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SUBMISSION - OBJECTION

RE: Bluestone Hardrock Quarry, Springvale Road, Elderslie - Response to the Integrated Transport Assessment prepared by Mr David Pavey

I am the owner and operator of Pierre's Wines, a long-established winery and tourism business at 82 Elderslie Road, directly on the proposed haulage route. I hold a Bachelor of Science (Honours) and a Bachelor of Applied Science, and I have professional experience as an environmental scientist, including the preparation of technical assessments analogous to the document under review.

This submission is in three parts:

- Part 1 summarises the grounds on which the Integrated Transport Assessment ("the Assessment") should be found inadequate for the purposes of State Significant Development assessment.
- Part 2 sets out those grounds in detail.
- Part 3 states the actions I request of the Department.

Part 1 - Summary: Why the Assessment Is Not Fit for Purpose

The Assessment does not meet the standard required to support assessment of a State Significant Development of this scale and duration, for the following reasons, each detailed in Part 2:

1. **Material factual errors.** The Assessment asserts that Elderslie Bridge can support simultaneous two-way traffic. The carriageway width does not permit this. An error of this kind on the route's single most critical constraint calls the reliability of the whole document into question (Section 2.2).
2. **No structural fatigue assessment of Elderslie Bridge.** The Assessment relies, at most, on static load capacity. It contains no fatigue life analysis under the projected axle loads over a 30–50 year period, despite recognised Austroads methodology existing for precisely this purpose (Section 2.2).
3. **No heritage impact assessment.** Elderslie Bridge is a listed heritage structure recorded on the NSW State Heritage Inventory (item 1530255) and subject to conservation obligations under the Heritage Act 1977 (NSW). The Assessment contains no evaluation of the impact of sustained heavy vehicle loading and vibration on the listed structure - the same class of risk that led Transport for NSW to reduce load limits on the heritage-listed Hampden Bridge in June 2025 (Section 2.2).
4. **No cumulative impact modelling.** The corridor is an approved and active residential growth area, including the Radford Park Estate expansion (PP-2022-3868) and the Huntlee development, yet the Assessment models quarry traffic against the existing network only. SSD assessment requires cumulative analysis (Section 2.8).
5. **Data integrity concerns.** Table 1 (page 14) of the Assessment reports identical figures for AM and PM peaks, which is statistically implausible and indicates the underlying data has not been verified (Section 2.7).

6. **Significant scope omissions.** Despite its title, the Assessment does not address property ingress and egress along the route, corridor noise (including engine braking and temperature inversion effects), travel time impacts, intersection queuing behaviour, or induced traffic through residential streets (Sections 2.3-2.6).
7. **Failure to engage with directly applicable precedent.** The Independent Planning Commission refused the Martins Creek Quarry expansion (SSD-6612) in 2023 specifically on road haulage impact grounds - a decision upheld by the Land and Environment Court in July 2025 which was approximately half the annual tonnage and half the duration of the Bluestone proposal. The Assessment does not mention it (Section 2.10).
8. **Unassessed agricultural and drinking water contamination.** The Assessment fails to address the impact of fugitive silica dust and diesel particulate deposition on agricultural operations and rainwater tanks along the haul route. (Section 2.9).
9. **Defective consultation.** Written concerns provided directly to the author before the Assessment was finalised are not addressed anywhere in the document. The consultation record is set out, with dates, in Section 2.1 and Appendix A.

For these reasons the Assessment should be rejected and a replacement commissioned from an accredited transport engineering firm, subject to independent peer review, before the project's assessment advances.

Part 2 - Detailed Grounds

2.1 The Consultation Record

When it became known that a traffic assessment had been commissioned, I wrote to the proponent on 4th February, 2026 offering my direct experience of living and operating a business on the proposed haul route, and requesting the author's contact details so that site-specific matters could be raised with him before the report was prepared. The proponent declined to identify the author or provide contact details, and stated that the consultant had not been engaged to speak with individual residents.

I subsequently attended the public information session at Elderslie Hall, where I spent approximately half an hour outlining the issues affecting our business and the local community to Mr Pavey directly. He advised that he would complete the assessment and that any problems with it could be raised during the submission stage. I observed that he took no notes of the concerns raised.

The following day, at the Branxton Community Hall session, I provided Mr Pavey with a written summary of the issues relevant to our property and business. A copy of that summary is attached at Appendix A. None of the issues it raises are addressed in the Assessment.

