



**TRISH DOYLE MP**

STATE MEMBER FOR THE BLUE MOUNTAINS

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# **Great Western Highway Blackheath to Hartley**

## **Environmental Impact Statement**

**Submission  
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Blackheath to Hartley Environmental Impact Statement**

**Submission  
Trish Doyle MP – Member for Blue Mountains**

**INTRODUCTION**

The Great Western Highway Environmental Impact Statement is a bewildering document and no doubt intimidating for many who attempt to pore over the pages and pages and through the 49 chapters of information on offer. I would have preferred to see an independently compiled EIS, separate to any entities with vested interests in the project, such as AECOM and Aurecon. Whilst the NSW Government's argument is that close collaboration will be ensured this way, sceptics may ponder if the EIS has been designed to 'fit the project', rather than the other way around.

I won't attempt to delve too deeply into the technical aspects of the EIS, in this submission. There are experts in relevant fields of engineering, environment, and transport, some of with whom I've consulted, who are better equipped to express the many concerns that remain unanswered by the EIS. Rather, my submission will provide an overview of the issues being raised with me, it is worth noting, by experts living in the Blue Mountains who possess an intimate understanding of local topography and environmental sensitivities.

**ENVIRONMENT**

The environmental impacts of this project are undoubtedly of the greatest concern to the Blue Mountains community. We are proud of our World Heritage National Park and passionate about the protection and preservation of this land we live upon.

I have consulted extensively with the Blue Mountains Conservation Society and the Blue Mountains World Heritage Institute, as well as receiving hundreds of emails and phone calls from residents, particularly focused on the harm this project could potentially cause to the environment.

There will be submissions that delve further into the detail of environmental concerns so here I will provide an overview of that which has been brought to my attention. The following concerns, many believe, have been inadequately addressed in the EIS:

- **Groundwater and dependent swamps impacts**, in particular the Greaves Creek system and the Commonwealth listed peat swamps. I am aware that TfNSW has consulted with the Blue Mountains World Heritage Institute (BMWHI), a highly respected, well-researched organisation whose local knowledge is invaluable. Their research and knowledge must be observed and acted upon. BMWHI have emphasised the unquestionable necessity for water catchment management and the provision of forward projections on increased extreme weather due to climate change. Shallow aquifers must be identified, assessed, and managed to avoid swamp collapse. We cannot see another monumental stuff up by TfNSW that saw the devastation of the Bullaburra swamp during highway 'upgrades' a decade ago. Despite the predicting of this disaster, works ploughed ahead and a 12,000-year-old swamp was destroyed. This can't happen again.
- **The issue of weed infestation in swamps and streams** has been raised with me continually. The transformation of water pH from acidic to alkaline (a major risk from concrete leachate) will not only threaten the robust native flora but will also invite exotic weeds into the area.

- **Leachate from concrete** is of major concern and alternative construction materials must be considered. A serious question that needs answering is: *Will geopolymer concrete be used, as it has been in environmentally conscious projects around the world?* Every attempt should be made to protect the highly vulnerable ecosystems in the Blue Mountains.
- **Amassing of water in and around cross-tunnel pathways** and significant impacts on water flow across the entire length of the tunnel. Concerns surrounding the likelihood that this change in water flow will have a direct impact on biodiversity and threatened species.
- **Pollution** caused by the tunnel construction (cement seepage, changes in water pH content that is then released into local waterways, impacts on water quality from cement, treated water, sediment, potential chemical spills etc).
- Have there been extensive investigations into the **impacts of vibrations** from the tunnelling process on already unstable land?
- TfNSW have indicated that **tunnel ventilation** options will be left for the public to decide. What consultation processes are designed for this important decision? Will the broader community be involved, or will we see another 'Select Committee' that is made up of only a handful of people and yet appears to be disproportionately instrumental in the decision-making process?
- **The transportation of uncovered spoils.** Where are there reassurances for our community that this will not be the case?
- Once again, whilst this EIS focuses on the upper Blue Mountains, there needs to be investigation and honest modelling around the **impacts of increased emissions across the breadth of the region.**
- I reject the statement made in the EIS that moving freight off the roads 'would not provide improved road safety outcomes' (3-6). This is a ridiculous, false assertion. Additionally, the benefits of **freight by rail** span both the environment and the economy, offering a long-term, sustainable solution that I believe requires further investigation.

