



Director of Transport Assessments  
Planning and Assessment  
Department of Planning and Environment  
[www.planningportal.nsw.gov.au/major-projects](http://www.planningportal.nsw.gov.au/major-projects)

**Submission re application number SS1-22004371**

Dear Sir/Ms

Blackheath Area Neighbourhood Centre (BANC) is a for-purpose community-based organisation supporting local communities in the Upper Blue Mountains by providing a range of neighbourhood, education and support programs, disability services, and out of school hours care.

In 2020, a BANC Board member was appointed to the Transport for NSW (TfNSW) Blackheath Community Consultative Committee for the Great Western Highway Upgrade Project. Our organisation has remained engaged with the project's development since that time.

BANC has supported the proposed 11 km Blackheath to Little Hartley tunnel option for the Great Western Highway (GWH) upgrade subject to a positive business case being made and a sound environmental impact assessment being completed that comprehensively identifies environmental and social risks and vulnerabilities and outlines effective mitigation and management actions to address these impacts.

**The EIS application**

In principle, BANC supports the EIS.

BANC would, however, recommend the following conditions/clarifications to be applied to any approval that is given to proceeding with the upgrade project:

1. Both the proposed Construction Environmental Management Plan (CEMP) and the Construction Transport and Access Management Plan (CTAMP) become conditions of any approval of this application, involve community participation and consultation in their development and are lodged with DPE for formal approval once completed;
2. 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 (PDLF), the Social Impact Management Plan (SIMP) and the Bushfire Management Plan all become conditions of any approval of this application, involve community participation and consultation in their development, and are lodged with DPE for formal approval once completed;
3. A community reference panel be formed by TfNSW that comprises independent resident and business members drawn from Blackheath, Megalong Valley, Mount Victoria and Little

Hartley. This reference panel would be a principal source of advice and feedback during the construction phase of the project and would be directly involved in the development of all the Plans outlined above. In addition, TfNSW should be required to conduct specific community consultations on a regular basis as key actions in the construction phase are about to commence, especially with local residents identified in the EIS as those most likely to be impacted by the various elements of the construction phase. These community participation and consultation mechanisms should be mandated by DPE as part of any approval given to this application;

4. Explicit additional assistance to households on and near Evans Lookout Road to minimise the air, noise, vibration, traffic, parking and related impacts throughout the construction phase of the project and potentially in the long-term tunnel operation;
5. Consideration of whether a 1,500 metre buffer zone around the proposed tunnel alignment is sufficient to fully assess the potential groundwater and biodiversity impacts on the surrounding National Park and World Heritage listed areas;
6. Construction of a new water supply pipeline from Little Hartley to Lithgow completed as early as possible to minimise the constant trucking of water above ground from the Blackheath end of the tunnel;
7. The assurance that the construction and operation of the Blackheath and Little Hartley compounds and portals are subject to the full EIS conditions for the Blackheath to Little Hartley section and not simply previous REF approval requirements for the Katoomba to Blackheath and Little Hartley to Lithgow sections of the GWH upgrade;
8. Clarification of the actual maximum truck size that will be allowed through the tunnel. At present, the GWH restriction is the 19 metres of truck length. Over the past 3 years, TfNSW has informed the local Blackheath community that larger trucks of up to 30 metres may be enabled to use the tunnel. In the EIS, there is a suggestion that trucks of up to 36 metres in length will be allowed (one length smaller than a road train). TfNSW is being disingenuous with local communities about this issue of significance to many people; and
9. Clarification of whether vehicles with dangerous goods will or will not be allowed in the tunnel.

### **What is missing**

An affordable housing strategy for the project needs to be developed and become a condition of approval of the application by DPE.

This strategy should apply to:

- finding accommodation for that portion of the 1,100 estimated workers required to undertake the project that will be housed in either the Upper Mountains or the Lithgow LGA, and ensuring that this accommodation source does not exacerbate the already critical

shortage of medium and long term private rental housing in these areas, especially for disadvantaged and vulnerable households;

- establishing a legacy of affordable and social housing in both the Upper Mountains and Lithgow LGA, in partnership with leading community housing provider(s) and the Blue Mountains and Lithgow City Councils.

Blue Mountains and Lithgow City Councils, community housing, and other community agencies should participate with TfNSW in the preparation of the strategy.

### **What is positive about the EIS**

The EIS is comprehensive, and TfNSW appears to have engaged an appropriate range of specialists to assess the multitude of environmental impacts that this 11km tunnel construction and operations project could have.

In choosing the tunnel alignment, the TBM method of most of the construction, the one direction boring pathway, and the removal of spoil from the Little Hartley portal entrance, TfNSW has demonstrated its recognition of community fears about social and environmental issues and responded appropriately.

### **What risks/vulnerabilities need further consideration**

In addition to the previously mentioned conditions of approval, BANC has identified the following matters which we believe DPE should further discuss with TfNSW prior to giving any approval to the application:

- The need for further groundwater modelling and possible mitigation strategies with particular reference to the area at Lake Greaves;
- The potential impact of water amassing around and in the cross-tunnel pathways that are to be constructed using road headers (it is understood there may be a six-week period of construction of these before long term sealing occurs); and
- The management of any coal seam gas escape eastwards from where the EIS indicates it may be found near Mount Victoria.

### **Other comment**

The Blackheath to Little Hartley tunnel section of the GWH upgrade project also lists as part of its benefits statement that a “tourist trail” generating increased economic activity and jobs in the Upper Mountains villages will be a legacy.



At present the surface GWH from Blackheath to Little Hartley is in a serious state of decay following landslips and significant road degradation caused by extreme weather events whilst other key roads such as Megalong Valley Road require constant repair works.

BANC believes that for the business case for this project to be justified, TfNSW will have to make significant and long-lasting repairs to the surface GWH between Blackheath and Little Hartley. It will also have to retain responsibility for this section of the GWH and Blue Mountains City Council (if the road was transferred to Council stewardship following the tunnel being opened) will never have adequate resources to maintain the “tourist trail”. We would also appreciate formal recognition of this matter in any approval that is given to the project.

BANC hopes that you will favourably consider the comments that we have provided in this submission. For further information, please contact BANC Board member, Gary Moore tel 0408 218 474 or email [garymoore260553@bigpond.com](mailto:garymoore260553@bigpond.com)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Leah Godfrey', written in a cursive style.

**Leah Godfrey**  
**General Manager**  
**20 February 2023**