

28 February 2023

Director of Transport Assessments  
Planning and Assessment  
Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Director,

Pease accept our submission in relation to the **Blackheath to Little Hartley 11 km tunnel EIS**  
**Application number SSI-22004371**

## **1 Support the Blackheath to Little Hartley 11 km tunnel.**

We confirm that Barker College supports the Blackheath to Little Hartley 11 km tunnel ('Central Section') as the only way to upgrade the Great Western Highway through Blackheath and Mount Victoria.

### **1.1 Strategic Importance**

The Great Western Highway is, like the Pacific and the Hume Highways, a national freight corridor of strategic importance. It is a vital link between Sydney, Port Botany, and the NSW Central West and beyond.

The Blackheath to Little Hartley 11 km tunnel is of strategic importance for the Upper Blue Mountains as well as the Central West because it will address the major bottlenecks of Blackheath, Mount Victoria, and Victoria Pass.

There is broad agreement across the political aisle that the only way to deliver a four-lane dual carriageway across the Blue Mountains is to upgrade the Great Western Highway between Katoomba and Lithgow. The Bells Line of Road corridor appears to no longer be a suitable alternative because of cost and environmental factors. There are no other viable corridors available to provide four-lane dual carriageway across the Blue Mountains.

The existing Highway through Blackheath, Mount Victoria and Victoria Pass remains a major bottleneck with a single lane alignment that follows the original 1813 Blue Mountains crossing route. The Highway through Blackheath is severely hampered by the very narrow corridor around the Govetts Leap Road and Bundarra Street intersection and the main western railway level crossing. Traffic lights at this intersection have become a major impediment to the flow of traffic during peak and holiday periods.



There are also traffic flow impediments around Mount Victoria. The highway corridor at the Station Street intersection is extremely narrow with heritage restrictions in place prohibiting the highway from being widened at this point.

The Highway between Blackheath and Little Hartley has been subject to regular closure due to bushfire, snow, black ice and accidents.

More recent weather events have strained the ageing infrastructure along this stretch of the Highway, with landslips and other related problems. This has severely impacted the flow of traffic in the Upper Blue Mountains and through to the NSW Central West. The movement of freight has also been severely impacted.

Victoria Pass, which was hand-built by Convicts in 1832, is also a major bottleneck which was earmarked to be bypassed by the Rudd/Gillard Government in 2008.

## **1.2 Social and Economic Benefits**

The adverse social and economic impacts caused by the frequent weekend and holiday congestion issues around Blackheath and the unreliability of the Highway due to weather events and natural disasters such as bushfire, snow and floods and landslides are very significant. With failing infrastructure, we cannot afford to find ourselves again in the situation when, due to both the closure of the Highway and the Bells Line of Road, the NSW Government and its agencies are forced to advise both the travelling public and the freight industry to avoid the Blue Mountains, as has occurred several times in 2021 and 2022.

Sustainable tourism development in Blackheath, Megalong and Mount Victoria is being significantly constrained by the lack of a Tunnel. Both visitors and employees struggle to get to and from these locations on weekends, during holiday periods and when the ageing highway infrastructure fails, which has already occurred several times in 2021 and 2022.

The Blackheath to Little Hartley 11 km tunnel will address the above issues and provide significant social and economic benefits to the Upper Blue Mountains as well as the Central West, while also protecting the operation of our School campus, and the safe amenity of the staff and students.

## **1.3 Environmental Benefits**

The Tunnel also has a much lighter footprint on the environment compared to a surface duplication and provides significantly more long-term benefits for local ecosystems connected to the Blue Mountains National Park and the Blue Mountains World Heritage Area.

The Tunnel also provides certainty to the residents and business owners of Blackheath and Mount Victoria because, unlike other highway upgrade proposals, the Tunnel does not require any property resumption and has a very positive impact on social amenity.

## **2 Support EIS subject to the following conditions being met.**

We note the EIS is extensive, and comprehensive, and appears to work towards addressing the concerns of our community, particularly in relation to the local environment.

