

BAG Submission

Our position

We reject all four proposed options for Blackheath and we also reject the Great Western Highway Upgrade Program in its entirety because of the potential and very significant economic, social and environmental impacts to the Blue Mountains. We also call on the NSW Government and the RMS to immediately lift the Strategic Corridor Study Area in Western Blackheath.

Why we have come to this position:

- Only \$268 million has been set aside in the 2019/20 over the four year estimates for this project. There is no certainty that either the NSW or Federal Governments will fund the project to its entirety which is estimated to be way in excess of \$4.5 billion.
- According to the *Review of Great Western Highway Upgrades West of Katoomba, Independent Review, January 2012* “The proposed upgrade is costly, technically challenging and responds to lower traffic volumes than the highway east of Katoomba.” The Independent Review notes “the Benefit Cost Ratio (BCR) 0.1 for the upgrade which compares poorly to the previous Great Western Highway investment east of Katoomba with BCR average 3.6.” **The RMS has not provided any justification as to why the BCR would have changed so significantly in such a short time period.** In addition “it is understood that current and future traffic volumes between Mount Victoria and Lithgow are within the capacity of the existing highway until 2033 (Central West Transport Needs Study, SKM, May 2009). This is supported by the NSW Government “the total number of vehicles travelling along the highway west of Katoomba expected to increase by at least 1.5 per cent each year,” (Media Release John Barilaro 6 March 2019).
- Most importantly, the Independent Review states a **“comprehensive analysis is required that builds on the recommendations in the Central West Transport Needs Study and considers an integrated transport approach to freight and passenger movement between the Central West and the coast”**.
- The RMS has not completed a strategic business case. Accurate data on truck movements including the movements of heavy vehicles transporting dangerous goods across the Blue Mountains is yet to be compiled and released. There has been no environmental or geotechnical studies undertaken to determine if any of the options proposed are feasible.
- The NSW Government and the RMS have not justified how the Great Western Highway Upgrade Program (Katoomba to Lithgow) is a project that meets the strategic merit test outlined in the NSW Central West Freight Study, especially in

relation to the investment required to upgrade the highway to B-doubles up to 25 metres and Performance Based Standard Vehicles up to 30 metre standard.

- Neither the RMS nor the NSW Government have committed to an economic impact study on Blue Mountains tourism and small business
- The Blue Mountains National Park is the most visited national park in Australia, with 8 million visits per annum. In addition, the Greater Blue Mountains Area was inscribed on the World Heritage List in 2000 in recognition of its significant natural values. Increasing large B-double passage through the townships of this unique city would be damaging the local tourism based economy and social amenity. If our World Heritage status was jeopardised it would have broad and far reaching implications for tourism in NSW and the Western Sydney economy.

B-doubles up to 25 metres and Performance Based Standard Vehicles up to 30 metres:

- There has been no study on the impact of opening the Great Western Highway to B-doubles up to 25 metres and Performance Based Standard Vehicles up to 30 metres on projected truck movement growth across the Blue Mountains. Further, there has been no study in relation to the movement of such freight by rail and the benefits and costs versus road freight.
- Any dramatic increase to freight on the Great Western Highway as a result of allowing large B-doubles (up to 25 metres and Performance Based Standard Vehicles up to 30 metres) to traverse the Mountains will have a number of negative impacts. According to the NRMA, the Great Western Highway between Katoomba and Lapstone is not suitable for B-doubles up to 25 metres and Performance Based Standard Vehicles up to 30 metres.
- The *NSW Central West Freight Study* notes the “Bells Line of Road Expressway: Improvements in efficiency of road haulage and connectivity to Sydney and export markets through the delivery of the Bells Line of Road Expressway is strongly supported.”
- The *NSW Central West Freight Study* also notes “Capacity Upgrades on the Country Regional Network: Increases in rail capacity through increased axle loads, improved signalling and/or additional track passing loops are supported.”

Great Western Highway between Katoomba and Lapstone

- Road safety for residents would be significantly decreased, (contrary to the RMS suggestions of the opposite), due to the fact that highway between Katoomba and Lapstone contains major traffic impediments to large trucks. There are school zones, reduced speed zones (60km), traffic lights, side streets and residential driveways along the corridor. The highway runs through the centres of Blaxland, Falconbridge, Hazelbrook, Lawson and Wentworth Falls. There are already major traffic issues around Wentworth Falls and Katoomba, especially during peak holiday

periods. These traffic conditions will only be exacerbated, not relieved, by a short-sighted plan to put further pressure on an already inadequate corridor

- There are no plans to upgrade the highway between Katoomba and Lapstone.

