

Submission of Objection to State Significant Development Application SSD-76210271 – Bluestone Hardrock Quarry Project

To the Department of Planning, Housing and Infrastructure,

Re: Objection to State Significant Development Application SSD-76210271 – Bluestone Hardrock Quarry Project

I am a nearby resident living within approximately two kilometres of the proposed quarry site. I strongly object to this application and respectfully request that the Department refuse the proposal.

I have lived in Elderslie for the past 16 years and have lived in the Branxton district since childhood. During this time, I have developed a thorough understanding of the local area, its rural character and the road network that serves the community.

I travel the proposed haul route every day, often making up to four return trips, and am therefore familiar with existing traffic conditions, road users and the operation of the local transport network.

Having reviewed the Environmental Impact Statement (EIS) and supporting documentation, I have significant concerns regarding the accuracy of several technical assessments, the assumptions relied upon by the applicant, and the adequacy of the community consultation process. In my view, a number of conclusions presented within the EIS are either insufficiently supported by evidence or do not adequately reflect the likely impacts on nearby residents and the surrounding rural community.

1. Noise Impacts

The Noise and Blasting Assessment (EIS, p.18) concludes that sleep disturbance is not anticipated during the morning shoulder period between 5:00 am and 7:00 am. However the assessment also appears to overlook information contained within Section 6.11 (Social Impact), which identifies mining and health care as accounting for a combined 19% of local employment. Both industries commonly involve shift work, indicating that a significant proportion of residents may be sleeping during daylight hours. As a result, operational noise all day has the potential to create sleep disturbance to a considerable number of people.

Noise levels that may be considered acceptable in an urban environment can be highly intrusive in rural settings. The commencement of quarry operations, including mobile plant, reversing alarms, truck movements and general operational activity, has the potential to disturb sleep for shift workers and reduce residential amenity for retirees,

people working from home, stay-at-home parents, holidaymakers and residents enjoying days off during the week.

The assessment also appears to rely on a limited number of identified sensitive receivers. Several residential properties, including my own, appear to have been omitted or incorrectly identified. Errors in identifying nearby residences call into question the accuracy of the overall noise modelling and whether all potentially affected properties have been appropriately assessed.

The report identifies only 11 sensitive noise receivers within approximately two kilometres of the proposed quarry. Given the rural nature of the locality and the distance over which quarry noise can travel, this assessment area appears unreasonably limited. A broader assessment radius should have been adopted to ensure all potentially affected residents were identified and assessed.

Section 3.3.2 states that blasting is expected to occur approximately once per week. However, the EIS provides limited information regarding drilling operations. Drilling activities can generate prolonged noise and vibration and may occur far more frequently than blasting. The expected frequency, duration and timing of drilling should therefore be clearly disclosed and assessed.

I also note that the initial project scoping documentation indicated blasting would occur approximately once per month. The increase to weekly blasting proposed in the EIS is concerning and highlights the importance of providing residents with certainty regarding the scale and frequency of quarry operations.

2. Traffic Assessment and Proposed Haul Route

The Traffic Impact Assessment raises a number of significant concerns.

Section 2.2 states that the proposed haul route does not approach Singleton and is therefore unlikely to impact residents or infrastructure within the town. However, other sections of the application repeatedly state that quarry products will supply Singleton, Maitland and surrounding areas.

These statements appear inconsistent.

If quarry products are intended to service Singleton, Maitland and surrounding communities, it is difficult to understand how these destinations will be reached without heavy vehicles either leaving the nominated haul route or travelling significant additional distances. This raises questions about whether the proposed haul route accurately reflects actual operational practice.

If the project is approved, appropriate measures should be implemented to ensure heavy vehicles remain on the approved haul route and are not permitted to determine alternative routes that increase impacts on local communities.

I also question whether Transport for NSW was provided with complete and accurate information regarding expected heavy vehicle movements before concluding that the use of Elderslie Bridge is acceptable. Elderslie Bridge is a single-lane, heritage-listed structure that is approximately 135 years old, and its long-term suitability for a substantial increase in heavy vehicle traffic warrants careful consideration.

