

SUBMISSION BLACKHEATH TO HARTLEY GWH 11KM TUNNEL EIS: 28 FEBRUARY 2023

To whom it may concern

GENERAL OVERVIEW:

In light of the Federal Government's stated concerns about not looking at the the 11km project 'as a whole', uncertainty around further federal funding and its climate change objectives, this project must be paused and all options put back on the table, including getting freight trucks off our mountain roads which are exposed to multiple vehicle accidents (road closures) and extreme weather events all year round.

Overall, I submit:

1. **Submission process:** The process of filing submissions on the TfNSW portal is slow and cumbersome and a deterrent to people making submissions – as a result the submissions review will not be an across the board objective assessment. An extension date for submissions should have been provided. Failure to do so is an abuse of process.
2. **Too many unknowns:** TfNSW's EIS has raised more questions about the project environmental impacts than provided answers, particularly (but not limited to) impacts on aquifers feeding hanging swamps, impacts on water run-off, impacts of the extent of cleared vegetation on biodiversity and endangered species and visual pollution of the proposed ventilation stacks in the UNESCO listed Blue Mountains.
3. **Evans Rd Section approved by stealth under REF an abuse of process:** TfNSW deliberately and by stealth avoided disclosing to the community, (during the Medlow to Blackheath REF community consultation), the size and extent the Evans Rd intersection works and its proposed ventilation stacks. Had the community known they could have vehemently objected on numerous grounds. These stacks may be acceptable around the Lithgow power stations but NOT at the high point of the UNESCO listed Blue Mountains. The impact on tourism visual amenity is very high. The environmental impacts of the works at Evans Rd (see "Environment" below) are also so **high** as to be totally unacceptable.
4. **Does not achieve project objective of returning local roads to local people in all sections:** TfNSW EIS highlights the project benefits of giving local roads back to locals in Blackheath and Mt Victoria, ease of local movements and alternate roads during emergencies yet the duplication at Medlow Bath still fails to provide any alternative access road. TfNSW's solution of creating contra flows at EMdlow Bath, during emergencies, is plainly not a solution, particularly when contra flows fail to work during emergencies in the lower mountains.

Whilst not a part of the EIS, the 'fake' politically driven Medlow Bath 'urgent safety upgrade' should be part of a whole of project EIS (see note 5 below). The current project design not only doesn't provide any alternative emergency access road, it will make the highway (less safe with its below safety standards lane widths) and extra lights will increase congestion. The fake safety upgrade at Medlow Bath, without having conducted an independent options report, wilfully destroys Medlow Bath's historically significant tourism...for good.

5. **Need to put project on hold:** The EIS has only heightened the urgency for the Katoomba to Lithgow GWH duplication project to be put on hold until:
- a) **The whole project is subject to an EIS.** (Note: the current piecemeal series of 'salami sliced' REF's and EIS are inappropriate for a project of such significance and fails to properly identify cumulative impacts. For TfNSW to assert its environmental assessments for REF's and EIS are the same standard is false and misleading. If that were the case, then why wasn't the whole project subject to an EIS in the first instance?)
 - b) **An independent options report is completed** including the option of a freight train tunnel from the eastern base of the mountains to the western base of the mountains. (Note: Having recently travelled by train in Germany/Austria/Italy observing drive on drive off freight trucks on rail, there is no impediment to Australia moving freight by rail using the same systems. The tunnel concept is too expensive and provides no long term benefits to safety, congestion and liveability of the Blue Mountains.
 - c) **The whole Blue Mountains community is consulted about the introduction of 30 – 36m B Double trucks** onto their local road – not just the upper Blue Mtns community. (Note: The recent major truck/multiple vehicle accidents at Leura and Bells line of road (22/2/23) and ongoing reports of trucks tailgating cars are self-evident that the 11km tunnel will do nothing to improve safety of road users. TfNSW is unable to support its assertion the increased number of 30- 36 M B Doubles will reduce truck volume because TfNSW, by its own admission during community consultations, has not assessed if trucks currently going around the Blue Mountains (North and South) will start going over the mountains, thereby increasing truck volumes.