Environment

- The NSW Government has not addressed how the Great Western Highway Upgrade Program will help NSW meet its new and ambitious emissions reduction target of lowering greenhouse gases by 35% by 2030 given that in 2012/13 road transport accounted for around 85% of greenhouse gas emissions arising from transport within NSW
- The Great Western Highway Upgrade is proposed within a corridor prone to major bushfire risk
- We have grave concerns that major road works between Katoomba and Blackheath, and especially a tunnel, will have major negative impacts on the catchment areas supplying Greaves Creek, the Lake Medlow dams and the three Cascade dams which provide water to the middle and upper Blue Mountains

Safety

- The NSW Centre for Road Safety argues the installation of a safety camera at the intersections of Govetts Leap Road, Bundarra Street and the Great Western Highway is not justified. Further, the RMS is yet to complete the Blackheath to Mount Victoria safety upgrade and there is no evidence provided to date by RMS to state that this safety upgrade has been ineffective
- The accident rate on Victoria Pass and River Lett Hill has significantly reduced with no recorded fatalities or serious injury accidents occurring since the safety upgrade and speed cameras have been installed
- The RMS has not released any data to justify its claims that the Great Western Highway Upgrade Program is needed to address safety along the highway between Katoomba and Lithgow
- Contrary to its own safety data the RMS removed essential safety works on the highway through Medlow Bath from the Katoomba to Mount Victoria safety upgrade project; even though it claims it had the funds to complete such works
- Heavy trucks were the 'key vehicle' in 39 per cent of fatal crashes in 2015 to 2017 and 59 per cent of serious injury crashes from 2014/15 to 2016/17 (*NSW Freight and Ports Plan 2018*). Whilst the road toll has declined since 2009 there has been an increase in fatalities from crashes involving heavy vehicles since 2017

- In light of the above points, any claims by the NSW Government and the RMS that the Great Western Highway Upgrade Program is required to improve safety are contradictory and baseless

Amenity

- Any disruption and or negative impact brought about by the Great Western Highway Upgrade Program will result in broad and far reaching consequences for Blackheath and the entire Upper Blue Mountains. Everything from school enrolment numbers, the level of medical facilities, aged and disability support services, the general health and well-being of our community will be impacted

Specifically to the various areas in the Upper Blue Mountains that will be impacted, we reject the project on the following grounds:

Medlow Bath

We object to the plans for Medlow Bath on the following grounds:

- Medlow Bath is a small historic village whose roots go back to Edward Hargraves in the late 1800's, followed by Mark Foy's vision from the early 1900's. Given this history and the present nature of this small community, building a five lane highway through the middle of the town will destroy the essence of this village
- After Medlow Bath's iconic corridor of conifers were removed following the 2011 windstorm the Medlow Bath community worked tirelessly to have these replaced. The replacement Thuja Plicatas were paid for and planted by Blue Mountains City Council and will provide the residents with natural noise abatement. The removal of the trees and possible replacement by an artificial sound barrier will only add to the disfigurement of this village

Blackheath

We object to all options for Blackheath on the following grounds:

- The potential and very significant economic, social and environmental impacts. The local economy and community has been built upon tourism, the environment and Blackheath's unique location. This is reflected by the fact that The Blue Mountains National Park Heritage Centre is located in Blackheath
- The Blackheath economy is growing, school enrolments are increasing, and the average mean age is decreasing. These are all indicators that the community is prospering. This is contrary to all other towns and villages in the Blue Mountains
- The impact of constructing a 5 lane dual carriageway through Blackheath and the upper Blue Mountains to facilitate the movement of B-doubles up to 25 metres and

Performance Based Standard Vehicles up to 30 metres and ultimately increase the share of freight transported by truck across the Blue Mountains will create incongruity and dissonance with the surrounding natural environment to the point where the attraction will be lost to visitors and residents

- Acquisition of homes and heritage buildings for demolition will change the very fabric and nature of the township, and will result in a loss of homes in a community where housing is already limited. Many of the people displaced will be forced to leave our community entirely

We object to the four proposals put forward by the RMS:

Duplicating existing Highway through Blackheath

We object to an option to duplicate the existing highway through the centre of Blackheath on the following grounds:

- Major property impact and property acquisition along the highway corridor
- Potential loss of heritage properties in an important heritage corridor
- Blackheath is Australia's favourite cold climate tourist destination which is a major driver of the upper Blue Mountains economy including Medlow Bath, Megalong and Mount Victoria. The loss of significant streetscape along the highway and the loss of heritage parks, the removal of the village amenity by carving a 5 lane highway through the centre of town to facilitate B-doubles up to 25 metres and Performance Based Standard Vehicles up to 30 metres would destroy all this and have a massive impact on local real estate values as well
- Significant economic disruption to the local tourism economy and businesses located along the highway in Blackheath including the potential loss of up to 400 direct jobs and further loss of indirect jobs in the associated local tourism industry and several significant local businesses
- This option would result in the loss of major parking areas for the central business district
- This option will create serious social impacts to residents living in and businesses located in Western Blackheath by disconnecting them from the central business district and transport links, as well as potential social isolation, which would have broad and far reaching consequences
- The loss of the avenue of trees, parks and green space along the highway would also negatively and significantly impact on the existing groundwater recharge source

