

16 December, 2019

Mr Alistair Lunn
Director Western Region
Transport for NSW
Great Western Highway Upgrade Program
PO Box 2332
Orange NSW 2800

Email: gwhd@rms.nsw.gov.au

Dear Mr Lunn,

Great Western Highway Upgrade Program – Public Consultation

The National Trust of Australia (NSW) makes the following comments in response to the public strategic corridor consultation on the Great Western Highway Upgrade Program. The Trust understands that this includes the strategic corridor upgrade proposed between Katoomba and Mount Victoria and the corridor reserved in 2013 between Mount Victoria and Lithgow.

The Trust must initially lodge its strong objection to the minimal time frame (comments ending on 16 December) for public input on such a huge project with the potential to impact on people's lives and the unique heritage and environment of the Blue Mountains. The design of the Great Western Highway Upgrade Program strategic corridor map, effectively upside down, with south to the top of the map, made it very difficult to interpret the impacts of the various highway diversions. Major re-routings of the highway which appeared to be southwards were actually to the north and vice-versa.

Climate change is contributing to extended drought, more intense and frequent bushfires and smoke levels twelve times hazardous levels, as scientists have warned for decades. Now is not the time to be proposing major expressway expansions when alternate more friendly environment and climate options such as rail transport are available.

National Trust Register Listed Landscape Conservation Areas

In November 1986 the ***“Kanimbla and Megalong Valleys: Cox's River Landscape Conservation Area”*** was listed on the National Trust Register. The eastern and north-eastern boundaries of the Landscape Conservation Area follow the Great Western Highway from Katoomba to Mount Victoria.



Also in November 1986 the “**Hartley Valley (Cox’s River) Landscape Conservation Area**” was listed on the National Trust Register. This Landscape Conservation Area includes the Great Western Highway from Mount Victoria to South Bowenfels.

National Trust Register Listed Properties in proximity to the Great Western Highway Upgrade Options

South Bowenfels, 76 Mudgee Street – c1845 “Ben Avon”, former Royal Hotel and grounds

South Bowenfels, 3431 Great Western Highway – c1840s “Emoh formerly Emu Store”

South Bowenfels, 3431 Great Western Highway – “Stone Culvert and Retaining Wall”

South Bowenfels, 700 Forty Bends Road – c 1890 “Forty Bends, formerly Monte Vista”

South Bowenfels, 70 Mudgee Street – 1858 “Former Bowenfels National School”

South Bowenfels, 3584 Great Western Highway, 1835 “The Royal Hotel”

South Bowenfels, 34 Mudgee Street, c1840 “Somerset House”

South Bowenfels, 3449 Great Western Highway, c1850 “Umera, formerly Bownfels Inn”

South Bowenfels, 12 Mudgee Street, 1842 “Presbyterian Church”

Hartley, 3109 Great Western Highway, 1856-1858 “Fernhill and Outbuildings, formerly The Australian Arms Inn

Hartley, Great Western Highway, 1847 “Old Roman Catholic Cemetery” (Lot 7320 DP 1165385)

Hartley, Old Bathurst Road, 1846 “Former Royal Hotel” (Lots 13 & 14 DP 1186105)

Hartley, 1 Old Great Western Highway, 1858 “Anglican Church of St John the Evangelist”

Hartley, 45-47 Old Great Western Highway, “St Bernard’s Presbytery” (Lot 8 Sec 9 DP 758503)

Hartley, 45-47 Old Great Western Highway, “St Bernard’s Catholic Church”, (Lot 8 Sec 9 DP 758503)

Hartley, 44 Old Great Western Highway, 1837 “Former Courthouse”

Little Hartley, 5 Ambermere Drive, c1845 “Ambermere, formerly Rose Inn”

Little Hartley, 2366 Great Western Highway, “Meades Farm, former Kerosene Inn”



Little Hartley, 2272 Great Western Highway, 1831 “Billesdene Grange formerly The Royal Garter”

