

**Submission
No 356**

**INQUIRY INTO PROPOSAL TO RAISE THE
WARRAGAMBA DAM WALL**

Name: Mr Stephen Craft
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Submission to the Legislative Council Select Committee on the Proposal to Raise the Warragamba Dam Wall

Stephen Craft, 10 September 2019

Executive summary

- The Greater Blue Mountains World Heritage Area (GBMWH) is of immense value to NSW and its citizens – as an environmental asset, a site for indigenous culture and history, and as a centre for tourism. In establishing the GBMWH, the NSW government put in place specific protections against damaging the world heritage value of the area by raising Warragamba Dam wall.
- Overturning those protections and raising the wall by 14m would:
 - After inundation, permanently damage up to 4,700 ha of the GBMWH, including 65km of wilderness waterways.¹
 - Significantly impact an area that is home to 48 threatened species, including the critically endangered Regent Honeyeater and one of Sydney's few remaining Koala populations in the lower Nattai Valley.¹
 - Damage or destroy an estimated 300 Aboriginal cultural and heritage sites, which appear to have been inadequately surveyed in a rushed and flawed assessment process.
 - Call into question the world heritage status of the GBMWH, following concerns expressed by Unesco's World Heritage Committee, which said that raising the wall would "impact on its Outstanding Universal Value".²
 - Damage the reputation of NSW and the GBMWH, both domestically and internationally.
 - Impact NSW park users, including users of some of the most popular and frequently used bushwalking and trail running areas in the GBMWH, who will be repeatedly reminded of the government's role in adversely affecting the wilderness qualities of a widely cherished and enjoyed natural asset.
- Raising the wall by more than 14m would have significantly greater impacts.
- Conversely, analysis suggests that raising the wall will be ineffective in reducing flood risks in the Hawkesbury-Nepean floodplain, and that alternative measures, including improved flood zoning based on international best practice, would offer greater protection.³
- Encouraging further development downstream by claiming to have removed or mitigated flood risk could expose western Sydney residents and the NSW government to significant costs and risks in the future.
- Accordingly, I urge the committee to recommend that:
 - The proposed raising of Warragamba Dam Wall should not proceed.
 - The government should restore statutory protections by reversing the changes introduced by the Water NSW Amendment (Warragamba Dam) Bill 2018.
 - The government should further investigate alternative measures to ameliorate flood risks to residents downstream from Warragamba Dam, including improved dam management and graduated planning controls based on international best practice zoning.
 - If the government proceeds with the environmental assessment process, the Legislative Council Select Committee should investigate and oversee that process, including the appointment of the lead consultant and their conduct.

¹ WaterNSW (2016), *Warragamba Dam Raising Preliminary Environmental Assessment*.

² Unesco (2019), *Decisions adopted during the 43rd session of the World Heritage Committee*.

³ Associate Professor Jamie Pittock, ANU (2018), *Managing flood risk in the Hawkesbury – Nepean Valley*.

My interest in this proposal

I'm writing to you as a concerned NSW citizen and frequent park user who has a long association with the area affected by this proposal. My family has been walking in the greater Blue Mountains for almost 100 years, since before the dam was built. Our connection with the area is commemorated in the naming of Crafts Walls, on the well-established and popular route between Kanangra Walls and Katoomba which will be potentially impacted by inundation if this proposal proceeds.

More importantly, I believe I am representative of a large number of park users whose voices have not been heard and whose interests have not yet been fully considered in the formulation of this proposal.

Warragamba Dam and the Greater Blue Mountains World Heritage Area

Sydney is almost unique as a global city with a world heritage area on its doorstep. Blue Mountains National Park is the state's most popular national park, attracting 8.4m visitors in 2018¹ and underpinning half a billion dollars in economic output from tourism each year in the Blue Mountains region.² Next to the Opera House and Bondi Beach, the Blue Mountains wilderness is an internationally recognised symbol of NSW, cherished by Sydney residents and international visitors alike.

According to Unesco, the area was awarded world heritage status for:

- the quality of its wilderness and pristine bushland
- its cultural significance as home to sites from six Aboriginal language groups, and
- the significant protections put in place by the Commonwealth and NSW governments to preserve these unique characteristics.

Those protections included specific measures to prevent flood damage to the heritage value of the area – measures which were overturned by the Water NSW Amendment (Warragamba Dam) Bill 2018.

All of these characteristics are threatened by the current proposal.

Environmental and cultural impacts

The environmental and cultural impacts of the proposal were outlined in the government's Preliminary Environmental Assessment, summarised in the Executive Summary above. It is important to note that the environmental impacts of repeated inundation do not disappear after floodwaters recede, but permanently alter the quality and character of the affected areas.

The cultural impacts are equally severe, with the potential to damage or destroy a large number of Aboriginal cultural and heritage sites. Estimates of the number of affected sites vary from 50 to 300, pending a properly conducted evaluation.

I note with concern that the recently completed assessment of the cultural impact of the proposal appears to have been both rushed and inadequate, covering only 26% of the affected area and providing inadequate opportunities for consultation and discussion. Furthermore, the lead consultant appointed by the government, SMEC Engineering, has previously faced extensive criticism from the scientific community and others for their actions in similar projects in Laos and Myanmar.³

Accordingly, should the assessment process continue, I would urge the members of the committee to investigate the process in detail to ensure it is conducted in line with the relevant IUCN and ICOMOS World Heritage Assessment guidelines.

Reputational damage and future risks

The Unesco World Heritage Committee has noted with concern the potential impacts of the proposal on the GBMWhA's heritage value,⁴ in addition to the concerns it has previously expressed over the impacts of the

¹ NSW Department of Planning, Industry and Environment (2019), [Domestic visitation](#).

² REMPLAN/Blue Mountains Economic Enterprise (2017), [Tourism output](#).

³ Kirchherr et al (2017), "The interplay of activists and dam developers: the case of Myanmar's mega-dams", International Journal of Water Resources Development, Vol 33, Issue 1.

⁴ Unesco (2019), *Decisions adopted during the 43rd session of the World Heritage Committee*.

Western Sydney Airport.¹ Any doubt over the continuation of the area's world heritage status would be profoundly damaging to the NSW government's reputation, both at home and abroad, even if that status was maintained. Meanwhile, park users visiting the affected areas will be repeatedly reminded of the government's role in adversely affecting the wilderness qualities of a widely cherished and enjoyed natural asset.

The project also has the potential to expose the NSW government to future reputational and other risks from events affecting downstream residents. An analysis from the ANU's Associate Professor Jamie Pittock has found that raising the wall will be ineffective in mitigating flood risk, given that 45% of historical flood waters in the valley have originated from other catchments. Any increase in downstream development following the raising of the wall could therefore see future governments held responsible should future flooding occur. A better course of action would be to continue to manage flood risk using proven graduated planning controls based on international best practice, rather than exposing residents to an uncontrolled risk.

For all of these reasons, I urge the committee members to recommend that the proposal should not proceed.

¹ Unesco (2017), [World Heritage Centre Statement on the Greater Blue Mountains Area](#).