

Objection to the Proposed Bluestone Hard Rock Quarry (SSD-76210271)

I object to the proposed Bluestone Hard Rock Quarry, I believe the Environmental Impact Statement (EIS) does not adequately demonstrate that the environmental, social, health, safety and planning impacts of the proposal have been comprehensively identified, assessed or appropriately mitigated. In my view, the information presented does not establish that the development is suitable for the proposed site or that its impacts can be effectively managed in accordance with the Secretary's Environmental Assessment Requirements (SEARs), the objects of the *Environmental Planning and Assessment Act 1979*, and the principles of ecologically sustainable development.

While the EIS contains extensive technical documentation, a number of its conclusions rely on assumptions, incomplete assessments and data that do not appear to adequately reflect local conditions. In several key areas, including bushfire risk, human health, traffic, cumulative impacts and community amenity, the assessment does not provide sufficient confidence that the proposal can proceed without causing significant and lasting impacts on the surrounding community and environment.

I am a concerned resident living within two kilometres of the proposed quarry. I have lived in my current home for the past eleven years and have called Elderslie home for thirty-six years, apart from a brief two-year period elsewhere in the Hunter region. This community is far more than a location identified on a planning map or within a technical report—it is a place that must be experienced to be truly understood.

The appeal of Elderslie extends well beyond its peaceful rural setting. It is defined by its people, its natural landscape, its history, and the strong sense of belonging shared by those who live here. As a stay-at-home mother, I spend much of my day within the community and experience first-hand the qualities that make Elderslie such a special place to live and raise a family.

To illustrate what is at stake, I would like to describe what is, for me, an entirely ordinary morning “school run” travelling along the road proposed to become the quarry haul route.

As I leave my property each morning, I often see native wildlife beginning their day. I pass neighbours who greet one another with a friendly wave and farmers already tending to their livestock and land. Crossing the historic Elderslie Bridge, I always appreciate the beauty of the Hunter River before continuing my journey.

Further along the road I pass a number of well-established local businesses, including turf farms, accommodation providers and mechanical workshops. I often see the familiar white van from the local Hunter Pet Motel travelling in the opposite direction, carrying someone's

much-loved family pet to be cared for. These small, everyday moments reflect the close-knit and supportive community that has developed here over generations.

Many retirees are already outside tending their gardens or walking grandchildren to nearby school bus stops. Along this relatively short drive I pass three separate school buses, one of which my own child catches home each afternoon. Children gather at bus stops throughout the route, chatting with friends as they begin another school day.

Near Radford Park, two bounding golden retrievers take their master for a walk, while a young couple complete their morning exercise. As I approach the intersection with Maitland Street, I look across the cricket field towards the golf course. The nearby playground is already alive with young children, a little boy proudly practises riding his bicycle near the netball courts, and Miller Park is being prepared for another busy weekend of community sport.

This is not simply a drive along a rural road. It is a journey through a living, thriving community where families, farmers, retirees, school children, volunteers and local businesses all share the same space. Every morning serves as a reminder of why so many people have chosen to live, work and raise their families in Elderslie, Stanhope, Branxton & other local rural towns & villages.

The proposed haul route passes directly through the heart of this community. It is difficult to reconcile the existing character of the area with the introduction of frequent heavy vehicles operating throughout the day. This proposal is not merely an alteration to the local road network; it would fundamentally change the character, safety, amenity and liveability of a long-established rural community. Increased heavy vehicle traffic, industrial noise, dust, vibration and associated safety risks would diminish the very qualities that have attracted generations of families to Elderslie and the surrounding localities.

Technical reports can quantify traffic volumes, noise levels and air quality, but they cannot adequately measure community cohesion, children's independence, the enjoyment of a peaceful rural environment or the sense of place that defines a community. These values are no less important simply because they are difficult to express in numerical terms.

Elderslie is not an industrial transport corridor. It is our home. I respectfully ask the consent authority to consider not only the technical assessments contained within the EIS, but also the lived experience of the people who call this community home and who will bear the consequences of this proposal every day should it proceed.