Little Hartley, 2187 Great Western Highway, 1839 “Rosedale formerly Victoria Inn”

Little Hartley, 2329 Great Western Highway, 1831 “Harp of Erin, formerly Sheepcombe”

The November 2019 Community Update sets out the various upgrade program options that are being investigated and considered: -

- Katoomba to Medlow Bath to include bridges between highpoints along the ridgeline.
- Medlow Bath to include widening the existing corridor within the current property boundaries through the township with a 60km/h speed limit.
- Medlow Bath to Blackheath options to include widening the existing corridor or running along the western side of the rail line.
- Blackheath options to include: widening the existing corridor; an outer bypass with bridges over Shipley Road, Centennial Pass and Porters Pass Track; a western bypass; or a long tunnel or short tunnel bypass (both beneath the town).
- Options that run around the eastern side of the Blackheath village have been ruled out due to impact on the World Heritage Areas of the Blue Mountains. Options that run directly through the Blue Mountains National Park have also been ruled out.
- Blackheath to Mount Victoria to include widening the existing corridor and changes to the Mount Boyce Heavy Vehicle Inspection Bay.
- Mount Victoria to the base of Victoria Pass to include a tunnel bypass beneath the village.
- Base of Victoria Pass to South Bowenfels to include a four lane divided road with a 100km/h speed limit.
- Jenolan Caves Road intersection to be grade separated.

The November 2019 Great Western Highway Upgrade Program Overview and Strategic Corridor Frequently Asked Questions document expands on the options for Blackheath: -

- An option to duplicate the existing highway through the centre of Blackheath, could see the likely partial or full property acquisitions of some residences, businesses and open space, and potential relocation of some Blackheath Station buildings.
- An option to build an outer bypass with bridges crossing over Shipley Road, Centennial Pass, Porters Pass Track, and over the rail line at the north. Tunnels would cross the rail line at the south and under the Mountains Christian College. There are likely impacts on the existing environment through the valley but the potential to create a scenic route for locals and visitors.



- An option to build a bypass running next to the rail line either at ground level or in a cut-and-cover tunnel would start at the southern end with a tunnel underpass of the rail line, and finishing with a bridge over the rail line at the north. There would be some impacts to residential and commercial properties located along the rail line. The tunnel option provides the possibility of reusing the surface above with open space or other community purposes.
- Options to build long or short tunnels underneath Blackheath would remove traffic from the centre of Blackheath, require tunnel portals (entry and exit points) with some property and environmental impacts. Both options would require subsurface acquisition. Both options would have ventilation stacks constructed at either portal end.

Greater Blue Mountains World Heritage Area and Blue Mountains National Park

The National Trust strongly supports the ruling out of options that run around the eastern side of the Blackheath Village due to impacts on the Greater Blue Mountains World Heritage Area.

The Trust also strongly supports the ruling out of options that run directly through the Blue Mountains National Park.

Medlow Bath

The Trust strongly supports the retention of the current 60km/hour speed limit through the township of Medlow Bath.

Trust Register listed properties in the vicinity of the proposed highway upgrade are: -

Medlow Bath, 52-88 Great Western Highway, 1891 “Hydro Majestic Hotel, former Belgravia Hotel”

Medlow Bath, Great Western Highway, 1902 Medlow Bath Station Group

Hartley Historic Site 1837 – 1850

The Great Western Highway Upgrade Web Portal “Have Your Say Map” of the route of the proposed new road (<https://v2.communityanalytics.com.au/rms/great-western-highway/have-your-say>) indicates that the proposed route passes through the State Heritage Register listed Hartley Historic Site. It appears to pass directly beside the northern wall of the Historic Site’s earliest building, the 1837 sandstone, Old Colonial Greek architectural style Courthouse, designed by Colonial Architect Mortimer Lewis.



