

Blackheath Highway Action Group

PO Box 339, Blackheath NSW 2785

28 February 2023

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

Dear Director,

Submission - Blackheath to Little Hartley 11 km Tunnel EIS - application number SSI-22004371

The Blackheath Area Community Alliance ('Blackheath Alliance') comprises and represents approximately 29 different not-for-profit community groups, organisations, and business chambers in the Upper Blue Mountains, including Blackheath, Mount Victoria, Medlow Bath, and Megalong Valley. The Blackheath Alliance has been in existence now for more than nine years.

We thank you for the opportunity to make a submission in relation to the Blackheath to Little Hartley 11 km Tunnel EIS.

1 Support the Blackheath to Little Hartley 11 km tunnel

We confirm that the Blackheath Alliance 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 (the 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 is not 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 constrained 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. 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 Katoomba and Little Hartley has been subject to regular closure due to bushfire, snow, black ice, and accidents.

Recent weather events have strained the ageing infrastructure along this stretch of the Highway, as evidenced by landslips and other related problems. These impediments have severely impacted the flow of traffic to the NSW Central West, and beyond and have caused a significant drag on tourism in the Upper Blue Mountains and 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. It was earmarked to be bypassed by the Rudd/Gillard Government in 2008.

The Blackheath Alliance has consistently argued for the need for an Independent Options Report (IOR) into any upgrade of the highway through Medlow Bath. The IOR needs to be completed as soon as possible to address the concerns of residents in relation to safety and the impacts of the predicted increase in vehicle movements on traffic congestion impeding access for freight, tourism, and residents. Consideration of bypass options for Medlow Bath will add value to the whole duplication project and will extend the benefits of the Tunnel.

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 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. Such closures have occurred several times throughout 2021 and 2022.

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

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

The Tunnel will also have a much lighter footprint on the environment compared to a surface duplication and will provide significantly more long-term benefits for surrounding local ecosystems in local reserves, the Blue Mountains National Park, and the Blue Mountains World Heritage Area.

The Tunnel will also provide 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 for residents, freight, tourism, and all levels of government.

2 Support of the 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 communities, particularly in relation to the local environment.

To quote the Blackheath Area Neighbourhood Centre EIS submission *"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."*

We thank TfNSW for the EIS consultation process and praise their project team for working constructively with the Blackheath and Mount Victoria communities during this process.

We also note the EIS acknowledges that further work is required.

Therefore, the Blackheath Alliance 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

Based on information included in the EIS, we have identified 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 which may be impacted by noise and vibration after the opening of the Tunnel.

As a condition of approval, we request that these households be provided with appropriate support and explicit measures to mitigate noise, dust and vibration impacts. This may include modifications to buildings 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 into the Greaves catchment.

We also request, as a condition of approval, that dilapidation audits of existing at-risk households be undertaken prior to portal and Tunnel construction.

We are seeking a commitment from 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.

We also request that TfNSW implement appropriate vehicle safety and driver behaviour management plans to minimize the impacts of vehicle movements to and from the construction compounds during Tunnel construction.

2.3 Consultation

As a condition of approval, that Transport for NSW (TfNSW) commit 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 so that it will provide reliable access for residents, construction operators, and tourists.

To our 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. We 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 which would offset any potential impacts, particularly during construction of the Tunnel and the eastern section of the Katoomba to Lithgow GWH Upgrade Project.

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 the eastern section of the Katoomba to Lithgow GWH Upgrade Project.

We believe tourism development projects, including bike trails and the opportunities to develop the Highway between Katoomba and Little 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

The Blackheath Alliance seeks clarification as follows:

3.1 Construction compounds – Blackheath and Little Hartley

We seek clarification because we strongly believe that 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.

We note that the location of the Blackheath construction compound is less than desirable. We acknowledge the commitment by TfNSW that there will be screening along the highway to minimize the visual impact of the compound. However, we seek clarification from TfNSW that such screening will be effective enough to ensure that tourists and visitors are not dissuaded from visiting Blackheath.

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

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

3.3 Housing and accommodation

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) Minimise 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 which own surplus land in Lithgow and Blue Mountains LGAs, as well as the two Councils involved 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 for 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.

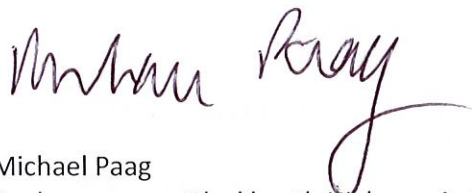
We also note the level of accommodation required for construction workers should also not result in the depletion of accommodation available for tourists because without tourists, tourism-related business could not successfully operate.

3.4 Mount Boyce Heavy Vehicle Safety Station

There has been little mention of plans for the relocation of the existing Heavy Vehicle Safety Station at Mount Boyce and what the future of the existing facility might be.

Please do not hesitate to contact me by email michaelpaag@gmail.com or by mobile on 0423 596 240 should you require further information in relation to this submission.

Yours faithfully,



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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

