

Hunter Community Environment Centre.



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December 18, 2023

Submission: Hunter Transmission Project – Preliminary Route Energy Corporation of NSW (EnergyCo)

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The Hunter Community Environment Centre was established in 2004 and provides resources to community members working to protect the Hunters unique, abundant ecology and biodiversity. For nearly 20 years along with thousands of grassroots supporters, we have participated in campaigns and projects to defend clean water and air, act on climate change, conserve threatened species habitat, secure marine sanctuaries, contest new offshore oil and gas extraction proposals. The HCEC is a founding affiliate of the Hunter Jobs Alliance and are in solidarity with the labour movement working to secure fair conditions for the local workforce in the emerging renewable energy sector.

The environment centre's continued research and advocacy with communities in the Lake Macquarie and the Central Coast impacted by air and water pollution from coal power generation commenced in 2018. We understand the urgent nature of the Hunter Transmission Project and that it will enable the NSW energy transition to proceed expeditiously, ridding the Hunter community and ecosystems of ongoing pollution impacts and crucially, delivering infrastructure critical to increased renewable transmission capacity needed to meet urgent carbon emission reduction imperatives.

We thank EnergyCo, for the opportunity to make a submission on the proposed route and for the transparency with which consultation has proceeded to date. Whilst we give our in-principle support for the project to proceed, regrettably we are concerned that if constructed according to the preliminary route proposal, the HTP will result in the fragmentation of substantial areas of core habitat currently within State Forest tenure. It is for this reason we deem the proposed preliminary route unacceptable and must raise an objection.

The natural environment of the region is under intense pressure. As part of the Barrington to Hawkesbury Climate Corridor Alliance,¹ the HCEC proposed to the NSW Government a network of Climate Corridors that would protect climate refugia from further clearing and fragmentation.² Refugia represent areas where biodiversity can persist in, or retreat to, until the surrounding landscapes becomes favourable to expand.

Our work suggests that under a worst-case climate warming scenario, by 2070, 44% of Threatened fauna species and 86% of Threatened flora species will suffering range

¹ The Community Environment Network (CEN), EcoNetwork Port Stephens, The Hunter Bird Observers Club (HBOC), and The National Parks Association NSW – Hunter branch, and the HCEC.

