

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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Warragamba Dam Assessment Team

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

We object to this costly taxpayer-funded project.

Our reasons for objecting are covered below and include the following:

- *failure to acceptably mitigate risk;*
- *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.*

Failure to acceptably mitigate risk

- The Project is claimed to reduce risk to life and property damage downstream in the Hawkesbury-Nepean valley (the Valley). Raising the Warragamba Dam wall does not remove the flooding risk in a major rain event and flood. The Warragamba catchment is not the only source of flooding. The Hawkesbury-Nepean floodplain is fed by rainfall from four catchments, with the Warragamba Dam collecting run-off from just one.
- The Valley creates a bath tub effect that in which water cannot drain away sufficiently to prevent major 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.
- The problem of badly-located housing developments on the flood plain remains.
- The limited warning the Bureau of Meteorology can provide, coupled with insufficient road capacity to evacuate all residents impacted within this warning time remains unresolved.

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 at best. 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. 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.*
- Salient lessons should be learnt from the devastating and unprecedented flooding of Lismore and other parts of NSW and Australia this year. The impacts of climate change on the Valley cannot be predicted or necessarily prevented by raising a dam wall. Putting people in harm's way is unconscionable and must stop.

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>

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

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. Yet the population of the Valley is planned to increase. This is despite insufficient road capacity for timely evacuation of the current population.

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 Insurance Council of Australia does not support the project, claiming that buy-backs of housing in areas that should never have been developed is a more viable option going forward. Residents are unlikely to be offered insurance at an affordable cost which leaves communities vulnerable and the State potentially liable for compensation as occurred after flooding in Queensland in 2011.

Project has unacceptable upstream impacts

- Cultural impacts of inundation include:
 - Destruction of culturally significant Aboriginal sites^{2,3}
 - Loss of Aboriginal cultural 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
- 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.

² 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/>

³ 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>

- UNESCO 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. This project breaks the commitment made by the Commonwealth and NSW Governments to future generations to protect the Greater Blue Mountains World Heritage Area and is a breach of Australia's obligations under the World Heritage Convention.
- Ecological impacts of inundation include:
 - decimation of the ecological integrity of this wilderness and loss of 6,000 hectares of the World Heritage-listed Blue Mountains National Parks
 - previously non-inundated areas may harm water quality through increased level of sediment and organic material.
 - threatened survival of 48 endangered plant and animal species
 - further endangerment of already threatened species like the Regent Honeyeater and the Camden White Gum.
 - loss of pristine ecological value of wild rivers, including lower sections of Kowmung River, a NSW state declared Wild River and adverse impacts on the Nattai, Coxes, Wollondilly and Tonalli Rivers.

Our group does not accept that raising the Warragamba Dam Wall is critical infrastructure nor that it is in the public interest. We again submit its impacts are clearly unacceptable and that it would not achieve the desired reduction in risk to life, livelihoods and property.

Yours sincerely,



Glenda Davis
President