I make no comment on the author personally. However, an assessment methodology in which affected parties' documented input is received before finalisation and then not addressed, and in which stakeholders are told to raise deficiencies only after publication, is not consistent with the genuine consultation contemplated by the SSD Guidelines. The consultation record here is a matter of documented fact, and it supports a finding that the Assessment was prepared without adequate input from directly affected parties. Taken together, the refusal of pre-finalisation contact, the absence of any record of concerns raised in person and the omission of documented written concerns, the document reads as advocacy rather than independent assessment.

2.2 Elderslie Bridge

The haul route crosses the Hunter River via Elderslie Bridge, a heritage-listed single-lane wrought iron lattice structure built in 1891, recorded on the NSW State Heritage Inventory (Heritage NSW item 1530255 - <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1530255>). It comprises three main lattice girder spans on iron cylinder piers approximately 20 metres above water level. It was designed and built in the era of horse-drawn carriages, long before 50-tonne truck-and-trailers existed. Under the proposal it would carry sustained heavy vehicle movements for a further 30–50 years, by the end of which the structure would be approaching 200 years of age.

Heritage obligations

As a listed heritage asset, the bridge is subject to statutory conservation obligations under the Heritage Act 1977 (NSW), including through Transport for NSW's Section 170 Heritage and Conservation Register. Roads and Maritime Services undertook a six-month conservation program on the bridge (steel element repairs and repainting) in 2019, confirming that the asset owner actively manages it as a heritage structure. The EIS must therefore assess the heritage impact of sustained heavy vehicle loading and vibration on the listed structure, a matter entirely absent from the Assessment. Notably, when Transport for NSW reduced the load limit on the heritage-listed Hampden Bridge in 2025, it stated that its "highest priority was to repair the heritage structure in accordance with its legislative requirements, and maintain the bridge's heritage value" <https://www.transport.nsw.gov.au/projects/current-projects/hampden-bridge>.

The two-way traffic error

The Assessment states that the bridge can support traffic in both directions simultaneously. (Appendix F section 5.1). This is factually incorrect: the carriageway width is 5.6m kerb to kerb, so does not permit two-way movement. Historical construction records give the roadway as 18 feet (5.5 metres) kerb to kerb - a width at which two heavy vehicles cannot pass and during Roads and Maritime Services' 2019 maintenance program, traffic on the bridge was restricted to 3.2 metres. The proponent's own scoping documentation, as reported at the time of its release, describes the haul route as crossing the Hunter River via the historic *single-lane* Elderslie Bridge (Singleton Argus, 25 November 2024). The Assessment therefore contradicts the proponent's own project documents on this point. That it contains a demonstrable error on the corridor's single most significant physical constraint is, on its own, sufficient reason to question its reliability.

Queuing analysis understated

The Assessment predicts queues of approximately three vehicles at the bridge. My own observations of current conditions, without any quarry traffic, regularly show queues of six vehicles. The queuing model's base assumptions therefore appear inconsistent with observable existing conditions and the position with approximately 200–220 additional heavy vehicle movements per day will be materially worse than predicted. I request that the queuing model's inputs, survey data and assumptions be disclosed for independent verification.

No fatigue life assessment

A load rating demonstrates static capacity under defined assumptions. It does not address cumulative structural fatigue under repetitive heavy loading over decades. Austroads fatigue design methodology exists for assessing projected axle loads over a 30-50 year horizon. The Assessment contains no such analysis. For a heritage-era, single-lane, low-redundancy structure facing a multi-decade heavy haul task, this is a fundamental omission.

Two recent NSW precedents illustrate the consequences of sustained heavy vehicle loading on historic road structures:

- **Hampden Bridge, Kangaroo Valley (June 2025):** Transport for NSW reduced the load limit on the 127-year-old bridge from 42.5 tonnes to 23 tonnes after engineering testing

identified key elements under excessive strain and ongoing damage from heavy vehicle loading.

- **Victoria Pass, Great Western Highway:** Damage to the convict-era viaduct resulted in extended closure of a major highway, demonstrating the network-wide consequences when a heritage structure on a critical route is compromised.

Consequences of bridge loss. If Elderslie Bridge were restricted or closed, traffic would be forced to cross the river via Maitland or Singleton, adding in the order of 40-50 kilometres to affected journeys. If the bridge required rehabilitation or replacement as a result of quarry traffic, the cost (likely many millions of dollars) would fall on Council or the NSW Government unless binding arrangements place it on the proponent. The Assessment is silent on this foreseeable outcome, and the project's economics have not been tested against it. If the proposal is approved and the bridge later deteriorates or fails, the adequacy of the pre-approval assessment will rightly be examined.

