24 October 2012

The Hon Duncan Gay MLC
NSW Minister for Roads and Ports
Level 35
Governor Macquarie Tower
1 Farrar Place
SYDNEY NSW 2000

The Hon Anthony Albanese MP
Minister for Infrastructure and Transport
PO Box 6022
Parliament House
CANBERRA ACT 2600

Dear Ministers,

Submission

1 Concept design – proposed upgrade of Great Western Highway between Mt Victoria and Lithgow
2 $250 million Great Western Highway Upgrade Announcement 17 July 2012

We are writing to you in relation to the announcement by the Hon Duncan Gay MLC, NSW Minister for Roads and Ports on 17 July 2012 calling for public comment on the $250 million Great Western Highway revised investment package and the concept design for the proposed upgrade of the Great Western Highway between Mount Victoria and Lithgow.

The Blackheath Highway Action Group (‘BAG’) is a joint initiative of the Blackheath Area Neighbourhood Centre and the Blackheath & District Chamber of Commerce & Community. BAG has approximately 200 members and includes representatives from the Blackheath Area Neighbourhood Centre, Blackheath & District Chamber of Commerce, Blackheath Rhododendron Festival, the Blackheath Public School Council, the Blackheath Mt Victoria RSL
Sub-branch, the Blackheath Streetscape Group and Friends of Blackheath Pool and Memorial Park.

BAG was established in 2008 in response to the State and Federal Government announcement to upgrade the Great Western Highway between Mount Victoria and Lithgow.

Since established BAG has coordinated various submissions on Blue Mountains transport issues and has formed alliances with many groups across the region including the Hartley Highway Action Group, the Mount Victoria Highway Bypass Action Group, the Katoomba Chamber of Commerce and Community Inc., the Blue Mountains Commuters and Transport Users Association, the Blue Mountains Conservation Society, the Association of Concerned Mid Mountains Residents and the Bell Against the Highway Action Group.

BAG through its involvement in the Blue Mountains Commuters and Transport Users Association also participates in the Lachlan Regional Transport Forum, the NSW Commuter Council and the Western Sydney Public Transport Users group.

In November 2009 BAG, along with the Mount Victoria Highway Bypass Action Group and the Hartley Highway Action Group, collected more than 3,500 written submissions over a four-week period against the proposed upgrade of the Great Western Highway between Mount Victoria and Lithgow.

BAG has strong links to the Blue Mountains community and has been effective in campaigning on a number of transport issues including local highway safety issues.

1. Concept Design – proposed upgrade of Great Western Highway between Mt Victoria and Lithgow

BAG rejects the concept design for the proposed upgrade of the Great Western Highway between Mt Victoria and Lithgow on the following basis:

i) Proceeding with the concept design is contrary to the recommendations of the Evans and Peck Independent Review.

ii) The concept design does not take into account the findings of the Central West Transport Needs Study, particularly in relation to projected increases in traffic movements on the Great Western Highway in the lower Blue Mountains.

iii) The concept design is contrary to the recommendations of the NSW Long Term Transport Master Plan draft report.

iv) The concept design has been prepared and released for public comment before the Bells Line of Road Strategic Corridor Plan has been released.

v) Proceeding with the concept design is contrary to the recommendations of the Infrastructure NSW State Infrastructure Strategy released on 3 October 2012 in relation to road and rail movements from Western Sydney. The State Infrastructure Strategy also recommends that further investigation is needed and that such further investigations should include rail.
vi) The concept design does not address the estimated cost of the project, which we believe will be in the order of around $2 billion, making it one of the most expensive highway projects on a per kilometre basis in the history of New South Wales.

vii) The concept design does not acknowledge Government Policy preventing B-double trucks longer than 19m travelling along the highway through the Blue Mountains. We all agree that the Great Western Highway between Mount Boyce and Lapstone will not be suitable for high productivity vehicles (HPVs), i.e. b-double trucks longer than 19m and b-triple trucks. There is widespread public support across the Blue Mountains for the ban on b-double trucks longer than 19m to remain. Even the NRMA has publicly acknowledged that the Great Western Highway is not suitable for standard B-double trucks (25/26m b-double trucks). Therefore there is no point implementing a concept design for the construction of a motorway style $2 billion upgrade between Mount Victoria and Lithgow with grades of 5% when the purpose of the upgrade is to facilitate HPVs on the highway through the Blue Mountains.

viii) Proceeding with the concept design is contrary to the more than 3,500 public submissions made in November 2009, all which categorically reject the proposed upgrade.

ix) The concept design fails to consider the impacts on the future viability of the proposed upgrade:

   o the carbon tax,
   o the predicted future increases in fuel costs, and
   o economic, tax and regulatory factors and related issues.

x) The concept design fails to consider the Great Western Highway between Mt Boyce and Katoomba, particularly the significant physical, economic, environmental and social constraints and impediments of upgrading the highway through this route, especially on the village of Blackheath and near Explorers Tree.

xi) There are considerable physical, economic, social and environmental constraints that considerably limit the opportunity to widen the highway between Katoomba and Mt Boyce to the same standard as that of the concept design between Mt Victoria and Lithgow. The concept design should not focus solely on the study area in isolation. Any concept design for the upgrading of the highway between Mt Victoria and Lithgow must consider all aspects of the highway between Katoomba and Mt Boyce.