In short, TfNSW fails to demonstrate the \$8-11b 11km tunnel will achieve the NSW Government's objective of providing a safer, faster, more reliable journey for all road users of the GWH from Sydney to the Central West and fails to demonstrate the 11km tunnel will have negligible impact on the environment and liveability of the UNESCO listed Blue Mountains.

FURTHER SUBMISSIONS ON SPECIFIC EIS CHAPTERS

ENVIRONMENT

1. Construction site corner Evans Lookout Rd and GWH

- a) Plans for the Section changed between Medlow Bath to Blackheath (REF) Submissions Report (Oct 2022) and the release of the 11km tunnel EIS (Jan 2023). However, the EIS states this section has already been assessed and approved as part of the Medlow Bath to Blackheath REF.

This is false and misleading conduct by TfNSW and an abuse of process. Making such significant and radical changes to this Section, after the closing of REF submissions denied the community the opportunity to make submissions on this section. The inference must be drawn that TfNSW deliberately misled the community by approving the revised Medlow Bath to Blackheath section, by stealth.

TfNSW manipulatively avoided this section being assessed as part of the EIS; inserting late changes into the lower standard REF assessment, which only required sign off by TfNSW as sole determining authority.

TfNSW has failed to be honest and transparent with the community. Had the community known about these late changes to this section, they would have made comments in very strong terms that the environmental and visual impacts are so high as to be unacceptable.

- b) All vegetation will be cleared and the land levelled at the Evans Rd/GWH intersection. TfNSW was deliberately vague and mislead the community about the extent of vegetation clearance during the Medlow Bath to Blackheath REF community consultation.
- c) The Evans Rd intersection worksite will provide parking for about 100 vehicles requiring further vegetation clearing which was not fully disclosed to the community during the Medlow Bath to Blackheath REF consultation period.

2. Catchment

- a) The Evans Rd intersection 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.
- b) The Evans Rd intersection 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 will threaten its status.
- c) TfNSW state that leaching of cement from the tunnel will change the pH of ground water and could affect the downstream swamps and endangered vegetation communities. The long term impacts of this are not adequately assessed in the EIS.

3. Ancient Hanging Swamps

The risk of sedimentation (and weeds) entering the Blackheath Special Catchment Area and the downstream World Heritage Area from initial site clearing followed by 9 years of tunnel construction is significantly high. Current water flow through the catchment area feeds ancient hanging swamps which are nationally endangered and home to a unique range of fauna including the endangered Giant Dragonfly and endangered Blue Mountains Water Skink. TfNSW has a poor understanding of the sensitivities of hanging swamps acknowledging it caused the catastrophic collapse of Bullaburra hanging swamp. TfNSW may claim to have 'learned from our mistakes' but the EIS fails to address what TfNSW has learned, leaving little confidence it wont happen again.

4. Ancient Aquifers

EIS claims it will avoid damage to ancient aquifers however the proposed cut and cover entrance tunnels, will be shallow 'covered' trenches. The extent this will interrupt shallow aquifers feeding the hanging swamps is not properly assessed risking catastrophic impacts to the habitats of endangered flora and fauna. The EIS fails to adequately assess impacts of shallow tunnels on aquifers, hanging swamps, creeks and waterfalls. Inflow into Greaves Creek is predicted to be reduced by up to 15-17% due to the tunnel portal diggings. **Given TfNSW's poor record damaging hanging swamps, it is not enough TfNSW claim these will be the subject of ongoing assessment. These delicate poorly understood ancient aquifers must be fully understood before any sign off of this EIS, and before any shovels go into the ground.**

5. Air quality

Two ventilation systems are being considered for the tunnels, TfNSW has stated it is most likely to erect two ventilation stacks each tunnel entrance which is of concern because:

