

# **SUBMISSION INTO THE SECOND (2022) EIS BY THE NSW DEPARTMENT OF PLANNING, INDUSTRY AND THE ENVIRONMENT ON THE PROPOSED RAISING OF THE WARRAGAMBA DAM WALL**

Janette Ardill  
19 Albert Rd  
Hazelbrook 2779  
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(ardillann@gmail.com)

## **INTRODUCTION**

My name is Jan (Janette) Ardill and I am submitting this response to the NSW Government Plan and Second Environmental Impact Statement (Department of Planning, Industry and Environment) for the raising of the wall of Warragamba Dam for the stated purpose of mitigating flood events in the Hawkesbury-Nepean River Valley of western Sydney.

I sent a previous submission to the first EIS of 2021 stating in detail the reasons for my objection to the proposed Dam Wall Raising. Apparently the 2500 submissions received by the NSW Coalition government in 2021 were not sufficient to make any difference to the government's proposal.

Nevertheless my reasons for objecting remain the same, as well as my belief that this proposal is one that brings shame to us all in the eyes of the world.

## **Why do I object to this Proposal?**

### **World Heritage:**

The area to be flooded is part of the **Greater Blue Mountains World Heritage Area**, which is protected by the **UNESCO World Heritage Convention**. This is an agreement whereby the various levels of Australian governments and local populations undertake, to the best of their ability, to protect and enhance the natural and cultural heritage contained within the area set aside for the benefit and enjoyment of the earth's population.

The proposed dam wall raising will obliterate (by flooding):

- 5700 hectares of important natural habitat which is part of the Greater Blue Mountains World Heritage Area and contains endangered plants, trees and native Australian wildlife, including the Regent Honeyeater, the White Camden gum, which will become extinct in the wild, and the local Emu population.

- Over 1500 Indigenous heritage sites, which are to be found in ancient camping and cultural areas alongside the banks of the Cox's and wild Kowmung rivers and in the area to be flooded. These are also recognised as an important part of the World Heritage Area.
- 65 kilometres of wild rivers, particularly the Wild Kowmung River and its junction with the Cox's River. The Kowmung is the last wild river remaining within the vicinity of the city of Sydney.

### **The EIS has many problems:**

This proposal by the NSW state Government signifies its great lack of respect for the **indigenous people** of our state and their culture. The EIS has ignored the concerns of the Gundungurra and Dharug tribal elders who live in the Wollondilli and Blue Mountains Local Government areas.

The EIS makes no mention of the value of **Australian native habitat**, makes no mention of the losses to biodiversity during the bushfires of 2019-20, and makes no mention of the role of climate change and need to maintain native habitat "carbon sinks."

Included in these areas to be flooded are habitat for **endangered wildlife** such as breeding habitat for the critically endangered Regent Honeyeater. The restricted range of the Camden White Gum is also to be flooded, thus causing it to become extinct in the wild. This tree was already caused to be endangered in the first place by the construction of Warragamba in 1933.

Both these species were conveniently omitted from a list of endangered species compiled for "special protection" by then NSW Environment Minister Matt Kean in 2021.

### **Lowering the Flood Risk?**

The NSW Coalition government says that lowering the Dam Wall is necessary to lower the flood risk which has always existed in the Hawkesbury Nepean

catchment area. This is a very rich agricultural area which in fact depends on the flooding of the alluvial plains along the river for its ability to support agricultural activity.

In my opinion this does not appear to be the real reason for the proposal. It is more likely that there is a lot of pressure from property developers who would profit from increased housing built right along the flood plain and closer to the river. It is shocking that all this time housing estates have continued to be built in flood prone areas particularly close to Windsor, Richmond and the north western areas of Blacktown. This should have stopped many years ago.

It is not just the role of property developers. I am sure that the demographics of the new home-owners in these new areas are such that they are likely to be Coalition voters. This appears to be a kind of electoral “stacking” by the parties and the local member, Stuart Ayers who is most in favour of the plan.

Of course those who have purchased new properties which are now located in flood prone areas are most anxious to avoid the repeated flooding which has recently occurred, and which is very likely caused by climate change, and will continue. As well, there is increased runoff from residential development itself as the water cannot be absorbed into the large expanse of paved areas.

As one who has worked and socialised in the Penrith and Hawkesbury area for many years I can assure the proponents that the long-term residents are not at all happy with this high level of population growth, as it lowers their quality of life and changes the nature of the strong community.

The only people to benefit from this proposal are owners of real estate, property developers and politicians.

### **Flood Mitigation and Evacuation Plans**

Prior to retirement I worked in Community Health services in the Penrith area and am well aware of the nature of the flood risk, as well as the failure of the state government to provide effective and clear evacuation plans and routes for the growing population.

Raising the wall will only affect around 50% of the floodwater experienced by the Hawkesbury-Nepean, as 46% comes from outside of Warragamba. For example, the Camden area was severely flooded recently, and this was to the north of Warragamba. The water from the Grose River between the Bells Line of Road and the Great Western Highway is not held back by the dam: this can

be a massive amount of water depending on rainfall and runs directly into the Hawkesbury river at Yarramundi and South Richmond.

The EIS does not consider any alternative means of flood mitigation. With billions of dollars spent on the Dam Wall Raising little will be left over for a multi-pronged plan to mitigate the flood water coming from the various directions outside of the dam. Similarly, there have been few resources devoted to working out an effective evacuation plan for the growing population living in the area bounded by the Hawkesbury-Nepean river and Blacktown. This will be unlikely to happen if the wall is raised.

### **Climate change**

Climate change itself, while responsible for the megafires of 2019-20, is also impacting on the wellbeing of Australian flora and fauna in ways that we are only just coming to understand. There has been no modelling in the EIS considering the impact of climate change on species and habitat within the World Heritage Area.

Forested and natural areas are regarded as important “carbon sinks” when states or other organisations are calculating their plans for reaching net zero carbon emissions. These carbon sinks can be used to offset carbon emissions. There is no such acknowledgement nor modelling in the EIS. Areas of natural “green” habitat are also important in moderating the temperature increases which will be (and already are) accompanying climate change.

The western suburbs of Sydney, adjacent to Warragamba, already experience significant temperature rises due to climate change. As climate change continues and worsens, the floods experienced will also increase in severity and frequency. It is likely that even with the dam wall raised, severe flooding will continue. With even more housing built on the flood plains, little will have been done to develop flood mitigation and evacuation plans for the population.

**This is a faulty, irresponsible and negligent plan which will benefit only a few; namely, those who have created it and sold it under false pretences.**