1. Bushfire Risk

Section 6.9 – Bushfire Prone Land

Section 6.9.2 of the Environmental Impact Statement (EIS) acknowledges that the proposal does not comply with the acceptable solutions contained within *Planning for Bush Fire*

Protection 2019 (PBP 2019). Instead, the applicant proposes a series of performance-based measures intended to achieve compliance.

Where a proposal departs from the acceptable solutions of PBP 2019, it is incumbent upon the applicant to demonstrate that the proposed performance-based approach provides an equivalent or greater level of protection for people, property and the environment. In my view, the EIS does not provide sufficient evidence to demonstrate that this standard has been achieved.

My concerns include the following:

- The proposed quarry is located on bushfire-prone land identified as BAL-12.5 to BAL-29.
- Appendix O (page 24) identifies the potential for bushfire attack at the site.
- The bushfire assessment relies on meteorological data from the Williamstown weather station, which is located a considerable distance from the proposed quarry. Given the differences in topography, vegetation, local weather patterns and fuel loads, it is not clear that this data accurately represents bushfire behaviour at the site.
- Quarry operations would introduce blasting activities, heavy machinery, fuel storage and increased vehicle movements into a bushfire-prone landscape. These activities have the potential to increase ignition risk, particularly during periods of hot, dry and windy conditions.
- The EIS does not adequately assess the cumulative risks associated with the proximity of the proposed quarry to the Hunter Gas Pipeline. In the event of a bushfire or other emergency, the interaction between quarry operations and critical gas infrastructure has the potential to create complex emergency scenarios with significant consequences. The assessment does not provide sufficient detail to demonstrate that these risks have been comprehensively evaluated or appropriately mitigated.
- The locality has experienced significant bushfire events in the past, including the 2013 Tangory Mountain bushfire, which threatened nearby residences. This demonstrates that severe bushfire is a credible and foreseeable hazard within the locality and reinforces the need for a robust site-specific assessment.

Collectively, these issues reduce confidence in the conclusions of the bushfire assessment. Given the acknowledged departure from the acceptable solutions contained within *Planning for Bush Fire Protection 2019*, together with the reliance on meteorological data from a distant weather station and the limited assessment of cumulative hazards, I do not consider that the EIS has demonstrated that bushfire risks have been comprehensively identified, assessed or appropriately mitigated.

Accordingly, I am not satisfied that the proposal has demonstrated an acceptable level of bushfire safety or that it meets the standard of assessment required by the Secretary's Environmental Assessment Requirements (SEARs).

2. Hunter Gas Pipeline

The Environmental Impact Statement (EIS) does not adequately assess the interaction between the proposed quarry and the nearby Hunter Gas Pipeline.

The close proximity of blasting activities to high-pressure gas infrastructure presents a potentially significant public safety risk should an incident occur. While the EIS acknowledges the presence of the pipeline, it does not provide sufficient detail to demonstrate that the risks associated with the coexistence of the two developments have been comprehensively assessed or appropriately mitigated.

In particular, the assessment does not adequately address:

- the potential effects of blast vibration on the integrity of the pipeline
- the consequences of accidental damage to critical gas infrastructure
- emergency response procedures in the event of a pipeline incident occurring in conjunction with quarry operations
- the cumulative risks associated with bushfire, blasting and gas infrastructure
- public safety implications for nearby residents and road users
- the potential consequences arising from multiple hazards occurring simultaneously

Section 7.7 states that the applicant has made reasonable efforts to consult with the Hunter Gas Pipeline proponent. While consultation is an important component of the assessment process, it is not a substitute for a comprehensive and independent quantitative risk assessment examining the interaction between the proposed quarry and the pipeline.

Given the potential consequences of an incident involving high-pressure gas infrastructure, I do not consider that the EIS provides sufficient evidence to demonstrate that these risks have been fully assessed or that appropriate mitigation measures have been identified. Accordingly, further independent assessment should be undertaken before the application is determined.

3. Existing Environment

Section 6.10.2 – Existing Environment

The EIS acknowledges that Tangory Nature Reserve directly adjoins the eastern boundary of the proposed quarry and identifies the reserve as having a high Zone of Theoretical Visibility (ZTV). Despite the proximity of this protected area, the assessment does not adequately demonstrate that the potential impacts of quarry operations on the reserve have been comprehensively evaluated.