It is also worth noting that if this bridge is damaged or there is an accident blocking the road, the entire Elderslie & Stanhope community, also Mitchell's Flat & Lambs Valley areas will be forced to drive many kilometres out of their way to arrive at their intended destination, this bridge is the only crossing of the Hunter River between Glendon & Melville Ford. Elderslie Road is also used as an alternative route if the New England Highway is blocked, we have seen traffic stopped for kilometres while the single lane Elderslie Bridge is navigated.

3. Traffic Volumes

Section 6.7.2 suggests that approximately 15 loaded trucks and 15 unloaded trucks per hour would have negligible impacts on traffic conditions. I find this conclusion difficult to accept.

This equates to approximately one heavy vehicle every two minutes throughout operating hours.

On rural roads that are regularly used by school buses, cyclists, pedestrians, horse riders, agricultural machinery and local residents, this represents a substantial increase in heavy vehicle movements that should not be dismissed as negligible.

The assessment also focuses primarily on delays associated with Elderslie Bridge but appears to give limited consideration to the cumulative impacts created by slow-moving loaded trucks negotiating steep grades along the haul route, particularly where overtaking opportunities are limited.

Based on observations during periods of road upgrades and private earthworks in the area, heavy vehicle numbers have at times approached those proposed for this development. During these periods, there has also been an observable increase in unsafe driving behaviours, including speeding, tailgating, centre-line encroachment and impatient overtaking. While these behaviours are certainly not representative of all heavy vehicle drivers, they demonstrate the potential safety risks associated with

substantially increased truck movements and should be considered within the overall assessment.

4. Traffic Management Plan

Section 6.7.3 outlines proposed mitigation measures within the Traffic Management Plan, including a requirement that drivers remain aware of school buses and children and comply with posted speed limits.

In my view, this does not constitute a meaningful mitigation measure.

These are fundamental legal obligations that apply to all licensed drivers, regardless of whether the quarry proceeds. Compliance with existing road rules should not be presented as project-specific mitigation.

Instead, the Traffic Management Plan should identify enforceable measures designed to minimise project impacts, including driver monitoring, fatigue management, route compliance monitoring, procedures for responding to community complaints and independent auditing of compliance.

5. Pedestrian and Cyclist Safety

Section 6.7.2 appears to assume that pedestrian activity occurs only where constructed footpaths exist. This assumption does not reflect the reality of rural communities.

Residents regularly walk, run and cycle along road shoulders, grass verges and pavement edges where no formal pedestrian infrastructure is available.

Along the approximately 13-kilometre proposed haul route, the only constructed pathway is located adjacent to Radford Park. This pathway extends for only around 1.2 kilometres and does not connect with any broader pedestrian network. Consequently, it cannot reasonably be assumed that pedestrians and cyclists are confined to this section alone.

The assessment therefore appears to underestimate the number of vulnerable road users who regularly utilise the proposed haul route. This should be more comprehensively assessed when considering the increased volume of heavy vehicle traffic generated by the project.

6. Community Consultation

I consider the community consultation process to have been inadequate.

Many residents remain concerned that consultation was conducted primarily as an information-sharing exercise rather than as genuine engagement capable of influencing the design or assessment of the project. Despite the concerns raised by community members, there appears to have been little evidence that this feedback resulted in any meaningful changes to the proposal or the assessments presented within the EIS.

Section 7.4 (Community Views) states that engagement included a letterbox drop to 2,354 properties. However, through discussions with nearby residents and those living along the proposed haul route, I found that many advised they did not receive any notification regarding the project, I am a listed noise receptor and did not receive any information. Conversely, several residents living well beyond the area likely to be affected reported receiving the information. This raises questions regarding the effectiveness and accuracy of the consultation process.

Community drop-in sessions were also held at times that may have limited attendance for some residents. During these sessions, information was presented that many attendees considered to be inconsistent with later project documentation. As a result, there is concern that some community members may have formed views based on information that was incomplete or inaccurate.

Given the scale and potential duration of this proposal, it is important that the Department is satisfied that consultation has been genuine, inclusive and effective, and that community feedback has been meaningfully considered during the assessment process.

7. Biodiversity Assessment

I respectfully request that the Department carefully review the Biodiversity Development Assessment Report, particularly in relation to the potential presence of threatened species, including the Regent Honeyeater, Swift Parrot and Spotted-tailed Quoll.

