation of this landscape for a 30-year period would fundamentally change the character of the locality.

Residents who have deliberately chosen to live in a rural environment should not be expected to bear the burden of a large-scale extractive industry in close proximity to their homes.

## 5. Environmental and Biodiversity Risks

The project has the potential to impact:

- Native vegetation.
- Wildlife habitat.
- Ecological corridors.
- Threatened species.
- Surface water and groundwater systems.

Once habitat is fragmented or removed, restoration can take decades and often fails to achieve equivalent ecological outcomes.

Given the increasing pressure on biodiversity throughout the Hunter region, any further loss of habitat should be carefully scrutinised.

The precautionary principle should be applied where there is uncertainty regarding environmental impacts.

I note that the applicant has previously cleared the vegetation on the exact footprint of the proposed quarry development in recent years, which has concealed any adverse biodiversity findings. The ecological assessment should now be repeated and extended to the surrounding un-developed bush and forest areas to assess for any endangered flora or fauna species.

## 6. Water Resource Concerns

Quarry developments can alter natural drainage patterns and create risks associated with:

- Sediment runoff.
- Erosion.
- Groundwater impacts.
- Water quality degradation.

Water resources are critical to agricultural production, environmental health and rural communities.

There remains uncertainty regarding the long-term cumulative impacts of quarry operations on local water systems over the proposed 30-year extraction period.

In addition, the extraction of water for any dust suppression activities as part of the quarrying or transport of product will place an unfair demand on local infrastructure, especially in times drought. The proponent should be self sufficient and capable of enduring a multi-year drought with zero water allocation from public systems.

## 7. Property Value and Social Impacts

The development is likely to adversely affect nearby property owners through:

- Increased traffic.
- Noise.
- Dust.
- Visual impacts.
- Perceived environmental risk.

Many landowners have invested substantial resources in establishing homes, farms and businesses in the area. The introduction of a major quarry could negatively affect property values and diminish residents' enjoyment of their properties.

The economic costs borne by local residents should be given greater weight in the assessment process, who have paid a premium to live in the rural zones bordering this development and especially rural residential areas along Elderslie Road.

## 8. Questionable Public Benefit Relative to Local Costs

The proponent argues that the project will assist with the supply of construction materials and housing growth. The project documentation states the quarry would produce approximately 30 million tonnes of material over 30 years and extract up to 1 million tonnes annually.

However, the majority of the benefits are regional or state-wide, while many of the impacts will be experienced directly by local residents and landholders.

The Department should carefully consider whether it is appropriate for a small rural community to bear decades of environmental and social impacts to deliver benefits that largely accrue elsewhere.

## Conclusion

For the reasons outlined above, I believe the Bluestone Hardrock Quarry Project is not in the public interest and should not be approved.

The proposal presents significant risks and adverse impacts relating to:

- Traffic and road safety.
- Noise.
- Dust and air quality.
- Rural character and community wellbeing.
- Biodiversity and environmental values.
- Water resources.
- Property impacts.
- Long-term cumulative effects.

Accordingly, I respectfully request that the NSW Department of Planning, Housing and Infrastructure refuse the application.

**Yours faithfully,**

Jason Thompson
6 Pyrus Avenue, Branxton, NSW, 2335
6th July 2026