

Camden Residents' Action Group

Incorporated
Camden – Still a Country Town

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Warragamba Dam Assessment Team

Planning and Assessment

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19 December 2021

Dear Warragamba Assessment Team,

Submission – Warragamba Dam Raising Project – SSI-8441 –
Camden Residents' Action Group Inc, Camden NSW

According to the EIS the objective of the project of raising Warragamba Dam wall is to reduce risk to life and property damage downstream in the Hawkesbury-Nepean valley (the Valley). It is a costly project funded by Taxpayers

As not all flood waters come from the Warragamba catchment, the project can, at best, only mitigate downstream flood risks, and this at the expense of upstream impacts.

As explained below we object to the project for the following reasons because it

- *does not factor in the effects of climate change*
- *has unacceptable upstream impacts*
- *does not address population management of the floodplain now or into the future*

Project does not factor in the effects of climate change

Given climate change and the unpredictability of the number and severity of extreme weather events, trusting that raising the dam wall will largely mitigate risk to life and property is wishful thinking and foolhardy. As stated by the Committee for Sydney's urban policy think tank¹: *There is one problem with this strategy: in a major rain event, the higher dam wall will still not be nearly enough to protect the flood plain. It will only work for smaller amounts of rain.*

The Warragamba catchment is not the only source of flooding. Whilst raising the dam wall may delay the flood peak, captured water would still spill to join water from other tributary sources and constrict the ability of the Hawkesbury River to drain the Valley. This bathtub effect means there is little chance for the water to escape and the maximum height of the flood waters is not necessarily reduced. Raising the wall may help in times of less extreme rainfall, but in the volatile climate we are faced with, cannot be relied upon to protect people and property.

Project has unacceptable upstream impacts

Raising the height of the wall would force waters further into the upstream Burratorang Valley area which also connects with the UNESCO Blue Mountains World Heritage Area and largely comprises native bushland. Wollondilly Shire Council and Blue Mountains Council, who best understand their areas, condemn the impacts as unacceptable.

In particular raising the dam wall will flood:

- wild rivers, including lower sections of Kowmung River, a NSW state declared Wild River with pristine ecological values;
- 1,200 sites of immense cultural, national and historical significance in the Burratorang Valley, such as indigenous cave art, occupation and burial sites, and the overall impact on the remaining Indigenous history of the Gundungurra people;
- 6,000 hectares of the World Heritage-listed Blue Mountains National Parks, and further endanger already threatened species like the Regent Honeyeater and the Camden White Gum.

¹Committee of Sydney 1 June 2021 *Warragamba Dam: To raise or not to raise... That is the question, or is it?* Available at <https://sydney.org.au/wp-content/uploads/2021/11/Committee-for-Sydney-Warragamba-Dam-To-Raise-or-Not-June-2021.pdf>

There are major impacts on the Blue Mountains World Heritage Area. UNESCO² (2019) having already urged Australia to ensure that the impacts are rigorously assessed, considers that the upstream inundation resulting from the raising of the dam wall is incompatible with its World Heritage status and is likely to adversely impact its Outstanding Universal Value.

The Federal Government requested, because about 70% of the predicted temporary inundation area was burnt in the black summer fires of 2019-2020, that Water NSW undertake an analysis of the impacts to be included in the EIS.

UNESCO³ (2021) in declaring the black summer fires of utmost concern states

The World Heritage Centre and IUCN continue to receive third-party information raising concerns about the rigor of the EIS process. It is therefore recommended that the Committee reiterate its request to the State Party to ensure, in line with its previous commitments, that the current process to prepare the EIS fully assesses all potential impacts on the OUV of the property and its other values, including Aboriginal cultural heritage. Given the significant impact of the 2019-2020 bushfires on the property, it will be also particularly important to undertake a thorough further assessment of how potential impacts of the raising of the Wall could exacerbate fire impacts, given that 70% of the predicted temporary inundation area is reported to have burnt. Such an assessment should also consider medium and longer-term recovery prospects of key species and habitats within those areas.

It is our understanding that the biodiversity section of the EIS was prepared before the 2019/2020 black summer fires. Therefore, their impact on endangered species in the upstream areas is not accounted for in the EIS. The EIS does not assess the full potential impact of raising the dam wall and flooding of their habitats. For instance, the vulnerable species of greater gliders was badly affected by the fires.

The destruction of culturally significant Aboriginal sites raises concerns about the level of engagement with First Nations, who in early 2018 established a panel of 22 Registered Aboriginal Parties on the project to participate in field surveys and provide comment⁴. The Federal Government in response to consistent complaints by traditional owners that they have not been properly included in cultural heritage surveys has told the New South Wales Government that the Indigenous heritage work needs to be redone⁵

² UNESCO 2019 Decision: 43 COM 7B.2 Greater Blue Mountains Area (Australia) (N 917) Available at <https://whc.unesco.org/en/decisions/7430/>

³ UNESCO 2021 Conservation issues presented to the World Heritage Committee in 2021 Available at <https://whc.unesco.org/en/soc/4174>