2.3 Elderslie Road - Condition and Geometry

The Assessment concludes that the condition of Elderslie Road is acceptable for the projected truck movements. This conclusion is inconsistent with the road's recent maintenance history. Singleton Council reconstructed the southern end of Elderslie Road approximately five years ago, and there have been two major reconstruction periods since - most recently in 2025/2026, involving road base rebuilding and new seal over significant lengths. A road requiring repeated reconstruction under existing traffic cannot credibly be described as suitable, without upgrade, for the addition of approximately 200-220 heavy vehicle movements per day.

Elderslie Road is narrow with limited shoulder width and no hard shoulders. Following vehicles have no refuge when residents slow to turn into their properties. For my own property, tourist traffic entering and exiting will be directly exposed to this conflict. The sealed carriageway sits close to the eastern side of the road reserve due to constrained terrain; if a turning lane into our driveway were required, it would necessitate major realignment of the road over a considerable distance. These access issues were included in the written summary provided to the author (Appendix A) and are not considered in the Assessment.

The final approximately 600 metres at the southern end of Elderslie Road is dangerous for vehicles due to the narrow pavement and extremely dangerous for pedestrians and cyclists due to the total absence of footpaths or any stable surface off the carriageway. The Assessment acknowledges this existing danger, appropriately, but then relies on a possible future upgrade by Cessnock Council, subject to design work and State funding that may never occur, to resolve it. A known, acknowledged safety deficiency cannot be discharged by reference to a hypothetical unfunded future project. If the upgrade is a genuine precondition of safe operation, it must be a condition of consent, funded by the proponent and completed before haulage commences.

2.4 Vulnerable Road Users and School Transport

Elderslie Road is a school bus route. Under the proposal, children would board and alight from buses and cross the carriageway, on a narrow road carrying heavy vehicles at a frequency of up to one movement every few minutes during the very hours school transport operates. Residents, including children, also walk and cycle along the road edge, as there is no separated infrastructure of any kind.

Australian traffic engineering standards treat heavy vehicle movement through effectively residential areas as undesirable. The southern end of Elderslie Road functions as a residential area. Given the proposed operational duration of up to 50 years, the applicable question is not whether the road can physically carry the trucks, but whether risk to vulnerable road users can be demonstrated to be ALARP - As Low As Reasonably Practicable - over the life of the approval. The Assessment does not engage with this standard. No Road Safety Audit incorporating pedestrians, cyclists and school transport movements is included or committed to.

2.5 Corridor Noise

For a document titled an “Integrated” assessment, the treatment of traffic-related noise is minimal. Four specific noise mechanisms require modelling at residential receptors along the corridor, none of which is addressed:

- **Unladen truck body noise:** empty trays impacting the chassis on road irregularities - a distinctive high-intensity intermittent noise that would occur along the haul route hundreds of times per day.
- **Engine/exhaust braking on descent:** laden trucks descending the grade approaching the 80 to 60 km/h speed limit change will use compression braking, which may be justified on safety grounds but produces significant noise at the residential southern end of the road.
- **Full-power hill climb:** laden trucks climbing from the bridge to the crest, past houses situated close to the road, potentially in convoy. At the public information sessions, the proponent’s representatives were asked for the expected noise levels in dB at these receptors and could not provide them.
- **Temperature inversion:** inversion is a common atmospheric phenomenon in this part of the Hunter Valley, trapping and reflecting sound so that noise levels are higher and propagate further - particularly in the early morning, precisely when concentrated truck dispatch is proposed. This was explained to the proponent’s representatives at a public meeting by a local resident who is a qualified mine environmental engineer. It is not addressed in the Assessment or, to my knowledge, elsewhere in the proponent’s documentation.

Intermittent high-intensity heavy vehicle noise every few minutes, for up to 12 hours a day, six days a week, over decades, is materially different in character from general traffic growth. Corridor noise must be modelled at residential receptors under worst-case meteorological conditions, not assumed away.