- a) Exhaust coming out of tunnel portals will negatively impact residents living nearby which is not acknowledged.
- b) The effects of fine particulates on photosynthesis of vegetation are not well understood; and there is not currently an established criteria for assessment of ecological receptors with regards to PM2.5 concentrations.
- c) The dispersion model uses regional meteorological data to predict the direction of travel and degree of dispersion for a pollutant from the point of emission. The study used less than 12 months of data from only one (of 3 possible) sites to 'model' the outcome: 'As such no significant air quality impacts are predicted for the project for the ventilation outlet option.' Blackheath and Soldiers Pinch construction sites are considered to have a high sensitivity to dust due to their proximity to the Blue Mountains National Park which is regarded as a highly sensitive ecological receptor due to its World Heritage and National Heritage listings.
- d) Slightly higher annual average Nitrogen Dioxide (NO₂) concentrations are generally predicted for the portal and ventilation stack emissions. NO₂ lowers the pH of water and soil, making it more acidic

6. Threatened species

- a) **Greater Gliders:** A significant number of mature trees with hollows (at a bare minimum 20) will be cleared for the tunnel portals and the work site at Evans Lookout Rd and GWH intersection. (It is noted, TfNSW hollow tree assessments are done at eye level only which means many higher level hollow trees are overlooked.) TfNSW plans to save and store felled hollow bearing trees then tie onto new trees which TfNSW will plant after the tunnel work is finished. That's 9 years of construction plus the time it will take for the newly planted trees to mature i.e. it will be at least 20 years before these hollow trees are replaced. This negligent treatment of endangered species alone necessitates this EIS not be signed off.

- b) **Large Eared Pied Bat**: is a Threatened Species affected by the Project.
- c) A further 8 species are likely to have their habitat affected.

7. Risk to World Heritage UNESCO status

All the above risks the Blue Mountains losing its World Heritage UNESCO status.

TRUCKS

1. Construction truck movements impacting Medlow Bath omitted from EIS

The EIS states that during construction truck and light vehicle movements up to 260 times per hour or **790 movements per day** (est.). These trucks will need to turn around somewhere, including the newly created Bellevue Cres Medlow Bath U turn bay, constructed to carry semi-trailers, whilst introducing heavy vehicles into a previously 'untouched' residential street.

During 2021, the Medlow Bath community put a proposal to TfNSW for a more modest less intrusive roundabout at Bellevue Eve and Delmonte Pde intersection. This was rejected on the grounds it couldn't carry semi trailers..... it is now plainly obvious why TfNSW semi- trailers to turn around at Medlow Bath. TfNSW needed somewhere for its tunnel construction vehicles to turn around, during the 9 year tunnel construction period.

During a conversation with **John Dinan** from TfNSW, on or around October 2021, I put to him the Bellevue Cres U-turn bay was being built to allow tunnel construction trucks to turn around and he rejected this suggestion outright, as not true. During a conversation with **Alastair Lunn** at a face to face community session in Blackheath, during late 2022, I asked why TfNSW had to build a truck U-turn bay at Medlow Bath when there is a purpose built truck U-turn bay just west of Katoomba, he replied that ' Katoomba was too far away.'

The inference must be drawn that all along TfNSW has been looking for a way for tunnel construction vehicles to turn around close to the Evans Rd tunnel entrance site and that the Medlow Bath community was deliberately misled by TfNSW. The community at Medlow Bath will now have to endure 9+ years of noisy 24/7 construction trucks near their homes in addition to the two years of construction of TfNSW's fake safety upgrade of Medlow Bath itself.

The EIS conveniently does not cover the social/environmental/ noise/liability impacts of the construction truck movements on the Medlow Bath Community, which is why the EIS in its current form is inadequate for a project of such size and cost. At the very least the whole project must be subject to a whole project EIS to assess cumulative impacts of all sections of the project.

2. Lifting restrictions on truck sizes upon completion of Duplication

- a) **Increase in truck size further compromises safety**: TfNSW has, revised truck sizes up from 30m to 36m further jeopardising the safety of road users and pedestrians using Great Western Highway surface road sections.