In particular, the EIS does not sufficiently assess:

- impacts on the landscape and scenic values of Tangory Nature Reserve
- fragmentation of ecological connectivity between surrounding habitats

- the visual impacts of quarry operations on a protected natural landscape
- the long-term effects of blasting, noise, dust, lighting and industrial activity immediately adjacent to conservation land
- the cumulative impacts of these activities over the life of the quarry

Appendix M also identifies the presence of groundwater-dependent ecosystems in the vicinity of Stewart Creek but the proximity map is vague and does not clearly demonstrate that groundwater-dependent ecosystems across the broader locality have been comprehensively investigated or that potential indirect impacts have been adequately assessed.

Tangory Nature Reserve has been established to conserve biodiversity, protect native habitat and safeguard threatened flora and fauna. Given its immediate proximity to the proposed quarry, the EIS should provide compelling evidence that the reserve's ecological values will not be adversely affected. In my view, the assessment does not provide sufficient confidence that these values can be protected over the life of the project.

Accordingly, I do not consider that the EIS has adequately assessed the potential impacts of the proposal on the adjoining conservation area or demonstrated that these impacts can be appropriately avoided, minimised or managed.

4. Social Impact Assessment

Section 6.15 and Appendix Q

The Social Impact Assessment does not appear to adequately define the full extent of the affected social locality.

While the assessment focuses primarily on communities immediately surrounding the proposed quarry, nearby localities including Mitchells Flat and Glendonbrook are also likely to experience impacts associated with increased heavy vehicle traffic, noise, dust, blasting, visual amenity and changes to the rural character of the area. The EIS does not clearly demonstrate that these communities have been appropriately recognised or that the potential impacts on their residents have been comprehensively assessed.

Community Consultation

Section 3.1.3 states that approximately 2,354 community survey packages were distributed. However, Figure 6 appears to illustrate GPS tracking of delivery routes rather than confirming that survey material was successfully delivered to individual households. I am aware of residents living along those delivery routes who have advised that they did not receive the survey package, I myself am listed as a receptor but I did not receive any sort of information. This raises questions regarding the completeness and effectiveness of the consultation process.

The consultation methodology also appears to have significant limitations. The Social Impact Assessment was informed by only six semi-structured interviews. The EIS notes that seven

people declined to participate and three did not respond, resulting in a very small sample that cannot reasonably be considered representative of the broader community likely to be affected by the proposal.

Furthermore, the EIS does not explain:

- how interview participants were identified or selected
- whether participants were located close to the proposed quarry or haul route
- whether residents most likely to experience impacts were proportionately represented
- whether local businesses, community organisations and vulnerable groups were adequately consulted
- why a broader qualitative consultation program was not undertaken given the scale and duration of the proposal

Greater transparency regarding the participant selection process and consultation methodology would assist in evaluating the reliability and representativeness of the Social Impact Assessment.

I was also concerned by information presented during community drop-in sessions that I believe did not accurately reflect aspects of the proposal. Effective community consultation should provide clear, accurate and balanced information to enable residents to make informed decisions. Any misunderstanding or inaccurate information has the potential to undermine confidence in the consultation process.

Given these limitations, I do not consider that the Social Impact Assessment provides a sufficiently robust understanding of the potential social impacts of the proposal or adequately reflects the views and experiences of the broader affected community.

5. Health Impacts

Section 6.17 – Human Health

The assessment of human health impacts does not provide sufficient confidence that the proposal can operate without adversely affecting the health and wellbeing of nearby residents.

The EIS appears to characterise community concerns regarding diesel particulate emissions and respirable crystalline silica as matters of perception rather than recognising the well-established public health risks associated with prolonged exposure to these pollutants. In my view, this approach does not adequately reflect contemporary scientific understanding or the precautionary principle.

In particular, the assessment does not comprehensively evaluate:

- potential exposure to respirable crystalline silica generated by quarrying, crushing and haulage activities
- cumulative diesel particulate emissions from quarry plant and heavy vehicles
- long-term respiratory and cardiovascular health risks associated with prolonged exposure
- potential impacts on vulnerable populations, including children, older residents and individuals with existing respiratory conditions
- cumulative health impacts over the operational life of the quarry
- the combined effects of dust, noise, vibration and diesel emissions on community health and wellbeing

Given the proposed lifespan of the quarry and the proximity of nearby residences, a comprehensive assessment of cumulative health impacts is essential. In my view, the EIS does not adequately demonstrate that these potential impacts have been fully investigated or that they can be effectively managed over the life of the project.