The Great Western Highway Upgrade Program strategic corridor map also appears to indicate the presence of a bridge in the general area of the 1837 courthouse. (great-western-highway-upgrade-program-a3-map-nov-2019.pdf)

The National Trust must express its grave concerns at the impacts of the proposed roadworks (including the proposed bridge) on the 1837 Hartley Courthouse and the State Heritage Register listed Hartley Historic Site.

Blackheath Option - Outer Bypass with Bridges over Shipley Road, Centennial Pass & Porters Pass Track

The National Trust is deeply concerned at the Blackheath option involving an outer bypass with bridges over Shipley Road, Centennial Pass and Porters Pass Track. Centennial Glen is an important Blue Mountains Tourism Destination described as “a cool Glen with small waterfalls, ferns and impressive sandstone overhangs & provides excellent views of Kanimbla Valley.” (www.visitbluemountains.com.au)

Centennial Glen is listed as a Heritage Item on the Blue Mountains Local Environmental Plan 2015 (Item BH021).

The Blue Mountains 2016 Heritage Register Review details the history and significance of the Centennial Pass and Porters Pass Reserve Heritage Conservation Area: -

Local use of Porters Pass began by the mid 1880s, and the Porters Pass and Centennial Pass reserves were gazetted on 13 April 1888. Tourist walking track development began by the mid 1890s (first section of Centennial Glen track) and continued until the 1930s.

The name Porter's Pass applies to the pass up the cliffs on the northern end of the walk and its extension into the Kanimbla Valley. The discovery of this pass by Timothy Porter, a tinsmith, is described in considerable detail in notes from his grandchildren assembled by local historian A. J. Hillier. The exact date is variously described as the mid 1880s or 1888 (Yeaman p.90, 355). It is described as 'quite recently discovered' in the 1887 Blue Mountains Guide.

The Centennial Glen Reserve was gazetted on 13 April 1888 and was named for the centenary of settlement in NSW. Centennial Glen is listed as one of the sights of Blackheath in the Mountaineer newspaper of September 1894. A short one-way track into the Glen had probably been constructed by this time. The Lithgow Mercury of 18 January 1895 refers to signposting of the area. The map of Blackheath in the 1898/99 Mountaineer Guide shows a proposed extension of this track northwards through the Glen and then eastwards towards the railway station via Bundarra Street. This map showing the proposed track was reprinted in the Mountaineer newspaper of 24/6/1904. However the first map located which shows the track completed (as Centennial Pass) is the Government Tourist Bureau Map of Blackheath 1908. However



the name Centennial Pass is more properly used for the loop track to the west of Collier's Causeway.

The Centennial Pass and Porters Pass Reserves have historical significance at the local level as an example of a reserve complex that was continuously developed by local trustees with walking tracks and lookouts to maximise their scenic and tourist potential over a period of some 50 years from the 1880s.

The Centennial Pass and Porters Pass Reserves have local significance for their association with the early Blackheath residents Timothy Porter, James Wall and Henry Collier. The design of the walking track network sensitively integrates natural and constructed features in a harmonious manner giving the reserves' developed features aesthetic values at the local level.

The reserves are well used by Blackheath residents. Since the improved maintenance of the last decade tourist visitation has increased. The reserves include some of the most popular sports climbing areas in New South Wales. The reserves have social significance at the local level.

Blackheath Option – Duplication of the existing highway through the centre of Blackheath

The Frequently Asked Questions November 2019 document ([great-western-highway-upgrade-program-overview-and-strategic-corridor-faq-nov-2019.pdf](#)) notes that “An option to duplicate the existing highway through the centre of Blackheath, could see the likely partial or full property acquisitions of some residences, businesses, open space, and potential relocation of some Blackheath Station buildings.”

This option has the potential to dramatically degrade the historic streetscape of the current Great Western Highway route through the township of Blackheath.

