

Blue Mountains Conservation Society Inc



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Nature Conservation Saves for Tomorrow

Great Western Highway East
Katoomba to Blackheath Upgrade - REF Submission
P O Box 334
PARKES NSW 2870

19th June 2022

GWH East Upgrade: Katoomba to Blackheath REF

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission, the Society advocates for the protection of the Greater Blue Mountains World Heritage Area.

Piecemeal REFs are an inadequate approach to assessment

Between Katoomba and Blackheath the Great Western Highway adjoins or is close to the globally significant, World Heritage listed, Blue Mountains National Park. The work to upgrade the Highway is likely to have a significant impact on the environment immediately surrounding the works as well as on a broader scale, including on:

- surface and subsurface waters that flow into and through the National Park;
- the environment surrounding the towns of Blackheath and Medlow Bath;
- lands and waters adjacent to the whole construction area from Katoomba to Blackheath, including the Blue Mountains National Park, by reason of the use, movement and storage of construction equipment and spoil;
- visual pollution and insensitivity to the natural landscape.

The significance of the environmental impact of the tunnel on Blackheath has been rightly conceded by the Government's decision to prepare an EIS. The impact of the Katoomba – Blackheath upgrade, either side of Medlow Bath, which now includes twin bridges with decks up to 32 metres high, must also be appropriately assessed.

It is for these reasons that the Society believes that the Government should prepare an Environmental Impact Statement (EIS) for the upgrade of the Great Western Highway between Katoomba and Blackheath, instead of an REF, as it will provide a more comprehensive assessment of the true impact.

An EIS would:

- enable the true impact of the development to be taken into account in a systematic and integrated fashion, including the cumulative impacts;
- provide an analysis of feasible alternatives to the carrying out of the activity, including the consequences of not carrying out the activity;
- provide a detailed description of the aspects of the environment that are likely to be significantly affected, both immediately and more broadly; and
- provide a full description of the measures to mitigate adverse effects of the activity on the environment.

We therefore believe that an EIS should be adopted for this upgrade. The Society believes that an REF is not a reasonable approach and will fail to adequately assess the environmental impact.

An EIS would address key features of the surrounding environment that may be affected, including the World Heritage-listed Blue Mountains National Park, other conservation and culturally significant areas and should also explore ecologically sustainable development.

The Blue Mountains Conservation Society requests that the NSW government commit to an EIS for the Great Western Highway East Upgrade from Katoomba to Blackheath to provide the most comprehensive picture possible of the project's impact on the environment.

Ideally, we would like to see the Government commit to a single EIS for the whole upgrade from Katoomba to Little Hartley to ensure the impact of the whole project is assessed appropriately. A piecemeal approach will not provide a comprehensive understanding of the overall impact and long-term consequences to the environment that this upgrade will have.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Madi Maclean', with a stylized flourish at the end.

Madi Maclean
President

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