Accordingly, I consider that the conclusions regarding air quality, noise and human health should be subject to further independent review before any determination of the application.

6. Air Quality Assessment

Appendix I – Air Quality Assessment

The Air Quality Assessment does not provide sufficient confidence that existing background air quality conditions at the proposed quarry site have been accurately characterised.

The assessment relies heavily on meteorological and air quality monitoring data collected from locations some distance from the proposal, including:

- climatic data from Cessnock (approximately 23 km from the site)
- climatic data from Maitland (approximately 19 km from the site)
- air quality monitoring data from Singleton (approximately 14 km from the site)
- air quality monitoring data from Beresfield (approximately 38 km from the site)

These locations differ from the proposed quarry site in terms of topography, surrounding land uses, vegetation, local meteorological conditions and existing emission sources. The EIS does not clearly demonstrate that the data obtained from these monitoring locations is representative of existing background conditions at the site or that the modelling adequately reflects local conditions.

The assessment also contains factual inaccuracies that reduce confidence in its overall reliability. For example, Receptor R06 is identified in Table A-1 as being located at **122 Stanhope Road**, which is an incorrect address. Errors relating to receptor identification raise questions as to whether all potentially affected receptors have been correctly identified and assessed.

Accurate baseline data and receptor locations are fundamental to any air quality assessment. Where errors are identified, they reduce confidence in the conclusions drawn by the modelling and warrant closer scrutiny.

The Secretary's Environmental Assessment Requirements (SEARs) require a comprehensive assessment of air quality impacts. In my view, the EIS does not clearly demonstrate that all relevant requirements have been satisfied or that the predicted impacts have been assessed using data that accurately reflects local environmental conditions.

7. Noise and Blasting

Appendix H – Noise and Blasting Assessment

The Noise and Blasting Assessment does not provide sufficient confidence that the potential acoustic and vibration impacts of the proposal have been comprehensively assessed.

My concerns include the following:

- Receptor R06 is identified as **122 Springvale Road**, which is an incorrect address. This inconsistency, together with the differing address provided within the Air Quality Assessment, raises concerns regarding the accuracy of receptor identification throughout the EIS and whether all affected residences have been correctly assessed
- Prevailing wind data has been sourced from Maitland, approximately 18 kilometres from the proposed quarry. Given the differences in local topography and meteorological conditions, it is not clear that this data accurately represents sound propagation at the site
- The assessment does not adequately evaluate the potential impacts of blasting in close proximity to the Hunter Gas Pipeline or demonstrate that associated vibration risks have been comprehensively assessed

The report notes that the existing rural acoustic environment is characterised by typical ambient sound levels of approximately **30 dB**. In contrast, operational quarry activities are predicted to generate noise levels of approximately **100 dB** within operational areas. While noise attenuation with distance is acknowledged, this represents a substantial industrial noise source introduced into an otherwise quiet rural landscape.

The assessment places considerable emphasis on compliance with applicable noise criteria. However, compliance with numerical limits does not necessarily address the broader impacts on rural amenity and quality of life. The introduction of recurring industrial noise, blasting and associated vibration has the potential to fundamentally alter the acoustic character of the locality over the life of the project.

In my view, the EIS does not adequately assess these long-term amenity impacts or demonstrate that the cumulative effects of quarry operations on nearby residents can be effectively avoided, minimised or managed.

8. Economic Assessment

Section 6.12 – Economic Assessment

The Environmental Impact Statement (EIS) states that quarry products will primarily supply concrete batching plants in Maitland, Singleton and Cameron Park, with Sydney identified as a secondary market.

This distribution indicates that the proposal will generate substantial heavy vehicle movements across a broad regional network, rather than being confined to a localised haulage task. While the EIS appears to focus on a defined haul route, the stated product destinations suggest a significantly wider distribution footprint than is fully reflected in the traffic and transport assessments.

