

21 October 2021

To: Warragamba Dam Assessment Team
Planning and Assessment
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From: Ted Plummer
1/30 Judge Street
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Dear Assessment Team

Re: Submission – Warragamba Dam Raising Project – SSI-8441

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) for the Warragamba Dam Raising Project.

I wish to **object** to the proposal.

Raising the dam wall by 17 metres would flood and permanently damage:

- around 1,200 hectares of the iconic World Heritage-listed Blue Mountains National Park,
- around 3,000 hectares of declared wilderness, and
- around 4-kilometres of the Kowmung River, a declared wild river under the NSW *National Parks and Wildlife Act 1974*.

Damaging world heritage area

The Greater Blue Mountains World Heritage Area is iconic, protects outstanding universal conservation values and is easily accessible to around 4.5 million people.

As UNESCO has said on its [website](#):

The Greater Blue Mountains include outstanding and representative examples in a relatively small area of the evolution and adaptation of the genus Eucalyptus and eucalypt-dominated vegetation on the Australian continent.

And further:

The site includes an outstanding diversity of habitats and plant communities that support its globally significant species and ecosystem diversity (152 plant families, 484 genera and c. 1,500 species). A significant proportion of the Australian continent's biodiversity, especially its scleromorphic flora, occur in the area.

And finally:

Most of the natural bushland of the Greater Blue Mountains Area is of high wilderness quality and remains close to pristine. The plant communities and habitats occur almost entirely as an extensive, largely undisturbed matrix almost entirely free of structures, earthworks and other human intervention.

Allowing around 1,200 hectares of the World Heritage Area to be flooded would be entirely contrary to protecting these identified UNESCO universal values.

Damaging declared wilderness

The declared wilderness areas that would be affected by the dam wall raising are the Kanangra and Nattai Wilderness areas.

Two key objectives of the *Wilderness Act 1987* (NSW) are:

- (a) to provide for the permanent protection of wilderness areas, and*
- (b) to provide for the proper management of wilderness areas.*

Further:

A wilderness area shall be managed so as:

- (a) to restore (if applicable) and to protect the unmodified state of the area and its plant and animal communities,*
- (b) to preserve the capacity of the area to evolve in the absence of significant human interference, and*
- (c) to permit opportunities for solitude and appropriate self-reliant recreation (whether of a commercial nature or not).*

Allowing around 3,000 hectares of these wilderness areas to be flooded would be entirely contrary to both the objectives of the Act and to these core management principles.

Damaging declared wild river

The Kowmung River is a declared wild river for the purposes of the *National Parks and Wildlife Act 1974* (NSW).

As the Act says:

The purpose of declaring a river or part of a river as a wild river is to identify, protect and conserve any water course or water course network, or any connected network of water bodies, or any part of those, of natural origin, exhibiting substantially natural flow (whether perennial, intermittent or episodic) and containing remaining examples, in a condition substantially undisturbed since European occupation of New South Wales,

Allowing around 4 kilometres of the Kowmung River to be flooded would be entirely contrary to this fundamental purpose.

Impact on cultural heritage sites

The proposal would, if approved, destroy hundreds of Aboriginal Gundungurra cultural heritage sites. I understand that only around one quarter of the impact area has been surveyed for its Aboriginal cultural significance, which alone found over 300 significant cultural sites.

I also understand that the Gundungurra people have not given their consent to the proposal and that consultation with them has been grossly inadequate at best.

The Commonwealth Department of Agriculture, Water and the Environment emphasised this point in June 2020 by saying:

There is a lack of clear evidence that a process to ascertain Free, Prior and Informed Consent has occurred with Traditional Owners and other indigenous persons with rights or interests in the project area.

To not properly engage with and consult the very people whose cultural heritage would be forever destroyed would be a travesty and renders the EIS process flawed.

The issue of destroying Aboriginal cultural heritage sites has been only recently brought into sharp focus by the destruction of Juukan Gorge in Western Australia. Indeed, the final report of the Australian Parliament's Joint Standing Committee on Northern Australia – *A Way Forward: Final report into the destruction of Indigenous heritage sites at Juukan Gorge* – was published only this week.

As the Committee chair said in his Foreword to the report:

Aboriginal and Torres Strait Islander cultural heritage, both tangible and intangible, is a key part of Australia's history. Loss of cultural heritage diminishes the heritage

of our nation and deeply wounds the Aboriginal and Torres Strait Islander peoples for whom this heritage is sacred.

The NSW Government has before it an opportunity to **not** repeat the appalling mistake that was made in the Juukan Gorge in Western Australia.

Of the minimum standards recommended by the Committee, one was to create “an ability for traditional owners to withhold consent to the destruction of cultural heritage.” In the case of this proposal, of course, and as noted above, consent has not been given.

A better way to manage flooding events

Effectively managing flooding events on the Hawkesbury Nepean Floodplain is of course a vitally important issue. I’m not questioning that. What I’m questioning, and what I’m objecting to, is that the “solution” proposed in the EIS is not only extremely damaging to the environment and Aboriginal cultural heritage, it ignores other less damaging ways to resolve the problem. The EIS doesn’t address these in any detail or doesn’t do so at all.

The EIS also ignores the fact that a large proportion of water entering the floodplain does so *below* the Warragamba Dam wall which means raising the dam wall will do nothing to mitigate flooding caused by those flows.

There are better ways to manage the airspace above the Warragamba water storage in advance of severe weather systems passing over the catchment, so the risk of spilling is reduced. Sydney’s desalination plant can also be used to ensure this does not affect the security of Sydney’s drinking water supply.

But perhaps most of all, governments should stop approving large residential subdivisions on the floodplain and there should be a greater investment in ensuring flood evacuation routes are delivered.

The EIS fails to address these alternatives.

Conclusion

The NSW National Parks Association has said that “the Warragamba proposal therefore represents the largest destruction of conservation lands ever proposed, let alone approved, in NSW.”

Given the damage that would be caused to the Greater Blue Mountains World Heritage Area, declared wilderness, national parks, a pristine wild river and Aboriginal cultural heritage this should come as no surprise.

Surely in the 21st century we can do better than this. We can do better than decide to deliberately destroy so many Aboriginal cultural heritage sites and to allow the inundation of such a large area of World Heritage listed national park, and not just any national park, but the Blue Mountains National Park, one of Australia’s most iconic and visited parks.

The proposal to raise the Warragamba Dam wall should therefore be rejected and other less damaging flood mitigation strategies should be pursued.

Yours sincerely

A handwritten signature in blue ink, reading "Ted Plummer". The signature is fluid and cursive, with the first name "Ted" and last name "Plummer" clearly distinguishable.

Ted Plummer