



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

Ms Tara McCarthy
Deputy Secretary
Safety, Environment and Regulation
Transport for NSW
stakeholder.relations@transport.nsw.gov.au

5 September 2021

Dear Ms McCarthy

Submission – Great Western Highway Upgrade Program

The Blue Mountains Conservation Society (BMCS) is a community based volunteer organisation with over 900 members. The goal of the Society is to promote the conservation of the environment in the Greater Blue Mountains region. The Society would like to make a submission in relation to the Great Western Highway (GWH) Upgrade - Review of Environmental Factors (REF).

The Society has examined the REF for the proposed Stage 1, Medlow Bath Upgrade and does not support the proposed upgrade and REF for a range of environmental reasons.

Firstly, the Society believes that the works are likely to have a significant impact on the environment and hence, the REF should be replaced by an EIS in accordance with the EPA Act. An EIS of covering both this section and the entire proposed GWH upgrade between Katoomba and Blackheath is necessary to appropriately address significant and cumulative environmental impacts.

The GWH Upgrade is located in a buffer zone of the Greater Blue Mountains World Heritage Area and has the potential to impact on areas which are protected under Commonwealth Environmental law. The peat-swamps distributed adjacent to the GWH route are all part of the Commonwealth-listed *Temperate Highlands Peat Swamps on Sandstone (THPSS) Endangered Ecological Community* (EPBC Act 1999). The swamps provide recorded habitat for endangered groundwater-dependent species including the Giant Dragonfly (*Petalura gigantea*) and Blue Mountains Water Skink (*Eulamprus leuraensis*). Almost every stream and drainage line each side the GWH route between Katoomba and Mt Victoria has areas of THPSS in their

headwaters. Impacts of both the construction and the road use itself needs to be assessed in accordance with the heritage protection and endangered species framework prescribed in the *Environment Conservation and Biodiversity Act 1999* (EPBC Act).

The Society has a long history of advocating for the protection of groundwater and surface water systems which are fundamental to these groundwater-dependent, endangered peat-swamp ecosystems. The Stage 1 upgrade of the GWH through Medlow Bath township, increases the potential for stormwater pollution and increased water flows on downstream watercourses.

The key threatening processes of increased stormwater run-off and decreased water quality have not been adequately considered in the REF and we do not agree with the assessment of TNSW of a minor negative impact over the short and long term. Proper consideration must be given to stormwater management and the potential impacts on receiving environments, including watercourses and THPSS through a comprehensive EIS. High volume stormwater flows have the potential to cause erosion and channelization with significant impacts on endangered species. Hence stormwater retention and management basins must provide for the most extreme rainfall events.

In addition, the sandstone hydrogeology of the Blue Mountains is extremely complex and detailed hydrogeological studies must be required for any proposed sections of tunnel. There is evidence from the Blue Mountains of pipeline boring penetrating claystone aquitards and causing depressurization of unconfined surface aquifers, resulting in lowering of water tables in downstream groundwater-dependent peat-swamps.

It is therefore our view that a comprehensive EIS is required to address the cumulative environmental impacts of the GWH upgrade proposal in its entirety.

Thank you for the opportunity to make a submission on this issue.

Yours sincerely,



Tara Cameron
President