# DPE note NOT for public display



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

www.planningportal.nsw.gov.au/major-projects.

## Application **EIS project number:** SSI-22004371

### I have not made any political donations in the last 2 year or ever!

I do not support the proposal as per EIS without the following objections being addressed. EIS project number SSI-22004371 is for Blackheath to Little Hartley, however I request/demand a single study (Full Project EIS) of the whole GWH Duplication Project is needed to ensure that the interconnected and wider environment is fully considered and addressed.

The whole process of separate REFs, Medlow Bath on its own (and release of findings 12 months overdue), Katoomba to Medlow Bath and Medlow Bath to Blackheath East has been tedious and exhausting for the community. The East REFs have been approved and reading the EIS for Blackheath to Little Hartley required much cross referencing to find many omissions.

### Environment

### • Catchment

- This site is wholly within the Blackheath Special Catchment area, which protects Greaves Creek Dam on Greaves Creek, and Lake Medlow on Adams Creek. Residents living between Medlow Bath and Mt Victoria depend on these dams for their water supply.
- This is still a concern in the Medlow Bath REF where I felt TfNSW project team did not understand the ramifications of highway duplication through Medlow Bath and the impact on Special Ware Catchment area.
- The Blackheath construction site will be located right at the headwaters for Greaves Creek which flows through the Walls Cave Aboriginal Area, into Lake Greaves, on into the Greater Blue Mountains World Heritage Area, through the iconic Grand Canyon into Govetts Creek and then into the Grose River. These are areas in the World Heritage Area and <u>will threaten its status.</u>

#### • Swamps

The threat of sedimentation (and weeds) entering the Blackheath Special Catchment Area and the downstream World Heritage Area from both the initial clearing of the site and the 9 years of road widening and portal/tunnel construction is very real. Current water flow through the catchment area helps feed hanging swamps which are nationally endangered and which are home to a unique range of fauna including the endangered Giant Dragonfly and endangered Blue Mountains Water Skink.

# • Aquifers

# Will the 11km tunnel be deep enough to avoid the aquifers?

Because cut and cover tunnels will be dug by Roadheader machines for about 250m at each tunnel portal in Little Hartley to where Tunnel Boring Machines (TBMs) can begin digging the two tunnels, as well as at the Blackheath end of the tunnels near Evans Lookout Road. (Ch 5, 5.4.2) These shallow trenches will be "covered" but will still intercept shallow aquifers feeding the hanging swamps that are the habitats of endangered flora and fauna. The impact of shallower tunnels on the aquifers, hanging swamps and creeks and waterfalls is unknown.

Requests during consultation for Medlow Bath REF for a longer tunnel Katoomba to Mt Victoria/Little Hartley continuously denied by TfNSW without good reason or investigation by EIS. If a longer tunnel starting at Katoomba and therefore under Medlow Bath was considered then the tunnels would be deeper thus avoiding aquifers.

# • Threatened species

- <u>Greater Gliders</u>: A number of mature trees with hollows (20) will be cleared for the tunnel portals and the work site at Blackheath near GWH and Evans Lookout Rd, and these tree hollows will be saved, stored somewhere and then tied up into the new trees TfNSW will plant after the tunnel work is finished. As these trees will not be mature for at least 20 years the threat on this endangered species is very real.
- <u>Large Eared Pied Bat</u> is also a Threatened Species affected by the Project.
- <u>A further 8 species</u> are likely to have their habitat affected.

# • Blackheath Construction site (corner of Evans Lookout Rd and GWH)

- The worksite will extend across **23 hectares** and will back on to **9 homes**.
- Worksite will be operational for 9 years and will include some permanent buildings for tunnel infrastructure.
- All vegetation will be cleared and the land will be levelled at the start of the Katoomba to Blackheath Duplication and used for that, and then for the Blackheath tunnel construction.
- During construction there will be truck and light vehicle movements up to 260 times per hour or **790 movements per day** (est.).
- Plans for this site have changed from the East Section Review of Environmental Factors (REF) Submissions Report (Oct 2022) to release of EIS (Jan 2023). However, <u>the EIS</u> <u>states it has already been assessed and approved as part of the REF.</u>

### Trucks

- The introduction of 26/30/36m trucks affects the whole of the Great Western Highway 'Freight Corridor' in what is currently the only local road for many villages. TfNSW states that the GWH Duplication is about giving local roads back to locals. This is clearly not happening. A 36m truck is 2.5 times longer than a 40 seater bus, and these trucks when loaded can weigh between 84-91 tonnes). Many Blue Mountains Villages will have these trucks driving right through the centre.
- There has been no consultation with any of the Blue Mountains residents about the introduction of these 36m trucks. Only 26m and 30m trucks have been mentioned in the REF's to date. This is an example of TfNSW misleading the public as the REF Submission Reports were released less than 5 months ago.
- What is the impact of trucks of this size in the Tunnel for all road users?