- b) 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.
- c) 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.
- d) The well documented reports of residents being tailgated by trucks on the current section of highway already duplicated surface road, is conveniently omitted from the EIS. A whole project EIS would capture these significant impacts of more and bigger trucks on what is a local road.
- e) Residents of Blue Mtns towns where the highway is already narrow (Blaxland, Faulconbridge, Wentworth Falls and Medlow Bath) will be unnecessarily exposed to increased safety risks as results of these much bigger trucks passing through their towns. Its an abuse of process that the lower Blue Mtns villages have not been consulted about the introduction of bigger trucks on their roads.
- f) The predicted 30% increase in freight through the Blue Mountains poses significantly high impact for road users including residents and tourists. No long term socio-economic studies have been conducted on the long term impacts of this project on the Blue Mountains – the project is primarily Central West and freight industry centric. There are now other smarter solutions to moving freight without permanently damaging the liveability, safety and ecology of the UNESCO listed Blue Mtns.
- g) The Cumulative Impacts of the introduction of 26/30/36m trucks has not been assessed in any of the REF's or this EIS.

TRAVEL TIME SAVINGS BY 2030 ARE ILLUSORY

Travel time between Evans Rd and Hartley is predicted to be reduced by just 9 minutes at time of completion, being the 2030s. Given the number of trucks on the road by 2030 remains unknown and given the number of traffic lights and school zones from Blackheath to Glenbrook remain the same, this figure is illusory and misleading. It fails to identify travel times from Blackheath to Glenbrook will likely increase negating any time savings of this \$8b project between Evans Rd and Hartley. By 2030 the project will not have achieved the stated objective of a faster, safer more reliable journey from Sydney to Lithgow.

SOCIAL AND ECONOMIC IMPACTS OF LONG CONSTRUCTION PERIOD

1. The 23 hectare construction site in Blackheath is very close to nine homes and a commercial hotel/restaurant. The social and commercial impact of this over a 9 years construction period is unacceptably high.

2. The total periods of construction disruption are comprised of the 11km tunnel ,Evans Road tunnel entrance, two years of construction at Medlow Bath, span bridge and surface road works between Katoomba and Medlow Bath. This will create at least 10 years of traffic chaos. The EIS fails to contemplate the social and economic impact of 10+ years construction and related congestion on the Upper Blue Mountains. The lack of a bypass of Medlow Bath will further exacerbate the highway congestion.
3. The EIS fails to demonstrate the 11km tunnel will enhance tourism. An opportunity has been missed to create a bypass of Medlow Bath this creating an upper Blue Mountains world class tourist drive. Instead the Hydro Majestic will become nothing but a truck and toilet stop before entering the tunnel. To suggest tourism operators will be compensated by the number of construction workers housed in the area and spending money on food is simplistic and short sighted. This will not preserve the long term tourism viability of the area because the many tourism dependent businesses wont survive (after just surviving bushfires and covid) and the tourists won't necessarily come back after 10 years of disruption.

CONSTRUCTION VIBRATION IMPACTS

1. The EIS predicts a significant increase from construction traffic. Most of these vehicles will be turning at the newly created Medlow Bath U turn Bay at Bellevue Crescent. The EIS fails to address the impact of 24/7 truck noise and vibration on residents in and around the Bellevue Cres U turn bayfor the entire 9 years of tunnel construction.
2. The EIS promotes the reduction of truck noise attained by trucks diverting to the tunnel..... this plainly only applies to residents above ground of the tunnel. The EIS conveniently fails to note that all residents near the highway from Evans Rd to Glenbrook will be significantly impacted by the increased noise and vibrations associated with the increased size and volume of trucks using the Great Western highway.
3. Many of the properties below the Blackheath tunnel section are old and 'frail' – there is no indication of measures in place to mitigate against blasting adversely impacting these homes.