As a result, the true extent of the haulage task appears broader than implied in the EIS, with the potential for cumulative traffic impacts to be distributed across multiple arterial routes within the region. In my view, the assessment does not clearly demonstrate that these wider regional freight impacts have been fully considered in the traffic, transport or cumulative impact assessments.

9. Traffic and Road Safety

Sections 6.16 and 6.18 – Traffic and Transport

The EIS concludes that there is no significant existing crash history relevant to the proposal area. However, this conclusion does not appear to fully reflect recorded road safety conditions or the functional performance of the surrounding road network.

The intersection of the New England Highway and Wine Country Drive is already understood to operate under constrained conditions and is subject to existing congestion and safety pressures. Appendix L records 13 reportable crashes over a five-year period, indicating that safety incidents are already occurring within the affected road network. This figure excludes minor incidents and near-misses that are not captured in police crash data, meaning the actual level of conflict is likely to be higher.

Accordingly, the EIS does not clearly demonstrate that existing road safety conditions have been fully accounted for in the cumulative impact assessment.

The EIS further assumes that quarry traffic will not coincide with school bus movements and therefore concludes that there will be no significant impacts on school transport routes. This assumption does not appear to be supported by evidence presented in the EIS.

Based on my observations as a local resident, the proposed haul route is currently used by multiple school bus services, including one servicing Singleton schools and approximately four services operating towards Branxton, Lochinvar and Maitland. These services typically operate during peak morning and afternoon periods (approximately 7:00–9:00am and 2:30–5pm), which will overlap with proposed quarry operating hours and heavy vehicle movements.

Given the safety implications of interactions between heavy vehicles, school buses and school-aged children at bus stops, this assumption should be independently verified. The EIS does not provide sufficient supporting evidence to demonstrate that these interactions have been adequately assessed or mitigated.

The mitigation measures outlined in Section 6.7.3, which include general requirements for drivers to “remain aware of school buses and children” and comply with posted speed limits, are basic obligations of all road users and do not constitute a meaningful mitigation strategy for increased heavy vehicle traffic in a rural school transport environment.

During periods of local road improvement works, heavy vehicle movements in the area have been comparable to those predicted for this proposal (approximately one heavy vehicle every two minutes). During these periods, I observed numerous instances of unsafe driving behaviour, including tailgating, excessive speed, aggressive driving, and heavy vehicles crossing the centre line. While these behaviours were not exhibited by all truck drivers, my observations indicated that approximately two out of every three heavy vehicles were being operated in a manner that raised safety concerns. These observations suggest that a sustained increase in heavy vehicle traffic of the magnitude proposed has the potential to significantly increase road safety risks for other road users and nearby residents.

It should also be noted that this is a rural area with a high proportion of agricultural land uses. As a result, slow-moving farm machinery and agricultural vehicles frequently use the local road network. An increase in heavy vehicle traffic would increase the likelihood of interactions between trucks, agricultural machinery, and other road users, potentially creating additional safety risks, particularly where overtaking opportunities are limited.

10. Compliance with the SEARs

The Environmental Impact Statement does not clearly demonstrate that the requirements of the Secretary’s Environmental Assessment Requirements (SEARs) have been fully addressed.

In particular, the assessment does not appear to provide sufficient detail or depth in the following key areas:

- air quality
- human health
- cumulative impacts
- bushfire risk

While these matters are addressed within the EIS, the level of analysis presented does not consistently demonstrate that the impacts have been comprehensively identified, assessed and mitigated in accordance with the SEARs.

Given these deficiencies, I do not consider that the EIS provides sufficient evidence to conclude that the proposal has been assessed to the standard required for determination under the *Environmental Planning and Assessment Act 1979*.

11. Heritage and Aboriginal Heritage

Section 6.18 – Heritage

The Environmental Impact Statement (EIS) identifies a number of listed heritage items in proximity to the proposal, however, I do not consider that the potential impacts on these assets have been adequately assessed.