## **AMENITY**

The EIS purports to support '*the current needs and future growth of Sydney and Central West NSW through an efficient transport network*', claiming that it is '*fundamental to the liveability, productivity and sustainability of Greater Sydney and NSW.*' We are also told that '*Heavy vehicle movements along the Great Western Highway are predicted to increase by around 30 per cent by 2036*'. During my almost eight years as the Member for Blue Mountains, I have often struggled with this region's inclusion in 'Greater Sydney'. Undoubtedly, 'liveability' means different things to different communities, but I can safely say that for many members of my community who reside beyond the eastern portal of the proposed tunnel, the predicted increase in number and size of trucks along the Great Western Highway does not equate to an enhancement to their daily lives. Quite the contrary.

Some questions that need addressing through this process:

- What mitigating measures have been planned for the Blue Mountains east of Blackheath?
- What reassurances can be offered to these communities to whom the Great Western Highway is a local road and a means of going about their day-to-day business?

- Has there been consultation with schools, many of which are located on the highway, to inform them of the impacts of increased heavy vehicle movements right alongside space where hundreds of Mountains children learn and play?

As an aside, we currently can't even secure a commitment from the Minister for Regional Roads to safety barriers on the GWH in Blaxland, where tragically a young local woman, Mackenzie Blake, was knocked down and killed by a disqualified truck driver, so you'll forgive my expectation that nothing has been done to address these concerns. Mackenzie's mother, Tracy, reported to me that after speaking directly to Minister Faraway regarding the installation of safety barriers along the highway in Blaxland, he informed her that there are many locations across the state that need similar attention, but they can't all be addressed – a 'we can't do them all so let's do none' approach which does little to instil any confidence that safety is high on the priority list for the NSW Government when it comes to the continuation of the Great Western Highway project.

When querying Transport for NSW (TfNSW) regarding the relaxing of minimum safety standards through Medlow Bath, I was offered some scant assurance that a reduced speed limit would mitigate this problem. This is a ridiculous, ineffective argument that ignores the realities of what happens far too often on our roads. Motorists speed. Truck drivers speed. Sadly, the rules are broken all the time and to pretend that this is not the case is foolish. Relaxing safety standards on our roads or increasing risk without the implementation of adequate mitigation measures shows a lack of informed, considered planning.

I speak to the fate that awaits Blue Mountains villages east of Blackheath to draw attention to the piecemeal approach that has been adopted on this project. I am bewildered how this can be the case. An Environmental Impact Statement that looks narrowly at the impacts on a specific project area whilst simultaneously ignoring the far-reaching impacts beyond the direct project site, makes no sense and could be viewed as almost tokenistic.

Projects of this magnitude take time and cause a lot of disruption, a seemingly inescapable feature of infrastructure development. This can be devastating for those directly in the firing line. I was contacted last week by a Blackheath resident who lives on Evans Lookout Road. She broke down when she told me what she and her family will face, the details of which they became privy to only recently at a Transport for NSW information session. In an email to my office, she wrote:

*"This week I attended an information session with Transport NSW and was informed that not only will my family have to endure 5-7 years of noise, dust, and pollution during the tunnel's construction but that the trees and bush (formerly National Park and part of the water catchment) directly behind my property is to be entirely removed and turned into a wasteland of a parking lot for workers and equipment. Instead of a tranquil bush outlook, myself, my partner and my 2 young daughters will see workmen, equipment, vehicles ploughing up and down, a permanent tunnel operations facility and possible ventilation stack whenever we step out in our backyard!!"*

She continues:

*"This project is a great city style freeway behemoth that does not belong in a World Heritage National Park. Its purpose and value are highly questionable and is destructive to the small village atmosphere between Medlow Bath and Hartley. There is a total disregard for the environment, wildlife, the heritage value of the towns and of the highway itself as a scenic route traversed by the original explorers, it also ignores the value of the landscape for indigenous people. This proposal is not in keeping with the rest of the GWH widening through the mountains."*

These are some of the real-life impacts that will be felt for those most directly affected by the proposed 'tunnel' project or preparing for it. I imagine that TfNSW has conducted a box ticking exercise to minimise these impacts, or rather minimise the number of people affected by these impacts, but for those whom the outlook is grim, these minimisation measures will offer no comfort.