DUST AND SILICOSIS

The SMH (21/02/23) reports Sydney sandstone contains up to 90% silica (a dust carcinogenic to humans) and that some tunnel construction workers have silicosis. The EIS does address dust created from tunnel construction, impacting workers and surrounding residents, noting the local high winds will spread the dust over a wide area.

DANGEROUS GOODS IN TUNNELS

The EIS is silent on what, if any, dangerous goods will be allowed to use the tunnel. The EIS also provides no assessment of the risks of 36m trucks carrying dangerous goods on the surface roads from Blackheath to Glenbrook; densely occupied residential and school areas.

WASTE MANAGEMENT

1. An uncovered tunnel spoil pile will be created at the Blackheath Construction Site in the protected water catchment area – up to **5000 cubic metres** in size. Given the area extreme weather including high rainfall and winds this will create unacceptable high risk of contamination of ecologically sensitive waterways, drinking water supply and local residential areas.
2. Trucks carrying spoil and cement casing pieces used to line the main tunnels will operate 24 hours a day 7 days a week creating noise unacceptable levels of noise pollution.

ENVIRONMENT, PROTECTION, BIODIVERSITY AND CONSERVATION (EPBC) ACT

The project requires approval by the Federal Gov under the EPBC Act if it is likely to have Significant Impact on matters of National Environmental Significance, including World Heritage. By this process it becomes a 'controlled action' under Commonwealth legislation requiring TfNSW to provide further information and do further assessment.

The EIS summary states:

“At the time of finalisation of this EIS there has been no decision by DCCEEW on whether the project is a controlled action or not. If the project is not determined a controlled action, Transport is not required to provide a separate assessment of the project under a Commonwealth approval pathway. If the project is determined a controlled action, Transport will need to prepare a draft environmental assessment under the EPBC Act to assess the project under additional requirements as required”.

EIS Chapter 1, 1.5 states:

“An assessment of the project’s potential impacts on Commonwealth matters of national environmental significance (MNES) (as discussed in Chapters 12 (Biodiversity) and 17 (Non-Aboriginal heritage)) has found that the project’s impacts on MNES would not be significant. Notwithstanding, Transport has referred the project to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) to confirm that approval under that Act would not be required. At the time of finalisation of this EIS there has been no decision by DCCEEW on whether the project is a controlled action or not”.

Releasing the EIS before a decision was made under the Act, is another abuse of process we’ve come to expect from TfNSW. Given the area of tunnel construction potentially impacts drinking water catchment, safety and World Heritage status, EIS should not have been prematurely released.

**SUMMARY:
FAILURE TO CONDUCT WHOLE PROJECT EIS INVALIDATES 11KM TUNNEL EIS**

Because the project is broken up into piecemeal series of REF's and one EIS, cumulative impacts have NOT been properly and independently assessed. A whole project EIS would ensure the interconnected and wider environment is fully assessed. Issues the piecemeal process have failed to address include:

1. The commercial/social/ environmental impacts of commencing the project's fake safety upgrade at Medlow Bat, when Federal funding for the 11km tunnel is still uncertain.
2. The effect of the planned increase in the size of trucks passing through all Blue Mountains villages.
3. The negative impacts on the natural environment of the World Heritage Area (downstream from the narrow 1500mm corridor covered by the EIS).
4. The predicted reduction of inflow into the drinking water catchments and into the World Heritage Area by water redirection to the construction works.
5. The predicted change in pH of the water flowing into the catchment and World Heritage area.
6. The increased risk of disturbance to shallow aquifers near Evans Lookout Road feeding the endangered peat swamp vegetation communities.
7. The negative effects on the iconic downstream tourist attractions including the Grand Canyon.
8. The negative effects on Threatened and Endangered Species.
9. The negative effect of the ongoing construction on local heritage attractions and tourist industry.
10. The uncertainty of the effects upon air quality in the villages and National Park.
11. The lack of information on how dangerous goods will be transported through the Upper Blue Mountains which includes schools and residential areas.
12. Proceeding with EIS ahead of decision as to whether the project is a 'Controlled Project'.

END