We also note the EIS acknowledges further work is required.

Barker College strongly believes that construction of the Blackheath to Little Hartley 11 km tunnel must proceed as quickly as possible, and on this basis, we support the EIS, subject to the following conditions;

## **2.1 Environment**

That the proposed Construction Environmental Management Plan (CEMP) and the Construction Transport and Access Management Plan (CTAMP) including related mitigation recommendations, measures, strategies, and actions contained in these plans become conditions of approval and be fully funded and fully implemented where feasible and practicable, in consultation with relevant stakeholders including the local community.

That the proposed Construction Noise and Vibration Management Plan (CNVMP), the Construction Flora and Fauna Management Plan (CFFMP), the Construction Soil and Water Management Plan (CSWMP), the Place Design and Landscape Plan (PDLP), the Social Impact Management Plan (SIMP) and the Bushfire Management Plan all become conditions of approval, and relevant stakeholders, including the community, be involved in the development of such plans.

In addition, that further ground water investigations of the Lake Greaves catchment, as noted in the EIS, be completed and that the results and related recommendations of such investigations be published and implemented in full where feasible. This is to ensure maximum environmental protection for the Greaves catchment during tunnel and portal construction.

Further, that appropriate environmental monitoring and reporting be put in place during tunnel construction.

## **2.2 Noise, Dust and Vibration Recipients – Evans Lookout Road**

As a condition of approval, we request that households near Evan Lookout Road be provided with appropriate support and explicit measures to mitigate noise, dust and vibration impacts. This may include building modifications such as double glazing, soundproofing and vibration offset measures. There should also be a buffer zone of no less than 100 metres between these households and the Blackheath tunnel portal construction site. Any spoil at the Blackheath tunnel portal construction site should be covered to mitigate dust and prevent sedimentation issues to the Greaves catchment.

We are seeking a commitment from Transport for NSW (TfNSW) as part of our support for the EIS to ensure there is ongoing engagement with and support for these households and those in surrounding areas if the area impacted during construction is larger than identified in the EIS.

## **2.3 Consultation**

As a condition of approval TfNSW commits to ongoing community consultation throughout the life of the Blackheath to Little Hartley 11 km tunnel project, and to engage and incorporate feedback, particularly in relation to the seven proposed plans noted above.

## **2.4 Local Economy**

The EIS notes the potential impact on the local economy during and post Tunnel construction. To mitigate any potential social and economic impacts during and post construction of the Tunnel, we request that TfNSW undertake, as a condition of this EIS, to repair the current highway alignment between Blackheath and Little Hartley to provide reliable access for residents, construction operators, and tourists.

We also believe TfNSW should, as a goodwill gesture and to improve access for residents, tourists, and construction workers, reinstate an hourly train service from Katoomba to Lithgow. This would take pressure off parking and vehicle movements and facilitate movement of tourists and visitors to Medlow Bath, Blackheath and Mount Victoria during the construction phase of the Tunnel and eastern section of the Katoomba to Lithgow GWH Upgrade Project.

## 2.5 Water Pipeline Supply

A condition of approval should also be that the construction of a water pipeline from Lithgow to Little Hartley be prioritized to avoid significant and potentially damaging water transport issues for the Tunnel Boring Machines located in Little Hartley.

We thank TfNSW for the EIS consultation process and praise their project team for working constructively with our community during this process.

Yours sincerely



**David Porter**  
Chief Operating Officer

- CC. Alistair Lunn, Director West, Transport for NSW  
The Hon Sam Faraway MLC, Minister for Regional Transport and Roads  
The Hon Catherine King MP, Minister for Infrastructure, Transport  
Trish Doyle MP, Member for Blue Mountains  
The Hon Shayne Mallard MLC, Parliamentary Secretary for Western Sydney  
The Hon Susan Templeman MP, Member for Macquarie  
The Hon John Graham MLC, Shadow Minister for Roads