## **BUSINESS CASE/ ONGOING ECONOMIC BURDEN**

The release of the elusive business case for the Great Western Highway project is something I've been requesting for many years. It is challenging to have faith in the economic viability of such a mammoth project when the NSW Government is unwilling to make this information public and leads one to the obvious conclusion that the numbers just don't stack up. This has been essentially echoed by both Infrastructure NSW and Infrastructure Australia in their assessments. This Coalition Government has a shocking track record on infrastructure spending blowouts and there is a growing consensus that this project will be no different. A 'build at all costs' approach is reckless and unjustifiable when, across the state our healthcare system is in crisis, our schools are in crisis and the cost of living is threatening to unravel hardworking families who are at breaking point.

After seeking advice from a former Roads Engineer, I was alerted to what seems to be an omission of ongoing maintenance and operational costs outlined in the EIS (absence from the overall budget for this project) – namely lighting, power, fans, and pumps. This further contributes to a lack of trust around what the eventual outlay will be for this project. We are being asked to trust that the tunnel is worth the spend whilst being kept in the dark and a table presented in the EIS conclusion with what I can only assume aims to be a reassuring little green dot next to the *Value for Money* objective, does not do the trick.

I have also been asked about where the responsibility will lie for the upkeep of the highway through Blackheath and Mount Victoria once a tunnel is built. There is talk of the stretch of road becoming a tourist drive, along with its day-to-day use returning to residents. Will the State Government remain as caretakers for this road, or will this fall back onto Local Council who already face significant challenges affording road maintenance in our electorate?

The lack of a business case also raises many questions around the depth of consideration that has been given to local businesses whilst the tunnel is under construction. TfNSW has emphasised that the majority of work takes place underground and once the ground is broken, impacts should be minimal. I would like to see further consultation with local businesses owners around this. The conversation needs to be frank and honest. If, after years of bushfires, floods and COVID, businesses in Medlow Bath, Blackheath and Mount Victoria are once again expected to endure further disruption, they may not have the ability to sustain operations. I would be curious to learn of the consultation, if any, that has taken place with business owners west of the Blue Mountains.

## **HOUSING**

This project is not being considered holistically if the impacts on housing availability in the Blue Mountains area is not given careful consideration. With an anticipated influx of potentially thousands of workers who will presumably be based in our region for the duration of the project, I am deeply concerned about the affects this will have on local housing needs.

I expect to see extensive consideration given to this aspect of the project, as affordable, available housing already presents a significant challenge for our community. The possibility of having this situation exacerbated even further is unacceptable, particularly for those households that are most vulnerable. It is incumbent upon the NSW Government to implement practicable solutions to mitigate these challenges.

## **INDIGENOUS HERITAGE**

The EIS offers assurances that 'the project would not have a significant impact on Aboriginal cultural heritage values in the Greater Blue Mountains Area'. I would like it noted that I question if the scope of the EIS encompasses the potential impacts on Indigenous cultural sites that may not sit within the project boundaries, however, could be impacted by issues that encroach on other areas, as a direct consequence of the tunnel project.

Ongoing consultation must take place with local Indigenous elders and in conjunction with this, it is essential that an Adaptive Management Plan is formulated, considering the evolving nature of the impacts of this project. The effects of climate change by way of human induced natural disasters ensures that any infrastructure undertaking from this day forward, first acknowledges these inevitable impacts and secondly, strives continuously to mitigate against them. This is crucial for both the Blue Mountains environment and the precious Indigenous cultural heritage that exists within it.

## **CONCLUSION**

Finding solutions to improve the traverse across the Blue Mountains, without destroying either local amenity or the World Heritage environment, is not a new issue. This project, or iterations of it, have been looked at for decades and thus far, no ideal outcome has materialised. We've seen upgrades east of Katoomba which have undeniably improved safety along this stretch of the Great Western Highway but still issues of congestion at peak periods remain.

In my time as Member for Blue Mountains I have stated repeatedly that the Blue Mountains is more than a conduit between Sydney and the Central West. Millions of tourists flock here each year to awe at the unique and ancient beauty of this area and residents feel privileged every day to live amongst this incredible landscape. Whilst this EIS focuses on the Blackheath to Little Hartley (central) section of the project; it is foolish to adopt a blinkered approach and ignore the inevitable impacts it will have across the breadth of the Blue Mountains. Undeniably, there are benefits of the construction of a tunnel under Blackheath and Mount Victoria however an infrastructure undertaking of such magnitude must be done right and there should be a complete absence of doubt that the environmental, economic and lifestyle outcomes of such a project are positive ones. Thus far many of us remain unconvinced that this is the case.