Elderslie Bridge is listed as an item of State heritage significance. It is a single-lane bridge of approximately 135 years of age and functions as a key Hunter River crossing for the local area. Any disruption to this bridge, whether through damage, closure, or restricted access, would have significant consequences for local residents who rely on it as a primary connection between communities. The EIS does not clearly assess the risk of indirect impacts on the bridge arising from increased heavy vehicle movements, vibration, or changes to traffic patterns associated with the proposal.

Beckers Bridge is also listed as a State heritage item. Although the proposed haul route does not directly traverse this structure, the EIS notes potential use of surrounding areas for quarry-related material transport or infrastructure activity. Given the potential for haul routes or transport patterns to change over the life of the project, the EIS does not adequately demonstrate that indirect impacts on this heritage item have been fully considered.

Johnson's Cottage is another heritage-listed property in the vicinity. While the EIS states that no direct impact is expected, I am concerned that the assessment does not adequately consider potential indirect impacts from blasting vibration, heavy vehicle movements, or cumulative changes in land use intensity in the surrounding area. The possibility of route adjustments or operational changes over time further reinforces the need for a more robust assessment of potential impacts on nearby heritage items.

The EIS also identifies Aboriginal heritage research measures; however, I am not satisfied that the assessment provides sufficient confidence that Aboriginal cultural heritage values have been comprehensively identified, assessed, and protected. Given the scale and intensity of the

proposed disturbance footprint, further assurance is required that heritage items will not be impacted during construction or ongoing operations.

12. Ecology and Biodiversity

The Environmental Impact Statement identifies a range of threatened species that may occur within or near the proposal area, including the Regent Honeyeater, Swift Parrot, Spotted-tailed Quoll and Koala.

I am concerned that the assessment does not adequately demonstrate that potential impacts on these species have been fully assessed or appropriately mitigated. Koalas have reportedly been sighted within the nearby Tangory Nature Reserve, and Regent Honeyeater calls and Spotted-tailed Quoll activity have also been reported in the broader locality. These observations suggest that the area may form part of a functional habitat or movement corridor for threatened fauna.

Despite this, the EIS does not clearly demonstrate that ecological surveys have captured seasonal variation, broader habitat use patterns, or cumulative impacts associated with habitat fragmentation, noise, dust, lighting and increased human activity over the life of the project.

Section 6.13.2 also notes that during an inspection on 8 July 2025, Several stockpiles of cleared trees were present. The EIS does not clearly explain the origin, timing or ecological context of this material, nor whether it may have influenced the baseline ecological assessment. Greater clarity is required to ensure that the biodiversity assessment is based on accurate and representative site conditions.

Accordingly, I do not consider that the EIS provides sufficient confidence that biodiversity impacts have been comprehensively assessed or that threatened species will be adequately protected.

13. Visual Impact

The Visual Impact Assessment relies on a Zone of Theoretical Visibility (ZTV) analysis which, in my view, does not fully reflect the likely real-world visual impacts of the proposal.

The ZTV appears to exclude a number of nearby residences and may not fully represent all locations from which the quarry will be visible, particularly given variations in topography and vegetation cover. The assessment also assumes that existing vegetation will continue to provide effective screening; however, this may not be reliable over the life of the project due to potential vegetation removal, seasonal variation, drought stress, or bushfire events.

In addition, the long-term industrial nature of quarry operations, including stockpiling, blasting and haul vehicle movements, is likely to result in a more pronounced visual presence than is suggested by the ZTV mapping alone. The EIS does not adequately demonstrate that these longer-term and cumulative visual impacts have been fully considered.

14. Property Impacts

The Environmental Impact Statement does not provide sufficient assessment of potential impacts on nearby private property.

In particular, the EIS does not adequately address the potential for vibration impacts from blasting, drinking water pollution, dust deposition, noise, or other operational effects to affect surrounding residential properties. While compliance with relevant criteria may be assumed in modelling, the assessment does not clearly demonstrate how potential impacts on individual dwellings and property improvements will be prevented or managed over the life of the project.

Given the proximity of the proposed quarry to surrounding residences, I am concerned about potential impacts on the structural integrity of my home and associated improvements, including sheds, swimming pool and other structures. The EIS does not provide sufficient assurance regarding how such risks would be monitored, mitigated or remedied should they occur.

