



Mount Victoria Business Association Incorporated

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

Dear Director

**Submission on the Great Western Highway Blackheath to Little Hartley Upgrade
Environmental Impact Statement, SSI-22004371**

Mount Victoria Business Association Incorporated (MVBA) comprises most Mount Victoria based businesses and provides a forum to promote and support the interests of all businesses in Mount Victoria. MVBA's objectives are:

- a. Advocate as one voice on issues that impact businesses in Mount Victoria.
- b. Develop agreed positions on behalf of businesses on issues that impact Mount Victoria.
- c. Represent Mount Victoria businesses in communications to politicians; councillors; Commonwealth, State and local governments and other relevant organisations.
- d. Promote Mount Victoria as a destination.
- e. Provide a forum for businesses to meet and exchange ideas.
- f. Work with other organisations to help address issues that impact Mount Victoria more generally.

MVBAs' submission on the proposed Great Western Highway Blackheath to Little Hartley Upgrade (proposal) is focussed on the potential impact of the proposal on businesses in Mount Victoria covered primarily in Chapter 19 – Social impacts, Chapter 20 – Business, land use and property and Chapter 24 – Cumulative impacts.

MVBA supports the proposal subject to the following matters being addressed in the Environmental Impact Statement (EIS).

Sections 19.3 and 20.4 Potential impacts - construction

The EIS refers in several places to the temporary uplift in revenue for retail business due to construction workers. It also states the potential for business impacts during construction, such as an increase in travel time or increased noise, would be more than offset by the anticipated increase in economic activity related to investment by construction workers in the local area (pages 19-20 to 19-21, Table 19-2 (business impacts, tourism impacts) and page 20-10 - Section 20.4.1).

MVBA comment – recent works in Mount Victoria (upgrade of the train station and repairs to the GWH and rail line after storm damage) do not support these statements for Mount Victoria. These

work sites had their own amenities on site and few if any workers visited the cafés and retail businesses in Mount Victoria.

It is requested the EIS acknowledges this and recommends that Transport for NSW encourages its contractors to visit the local cafés and retail shops.

Sections 19.4 and 20.5 Potential impacts - operation

The EIS states that some businesses such as petrol stations, take-away food businesses and other retail stores, which rely on passing trade, may be adversely affected in the short-term. In the medium to longer term there are expected to be improved conditions for businesses due to improvements in local amenity. Accommodation and other businesses which cater to tourism may benefit from an increase in demand, as bypassed areas become more attractive to visit due to decreases in traffic, in particular heavy vehicles, on the existing GWH, and the subsequent improvements in amenity that would arise (page 19-32, table 19-3 (business impacts, tourism impacts), page 20-21 - section 20.5.1).

The EIS states the magnitude of this impact would be minor and concludes that the overall significance would be medium (negative), however would improve over time as improvements in local amenity would potentially attract further visitors.

MVBA comment - the reference to improvement in local amenity is not supported. As the Darling Causeway will not connect to the proposed tunnel, Station Street in Mount Victoria will continue to experience frequent truck movements through the its retail heritage centre.

It is requested that the EIS takes this into account when considering how the proposal will improve local amenity. Realisation of the full benefit of the proposal for local amenity in Mount Victoria might be assisted if the proposed upgrade of the Bells Line of Road results in trucks being able to travel directly to and from Sydney without having to go via the GWH.

Section 24.4.12 – Business, land use and property (cumulative impacts)

MVBA comment – this section of the EIS does not address the economic impact of the cumulative transport and traffic issues on businesses in the Blackheath and Mount Victoria area arising from the Katoomba to Blackheath Upgrade, Medlow Bath Upgrade, Little Hartley to Lithgow Upgrade and the proposal. Figure 24-3 shows construction for these four projects combined occurring from late 2022 to 2031.

In addition, there is no consideration of the lessons learned from the cumulative impact of the upgrade of other sections of the GWH and how they might be applied to this project and the other upgrades happening simultaneously.

It is requested the EIS addresses these issues.

Other issues

Pre and post planning

The EIS frequently states that changes in amenity and availability of accommodation during construction could have a temporary negative impact on the attractiveness of the area to tourists, and flow on effects on employment in tourism (Chapter 19) and recognises that businesses, which rely on passing trade, may be adversely affected in the short-term (Chapter 20).

In Appendix P (Technical report – Economics and business), there is reference to an economic evaluation of town bypasses in NSW¹. This states that the small towns (less than 2,500 population) are generally more at risk of adverse economic impacts (highway generated trade and employment) from a highway bypass than medium and larger towns. For such smaller communities, the review highlights the importance of pre- and post-bypass proactive planning to mitigate against any potential adverse losses as a necessary step in managing post-bypass change.

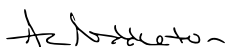
MVBA comment – the EIS refers to implementation of a strategy for directional signage to continue to attract visitors to the towns affected by the proposal and that Transport would also consult with relevant councils regarding opportunities to encourage visitors to areas which are bypassed. However, this is not considered to be enough. It is requested that the EIS is expanded to include other strategies that would be done by Transport to ensure the ongoing viability of businesses in the bypassed towns.

For example, it is suggested that Transport takes the lead and works with councils and Destination NSW to develop a plan that promotes Blackheath and Mount Victoria as destinations both during and post-construction. Such a plan could include initiatives such as:

- Identifying the successful lessons from other bypassed towns such as in the Southern Highlands.
- Directional signage.
- Development of initiatives to enhance Blackheath and Mount Victoria as tourism destinations including bike trails linking the two towns and then on to Little Hartley and Bell, and repairing existing bush walks that have fallen into disrepair such as Berghoffers Pass and Reinit's Pass.
- Upgrading the Bells Line of Road to allow truck movements to and from Sydney.
- Investigating how to limit truck movements on the Darling Causeway and requiring them to use the tunnel and Bells Line of Road.
- Installing traffic calming devices in Station Street, Mount Victoria in consultation with MVBA and the Mount Victoria Community Association.

Please contact me by email mvba2786@gmail.com should you require further information in relation to this submission.

Yours faithfully



Tony Middleton
Treasurer and Public Officer

¹ Parolin, B. (2011), Economic evaluation of town bypasses: Review of Literature, NSW Roads and Maritime Services, <https://roads-waterways.transport.nsw.gov.au/documents/roads/usingroads/bypasses/town-bypasses-literature-review.pdf>