There has been no feasibility analysis or public consultation for upgrading the highway between Mt Boyce and Katoomba. Given the considerable investment required to construct the concept design (around $2 billion) surely such a feasibility analysis should first be completed. This analysis must consider the economic and social impacts of upgrading this section of the highway on the villages of Blackheath and Medlow Bath, which rely heavily on tourism to support their local economies. The Great Western Highway is not a motorway: for these villages it is the only access to essential services in Katoomba and beyond.

xii) The concept design is contrary to the principle set out in the draft NSW Long Term Transport Master Plan, that is, the implementation of bypasses for regional towns to reduce
heavy truck traffic through town centres. Based on priorities developed in consultation with the regions and based on defined criteria contained in the NSW Long Term Transport Masterplan draft report there should be no high productivity vehicle access along the Great Western Highway through the Blue Mountains. Yet the concept design does not address this and refers to plans for two high productivity vehicle rest areas in the design put forward.

xiii) The concept plan fails to recognise the impact of the proposed upgrade on the highway through the Blue Mountains between Katoomba and Lapstone. The Great Western Highway is the major transport link for the more than three million people who visit Echo Point each year. The ‘Three Sisters’ is one of the most internationally recognisable natural attractions in Australia, third in importance after Ayers Rock, and the Great Barrier Reef. Tourism is the backbone of the upper Blue Mountains economy. There are also major traffic constraints that exist on the highway between Katoomba and Lapstone including:

- 5 school zones.
- 22 sets of traffic lights with more planned.
- 18 different speed zones, not including school zones or road works zones.
- The highway passes directly through the centre of many Blue Mountains villages including Blaxland, Faulconbridge, Lawson and Wentworth Falls.
- Unaddressed traffic black spots along the highway, for example:
  - The Peninsula Road intersection at Valley Heights.
  - The Macquarie Road intersection at Springwood.
  - The Boland Avenue intersection at Springwood and related pedestrian crossing issues.
  - The Station Street intersection at Wentworth Falls.
  - The Falls Road intersection at Wentworth Falls.

Accordingly BAG calls on both the NSW and Federal Governments to reject the concept design and instead implement a long term sustainable rail/road transport plan that incorporates the recommendations of the Central West Transport Needs Study, the Evans and Peck Independent Review, the Bells Line of Road Strategic Corridor Plan, the Infrastructure NSW State Infrastructure Strategy October 2012 report and the NSW Long Term Transport Master Plan draft report.

Implementing a concept design that calls for spending of around $2 billion to upgrade the approximately 20 kilometres of highway to a motorway standard to facilitate HML/HPV is not economically feasible and is contrary to the recommendations of the Central West Transport Needs Study, the Infrastructure NSW State Infrastructure Strategy report and the Evans and Peck Independent Review. Further, developing and implementing a concept design that ignores the economic, social and environmental impacts on the Blue Mountains and the physical constraints of upgrading the highway between Katoomba and Mount Boyce is a waste of taxpayers’ money. It will also cause significant financial hardship for landowners within the concept design corridor.

The proposed upgrade of the highway between Mount Victoria and Lithgow must be viewed within the whole context of the Great Western Highway between Katoomba and Lithgow. Given the significant cost of the concept design and the planning flaws we have highlighted above, we believe the Mount Victoria to Lithgow highway upgrade project in its current form should be totally abandoned.
As you would agree, what is needed is a more long term approach to solving the transport needs of the Central West which includes better fast rail and road links to Sydney and better rail links to intermodal facilities in Sydney and the ports of Newcastle, Botany and Port Kembla.

BAG, in conjunction with other community and advocacy groups will continue to lobby Blue Mountains City Council and local members of parliament for the concept design for the proposed upgrade of the Great Western Highway between Mount Victoria and Lithgow to be abandoned.

2. **$250 million Great Western Highway revised investment package announced 17 July 2012**

We refer to the media release dated 17 July 2012 entitled ‘Public Comment sought on $250 million Great Western Highway upgrade’ issued by the Hon Duncan Gay, MLC, NSW Minister for Roads and Ports, and set out below for your attention our submission in relation to the $250 million revised investment package.

