



Chairperson: Ms Lee Kemp
Secretary: Ken Fox Ph: 02 9987 2257
Address: P O Box 3, Hornsby NSW 1630
Email: abclk50000@gmail.com

Submission on Warragamba Dam Raising State Significant Infrastructure Application SSI-8441

The Association for Berowra Creek opposes the application to raise Warragamba Dam wall.

The Association for Berowra Creek was formed in February 1993 in order to prevent further degradation of Berowra Creek, a tributary of the Hawkesbury River, and its catchment area. Berowra Creek is tidal and stores floodwater as the level rises when the Hawkesbury River floods¹. Mangroves grow along Berowra Creek. Mangroves reduce erosion and bind soils together. They need adequate sediment supplies to build up soils. When mangroves are lost, coastlines retreat, as in the cases of the Gulf of Thailand and Guyana².

Flooding of the Hawkesbury River is a natural phenomenon. Sediments are carried to the coast resulting in a fertile alluvial plain. These sediments get washed into Berowra Creek with high tides, enriching the mangroves and preventing erosion.

Raising the dam wall and placing more urban development on the floodplain downstream from Warragamba Dam will result in more pollution of the Hawkesbury River, more erosion and loss of fertile rural lands which are needed for Sydney's food supply. The Greater Sydney Commission's Western City District Plan Action 35 states 'Protect and support agricultural production and mineral resources (in particular, construction materials) by preventing inappropriately dispersed urban activities in rural areas³'.

This project will do the opposite. It will enable more urban development on rural lands on the Hawkesbury-Nepean floodplain. It is inappropriate to have more urban development on the Hawkesbury-Nepean floodplain as it will put more lives at risk and houses will be uninsurable. The NSW Government could face litigation in the future.

The Insurance Council of Australia has dropped its support for this project and has asked the government to find other ways to reduce downstream flood risks in western Sydney.

Professor Jamie Pittock suggests that the government stops allowing new development in harm's way, 'A long-term program is needed to help the most flood-prone residents and businesses to resettle on safe land⁴'. Successful relocation programs have been undertaken e.g., in Grantham Queensland.

The project will inundate the Blue Mountains National Park, the Greater Blue Mountains World Heritage Area and Greater Blue Mountains Key Biodiversity Area. The impact area has been underestimated. A draft September 2018 study conducted for SMEC consultants estimated the affected World Heritage area would be more than 1300 hectares which is more than 4 times the 300 hectares stated in the EIS⁵.

Both the Commonwealth and NSW Governments committed to conserving the UNESCO Greater Blue Mountains World Heritage Area⁶ and protecting it from development such as flooding from reservoirs. Raising Warragamba Dam wall will be a breach of the commitments made by both governments to protect the World Heritage Area⁷.

Over 1500 indigenous archaeological sites, critically endangered species and ecological communities will be inundated.

The objects of the National Parks and Wildlife Act 1974⁸ are:

2A Objects of Act

(1) The objects of this Act are as follows—

(a) the conservation of nature, including, but not limited to, the conservation of—

(i) habitat, ecosystems and ecosystem processes, and

(ii) biological diversity at the community, species and genetic levels, and

(iii) landforms of significance, including geological features and processes, and

(iv) landscapes and natural features of significance including wilderness and wild rivers,

(b) the conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including, but not limited to—

(i) places, objects and features of significance to Aboriginal people, and

(ii) places of social value to the people of New South Wales, and

(iii) places of historic, architectural or scientific significance,

(c) fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation,

(d) providing for the management of land reserved under this Act in accordance with the management principles applicable for each type of reservation.

(2) The objects of this Act are to be achieved by applying the principles of ecologically sustainable development.

5,700 hectares of National Parks will be inundated by this project. This includes the pristine Kowmung River - declared a 'Wild River'. This project which will inundate the Blue Mountains National Park and will not apply the principles of ecologically sustainable development.

There are between 350 - 400 critically endangered adult Regent Honeyeaters left in the wild. Flooding from this project will destroy their foraging and breeding habitat, along with any nestlings. They have specific habitat requirements and can't nest elsewhere⁹. It is totally unacceptable to flood its breeding habitat and bring the Regent Honeyeater closer to extinction.

Inadequate time of 1 day was spent surveying and assessing aquatic life upstream. Threatened platypus were observed in the waterways upstream but no platypus numbers were recorded in surveys. This proposal will disrupt the water flow, endangering the platypus population. The size of the platypus population that would be adversely affected is unknown.

Inadequate time of 3.5 hours was spent assessing koalas, a threatened species. No post-bushfire field surveys of threatened species have been undertaken. It is unknown how many koalas will be impacted by the raising of Warragamba Dam wall.

The vulnerable Camden White Gum occurs on the alluvial flats of the Nepean River and its tributaries¹⁰.

Its threats include urban development and raising of Warragamba Dam wall. It is a site managed species in the NSW Government's Saving Our Species program to save it from extinction¹¹.

It is unacceptable to flood the Kedumba River where it occurs. This raising of the dam wall will bring this species closer to extinction.

The heavily fragmented and critically endangered Sydney Turpentine-Ironbark Forest will be brought closer to extinction by the raising of the dam wall¹².

Only 0.5 % of its original extent remains intact. This ecological community has been assigned to the NSW Government Saving Our Species Program¹³. It is unacceptable to inundate its habitat and destroy it.

The critically endangered White Box - Yellow Box - Blakely's Red Gum Grassy Woodland will be destroyed by temporary inundation by this project. This plant community is targeted in the NSW's Saving Our Species project¹⁴. yet this government seeks to destroy it upstream from Warragamba Dam instead of protecting it.

This EIS minimises the environmental impact on biodiversity to reduce offset costs. Only about 7.5m of the dam wall raising project was considered instead of its full height, resulting in the land below and above the inundation range not being included in the offset calculations. That a scientific report was selectively edited¹⁵ to downplay the impact of the Warragamba Dam wall raising project is deplorable. Altering the science so that direct impacts of this project become indirect impacts is unacceptable.

The Gundungurra community members have not been consulted in a meaningful way about assessing cultural heritage. This is deplorable.

Over 1500 indigenous archaeological sites will be destroyed. These sites are considered in isolation rather than as part of a story, the Dreamtime. This reduces their significance to Aboriginal culture. Only 27% of the area was surveyed resulting in many more cultural items present in the impact zone not being listed. Once inundated, this indigenous art, such as charcoal drawings and hand prints, will be destroyed. These significant sites are part of the Dreamtime stories passed down from generation to generation. Destruction of these sites will be a huge loss to our rich indigenous culture. The NSW Government has tripled the annual cultural heritage destruction approvals in the recent NSW budget estimates¹⁶. This rate of destruction is deplorable. Indigenous cultural heritage, what is left of it, needs to be protected and conserved.

The following photos of indigenous cultural heritage that will be destroyed or damaged are reproduced with permission from Kazan Brown¹⁷, Gundungurra traditional owner.

The destruction of these is unacceptable.













The raising of Warragamba Dam wall will not prevent flooding due to flooding from tributaries downstream from the dam. This ill-conceived project should be refused because it will destroy significant indigenous cultural heritage, critically endangered species and ecological communities.

Yours sincerely,

Lee Kemp

A handwritten signature in black ink that reads "Lee Kemp". The signature is written in a cursive, slightly slanted style.

Chairperson

REFERENCES

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