- What issues have been assessed for 26/30/36m Trucks using the GWH through other mountains villages such as Blaxland, Faulconbridge and Wentworth Falls and Medlow Bath where the highway is narrow?
- What other impacts from these larger trucks are expected and have they been assessed?
- A full assessment of the introduction of 36m trucks, as well as community and stakeholder consultation throughout the Mountains is needed immediately about this proposed change.
- A 30% increase in freight through the Blue Mountains poses significant (high) impact for road users including residents and tourists. What Socio-economic studies have assessed this?
- The Cumulative Impacts of the introduction of 26/30/36m trucks has not been assessed in any of the REF's. There must be a pause on all construction while these are assessed, as this is a requirement of the division of the GWH Duplication into 4 separate projects.
- Further, with the significant increase in heavy vehicle traffic along the entire BMGWH, will there be any upgrading of regulations regarding (or enhanced monitoring of) compression brake noise? This is already a significant noise disturbance at all times for Medlow Bath residents. Also, have you taken into consideration compression brake noise from trucks entering the tunnel at Evans Lookout Road as this will also be downhill? This effect is recognised in Ch. 11.4.2: 'Maximum noise levels are generally caused by truck engine braking events due to changes in gradient, and/or the presence of intersections,'
- What is the impact of increased noise and vibration over the entire stretch of the BMGWH on wildlife?

## Social impacts

• There will be a 23hectare construction site in Blackheath behind nine homes and across the road from other homes and an accommodation establishment. Why can't TfNSW move this site a few hundred metres away from these homes and create a buffer zone to lessen the impact on the lives of these residents for the 9 years that this site will be used for construction?

• Will the 11km tunnel deliver a prompt easing of traffic congestion?

Duplication of the highway through Medlow Bath will cause at least two years of traffic disruption and congestion. Duplication of the highway between Katoomba and Blackheath will then also provide several years of painful traffic chaos. Then, with the additional traffic around the Construction Site at the entrance to Blackheath, it will be more than 10 years of traffic torment suffered by any tourists who venture into the Upper Blue Mountains. The lack of a bypass of Medlow Bath will just move the current congestion further along the Highway. The highway is Medlow Bath's 'local' road. Build a tunnel and the traffic will come. Medlow Bath

• Will the 11km tunnel promote tourism?

With ten years or more of traffic chaos, tourist visitation is predicted to drop dramatically. Fortunately, tourist infrastructure will supposedly be supported by the spending of those employed in the construction. I wonder how many of them will appreciate our deluxe accommodation facilities, our quality dining establishments, our scenic vistas, our peaceful lookouts, our cute villages and our clean air? Will they become our target customers?

# Travel time savings

Travel time between Medlow Bath and Hartley is predicted to <u>reduce by just 9 minutes</u> when the tunnel is finally completed in the 2030s. This is currently estimated an \$8billion project and reliant on Federal monies. Nine years to complete and many billions for a savings of 9 minutes for trucks and

vehicles using 11km of tunnel. Medlow Bath will have 60kph zone and 2 sets of traffic lights, there is no savings for trucks and vehicles.

# All project EIS

Because so many of the following issues relate to areas beyond this EIS, a single study (Full Project EIS) of the whole GWH Duplication Project is needed to ensure that the interconnected and wider environment is fully considered and addressed. Issues that deserve further consideration include:

- The effect of the planned increase in the size of trucks passing through all villages across the Blue Mountains;
- The negative impacts on the natural environment of the World Heritage Area (downstream beyond the narrow (1500mm) corridor covered by the EIS);
- The predicted reduction of inflow into the drinking water catchments and into the World Heritage Area;
- The predicted change in pH of the water flowing into the catchment and World Heritage area;
- The increased risk of disturbance to shallow aquifers near Evans Lookout Road feeding the endangered peat swamp vegetation communities;
- The negative effects on the iconic downstream tourist attractions (eg the Grand Canyon);
- The negative effects on Threatened and Endangered Species;
- The negative effect of the ongoing construction on local heritage attractions and tourist industry;
- The uncertainty of the effects upon air quality in the villages and National Park;
- The lack of information on measures to ensure the safety of tunnel workers;
- The lack of information on how dangerous goods will be transported through the Upper Blue Mountains;
- The lack of decision as to whether the project is a 'Controlled Project';
- The 'less than best' plan requiring very significant Federal Investment.

It has been advised the lodgement of submissions has been very difficult via the DPE submissions link. I hope I have been successful in submitting this document. If not I wish to add my complaint to this process!



28 February 2023