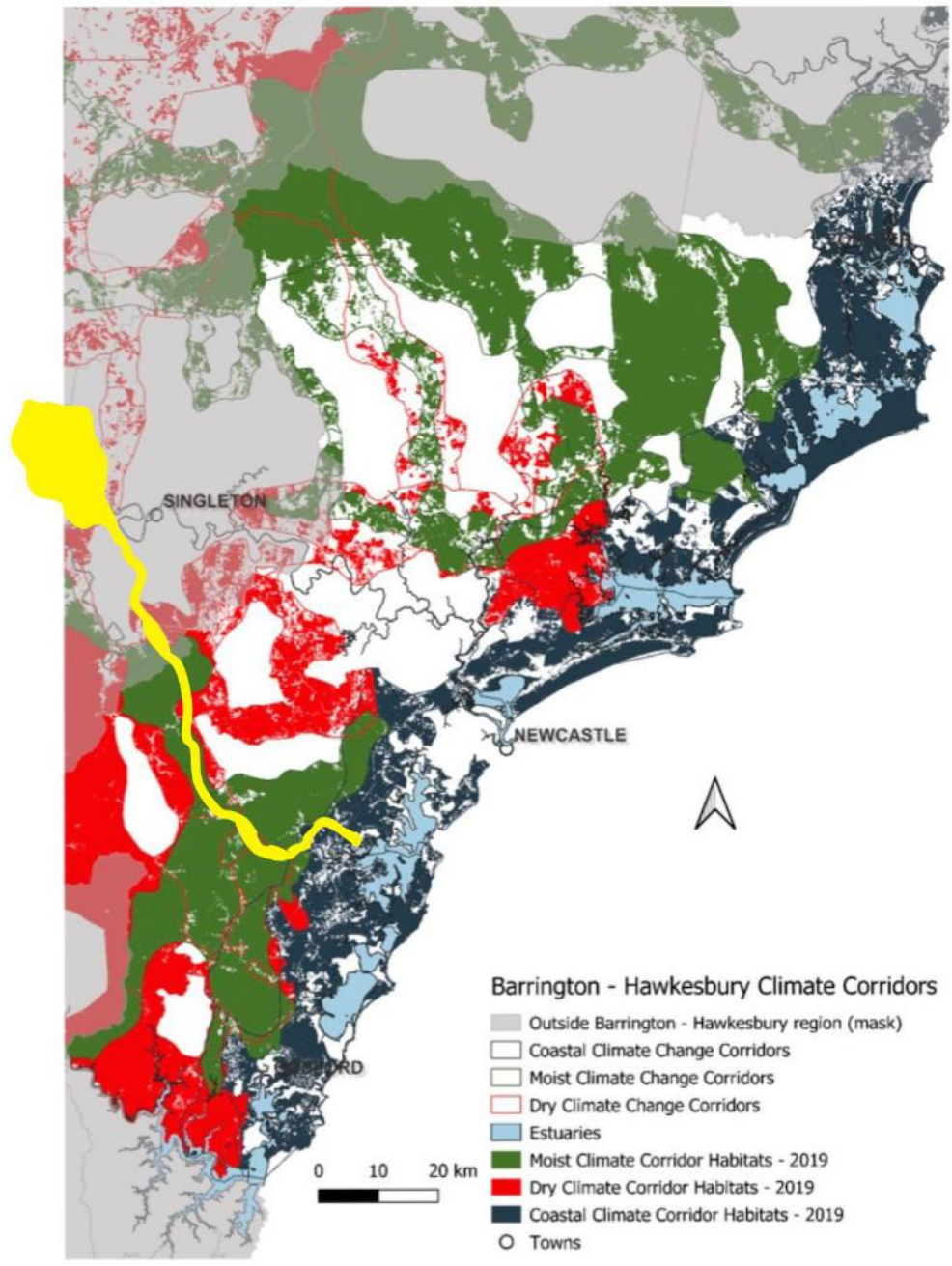
² <https://www.hcec.org.au/climate-corridors>

contractions, and 13% of Threatened fauna and 51% of Threatened flora will have no suitable habitat remaining in the region. Further habitat loss and fragmentation will add considerably to this extinction debt.

Pokolbin, Corrabare, and Olney State Forests, through which the HTP is proposed to be constructed, are predicted to be critical climate refugia for regional native populations.

Below the Preliminary route is shown to traverse areas mapped as Moist, Dry and Coastal Climate Corridors.

Five Coastal Climate Corridors, twelve Dry Climate Corridors, and five Moist Climate Corridors identified in 2007 by NSW Government² are recommended for rehabilitation and protection from further bushland loss and degradation.



2 The Department of Environment and Climate Change (2007) Fauna Corridors for Climate Change: Landscape Selection Process Key Altitudinal, Latitudinal and Coastal Corridors for response to Climate Change Hunter Central Rivers Catchment Management Authority (HCRCMA).

We estimate the proposed 70m transmission line easement corridor of the HTP is approximately 1,450 ha in area, including about 900 ha of native vegetation.

HCEC believes that to minimise impacts to regional biodiversity, existing transmission line easements should be utilised. Below we identify 5 alternative routes for the HTP. We estimate that an additional 70m corridor adjacent to these existing transmission lines would all result in significant loss of native vegetation. Nevertheless, Existing Transmission Line 5 (RED) set out in the maps below (Figure 1, 2) is our preferred option and includes about 520 ha of native vegetation.

