

Submission  
No 252

## INQUIRY INTO PROPOSAL TO RAISE THE WARRAGAMBA DAM WALL

**Organisation:** National Parks Association of NSW

**Date Received:** 10 September 2019

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Mr Justin Field MLC  
Chair  
Select Committee on the Proposal to Raise the Warragamba Dam Wall  
Legislative Council  
NSW Parliament

10 September 2019

Dear Mr Field,

### **Submission on the Proposal to raise the Warragamba Wall**

The National Parks Association of NSW (NPA) appreciates the opportunity to provide a submission to the NSW Legislative Council Inquiry (the Inquiry) into the proposal to raise the Warragamba Wall (the proposal).

#### **About NPA**

The National Parks Association of NSW (NPA) was formed in 1957 and six decades later has 15 branches and over 20,000 members and supporters. Our shared goal is to protect nature through community action. NPA believes that caring springs from personal connections with nature, and we deliver more than a thousand bushwalks, community events, bio-blitz surveys and bush regeneration projects each year.

We are vigorous advocates for nature, making proposals for additions to the park system, participating in all aspects of park management planning, scrutinising development proposals and conducting conservation campaigns across NSW. NPA's strengths include our regional reach, deep local knowledge and evidence-based approach to conservation. Throughout these diverse endeavours NPA is firmly focused on the protection and promotion of our parks and reserves.

#### **Our submission**

Our submission relates primarily to Term of Reference 1(d) and addresses the adverse environmental impacts of the proposal on the World Heritage listed reserves collectively known as the Greater Blue Mountains National Parks (GBMNP). The area to be impacted includes parts of Blue Mountains National Park (NP), Kanangra Boyd NP, Nattai NP, Yerranderie State Conservation Area (SCA) and Burrigorang SCA.

We note that the Environmental Impact Statement (EIS) for the proposal has not been publicly released and therefore our comments are framed without access to the detailed description or assessment of impacts that should be provided in an EIS.

#### **Comments**

##### *Intensity and scale of impact*

The proposal will result in the periodic inundation of extensive areas in GBMNP. The shores of the inundated areas will be subject to significant wave action due to the size, exposure and fetch of the water body. The environmental impact of such processes, irrespective of the duration of individual periods of inundation, is the loss of all terrestrial vegetation and the scouring of soils down to bedrock. For this reason, NPA recommends that the Inquiry proceed on the assumption that all areas that would be inundated will suffer permanent, irreversible and catastrophic loss of their natural and cultural heritage values.

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The total area that will be inundated has not been disclosed, however it will clearly be in excess of a hundred square kilometres. The Warragamba proposal therefore represents the largest destruction of conservation lands ever proposed, let alone approved, in NSW. At a national level the only obvious parallel is with the damming of the Franklin-Gordon Wild Rivers National Park, which was ultimately rejected by the High Court in the *Commonwealth vs Tasmania*.

**NPA recommends that the proposal be abandoned because of the unprecedented intensity and scale of impacts on gazetted conservation reserves.**

*Inconsistency with the area's statutory status*

The area that would be destroyed has exceptional conservation values at the local, state, national and international levels. The layers of statutory recognition that have been granted to the area include listing on, and/or gazettal as:

- World Heritage
- National Heritage
- National Park
- State Conservation Area
- Wilderness
- Special Area (water catchment)
- Threatened Ecological Communities
- State Heritage Register

Water NSW has indicated that their EIS will address the statutory constraints associated with all of the above instruments.

**NPA recommends that, rather than applying for approval to impact on listed areas, the NSW Government should withdraw all proposals to destroy the internationally recognised conservation lands of the GBMNP.**

*Severe and irreversible impacts on natural heritage*

The listings and gazetals referred to above were granted in recognition of the GBMNP's exceptional natural heritage values. In addition to this high-level recognition, there are several attributes which render the Warragamba catchment unique in a bioregional context. These include:

- Large areas of threatened grassy woodland communities, that are severely diminished outside of the catchment
- An assemblage of threatened woodland birds and arboreal mammals associated with the grassy woodlands, including breeding sites for the nationally listed Regent Honeyeater
- An extremely rare example of an ecosystem that retains native predators such as Dingo, Spotted-tail Quoll, several species of raptor and monitors.

These threatened ecological communities and threatened species habitats are poorly represented outside of the catchment and would be disproportionately impacted by the proposed inundation. This situation means that it is highly improbable that any 'like for like' offsets could be identified to mitigate the loss of these species and communities.

**NPA recommends that the proposal be abandoned due to the unavoidable impacts on threatened species and ecological communities and the lack of credible mechanisms to offset or otherwise mitigate those losses.**

*Severe and irreversible impacts on Aboriginal cultural heritage*

Closed water catchments traditionally provide a high level of protection from inadvertent or deliberate damage to sites of Aboriginal cultural heritage significance. Members of the local Aboriginal communities, including traditional owners of the catchment, have clearly stated their opposition to the loss of landscapes and sites of cultural significance. NPA supports the aspirations of Aboriginal communities for control over their land and notes that any increase in the water levels will exacerbate the severe losses that occurred during the construction of the original dam.

**NPA recommends that the NSW Government acknowledge the rights of traditional owners and provide them with ongoing access and resources to manage their sites within the proposed inundation zone and elsewhere in the catchment.**

*Visitor and aesthetic impacts*

Notwithstanding the status of the catchment as closed access Special Area, it contains authorised walking routes that are regularly used by NPA members and other bushwalking groups. The proposal would sever the iconic walk between Katoomba and Mittagong, at best requiring extensive re-routing. The availability of a walk offering a genuine wilderness experience in such close proximity to a capital city is remarkable, and should be recognised as a significant attribute in a state where nature based tourism is providing an increasingly important contribution to regional economies.

**NPA recommends that the walking access be retained through the catchment.**

We would be pleased to present our concerns in person if requested by the Inquiry. Our contact is Executive Officer Gary Dunnett,

Yours sincerely

Gary Dunnett  
Executive Officer  
**National Parks Association of NSW**  
*protecting nature through community action*