

The Hon Robert Stokes MP
Minister for Planning and Public Places
Email via: <https://www.planningportal.nsw.gov.au/major-projects/project/10571>

17 December 2021

Submission on the Warragamba Dam Raising Environmental Impact Statement

Dear Minister,

The National Parks Association of NSW (NPA) was formed in 1957 and sixty-four years later we have 15 branches, 4,000 members and over 20,000 supporters. NPA's mission is to protect nature through community action. We regard national parks, nature reserves and other conservation reserves as essential to life and well-being. Our strengths include state-wide reach, deep local knowledge and evidence-based approach to conservation advocacy.

NPA is aghast at the proposed raising of the Warragamba Dam because of the devastating impact on declared protected areas, including much of the Greater Blue Mountains World Heritage Area. We regard the project Environmental Impact Statement (EIS) as wholly inadequate, providing a cursory consideration of alternatives, a deliberately misleading underestimation of the size and severity of the development footprint, and displaying a profound misunderstanding of the importance of World Heritage and protected areas.

NPA implores you to refuse approval for this deeply flawed, inadequately justified project.

MAJOR ISSUES

Assessment of alternatives

NPA acknowledges that poorly- conceived urban planning and development across the Hawkesbury-Nepean floodplain has created a situation where major flood events impact upon tens of thousands of residents. However, this proposal will only exacerbate this situation by encouraging the intensification of development in locations with what are ultimately uncontrollable risks. The proposed works may reduce the frequency of flooding events, but it won't stop the worst impacts of floods since much of the water entering the floodplain comes from the other feeder catchments, while even a raised wall will spill during the most extreme of events.

Just as planning laws accept the need to accommodate sea-level rise projections, so must planning for western Sydney accept that flood risk renders many areas permanently unsuitable for urban development. Raising the Warragamba Dam offers nothing more than a temporary band aid against the risk of future floods. The only real solutions are better urban planning and the buy-back of properties in indefensible locations.

The evaluation of alternatives in the EIS doesn't demonstrate that the proposal is the best option for managing future floods. We recommend that approval be refused and that the NSW Government investigate alternative means of mitigating the impacts of high rainfall events across the Hawkesbury-Nepean floodplain.

Development footprint

The primary environmental impacts of the proposal are associated with the fact that raising the dam wall will cause the upstream catchment to be inundated during high rainfall events. The inundation associated with rainfall events will vary depending on the prior water level in the impoundment, the amount of rain, the topography of the upstream areas and the height to which the dam is raised. The duration of inundation will also affect the intensity of environmental impact, with longer inundation leading to increased habitat, vegetation and soil loss.

The EIS is required to assess the total environmental impacts that would result from the proposed development. In our view, the EIS is obliged to consider the worst-case scenario, under which the entire volume of a modified dam is inundated for a period that would kill all biota and cause irreparable damage to soils.

The EIS provides a deliberately misleading account of the extent and intensity of the development footprint. There are a number of elements to the misleading nature of the assessment. The first relates to the observation that, under flood conditions, the peak height of the impoundment increases to an estimated 2.8 metres above the Full Service Level (FSL). The EIS asserts that, as a consequence, the zone from 0- 2.8 metres above FSL has already been stripped of all environmental, cultural and heritage value.

No field observations are provided to support this assertion, and indeed aerial imagery and numerous the personal accounts indicate that this temporary inundation zone retains significant vegetative cover and allied habitat values. This presumably reflects the relatively short periods over which higher levels are retained behind the existing control systems.

If it is accepted that the 0- 2.8 metre zone is sterilised of all environmental values, then the corollary is that the total area subject to inundation after raising the wall would be similarly destroyed. Moreover, that zone would logically likewise extend 2.8 metres above the proposed 14 metres higher wall, that is, to a maximum height of 16.8 metres above the existing FSL.

However, contrary to this expectation, the EIS asserts that the maximum increase in the inundation zone would be to 10.5 metres above FSL. The rationale is that historic data suggests that this is the height of a 1 in 100-year flood event. Apart from the obvious point that climate change is predicted to cause more frequent extreme events, it stretches credulity that WaterNSW would seek to spend billions of public funds on a 14 metre higher wall if they genuinely believed that a 10.5 metre wall would be sufficient for the highest predictable flood event.

These disingenuous claims are clearly designed for one purpose only, to avoid acknowledging the vast extent of the catchment that would be impacted by inundation events. The EIS suggests that, based on a 10.5 metre flood event, a maximum area of 1,400 hectares would be destroyed. Based on the data provided in the EIS, we estimate that, adopting a 16.8 metre maximum height, the total area to the destroyed exceeds 3,000 hectares. In other words, the EIS understates the development footprint by a factor of more than two.