We warmly welcome Minister Gay’s announcement for highway safety upgrades between Katoomba and Mount Victoria. Safety is a critical issue for local residents and business owners who are located between Katoomba and Mt Boyce. BAG has, since it was established in 2008 and with the support of the Blackheath community, lobbied the RTA for safety improvements to the highway between Katoomba and Mt Boyce, particularly through Blackheath.

Since it was established in 2008 BAG, with the support of the Blackheath community, has lobbied the RTA for safety improvements to the Great Western Highway between Katoomba and Lithgow, and particularly through Blackheath. BAG believes the first priority for the Great Western Highway between Katoomba and Lithgow is to make it safer for local residents and the many tourists who visit the Blue Mountains, as well as others who use the Great Western Highway to travel further afield.

2.1 **Victoria Pass safety upgrade**

We refer to our previous correspondence with the Hon Duncan Gay, MLC, NSW Minister for Roads and Ports, in relation to the recently completed safety upgrade of Victoria Pass and again note our dissatisfaction with the quality of the works and the lack of action on areas of concern highlighted by the community at recent RMS public meetings held in Mt Victoria and Hartley.

We also refer to our letter to the Hon Duncan Gay, MLC, NSW Minister for Roads and Ports dated 26 July 2012 and once again raise with you the condition of the bottom corner of Victoria Pass following the completion of RMS works in 2011. In September 2011 Michael Paag, Chair of BAG, met with Roza Sage MP, Member for Blue Mountains and Paul Toole MP, Member for Bathurst along with representatives from RMS, including Chris Barnett and Peter Dearden at the bottom corner of Victoria Pass. At this meeting we raised a number of concerns relating to the RMS works on the bottom corner including:

i) Continuation of situations of water sheeting across all lanes on the western side of the bottom corner as a result of poor drainage, particularly from water trapped by the centre concrete barrier.
ii) Poor line marking, particularly the section where the two westbound lanes merge into one above the bottom corner.

iii) Poor visibility due to the poor sight lines for the merge referred to in point ii above. Visibility is particularly reduced for larger truck combinations trying to merge on this section.

iv) High incidence of speeding as witnessed by everyone in attendance at the September 2011 meeting.

v) The camber of the westbound lane on the bottom corner. The camber of the westbound lane tilts outwards away from the centre of the road, which we believe significantly increases the likelihood that a truck will roll over on the western side of the bottom corner.

At recent RMS convened public meetings at Mount Victoria several suggestions were put forward in relation to extending the concrete jersey barrier on the bottom corner so that it starts at a higher point on the highway (further east), i.e. where the two west bound two lanes merge into one. BAG supports these suggestions and requests the RMS investigate extending the concrete Jersey barrier as noted above.

We believe the above issues combined with excessive speed are significantly contributing to the continuing high accident rate on the bottom corner of Victoria Pass.

2.2 Blackheath Highway Safety Management Plan

The Blackheath community unanimously called on the NSW Roads and Traffic Authority (‘RTA’) at the public meeting held on 22 December 2008 to develop and implement in conjunction with the local community a Blackheath Highway Safety Management Plan. The idea of a Blackheath Highway Safety Management Plan was first raised by Councilor Terri Hamilton, Ward 1 Councilor, Blue Mountains City Council back in 2005. In September 2005 Blue Mountains City Council endorsed Councilor Hamilton’s motion calling on the RTA to develop and implement such a plan.

Representatives from BAG again called on the then RTA to develop and implement a Blackheath Highway Safety Management Plan at the RTA Community Consultation Meeting held on Wednesday 18 March 2009.

Representatives from BAG again raised the issue of the Blackheath Highway Safety Management Plan with representatives from the RTA at a meeting held on Thursday 16 April 2009. Michael Paag, Chair of BAG, also met with Diana Loges and Geoff Cahill on Friday 12 June 2009 to discuss the concept of a Blackheath Highway Safety Management Plan.

The Blackheath Highway Safety Management plan is an attempt by the local community to stop the ad hoc approach to dealing with highway safety and traffic issues through the town precinct. The community’s interrelationship with the highway has major significance for local business, tourism, the school and residents. Whilst we acknowledge that accident rates have historically been low through the town precinct there are issues that, if left unaddressed may result in higher accident rates and unnecessary community concern.
The basis of the Blackheath Highway Safety Management Plan is to take a ‘whole of town’ approach when addressing highway traffic and intersection management issues through the town precinct, i.e. from Evans Lookout Road to Mount Boyce. This is because of the unique geography of the town and the way businesses, tourists and residents move to and from the highway to access the town.