2.6 Traffic Flow, Intersections and Induced Traffic

The Assessment does not address several predictable network effects, all of which were raised with the author:

- **Travel times:** Elderslie Road has double centre lines along most of its length, with very few safe overtaking opportunities. Vehicles queued behind trucks at the bridge will remain behind them to Branxton. The Assessment contains no analysis of predicted travel time increases.
- **Elderslie Road / Maitland Street intersection:** this intersection is already problematic, with queues of four to five vehicles common in peak periods and no turning lanes. Accidents occur here - my wife was hospitalised following a collision at this intersection in 1998. As a result of existing congestion, many drivers already divert through George Street or Lindsay Street to join Maitland Street at the Wyndham Street traffic lights - an induced rat-run through residential streets that the Assessment does not mention and that additional queuing will worsen.
- **Maitland Street / Wine Country Drive intersection:** the author himself acknowledged to me that this T-intersection is a significant traffic issue. Right-turning traffic, which would include the quarry’s laden truck-and-trailer combinations, must wait for gaps in both directions of an 80 km/h road. A fully laden combination requires a very large gap to enter safely. Long wait times already occur. The predictable consequences - drivers turning left and performing U-turns at the Ampol service station, or diverting through Branxton’s residential streets to the Huntlee roundabout are already observable and will intensify. None of this is analysed.

2.7 Data Integrity

Table 1 on page 14 of the Assessment reports identical traffic figures for the AM and PM peaks. Identical peak-period counts are statistically implausible in real traffic data and indicate, at best, a transcription error that survived review - which raises the question of what verification the numerical analysis received. I request that all of the raw traffic count data, survey dates, locations, durations and methodology be disclosed in detail so that the data underpinning the Assessment can be independently verified.

2.8 Cumulative Impacts - An Approved Residential Growth Corridor

The Assessment models quarry traffic against the existing network. The corridor, however, is not static. It is an approved and active residential growth area:

- **Radford Park Estate:** 169 existing large-lot residential lots directly on Elderslie Road, currently in its eighth stage of release, plus an approved expansion of 162 further lots (Planning Proposal PP-2022-3868, approved May 2024), with access via Elderslie Road including a proposed new roundabout at Rusty Lane. In total, 331+ residential lots on the haul route itself.
- **Huntlee:** approximately 1,200 homes built and occupied, with Stage 2 plans lodged for approximately 5,000 further dwellings toward a planned total of 7,300 dwellings and some 20,000 residents, whose movements interact with the Branxton road network the haul route depends upon.
- **Regional forecasts:** the Branxton-Greta-North Rothbury area is identified as the highest dwelling-growth area in the Cessnock LGA to 2046.

State Significant Development assessment requires cumulative impact analysis. A traffic assessment that evaluates 50 years of quarry haulage against today's traffic, without integrating approved and forecast residential growth on and around the same corridor, does not meet that standard. The replacement assessment must model cumulative scenarios incorporating the Radford Park expansion, Huntlee growth and regional forecasts across the full approval horizon.

2.9 Dust and Air Quality Along the Haul Route

Quarry dust residues will be distributed along the haul route from truck tyres, truck bodies and the loads themselves, in addition to diesel particulate emissions from the vehicles. At the public information sessions I asked what the chemical composition and particle size distribution of dust from the trucks would be, including whether crystalline silica would be present. No answer has been provided. Properties along the corridor - including agricultural operations such as ours, where dust deposition on grape crops is a contamination risk, and homes reliant on rainwater tanks - are directly exposed. An integrated transport assessment for a hard-rock quarry haul task should identify the character of transport-related dust emissions and their implications for human health and agriculture along the corridor. This one does not.

2.10 The Applicable Standard and the Martins Creek Precedent

The Independent Planning Commission refused the Martins Creek Quarry expansion (SSD-6612) in February 2023, finding that the road haulage of quarry products - at approximately 450,000 tonnes per annum over 25 years, with up to 160 truck movements per day - would have unreasonable and unacceptable impacts on communities along the haulage route. The Land and Environment Court dismissed the proponent's appeal in July 2025. The present proposal involves approximately double the annual tonnage, double the duration and a higher peak daily truck movement, on a corridor with an older and more constrained river crossing and an approved residential growth trajectory. Any traffic assessment supporting this proposal must engage with that precedent and demonstrate why the impacts found unacceptable at Martins Creek would be acceptable here. The Assessment does not mention it.

