

Submission
No 211

INQUIRY INTO PROPOSAL TO RAISE THE WARRAGAMBA DAM WALL

Organisation: Ryde Hunters Hill Flora & Fauna Preservation Society Inc
Date Received: 10 September 2019

Inquiry on the NSW Government's proposal to raise the wall of Warragamba Dam

Mr Justin Field MLC
Chair
Legislative Council Select Committee

Dar Sir,

I am writing on behalf of the Ryde Hunters Hill Flora & Fauna Preservation Society Inc. We are an incorporated local conservation group that was established just over 50 years ago. Under our constitution the aims and objects of RHHFFPS are:

- a. The education of the membership and the community, particularly in the local area, in nature conservation and protection of the environment.
- b. The promotion of ecologically sustainable land use and development.
- c. The promotion of nature conservation including an adequate system of national parks, wilderness areas, nature reserves, wildlife refuges and corridors and urban bushland reserves; adequate protection measures for native wildlife.
- d. Achieving satisfactory measures to safeguard the environment from all forms of pollution to ensure clean air, clean water and a healthy environment.
- e. To work for the permanent retention and conservation of all natural areas in the local district and increase in the area set aside for nature conservation.
- f. To undertake the management of the Field of Mars Reserve with Ryde City Council as a major conservation project.

We note the proposal by the NSW Government to increase the height of the Warragamba Dam by 14 metres for the purpose of flood mitigation in the Hawkesbury/ Nepean Valley and we make the following submissions which are relevant to the Inquiry's terms of reference (b), (d), (e) and (i).

World Heritage impact

We do not support this proposal to increase the height of the dam by 14 metres on the basis of its impact on the World Heritage Area. The submission by the NSW Government to the Inquiry on the Water NSW Amendment (Warragamba Dam) Bill 2018 states at page 11,

*Based on preliminary assessment of the Warragamba Dam Raising proposal, in a 1 in 100 chance per year flood up to an additional six hundredth of one percent (0.06%) of the World Heritage Area would be temporarily inundated, above the area that would be flooded now (see area coloured red in **Figure 4**).*

We do not accept this incremental erosion of the WHA. This temporary flooding would compromise the Outstanding Universal Value (OUV) of that part of the WHA and effectively redraw the boundary for the WHA.

There is no evidence in the submission by the NSW Government that the boundary of the WHA was determined incorrectly and there is no basis for changing the boundaries based on WHA criteria.

This has been verified by the NSW Government introducing a bill to change the relevant Act (*National Parks and Wildlife Act 1974*) to permit flooding within the WHA.

To flood the relevant section of the WHA is therefore incremental erosion of the WHA.

Cost-effectiveness analysis

The submission by the NSW Government to the previous Inquiry also stated (page 21)

Raising Warragamba Dam by 14 metres for flood mitigation was recommended in the Flood Strategy as it (is) the most cost-effective infrastructure option, with net benefits of around \$200 million (2015),

Selecting the option that detrimentally impacts on the WHA because it is the most cost-effective infrastructure option in contrast to other options that do not impact the WHA is not appropriate.

Using such a basis sets the scene for other infrastructure projects that impact the WHA. These may be cost-effective and they may take only a small proportion of the WHA. The proposal is a dangerous precedent and the WHA is effectively being seen as an opportunity for development and not conservation.

Figure 7 on page 21 of the NSW Government submission indicates that permanently lowering the water supply by five metres has a net benefit of \$50 million. This is a substantial benefit and it is achieved without flooding the WHA.

We do not accept that the option to raise the dam by 14 metres is the most appropriate option when other options are available which provide a substantial cost-effective outcome.

Cost/benefit analysis is useful for considering competing alternatives but should not be the overriding factor in reaching a decision. In this case avoiding the loss of the OUV in the proposed flooded areas should be a prime consideration and options that result in such loss should not be adopted where other options provide substantial net benefits.

It seems to us that housing and commercial development in the Hawkesbury/Nepean Valley provides the context in which all other options are to be considered. This is treated as a 'given' in the cost-effective analysis and cannot be changed. In our view there are other suitable sites for housing and commercial development and the cost/benefit analysis does not take this into account.

The continued protection of the WHA should be the context around which all other options are considered.

Biodiversity offsets

The submission by the NSW Government to the previous Inquiry also stated (page 13) that biodiversity offsets are a suitable option for the loss of the area that would be flooded.

We do not accept that biodiversity offsets are appropriate for the loss of the flooded area or for any other detrimental impact on the WHA. Other locations outside the WHA may exist which have characteristics similar to those found in the area to be flooded and which may be considered for biodiversity offsets. If such areas exist then flooding in the WHA reduces the existing stock of such natural and cultural assets.

More likely the biodiversity formula will be used to put a monetary value on the area lost to flooding and a sum allocated for conservation of other areas that may have natural and cultural heritage value. Again this is not a satisfactory outcome as it results in deterioration of the existing stock of natural and cultural heritage assets.

It is also most unlikely that other areas would be found with OUV's that would match those lost by flooding.

We are also concerned that biodiversity offsets facilitate and encourage the incremental development of the WHA. We consider that payment of a sum for destroying part of the WHA is an attractive 'go to' solution for those that see commercial or other reasons for compromising the WHA.

Conclusion

In our view and on the basis of information available at this time the most appropriate option for mitigating the risks of flooding in the Hawkesbury/Nepean Valley is the lowering of water levels at the dam by five metres.

This may be complemented by measures to restrict housing and commercial development in the flood plain.

Frank Breen
President
Ryde Hunters Hill Flora and Fauna Society Inc