A number of National Trust Register listed properties are potentially at risk of severe adverse impacts from this option and they include: -

“The Gardens” at 267-269 Great Western Highway, listed on the National Trust Register in June, 1997. The Gardens are of historical significance as an example of the importance of parklands and places for public recreation dating from 1885. The Memorial Arch is an effective and powerful reminder of World War I and the impact this event had upon the local community. It is of aesthetic significance as it is situated in close proximity to the village centre and important community facilities such as the School of Arts and Library. The Gardens with the four distinct paths meeting at the centre and deciduous tree plantings demonstrate a high degree of design and formality. The imposing Memorial Arch fronting The Gardens is a strong local landmark.



“Nalawa” at 289-290 Great Western Highway, listed on the National Trust Register in September, 2002. Nalawa, built in 1915 for William and Sarah Tilly, is of state significance. A fine example of a late Federation bungalow, the house is important not just as an intact bungalow retaining most of its original finishings and fittings, but also in retaining virtually all of the features of its service spaces and outbuildings. The laundry block is one of few such surviving buildings, which has not lost its fine porcelain tubs and cupboards. Among other important details of the buildings which have not been lost over time are the well under the kitchen floor, bell system, original terrazzo flooring, flyscreens, leadlight glazing, urinal, tiling and bulb store. The house is also important for its garden setting, the structure of which remains intact. The fine screen walls with their latticework and pedimented gateways are of interest. The significance of the garden is reinforced by having been established by William Tilley, a foundation member of the Blackheath Horticultural Society.

“Headstones from Old Blackheath Military Cemetery”, 331 Great Western Highway, listed on the National Trust Register in March, 1981. The Headstones are significant as the only remains of Blackheath Military Cemetery established by the Commander of Blackheath Stockade, Captain J.E.N. Bull. The present setting of the gravestones is particularly evocative of the pioneer bush clearings that were the beginnings of early settlement along the Great Western Road. A small child’s grave with no discernible inscription is also a particularly poignant reminder of the rugged and difficult life of early Western settlement. The earliest gravestone of John Carol dates from 1845.

“Gwandoban”, 24 Lookout Street, listed on the National Trust Register in September, 2000. Gwandoban is of aesthetic significance as a fine, intact, representative example of a large holiday home in the Blue Mountains built in the Federation bungalow style. It has high quality internal and external detailing and takes advantage of a northeast aspect and substantial views over the Megalong Valley. Much of the original fixtures and fittings, including kitchen cupboards, built-in wardrobes and pressed metal ceilings, survive. Gwandoban has historic significance for its association with Joseph Stimson who was a onetime president of the Conference of the Church of Christ and a wealthy Sydney estate agent who built the house and owned it until his death in the 1930s. The house is also associated with Group 24, a prominent artists’ studio in the Blue Mountains led by John Ellison who lived in the house during the 1980s. Gwandoban has technical significance for its use of an unusual form of construction with cement render either side of expanded steel lathe spanning between timber studwork, giving the appearance of rendered masonry.

Blue Mountains City Council has 24 places along the Great Western Highway at Blackheath listed as Items of Environmental Heritage on the Blue Mountains Local Environmental Plan 2015.



There are also a number of Heritage Conservation Areas listed on the Blue Mountains Local Environmental Plan 2015 which may be impacted by the various road proposal options including: -

Blackheath Village and Setting (BH 212)

Blackheath West (BH 214)

Lookout Hill (BH 215)

Blackheath Option – Tunnelling

While tunnelling may appear a more attractive option in terms of minimising impact on the Blackheath Township and its adjoining bushland, there would be concerns about the location of the entry/exit portals and the siting of ventilation stacks.

The Trust would argue that the upgrading of the rail line for additional freight and passengers may be a far more acceptable option with much less environmental and heritage impact.

Conclusion

The National Trust strongly urges Transport NSW to carefully consider the Great Western Highway Upgrade Program, responding to the high level of community concern, the impacts on the Blue Mountains heritage and environment raised by the National Trust and the broader and urgent imperative of dealing effectively with the growing impacts of Climate Change.

Yours sincerely,

Graham Quint
Director, Conservation