There have been reports of Spotted-tailed Quoll activity in close proximity to the project area, Regent Honeyeater calls are believed to have been heard nearby, and koalas have reportedly been sighted within the nearby Tangory Nature Reserve. While these observations may require formal verification, they indicate that the potential presence of threatened species warrants careful and independent consideration.

Given the conservation significance of these species, it is important that the survey methodology, seasonal timing and survey effort are independently reviewed to ensure the biodiversity assessment has adequately identified and assessed potential impacts.

The EIS also states that the project site has been "historically cleared". I request clarification regarding when this clearing occurred and the evidence relied upon to support this conclusion.

Section 6.13.2 (Impact Assessment) notes that, during an inspection undertaken on 8 July 2025, stockpiles of previously cleared trees were observed on the site. The Department should determine whether this vegetation clearing formed part of approved land management activities and whether it may have influenced the biodiversity assessment or survey outcomes.

8. Meteorological Data

The Noise Assessment (Appendix I) and Air Quality Assessment (Appendix H) rely upon meteorological data collected from weather stations located at Cessnock and Maitland.

Given the topography of the project site and the local climatic conditions surrounding the proposed quarry, I question whether these locations accurately represent site-specific wind patterns, temperature inversions and other atmospheric conditions that influence the dispersion of dust and the propagation of noise.

The surrounding terrain may create localised weather conditions that differ significantly from those recorded at the nominated monitoring stations.

Accordingly, I consider that additional site-specific meteorological monitoring should be undertaken to provide a more accurate basis for both the noise and air quality assessments.

9. Environmental Monitoring and Compliance

The EIS refers to a range of mitigation measures intended to manage dust, noise, blasting and traffic impacts. However, it provides limited detail regarding how compliance will be independently monitored and enforced over the proposed 30-year operational life of the project.

In particular, I seek clarification regarding:

- who will be responsible for undertaking compliance inspections
- how frequently monitoring and inspections will occur
- how compliance with noise, dust, blasting and traffic conditions will be independently verified
- whether monitoring results will be publicly available to affected residents
- what enforcement mechanisms will apply if approval conditions are exceeded

Independent monitoring is essential to maintain public confidence that environmental conditions will be complied with and that any exceedances will be identified and addressed in a timely and transparent manner.

10. Heritage

Section 6.18 identifies Elderslie Bridge and Beckers Bridge as items of State heritage significance and also acknowledges the heritage significance of the nearby Johnson's Cottage.

The EIS concludes that heavy vehicles may utilise Elderslie Bridge while excluding the use of Beckers Bridge. However, if transport operators deviate from the approved haul route, there is potential for unintended impacts on Beckers Bridge and other heritage assets.

I remain concerned that Elderslie Bridge, given its age, single-lane configuration and heritage significance, will not be suitable for the substantial increase in heavy vehicle traffic proposed by this development. I respectfully request that the Department carefully consider whether the bridge is capable of accommodating the projected traffic volumes over the life of the quarry without compromising its structural integrity or heritage value.

I also have concerns regarding the potential impacts of blasting and vibration on Johnson's Cottage. Furthermore, should heavy vehicles utilise alternative routes in the future, the close proximity of this heritage structure to the roadway may increase the risk of accidental damage.

11. Visual Impact

I question the accuracy of the Zone of Theoretical Visibility (ZTV) assessment presented within the EIS.

The mapping does not appear to fully represent all existing residences, buildings, vegetation or actual viewing opportunities from surrounding properties and public roads.

The visual assessment also places considerable reliance on existing vegetation to provide long-term screening of quarry operations. However, as substantial vegetation clearing is proposed as part of the development, it is unclear whether the level of visual screening assumed by the assessment will be maintained throughout the life of the project.

Given the long operational life of the proposed quarry and the importance of protecting the rural landscape, I respectfully request that the visual impact assessment be

independently reviewed to ensure it accurately reflects existing conditions and the likely long-term visual impacts experienced by surrounding residents.

12. Future Residential Development

The EIS references the approved Radford Park residential estate, comprising approximately 139 residential lots. However, this development continues to expand and attract new residents to the locality.

Given the proposed operational life of approximately 30 years, it is important that the assessment considers not only the existing population but also the likely increase in residents who may be exposed to quarry-related impacts over time.

The assessment should therefore give appropriate consideration to foreseeable residential growth when evaluating the project's long-term impacts on community amenity, traffic, noise and air quality.