Outer Bypass

We object to an option to build an outer bypass via Centennial Glen on the following grounds:

- This option would decimate the thriving international climbing and adventure tourism industry based around Centennial Glen which would have major social and economic impacts to Blackheath and the upper Blue Mountains. Centennial Glen is a very popular climbing destination in the Blue Mountains and has been the training ground for some of the climbing elite for decades
- There are many historical paths and tracks which would be permanently damaged by this option
- Centennial Glen is an important area for volunteer activity in partnership with the Blue Mountains City Council
- As a council reserve it is unique and provides for multi-use spanning a number of tourism segments

This option will create major environmental impacts including:

- Hallmark of the Blue Mountains landscape and geology is sandy soils draining to hanging swamps. These hanging swamps are enormously ecologically important and contain endangered species of flora and fauna
- Tunnels will intercept, interrupt and permanently disrupt one or more significant aquifers and subterranean flows under Blackheath which would result in the loss of those hanging swamp ecosystems
- It is unreasonable to conclude that aquifers and subterranean flows within the World Heritage Area would be unaffected

Inner bypass option

We object to an option to build a bypass running next to the rail line (either at ground level or in a cut and cover tunnel) due to:

- Major property impact, surface and sub-surface, and property acquisition
- Potential loss of heritage properties in an important heritage precinct
- Significant economic disruption to businesses located on the western side of Blackheath including the potential loss of up to 70 jobs and several significant local businesses including Blackheath's only hardware shop
- Construction of 6 to 8 lane wide tunnel entrances (and portals) at either end of town

- This option will create serious social impacts to residents living in Western Blackheath by disconnecting them from the central business district and transport links as well as potential social isolation

This option will create major environmental impacts including:

- A hallmark of the Blue Mountains landscape and geology is sandy soils draining to hanging swamps. These hanging swamps are enormously ecologically important and contain endangered species of flora and fauna
- A tunnel will intercept, interrupt and permanently disrupt one or more significant aquifers and subterranean flows under Blackheath which would result in the loss of those hanging swamp ecosystem
- It is unreasonable to conclude that aquifers and subterranean flows within the World Heritage Area would be unaffected
- The existing railway corridor is a major groundwater recharge source

Long and Short Tunnels

We object to an option to build long or short tunnels under Blackheath due to:

- Major property impact, surface and sub-surface and property acquisition
- Construction of 6 to 8 lane wide tunnel entrances (and portals) at either end of town

This option will create major environmental impacts, including:

- The compromising and degradation of hanging swamps that are enormously ecologically important and contain endangered species of flora and fauna.
- A tunnel will intercept, interrupt and permanently disrupt one or more significant aquifers and subterranean flows under Blackheath which would result in the loss of those hanging swamp ecosystems
- It is unreasonable to conclude that aquifers and subterranean flows within the World Heritage Area would be unaffected
- The existing railway corridor is a major groundwater recharge source

Conclusion

The NSW Government needs to abandon the proposed Great Western Highway Upgrade and instead immediately adopt the recommendation of the *Review of Great Western Highway Upgrades West of Katoomba Independent Review January 2012*, i.e. **“comprehensive analysis is required that builds on the recommendations in the Central West Transport Needs Study and considers an integrated transport approach to freight and passenger movement between the Central West and the coast”**.

Only when such an analysis is completed in full consultation with the NSW Central West and, Blue Mountains, the freight industry and key stakeholders will the transport needs of the NSW Central West be finally resolved in terms of the movement of freight and passengers across the Great Dividing Range.

Finally the Great Western Highway Upgrade must be properly assessed and evaluated against the NSW Government’s priority to achieve three very important priorities it has set;

- 1) Its new and ambitious emissions reduction target of lowering greenhouse gases by 35% by 2030; and
- 2) Achieve a modal shift (reduce percentage of freight moved by road from 96% to 85%) and improve freight efficiency
- 3) Reduce the road toll and improve road safety

Therefore all the recommendations outlined in the NSW Central West Freight Study must be seriously considered in view of the above, especially given the massive cost and complexity of the Great Western Highway Upgrade Program and the potential damage this program will do to the Blue Mountains whilst not solving the strategic transport needs of the NSW Central West.