⁴ Rachel Knowles 30 October 2020 Raising of Warragamba Dam to destroy over 1,200 cultural sites National Indigenous Times Available at <https://nit.com.au/raising-of-warragamba-dam-to-destroy-over-1200-cultural-sites/>

⁵ Kathleen Calderwood 12 Sep 2020 Plans to raise Warragamba Dam wall could see flood destroy Indigenous artefacts, leaked document says ABC News Available at <https://www.abc.net.au/news/2020-09-12/report-slams-waragamba-dam-raised-wall-plans-indigenous-heritage/12656878>

Project does not address population management of the floodplain now or into the future

The population of the Valley is planned to increase, with Infrastructure NSW⁶ (p. 19) stating *The Hawkesbury-Nepean Valley is changing from a semi-rural landscape to an urbanised floodplain, and includes parts of Greater Sydney's rapidly growing North West Growth sector. Up to 134,000 people live and work on the floodplain and could require evacuation. This number is forecast to double over the next 30 years. Over 25,000 residential properties and two million square metres of commercial space are currently subject to flood risk, and this will significantly increase in the coming years.*

This urbanisation of the floodplain is contrary to the project's objective of minimising risk. It places more people in harm's way whilst benefiting property developers who make short term profits as the expense of the long-term welfare of residents. The geography of the Valley and the river system of tributaries means that attempts to control the Warragamba catchment cannot necessarily control the risk to people and property.

Means of mitigating the flood risk for the current population of the floodplain could include releasing water from the dam, when necessary, without raising the wall, if another source of water for Sydney, such as a desalination plant, was established.

Salient lessons should be evident from Queensland's flooding in 2011 with over 200,000 people affected including 35 deaths and an economic cost to the nation of billions. Legal action was launched (and won) on behalf of thousands of flood victims for compensation from the Queensland Government, SunWater and the dam operator Seqwater.

Infrastructure NSW (p. 3) further states that the flood risk is currently heightened by:

- insufficient road capacity to safely evacuate the whole population in a timely fashion;
- a fragmented approach to managing flood risk;
- low community awareness about the flood risk.

An increase in population on the floodplain can only exacerbate these problems.

⁶ Infrastructure NSW *Resilient Valley, Resilient Communities Hawkesbury-Nepean Valley Flood Risk Management Strategy January 2017* Available at https://www.infrastructure.nsw.gov.au/media/1534/insw_hnvfloodstrategy__1_v2.pdf

In summary, we object to the project because:

- **second guessing the future climate is fraught with uncertainty and cannot be factored reasonably into any potential benefits of the project;**
- **the upstream impacts are not adequately researched and assessed, but are by all accounts of experts including the indigenous community, very severe and will result in irreplaceable loss;**
- **people and property on the floodplain will still be subject to flood risk. The objective of the proposal is not satisfied.**

According to the Wollondilly state Minister⁷, who has recently come out against his own government's project, WaterNSW has conceded damage to this pristine area will occur and monetary offsets of up to \$2 billion will be likely necessary. The MP further stated that much of what will be lost is irreplaceable and priceless and that there appears to be minimal benefit for the project's \$1.6 billion construction cost.

The Insurance Council of Australia⁸ also recently stated that the public money spent raising the wall would be better used buying back flood-prone land that never should have been developed in the first place and that settlement in the Hawkesbury-Nepean Valley was the country's biggest example of historically poor planning decisions, with tens of thousands of people living on one of Australia's most effective flood plains.

A parliamentary inquiry in June 2021 was told that the cost of buying back homes in the one-in-100 flood level would cost more than \$4.5 billion, which is within the order of magnitude of the \$3.6 billion that has been estimated for the cost of the project and monetary offsets for damage to upstream areas.

A cost benefit analysis of this project is very unlikely to show any net benefit. The losses to the environment and indigenous heritage cannot be properly monetised and are simply too great.

⁷ Jess Layt 6 December 2021 *Wollondilly MP Nat Smith against raising of Warragamba Dam wall* Camden Advertiser Available at <https://www.camdenadvertiser.com.au/story/7540415/wollondilly-mp-nat-smith-against-raising-of-warragamba-dam-wall/>

⁸ Angus Thomson 21 October 2021 *'False comfort': Buy-backs call sparks government spat with insurers over Warragamba* Sydney Morning Herald Available at <https://www.smh.com.au/environment/conservation/false-comfort-insurers-call-for-land-buybacks-instead-of-raising-warragamba-dam-wall-20211020-p5911d.html>

This project is compounding the planning mistakes of the past. The appropriate approach is to redress them.

A more logical and responsible approach is to concentrate on direct ways of managing risk to life and property in the Valley by:

- **acquiring existing flood affected properties;**
- **providing sufficient road capacity for evacuation;**
- **providing education and requiring plans to minimise risk;**
- **ceasing housing development on the floodplain.**

This approach is superior because it reduces risk to life and property, reduces the long-term costs to the economy and eliminates the upstream impacts.

We consider that this project is ill-conceived and not in the public interest. The full social, environmental and economic impacts of raising the wall have not been appropriately researched and assessed.

Our group submits that these impacts are clearly unacceptable and that the project should not proceed.

Yours sincerely,



Glenda Davis
President