The EIS indicates that the longest inundation period would be in the order of 14 days. However, it also acknowledges that the rate of discharge is entirely dependent upon the conditions prevailing downstream. Under flood conditions this may preclude any rapid release of water. The lack of certainty about future events undermines any confidence in the suggestion that inundations would be infrequent and short.

The EIS seriously understates the extent of area that would be impacted and the severity of impact within that area. Rather than assessing fleeting impacts over 1,400 hectares, the EIS should have assessed total destruction of habitats and soils over an area of more than 3,000. The EIS does not fulfil its statutory purpose and therefore approval should be denied.

World Heritage and Protected Areas

The inundation zone that would be destroyed is wholly within gazetted protected areas, namely Blue Mountain National Park, Nattai National Park, Kanangra Boyd National Park, Burragorang State Conservation Area and Yerranderie State Conservation Area. NPA notes that the two State Conservation Area are both long overdue for re-gazettal as national parks.

Much of the three national parks are declared as wilderness and more than 70% of the catchment is included in the Greater Blue Mountains World Heritage Area.

National Parks, especially those very rare parks that are also of World Heritage significance, are the most important natural landscapes in the world. It is appalling that the NSW Government would seek to inflict so much irreversible damage to such outstanding landscapes in contravention of community expectations and international agreements. An inevitable consequence of any approval would be the inclusion of the Blue Mountains on the World Heritage at risk list, and potentially even the revocation of the World Heritage status. Australia is increasingly regarded as a 'bad player' on the international stage, and our environmental rogue status would be more than confirmed by any approval to decimate the Greater Blue Mountains World Heritage Area.

The EIS utterly fails to address the importance of the protected areas. Instead it adopts an excessively reductionist approach that sees protected areas as nothing beyond the sum of the threatened species or ecological communities that would be destroyed.

The NSW *National Parks and Wildlife Act* and the *International Union for the Conservation of Nature* both provide straightforward definitions of the objectives and purposes of protected areas. Protected areas are not declared to protect entire ecosystems and the ecological processes that support the biodiversity indigenous to those landscapes. They have a similar role in protected cultural heritage in landscape context. Protected areas must be considered as integrated ecosystems and landscapes, and any proposals must be considered not only in terms of the direct impact footprint, but more broadly in respect to the integrity and resilience of the entire system.

The EIS makes no effort to consider the implications of the proposal at this broader scale, instead focusing on the avoidance of offset liabilities for the damage that would be wrought within the inundation zone.

One of the outstanding features of the catchment is the extensive grassy box woodlands, an ecological community that in this location supports a range of threatened woodland birds including Regent Honeyeater. The examples in the catchment are some of, if not the, best grassy woodlands remaining in NSW. The fact that they are located in a protected area adds a security that further enhances their significance at the state and national level. Far from recognising the unique importance of this community, and the contribution it makes to the overall significance of the entire World Heritage Area, the EIS reduces it to nothing more than a financial liability whose severity is determined by the offsets calculator.

In NPA's view the EIS fundamentally misrepresents the national and international significance of the catchment, as well as the corresponding international consequences of inflicting permanent damage.

The Commonwealth and NSW Governments made a commitment to future generations to protect this landscape in perpetuity. It is the last place that any Government should seek sacrifice for the sake of floodplain development.

The scale and intensity of environmental impacts is entirely inconsistent with the area's legal status community expectations and international commitments. For these reasons approval must be denied.

Survey coverage

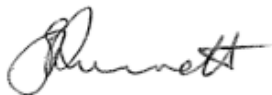
The EIS relies upon surveys that simply don't reflect the current condition of the catchment or the relative importance of the area following the devastating fires of 2019/20, which burnt 81% of the Greater Blue Mountains. The inadequacy of survey coverage is especially acute in relation to Aboriginal cultural heritage, a point repeatedly made by Gundungurra Traditional Owners.

Conclusion

This proposal is flawed at every level: it is based on inadequate survey; it woefully understates the scale and intensity of environmental impacts; it ignores the international status of what is one of the most important places on the globe; and it avoids grappling with practical solutions to decades of bad planning decisions. This isn't a situation that can be solved through yet another bad planning decision- it demands a Minister with the integrity to stand up for nature and reject this appalling proposal.

NPA can be contacted through Executive Officer Gary Dunnett at garyd@npansw.org.au or on 0432 757 059.

Yours sincerely,



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National Parks Association of NSW
protecting nature through community action