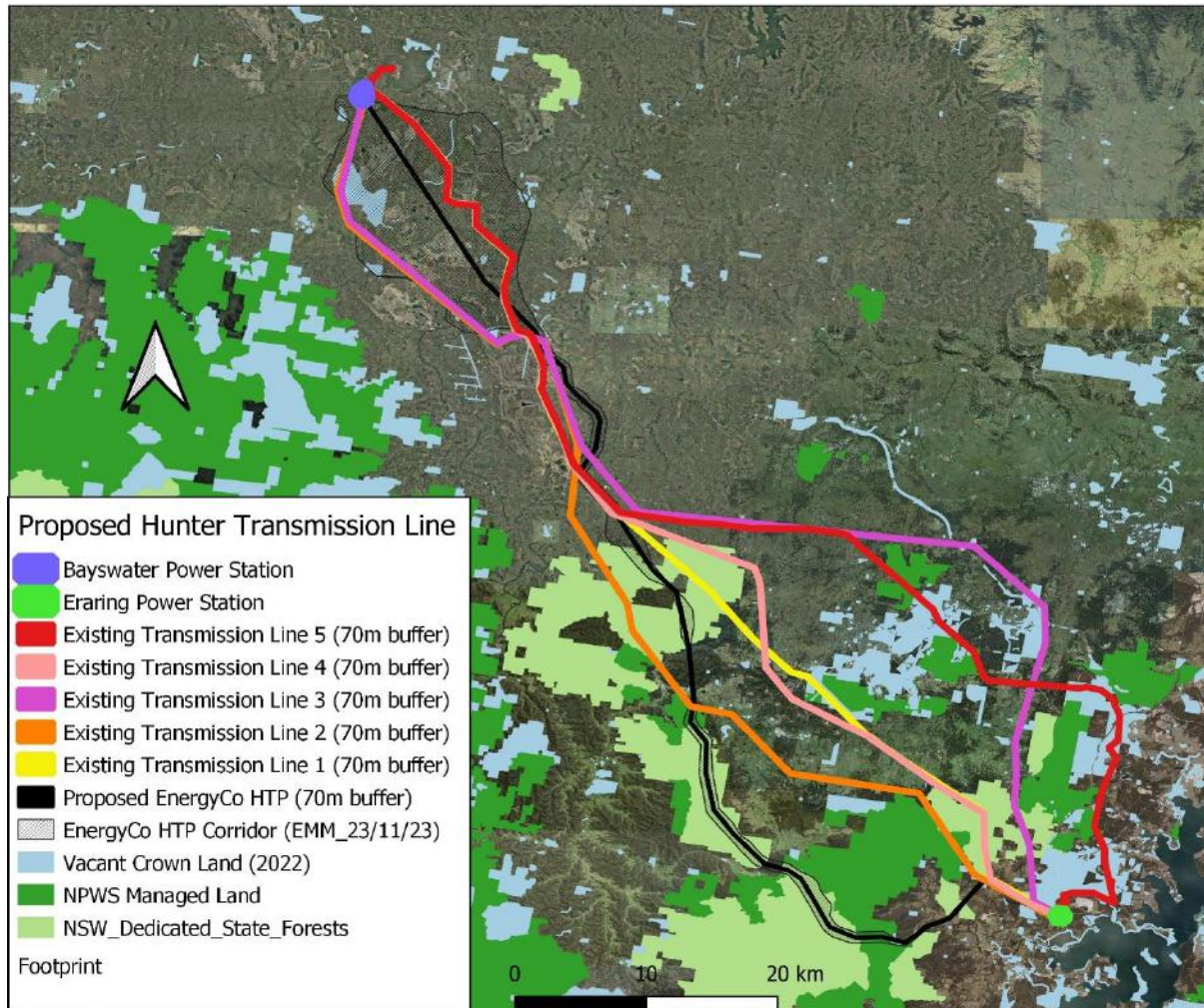


Figure 1. Proposed Preliminary Hunter Transmission Project and Existing Transmission Lines (HCEC, GIS)

