

34 Bathurst Street, Woollahra, NSW 2025

Phone: 02 9389 6728

Property : Wayamba, 454 Pademelon Road,

Little Wallabadah, via Laguna NSW 2325

Phone: 02 4323 3121

Donald:: whitedon@bigpond.net.au

Online submission -: <https://www.planningportal.nsw.gov.au/major-projects/project/10571>.

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Warragamba Dam Wall Raising

STATE SIGNIFICANT INFRASTRUCTURE APPLICATION

Application No SSI-8441

Warragamba Dam Raising is proposed to provide temporary storage capacity for large inflow events into Lake Burragorang to facilitate downstream flood mitigation and includes infrastructure to enable environmental flows.

Introduction

The planning for metropolitan Sydney and its water supplies is a topic in which I have had an interest for 20 years. I have lived in Sydney and spent recreation time in the Blue Mountains. I understand the flood risks in Western Sydney and I have had students conduct thesis into the topic

I have long opposed this proposal as it is completely unnecessary. Similar protection against flooding in Western Sydney would be achieved by lowering the normal Warragamba Dam operating level to 60% .(Utilising the 60-100% space for flood mitigation) and running the existing desalination plant harder and building another one (Running on renewable power).

This proposal will have too many terrible consequences for the natural and heritage values of the area to be flooded to even be considered. It should not be approved.

World Heritage Area

The Blue Mountains World Heritage area is not just a world class National Park, in 2000 it was inscribed on UNESCO's World Heritage list in recognition of its Outstanding Universal Value for the whole of mankind. Raising the Warragamba dam wall and consequent damage to natural and cultural values would be a clear breach of these undertakings and Australia's obligations under the World Heritage Convention.

An estimated **65 kilometres of wilderness rivers, and 5,700 hectares of National Parks**, 1,300 hectares of which is within the Greater Blue Mountains World Heritage Area, would be inundated by the Dam project. This includes:

- The **Kowmung River** - declared a 'Wild River', protected for its pristine condition under the National Parks and Wildlife Act 1974;
- Unique **eucalyptus species** diversity recognised as having Outstanding Universal Value under the area's World Heritage listing such as the Camden White Gum;
- A number of **Threatened Ecological Communities**, notably Grassy Box Woodland;
- Habitat for endangered and critically endangered species including the **Critically Endangered Regent Honeyeater and Sydney's last Emu population**.

Systematic Failures of the EIS

The engineering firm (SMEC Engineering) who undertook the environmental and cultural assessments for the project have an established history abusing Indigenous rights, recently being **barred from the world bank**.

Severe fires during the summer of 2019/20 devastated 81% of Blue Mountains Heritage Area. **No post-bushfire field surveys have been undertaken.**

Only **27%** of the impact area was assessed for Aboriginal Cultural Heritage. Threatened species surveys are **substantially less than guideline requirements**. Where field surveys were not adequately completed, expert reports were not obtained.

No modelling of the stated flood and economic benefits of the dam wall raising are outlined in the EIS.

The **integrity of the environmental assessment is fundamentally flawed**, and cannot be accepted as a basis for further decision-making by the Minister for Planning.

Traditional owners

Over **1541 identified cultural heritage sites** would be inundated by the Dam proposal.

The Aboriginal Cultural Heritage Assessment Report has been severely and repeatedly criticised by both the Australian Department of Environment and the International Council on Monuments and Sites (ICOMOS) for not appropriately assessing cultural heritage in meaningful consultation with Gundungurra community members.

Alternatives

Similar protection against flooding in Western Sydney would be achieved by lowering the normal Warragamba Dam operating level to 60% (Utilising the 60-100% space for flood mitigation) and running the existing desalination plant harder and building another one (Running on renewable power).

Alternative options were not comprehensively assessed in the EIS. Any assessment of alternatives does not take into account the economic benefits that would offset the initial cost of implementation.

On average, 45% of floodwaters are derived from areas outside of the upstream Warragamba Dam catchment. This means that no matter how high the dam wall is constructed, it will not be able to prevent flooding in the Hawkesbury-Nepean Valley downstream.

Conclusion

This proposal will have too many terrible consequences for the natural and heritage values of the area to be flooded to even be considered. It is completely unnecessary. Similar protection against flooding in Western Sydney would be achieved by lowering the normal Warragamba Dam operating level to 60% .(Utilising the 60-100% space for flood mitigation) and running the existing desalination plant harder and building another one (Running on renewable power).

It should not be approved.

Thank you for the opportunity to comment.

Donald O White

Prof Donald O White