Accordingly, I do not consider that the EIS adequately demonstrates that impacts on private property, mitigation policies or community benefit schemes have been fully assessed or appropriately addressed in accordance with the SEARs.

The Elderslie Hall is a significant community facility that serves as a local hub for social and community activities. It has the potential to be adversely affected by blasting operations and increased heavy vehicle movements if there are changes to haul routes, which may result in impacts such as vibration, noise, dust, and accelerated road wear.

Conclusion

The Environmental Impact Statement (EIS) for the proposed Bluestone Hard Rock Quarry (SSD-76210271) contains a range of assumptions, omissions, inconsistencies and areas of limited analysis which, when considered collectively, reduce confidence in its findings and conclusions.

Across key assessment areas—including bushfire risk, the Hunter Gas Pipeline interface, air quality, noise and blasting, traffic and road safety, human health, social impacts, biodiversity, heritage, visual amenity, property impacts and cumulative effects—the EIS does not consistently demonstrate that environmental and social impacts have been fully identified, appropriately

assessed, or effectively mitigated in accordance with the Secretary's Environmental Assessment Requirements (SEARs).

In particular:

- The bushfire assessment acknowledges departure from the acceptable solutions of *Planning for Bush Fire Protection 2019* yet does not adequately demonstrate that the proposed performance-based approach achieves an equivalent level of safety, particularly given the presence of bushfire-prone land, nearby critical infrastructure and the limitations of meteorological data used
- The interaction between quarry operations and the Hunter Gas Pipeline has not been sufficiently assessed in terms of blast vibration, emergency response scenarios, or the potential consequences of multiple hazards occurring simultaneously
- Air quality and noise assessments rely on data from distant monitoring locations and contain inconsistencies in receptor identification, reducing confidence in the accuracy and reliability of predicted impacts
- Traffic and road safety assessments appear to understate existing road safety conditions and rely on assumptions regarding school bus movements that are not substantiated by clear evidence
- The Social Impact Assessment does not adequately define the affected social locality and is based on a limited consultation process that may not be representative of the broader community likely to experience impacts
- The health assessment does not comprehensively address cumulative exposure to respirable crystalline silica, diesel particulate emissions and other pollutants, nor does it adequately consider long-term impacts on vulnerable populations
- Biodiversity and ecological assessments do not clearly demonstrate that threatened species habitat, ecological connectivity and cumulative environmental impacts have been fully and robustly assessed
- Heritage and visual assessments do not sufficiently address indirect impacts, cumulative effects, or the limitations of modelling approaches such as ZTV analysis in capturing real-world outcomes
- Property impacts, including potential vibration, dust and noise effects on nearby residences, are not fully assessed in terms of long-term risk, monitoring or mitigation

Taken together, these issues indicate that the EIS does not provide a sufficiently robust or reliable basis upon which to conclude that the proposal is suitable for the site or that its impacts can be effectively avoided, minimised or managed over its operational life.

While each issue is significant in its own right, the cumulative effect of these deficiencies is particularly concerning. The proposal would introduce a major industrial quarry operation into a long-established rural residential and agricultural landscape, with consequential impacts on community amenity, safety, health and environmental values.

On this basis, I respectfully submit that the consent authority cannot be satisfied that this proposal has been adequately assessed in accordance with the Secretary's Environmental

Assessment Requirements (SEARs), or that it is consistent with the principles of ecologically sustainable development under the *Environmental Planning and Assessment Act 1979*. Accordingly, I respectfully request that the consent authority refuse this proposal.

In making its determination, I ask that due weight be given not only to the technical reports submitted by the proponent, but also to the lived experience and practical knowledge of the existing rural community, whose residents will bear the ongoing environmental, social, health and safety impacts of this development.

These are the homeowner who invest in improving their properties, teenagers who kick a football around in the fresh country air, the children learning to swim in backyard pools, the toddlers exploring the outdoors, the cyclists and pedestrians who use our local roads, the farmers who work tirelessly to keep our country running, the motorists who expect safe roads, and the local business owners whose livelihoods depend on a thriving and healthy community.

Their voices, experiences and legitimate concerns deserve meaningful consideration alongside technical assessments. They are not simply stakeholders in this proposal—they are the people who will live with its consequences every day.