



# Blue Mountains Conservation Society Inc

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## Nature Conservation Saves for Tomorrow

To whom it may concern

### **Submission: Great Western Highway Upgrade: Blackheath and Medlow Bath**

The Blue Mountains Conservation Society (BMCS) is a community-based volunteer organisation with over 800 members. Its mission is to help conserve the natural environment of the Greater Blue Mountains, and to increase awareness of the natural environment in general.

The Blue Mountains Conservation Society (BMCS) does not support the proposed highway upgrade for Blackheath/Medlow Bath for a range of environmental reasons. This includes the two tunnel options currently being proposed for Blackheath

#### *Impacts of increased freight and road traffic across the Blue Mountains*

The Society recognises that the highway upgrade will not only impact the Blackheath and Medlow Bath communities but all communities across the Mountains due to increased traffic including larger and increased heavy truck movements. One explicit reason for the highway upgrade is to allow more freight via larger and heavier freight vehicles moving through the Blue Mountains to the central west.

This means for all Blue Mountains communities more highway noise, more and heavier vehicle traffic, more air pollution and less local amenity. The argument that the highway upgrade, by allowing modern, higher capacity vehicles will lead to a 15–20% reduction in articulated truck trips on the Highway between Katoomba and Lithgow is spurious. While the upgrade may result in less freight vehicles this can only be achieved if there is an increase in bigger, heavier, and noisier freight vehicles.

The reality is that the highway upgrade will result in more traffic – both in terms of cars and freight vehicles. Residential areas, schools, community facilities and some town centres across the Blue Mountains directly front the highway and all will be impacted from increased noise, congestion and pollution. While the Great

Western Highway is major inland route it should not be forgotten that for the residents of the Blue Mountains it is the road that fronts their houses, is adjacent to their schools and is a local road corridor for the villages.

International research has demonstrated time and time again that freeways and highway expansions only promote more traffic and carbon-polluting transport. This research also shows the time saved in terms of road trips immediately after significant highway upgrades is quickly lost through increased traffic.

The Society believes more creative responses to our freight and transportation needs are required now, not just the 'business as usual' model presented by the proposed highway upgrade. This includes increasing the capacity of moving freight on rail, and other innovative options.

### **Environmental impacts of the tunnel**

#### *Impacts on Water Catchments and Blue Mountains National Park*

The tunnel options will have a direct impact on the Blackheath Water Catchment Area and the Blue Mountains National Park. At least one tunnel option based on current designs will involve revocation of part of the Blue Mountains National Park as the land is required for associated road infrastructure. As the design options are still to be finalised further areas of either the national park or the catchment area maybe lost – this is unacceptable. National parks are gazetted for their conservation value not for road building.

Other impacts include runoff and stormwater impacting on water quality in the creeks within the national park and catchment area, increased noise disturbing wildlife, loss of visual amenity and pollution risks from traffic accidents especially from increased freight.

#### *Tunnel stacks*

Tunnels require stacks to remove pollution and exhaust build up in tunnels. Stacks in effect concentrate the release of pollutants at one point. Where stacks will be located, and the quality of the stacks in terms of the level of removals of pollutants and particulates, is a major concern.

#### *Movement of dangerous goods*

Some freight, including dangerous goods such as chemicals and petroleum products, cannot be transported through road tunnels. The Society understands this depends on tunnel design and length. If ultimately some or all dangerous goods cannot be transported on road freight through either tunnel option, Blackheath residents will face these goods being transported by freight transport along the existing road corridor through the town.

### *Impacts on groundwater and swamps*

To date no environmental assessment or hydrological mapping has occurred in relation to either tunnel option. This is major concern given the unique geology and groundwater ecosystems that occurs in the Blue Mountains, including the nationally endangered Blue Mountain Swamps.

Either tunnel option will result disturbance through the permeable layers of sandstone through which flows the groundwater that feeds our upper mountains swamps and creeks, and keeps waterfalls flowing.

No geological studies of the area or modelling of the impact of the tunnel options on groundwater flows have yet been provided. Even when geological and hydrological studies have been done in the past in relation to tunnelling, major damage to aquifers still happened.

A prime example of this was during the construction of the sewer tunnel from Mt Victoria to the Winmalee Waste Water Treatment Plant in the late 1990s/ early2000s.

Prior to drilling for the sewer tunnel in the upper mountains, Sydney Water geologists admitted to residents that they could not be sure of the location of aquifers until they were impacted by the tunnelling.

In January 2000 there were two incidents in the North Leura/ North Katoomba area investigated by the EPA. Torrents of water flowed from the boreholes being drilled on to the surface, leaving the rocklayer dry, resulting in swamps drying over the following years. The full extent of the damage may not become evident for 50 years or more. The sewage tunnel itself continues to drain groundwater away from the upper mountains to the Winmalee Treatment Plant.

In short we don't know what impacts either tunnel option will have on the waterways and swamps in the upper mountains – but experience to date suggests these impacts could be significant and long lasting.

### *Other environmental impacts*

Material provided as part of the community consultation states that environmental impacts for the Blackheath and Medlow Bath highway upgrades are yet to be assessed. The list of potential environmental impacts that will be assessed is extensive and includes:

- Air Quality
- Heritage
- Aboriginal Heritage
- Biodiversity
- Noise and Vibration
- Visual impact
- Traffic and access

- Soil and Water
- Flood and hydrology
- Ground Water
- Bush fire
- Waste
- Greenhouse gasses

Without any assessment of these potential environmental impacts, any of which could be significant, it is unreasonable to ask the community to choose between two tunnel options or make any informed comment on the proposed highway upgrade.

Thank you for the opportunity to make a submission.

Yours sincerely

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