13. Economic Justification

Section 6.12 (Cost Benefit Analysis) concludes that the project will deliver an economic benefit to New South Wales and improve the security of hard rock supply.

While the EIS identifies potential economic benefits, it does not clearly explain where these benefits will be realised or how they have been balanced against the long-term environmental and social impacts that will be experienced by the surrounding community.

The conclusion that the project is justified on economic grounds because it will improve the security of hard rock supply within New South Wales also warrants closer examination.

The Hunter region already contains a number of established hard rock quarries supplying construction materials to the domestic market. The EIS does not appear to clearly demonstrate that existing supply is insufficient, that there is a demonstrated shortage of hard rock resources, or that this particular location is necessary to meet future demand.

In my view, the applicant should be required to provide stronger evidence demonstrating the need for a new quarry at this location, particularly given the project's potential impacts on nearby residents, the rural landscape and the surrounding environment.

While economic benefits to NSW are an important consideration, they should not outweigh unacceptable environmental, social, or community impacts.

It is also unclear how much of the economic benefit would actually flow to NSW. I would assume that the majority of the financial benefit would accrue to the proponent, and that private financial gain should not be considered a public benefit when assessing the proposal.

14. Fire Safety and Air Quality

The EIS should provide a more comprehensive assessment of risks associated with the proposed development, including:

- bushfire risks associated with quarry operations and vegetation management
- emergency response capability in a rural location
- potential exposure of workers and nearby residents to airborne crystalline silica
- measures to prevent silica dust and other particulate matter from leaving the site

Given the increasing community awareness of the health impacts associated with crystalline silica exposure, the EIS should clearly demonstrate how these risks will be monitored, managed and independently verified throughout the life of the project.

15. Rural Character

The proposed development represents a significant industrial land use within a predominantly rural landscape.

Over its proposed 30-year operational life, the project has the potential to permanently alter the character of the locality through:

- ongoing industrial activity
- increased heavy vehicle traffic
- blasting operations
- operational noise
- dust generation
- visual impacts

While each of these impacts has been assessed individually within the EIS, their cumulative effect extends well beyond the quarry boundary.

Collectively, these impacts have the potential to fundamentally alter the rural character, tranquillity and lifestyle currently enjoyed by local residents, which should be afforded significant weight during the assessment process.

16. Property Impacts

In my view, the EIS gives insufficient consideration to the impacts likely to be experienced by neighbouring landowners.

These may include:

- reductions in residential amenity
- potential impacts on property values
- increased insurance premiums where properties are located near blasting activities or heavy vehicle routes
- structural damage associated with blasting vibration, should vibration limits be exceeded
- increased maintenance costs arising from greater heavy vehicle traffic on local roads
- reduced enjoyment and use of residential properties

While some of these impacts may be difficult to quantify, they should not be dismissed or assumed to be negligible without appropriate assessment.

17. Proposed Hunter Gas Pipeline

I also have concerns regarding the relationship between the proposed quarry and the proposed Hunter Gas Pipeline.

The EIS provides limited information demonstrating that both projects can safely operate in close proximity throughout their respective operational lives. In particular, I am concerned that insufficient information has been provided regarding the final pipeline alignment, potential ground movement, vibration impacts and the interaction between blasting activities and pipeline infrastructure.

Should both projects proceed, I respectfully request that the Department ensure a comprehensive and independent assessment is undertaken to confirm that the quarry can operate safely without compromising the integrity, operation or maintenance of the pipeline.

Conclusion

For the reasons outlined above, I respectfully request that the Department refuse State Significant Development Application SSD-76210271.

Should the Department nevertheless consider granting approval, I request that it first require comprehensive additional investigation and independent review of the deficiencies identified within the Environmental Impact Statement, particularly in relation

to noise, traffic, biodiversity, visual impacts, cumulative impacts, environmental monitoring and community amenity.

In my view, the EIS contains a number of assumptions and conclusions that appear to be inadequately supported by evidence or are inconsistent with other sections of the application. These matters warrant careful scrutiny before any determination is made.

As a resident living within approximately two kilometres of the proposed quarry, I remain deeply concerned about the long-term impacts this proposal may have on my family's health, wellbeing, safety, property, and quality of life, as well as on the broader rural community.

I respectfully ask that these concerns be given full and careful consideration before any determination is made.

Adam Bogacz
Resident