I am disappointed that the NSW Government and TfNSW continue with a narrative that aims to absolve them of any real responsibility for the protection and preservation of our World Heritage National Park. I can only deduce from this that neither body has a full grasp of the significance of what it means to be inscribed on the World Heritage list. Technically speaking, the tunnel project may not fall within the boundaries of the World Heritage National Park but the impacts of such a project inevitably will.

As previously mentioned, I have consulted extensively with the Blue Mountains Conservation Society, the Blue Mountains World Heritage Institute, and road engineers - seeking the advice of these expert researchers and environmentalists. I have absolute faith in their work and their processes of investigation. They are educated, well-informed and compassionate people and I wholly concur with their findings and recommendations relating to the EIS, much of which I have referenced to inform my own submission.

There remain extensive further investigations that need to take place before I would wholeheartedly welcome the tunnel proposal for my community. I have, from the start, disagreed with the piecemeal approach that excludes Medlow Bath, and essentially the rest of the Blue Mountains, from the impacts this project will have.



From the time that TfNSW 'accidentally' informed Blackheath residents along Station Street that their homes were to be compulsorily acquired, to the formation of a chosen few, appropriately named the 'Select Committee', to the poor attempts at community consultation that did more to confuse than inform local residents, this project has been extremely flawed.

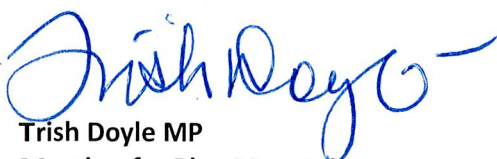
I will continue to demand, for my community, that there is no progression on this project when so many concerns remain. I acknowledge that Victoria Pass needs to be looked at and I acknowledge the challenges of peak period traffic through Blackheath, however I cannot in good faith support a concept that will escalate issues for the remainder of the Blue Mountains electorate, and at such an exorbitant cost. I think we all know that the current price tag of around \$8 billion is conservative to say the least. Advice I have sought has the real cost, all things considered, coming in at almost double that figure. My community needs a new hospital, our schools need long-overdue infrastructure works and we are desperately lacking in social housing stock – all of which I believe a socially conscious, empathic Government would find easy to prioritise if their motivations were sound.

I'll finish with more words from the resident of Evans Lookout Road:

*"There are volumes of information in all sorts of technical speak that Transport knows the average person can't fathom. We are not powerful or influential people in the community, nor are we academics. We are local people. I am a nurse at BMDAMH, my partner is a disability support worker, and my daughters attend local public schools. We are average hard-working people who have tried to provide a lovely home for our children to grow up in. I moved to the Blue Mountains over 25 years ago to escape Sydney for a quieter lifestyle and it is now being brought to my very doorstep. I have attended meetings and made submissions, but the project moves on proving this lip service and a box is being ticked by someone somewhere that consultation took place. It proves I am nobody and have NO power and NO choice. When I bought my property 23 years ago, realising my dream of home ownership, I checked in the contract if the property was subject to road widening. It was not. I felt safe.*

*Ms Doyle, I implore you to act for the affected residents!! NO ONE has represented us, we aren't powerful people in the community, but I feel the sanctity and privacy of my home is totally destroyed. I am losing sleep over this and have not yet told my daughters that the bush and trees will be cut down and not only will they have to endure noise, dust and pollution while trying to study, they won't see bush, trees, birds, and kangaroos but they will step outside their back door and see trucks, equipment, and workmen. Teenage daughters, not great. It will NEVER be the same if this goes ahead. I would have sold my house 2 1/2 years ago if I had known this was what was planned. I never had the opportunity to make an informed decision. Whenever you ask questions about the specifics, Transport says "We don't know yet" until the next step in the approval process is achieved.*

*How can we ever enjoy our home in the same way? How can my kids have friends over, relax in their own yard or have a party for the next 10 years? How can I sit in my own yard, or garden, or read a book or hang my washing on the line? Your home is meant to be your refuge, but I feel we are under siege in our own home. As a nurse, it galls me to see the amount of money being poured into this project when we can't pay for more nurses, when the hospital is falling apart and has no equipment. I have tried to reassure myself and accept that this project would not be as bad as I imagined, but the meeting I attended this week confirmed it will be my worst nightmare. PLEASE HELP US!!"*



Trish Doyle MP

Member for Blue Mountains

1 March 2023