As was mentioned to James Surprain from the RTA on Saturday, 27 June 2009, there are high levels of community concern regarding the current difficulties westbound traffic experiences in accessing the town from the highway via both the Govetts Leap Road and the Hat Hill Road intersections.

There are also concerns about excessive speed through the town precinct, especially by large trucks.

Noise from compression braking of large trucks is negatively impacting on residents and tourist establishments all along the highway through Blackheath, but especially in and around the Hill 33 area.

Local residents are also concerned about the danger posed to traffic turning right from the highway into Prince George Street, and access to the highway from Abbott Street.

The Blackheath community wants to work constructively with RMS and Blue Mountains City Council to positively address these issues for the benefit of both local residents and highway users.

BAG calls on the RMS to begin work on the following projects as part of the development and implementation of a Blackheath Highway Safety Management Plan:

i) Installation of “No Standing” signs along the Great Western Highway adjacent to the Hat Hill Road intersection and improvements to road surface and shoulder to facilitate safer right turn access into Hat Hill Road from the Great Western Highway,

ii) Installation of speed cameras / safety cameras and speed calming measures in the town precinct to reduce incidence of excessive speeding and minimise risk in a high pedestrian zone,

iii) Improve right turn access into Govetts Leap Road from the Great Western Highway including the provision of a right turn green traffic signal,

iv) Safety modifications for Sutton Lane, Gardiner Crescent, Abbott Street and Prince George intersections with the Great Western Highway, and

v) Improve access to the Level Crossing for traffic turning right into the Level Crossing from the Great Western Highway, and take steps to stop traffic queuing across the railway tracks which impedes traffic flows in the Bundarra and Station Streets intersection.

vi) Reduce the current speed limit of 80km/hr to 60km/hr between north Blackheath and Mt Boyce RMS truck weigh station.
vii) Implement a No Right Turn at the intersection of Hargraves Street and the Great Western Highway.

The above suggested projects have come about as a result of consultation between BAG and its members, local residents and Blackheath based community organizations. These projects form the initial stage of a highway safety management plan which we envisage would be developed by the RMS, Blue Mountains City Council and the local community as a comprehensive short to long term strategy to deal with increased traffic flows along the highway and future growth in the Blackheath community.

2.3 Great Western Highway between Medlow Bath and Evans Lookout Road, Blackheath

Crash data obtained by the Blue Mountains Gazette from Transport for NSW show that there were 29 crashes on the highway at Medlow Bath between 2008 and 2011 which have caused significant injuries. There was also an accident resulting in a fatality in 2011.

Data collected by the Blue Mountains Gazette from NSW Police show there were at least five crashes causing injuries on the highway between Medlow Bath railway station and Evans Lookout Road between February 2012 and August 2012, all within a 1 kilometre stretch of the highway.

Accidents on the Great Western Highway between Medlow Bath railway station and Evans Lookout Road continue to cause major disruption to the local community and tourism because there are no alternative routes or vehicle access points between Medlow Bath and Blackheath.

Accordingly, we call on the RMS to attend to the following safety improvements as part of the $250 million Great Western Highway revised investment package announced on 17 July 2012:

i) Straighten the three sharp bends on the highway near Medlow Bath and improve the camber and alignment of the highway at this section.

ii) Improve signage, road surface and drainage.

iii) Realign the start of the two lanes on the highway east of Evans Lookout Road to improve driver certainty and extend this two lane section.

iv) Implement proactive speed control measures along the highway.

v) Implement electronic warning signs at Katoomba and Blackheath to alert motorists if there is a major incident on the highway between Katoomba and Blackheath.

vi) Examine the possibility of developing an alternative local road between Medlow Bath and Blackheath along the southern side of the railway line for emergency use only.

We also call on the RMS undertake public consultation with the local community in relation to the safety concerns we have raised in relation to the highway between Medlow Bath and Evans Lookout Road.
Please do not hesitate to contact me on (m) 0423 596 240 or by email, michelpaag@gmail.com if you require further explanations and or additional information in relation to this submission.

Yours sincerely,
Blackheath_highway Action Group

Michael Paag
President

cc. Office of Roza Sage MP, State Member for Blue Mountains
Office of Paul Toole MP, State Member for Bathurst
Office of Louise Markus MP, Federal Member for Macquarie
Mr Peter Dearden, Regional Manager, Western Region – Road Projects, RMS
Mt Victoria to Lithgow Alliance
Councillor Robert Stock, Ward 1 Councilor, Blue Mountains City Council
Councillor Michael Begg, Ward 1 Councilor, Blue Mountains City Council
Councillor Don McGregor, Ward 1 Councilor, Blue Mountains City Council
Mt Victoria Community Association
Barker College