

31 January 2022

Director  
Great Western Highway Upgrade Program  
PO Box 334  
Parkes NSW 2870

By email: [gwhd@transport.nsw.gov.au](mailto:gwhd@transport.nsw.gov.au)

Dear Transport NSW,

**Re: Submission on the Great Western Highway (West) Upgrade REF**

Thank you for the opportunity to make a submission on the Review of Environmental Factors (REF) for the Great Western Highway (West) Upgrade. The REF contains a complex suite of documents, including 17 supporting technical studies and we are grateful for Transport NSW extending our submission deadline until the 31<sup>st</sup> January 2022. We would also like to thank Transport NSW for taking the time to provide the National Trust with a project briefing.

**Hartley Valley's Heritage Value**

The Hartley Valley, 125 kilometres west of Sydney, is a cultural landscape with remarkable natural, built and indigenous heritage value. The National Trust of Australia (NSW) recognised these values 35 years ago and listed the Hartley Valley Landscape Conservation Area on the National Trust Register.

Hartley Valley Landscape Conservation Area is a significant and important cultural landscape. The National Trust's listing notes, amongst other things, its patterns of early settlement, the historic early mountain passes which provide access down the stunning escarpment and the existence of a range of rare and endangered flora and fauna in the Valley.

The Hartley Valley's nomination to the National Heritage List extolls its attributes as a cultural landscape, stating:

*The Hartley Valley is topographically defined and visually spectacular. It is historically and culturally distinct, as it marks the place, the manner and the moment of inland expansion and in this sense occupies a unique place in the history of Australia... It has maintained exceptional continuity in patterns of life and industry, and as a result has a cultural landscape of integrity and authenticity, enriched with a large number of places of exceptional heritage value from first settlement until now.<sup>1</sup>*

The Trust is deeply concerned that although the REF and its related Technical Studies refer to the numerous heritage listings and reports that have previously been prepared for the place, these heritage assessments do not refer to the Trust's listing of the Hartley Valley landscape. The Trust responded to a request from the technical study consultants on the 15 June 2021 and supplied an excel of sites listed by the Trust in the vicinity of the project (which included the Hartley Valley Landscape Conservation Area) and also supplied

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<sup>1</sup> Australian Heritage Database. *Hartley Valley, Great Western Hwy, Hartley, NSW, Australia*. Accessed 30/12/20201 via [https://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place\\_detail;search=place\\_name%3Dhartley%2520valley%3Bkeyword\\_PD%3Don%3Bkeyword\\_SS%3Don%3Bkeyword\\_PH%3Don%3Blatitude\\_1dir%3DS%3Blongitude\\_1dir%3DE%3Blongitude\\_2dir%3DE%3Blatitude\\_2dir%3DS%3Bin\\_region%3Dpart;place\\_id=106092](https://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;search=place_name%3Dhartley%2520valley%3Bkeyword_PD%3Don%3Bkeyword_SS%3Don%3Bkeyword_PH%3Don%3Blatitude_1dir%3DS%3Blongitude_1dir%3DE%3Blongitude_2dir%3DE%3Blatitude_2dir%3DS%3Bin_region%3Dpart;place_id=106092)



the consultants with a copy of the listing card for the Hartley Valley Landscape Conservation Area. These are not acknowledged in the technical studies, and importantly the technical studies do acknowledge the heritage significance of the Hartley Valley as outlined on the listing card, which appears to have contributed greatly to certain design aspects of the actual proposal.

### ***Inadequate Heritage Consideration***

Cultural landscapes are more than the sum of their parts - each element combines to create the highly significant cultural landscape. The Urban Design Report notes this when it states (p.25) that cultural and scenic values define the experience of the drive along this section of the Great Western Highway:

*"a number of factors... combine to give the road a unique character and therefore represent a set of values associated with the journey..."*

*The majority of the study area lies within the highly picturesque Hartley Valley. Bordered by dramatic sandstone escarpments to the north and east, and undulating hills to the west, the valley has a distinctive form and cultural identity that is highly valued by both residents and visitors."*

The National Trust accept that road safety upgrades do need to be made, and that this project has many key deliverables which it seeks to satisfy. The way in which these outcomes are achieved however, will have a significant impact upon the unique cultural and scenic values of this very precious landscape. The Urban Design and LCVA Report (p.25) prepared for the REF notes this and provides a sensible recommendation:

*"Careful consideration must be given to the relationship between the form and character of the proposed highway, its associated structures and earthworks, and the form and character of the existing landscape. As the highway would be visible from the numerous lookouts along the escarpments overlooking the valley, **it is important that the overall highway upgrade is designed to 'fit' visually with the surrounding landscape character** (National Trust emphasis).*

The National Trust is concerned that the following elements will have an unacceptable impact on the identified landscape character of the landscape:

- The substantial increase in road corridor width adjacent to the Hartley Historic Village from 18m wide to 57m wide. This important heritage site is of such a small scale that these works in this particular location would appear to overwhelm it.
- The Visual Impact Assessment does not include an assessment of the Heavy Vehicle Rest Areas
- Two SHR listed heritage items are impacted by the proposal and that both Fernhill and Hartley Historic Site "may be susceptible to vibration impacts during construction" (non-Aboriginal heritage working paper, p.122)
- Within the study area there are 31 local heritage items, 28 of which would be impacted by the proposal through either direct (physical), indirect (visual), indirect (vibration) or archaeological impacts. Of these, there would be a major impact to the heritage significance to five items, a moderate impact to one item, a minor impact to eight items and a negligible impact to 14. (non-Aboriginal heritage working paper, p.122)

A major concern that the Trust has is that the proposal, in the way it has been presented in numerous individual plans and illustrations, has suffered from a lack of cohesive analysis. The individual projects must be viewed collectively to understand its impact. The non-Aboriginal heritage working paper notes the effect of this impact when it states (p.21) that *"cumulative impacts occur when impacts from the proposal interact or overlap with impacts from other proposals in the area, potentially creating a larger or longer-term impact than the individual proposal in isolation... Cumulative impacts may also occur when proposals are constructed consecutively, resulting in construction fatigue in local communities."*

The Trust see this as a key weakness in the heritage analysis however, where five study areas have been assessed separately, with over 30 statements of heritage impact.



Despite the listed cultural landscape significance of Hartley Valley, the REF's heritage technical studies do not, in our view, adequately assess the significance of the cultural landscape nor the overall, cumulative impact of the project.

The Indigenous Heritage Assessment also notes that Aboriginal community members have stated the entire area within the project is significant to Aboriginal people:

*The Country of the Blue Mountains that the GWH travels through is an incredibly rich cultural landscape. Throughout this Country there are myriad places of cultural value and meaning including contemporary, historical, and traditional living places, trading places, rich resource areas, ceremonial places, women's and men's business sites, and a complex network of movement routes linking them all together.*

*The living importance of this Country to the Gundungurra, Wiradjuri, and Darug people is clear in the consultation section of this report.*

It further states that:

*The sites themselves, whilst being expected site types found within the project area ... are of increased significance due to their rarity in an increasingly developed environment. Therefore, the regional Aboriginal cultural heritage values across the project would be reduced significantly by the cumulative impacts from the project if serious harm such as complete loss of a site was to occur.*

However, the Technical Studies once again only assess the impact on individual sites not on the overall landscape; despite many of the sites being directly impacted by the project.

Transport for NSW's *Guideline for Landscape Character and Visual Impact Assessments* (2020, Section 5.1) outlines the method for understanding and analysing existing landscape character and its sensitivity. The guideline recommends that:

*The analysis should be descriptive, illustrative and capture the qualities of the place, what makes it valued and what are the particular challenges which emerge in relation to the needs of the project. The analysis should cover... the Aboriginal and non-Aboriginal heritage and cultural qualities of the area whether they are formally designated in planning documents, including the presence of individual items and broader conservation areas or instead aren't listed but reflect local traditions around community, cultural practice, stories, prior occupancy and significant events.*

The REF's *Urban Design, Landscape Character and Visual Impact Assessment* fails to identify and assess the impact of a key element of the proposal on the cultural landscape when it fails to include a visual impact assessment of the Heavy Vehicle Rest Areas.

It is imperative that any REF assesses the full impact of the proposal on the integrity and significance of the entire cultural landscape of Hartley Valley Cultural Landscape and other landscapes that the project will impact, both Aboriginal and non-Aboriginal.

### **Heritage Impact of the Project**

The REF confirms the significance of the Valley as a heritage place, noting the existence of 50 European heritage sites along the fourteen kilometre corridor and 19 indigenous sites, including an important possum skin processing site and a significant fire hearth.

The proposal for a fourteen kilometre Hartley Valley motorway upgrade includes five bridges and overpasses in one six kilometre stretch, two rest areas in the valley each capable of accommodating thirteen or more B Double trucks and a similar number of other vehicles, and is likely to cost close to a billion dollars. All of this work will result in a two minute saving in travel time.

**The proposed upgrade will have a major impact on individual sites and species of significance, well as impacting the integrity and value of the overall Hartley Valley cultural landscape.**



The National Trust remain concerned that the proposed project has potential to adversely impact the significance of many heritage places, including the Hartley Valley Landscape Conservation Area (a cultural landscape with remarkable natural, built and indigenous heritage value recognised by the National Trust 35 years ago and listed on our National Trust Register) and the Hartley Historic Site.

The National Trust consider that there are alternative options available that can reduce the heritage impact of this proposal and these should be explored.

Yours faithfully,

Jane Alexander  
**Manager - advocacy**