Part 3 - Requested Actions

I respectfully request that the Department:

1. Find the Integrated Transport Assessment inadequate for the purposes of SSD assessment, on the grounds set out above.
2. Require a replacement transport assessment prepared by an accredited transport engineering consultancy, subject to independent peer review, and made public on the Planning Portal.
3. Require that the replacement assessment include, as a minimum:
 - (a) a structural fatigue life analysis of Elderslie Bridge under projected axle loads over the full approval horizon, consistent with Austroads methodology;
 - (b) a Road Safety Audit of the full corridor incorporating pedestrians, cyclists, school transport and property access movements;
 - (c) cumulative traffic modelling incorporating the approved Radford Park expansion (PP-2022-3868), Huntlee growth and regional forecasts;
 - (d) corridor noise modelling at residential receptors, including engine braking, unladen body noise and temperature inversion conditions;
 - (e) intersection analysis with swept path modelling, queue length validation against surveyed existing conditions, and induced-traffic assessment of Branxton residential streets; and
 - (f) characterisation of transport-related dust emissions along the route.
4. Require disclosure of the raw traffic survey data, dates, locations and methodology underlying any traffic assessment relied upon.
5. Note, as part of the assessment record, that written concerns from a directly affected business (Appendix A) were provided to the Assessment's author prior to finalisation and were not addressed, and that the proponent declined to facilitate direct contact between affected parties and the traffic consultant.

I have retained all correspondence referred to in this submission and can provide copies on request. I would welcome the opportunity to walk any assessing officer or independent reviewer along the haul route and through the constraints described above.

Yours faithfully,

Peter Went, BSc (Hons), BAppSc

Owner, Pierre's Wines, 82 Elderslie Road, Branxton

Appendix A - Written Summary Provided to the Assessment's Author

Date of delivery to Mr David Pavey: 31st March, 2026

Traffic and Other Issues at Pierre's Wines.

Author: Peter Went owner/winemaker

1. The business was started in 1986. It is a successful winery/cellar door.
2. Tourist traffic enters our driveway usually from the south.
3. The number of customer vehicle movements per day is highly variable, from zero customers during some weekdays to maybe 70 vehicle movements on a busy Saturday.
4. In addition, during vintage periods, we take delivery of grapes from semi-trailers. There are other delivery truck movements throughout the year.
5. The alignment of the paved surface is not in the centre of the road reservation, it is very close to our western boundary. There is no "hard shoulder" on the western side of the pavement. If the heavy traffic predictions are accurate, there are consequences:

There will be no safe way for vehicles to pass on the left of vehicles turning from the south into our driveway, currently this not a significant issue due to the number and nature of the vehicles using Elderslie Road. An empty truck with dog trailer gaining

speed before the hill to our immediate north will create a dangerous scenario.

Likewise, there is a safety problem for vehicles turning left into our driveway from the north. There is no possibility of creating a left turn lane without a major re-alignment of the paved surface. If the truck traffic is as predicted we have a potentially dangerous situation. The laden 50 tonne trucks will be descending the hill to our north at a speed of least 80km/h. Having to come to stop to allow traffic to turn into our driveway is an obvious safety hazard.

6. There are other negative issues for our business created by the predicted heavy truck movements:
 - a. Empty trucks and trailers produce a lot of noise from the tipper bodies impacting on the chassis as they encounter road imperfections, of which there are plenty.
 - b. Laden trucks descending the hill will naturally prefer to engine compression braking to minimise wear to friction brakes. These are noisy and will impact the ambiance of the property. Remember this is an agricultural pursuit and noise like this are not compatible with our business.
 - c. Pollution from tyres, brake dust and exhaust fumes is a minor negative, but still needs to be considered. Silica dust, a known carcinogen, contamination needs to be addressed. These pollutants will end up in our wines, after all we do not wash each bunch of grapes!

Up to 80 %of our customers at the cellar door are repeat business. Part of the appeal of visiting a boutique winery is the rural ambiance and peaceful environment. Clearly the negative impact of the movement of large numbers of noisy and dusty trucks is not going to enhance their experience. The severely dangerous nature of the road will further deter return visits.

Employment claims made by the quarry proponents are limited to their few employees. In the local tourism area, there is a large multiplier of economic activity. My customers are usually spending a few days in the area visiting wineries, cheese outlets, other

attractions and restaurants, staying at least one night in local accommodation. Each customer is possibly spending over \$1000 during their visit to the Hunter Valley.

The outlined issues may well make my business no longer viable. To move the business to another local site would cost millions of dollars.

The behaviour of, and communications with the proponents of the development and their consultants has been totally arrogant, unsympathetic, uncooperative and I suggest amoral! They refuse to allow communication with their consultant report writers! I have zero respect for the consultants and their reports supporting the development.

I strenuously will object to the proposed quarry at every stage.