

26 February 2023

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

Dear Director,

Blackheath to Little Hartley 11km tunnel EIS

Thank you for the opportunity to make a submission in relation to the Blackheath to Little Hartley 11km tunnel EIS.

1 Support the Blackheath to Little Hartley 11km tunnel

I support 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 spectrum 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. There are no other viable corridors available to provide four-lane dual carriageway access across the Blue Mountains.

The existing Highway through Blackheath, Mount Victoria and Victoria Pass remains a major bottle neck with a single lane alignment which 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 rail line level crossing. Traffic lights at this intersection have become a major impediment to the flow of traffic during peak and holiday periods. These lights have also severely hampered access to the emerging tourism destination of Megalong Valley.

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, and black ice.

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 to the NSW Central West and beyond and has caused a significant drag on local tourism as well as Central West tourism. 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 Environmental, 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 ice are very significant. With failing infrastructure, some of which was hand-built by convicts, we cannot afford to find ourselves again in the situation where 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 impacted 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. Local businesses have reported that visitation rates for walking, rock climbing, camping, vineyards, and other tourist activities in Blackheath, Mount Victoria, the Megalong, and Grose Valleys are also being impacted.

The Blackheath to Little Hartley 11km tunnel will address the above issues and provide significant social and economic benefits to the Upper Blue Mountains as well as the Central West.

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 minimal impact on social amenity.

2 Support EIS subject to the following conditions being met

I 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.

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.

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

I also note the EIS acknowledges further work is required.

I strongly believes that construction of the Blackheath to Little Hartley 11 km tunnel must proceed as quickly as possible, and on this basis, I 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

Based on information included in the EIS there are approximately 30 households around the Evans Lookout Road precinct which may be impacted by noise, dust and vibration during tunnel and portal construction.

Of these 30 households, there are 15 households who may be impacted by noise and vibration after the opening of the tunnel.

As a condition of approval, I request that these households 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.

I also request, as a condition of approval, that dilapidation audits of existing at-risk houses be undertaken prior to portal and tunnel construction.

I am seeking a commitment from TfNSW as part of my 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 Transport for NSW (TfNSW) commits to ongoing community consultation throughout the life of the Blackheath to Little Hartley 11km 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, I 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.

To my knowledge, despite the impacts of the 2013 and 2019 bushfires there has not been an economic and tourism study incorporating Medlow Bath, Blackheath, Megalong, Mount Victoria, Mount Wilson, Mount Irvine, Bilpin, and Little Hartley to determine a baseline for tourism and economic activity. I believe such a study should be undertaken to determine the baseline from which evaluations during and post Tunnel construction can be measured so appropriate and proactive measures can be taken to develop a tourism and economic development strategy to offset any potential impacts, particularly during construction of the Tunnel and the eastern section of the Katoomba to Lithgow GWH Upgrade Project.

I 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.

I believe tourism development projects including bike trails and the opportunities to develop the Highway between Katoomba and Hartley as a tourism drive should also be investigated in consultation with relevant stakeholders as part of the Tunnel 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 TBMs located in Little Hartley.

3 Clarification Required

3.1 Construction compounds – Blackheath and Little Hartley

I strongly believe the EIS mitigation controls should prevail over the prior approvals obtained under the REFs for the Eastern and Western Sections for the Blackheath and Little Hartley construction compound sites.

3.2 Access to and from West Blackheath, Shipley, Centennial Glen and Megalong

I acknowledge the commitment by TfNSW to thoroughly research and investigate, in conjunction with the community, alternative options, where feasible, to improve access to and from West Blackheath, Shipley Centennial Glen and Megalong, in the immediate period pre tunnel construction. I seek clarification that such investigations will be undertaken by TfNSW.

3.3 Housing

As there will be a need to generate new housing stock for some of the proposed workforce over the life of the construction, an opportunity exists to:

- i) Not exacerbate the existing rental crisis that especially impacts low-income households in the upper mountains and Lithgow; and
- ii) Leave a legacy of new, additional social and affordable housing for both low-income households and key workers in the future, post construction phase of the 11 km tunnel

This could be achieved through partnering with other NSW Government agencies that own surplus land in both the Lithgow and Blue Mountains LGAs, the two Councils and a major tier one community housing provider such as Link Wentworth.

Suitable land could be provided by State agencies and the Councils, extra funding could be obtained as investment by the Community housing provider through Commonwealth financing mechanisms and TfNSW project funding and the generated housing stock could be managed both short and long term by the community housing provider.

Please do not hesitate to contact me by email evajohnstone2@gmail.com or by mobile on 0432 321 730 should you require further information in relation to this submission.

Yours faithfully,

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