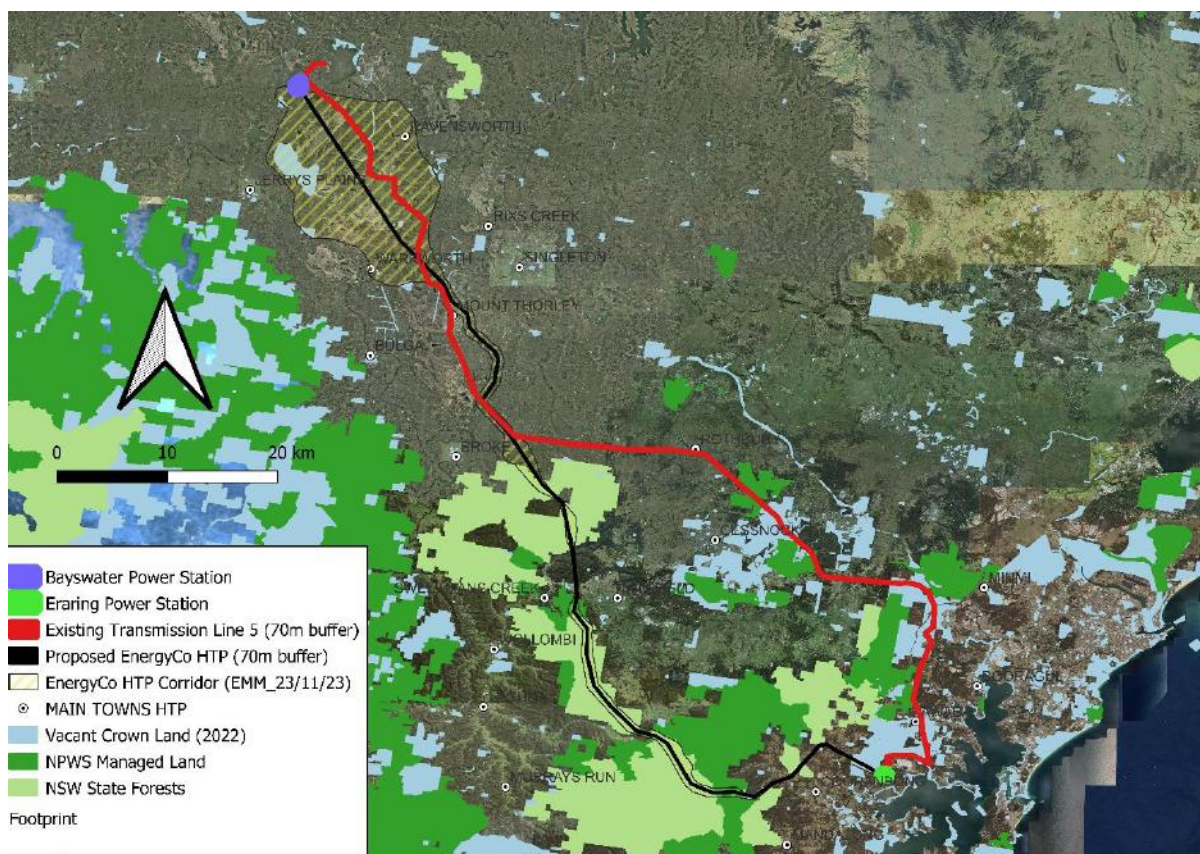


Figure 2. HTP Proposed Preliminary Route and HCEC Preferred Route

Plant Community Types proposed to be cleared by HTP Proposed Preliminary Route

| Plant Community Type | Area (ha) |
|-----------------------------------------------------------------|------------------|
| Blue Mountains Peppermint Shrub Forest Total | 10 |
| Central Coast Flats Mesic Swamp Forest Total | 0 |
| Central Hunter Ironbark Grassy Woodland Total | 59 |
| Central Hunter Ironbark-Spotted Gum Forest Total | 18 |
| Central Hunter Swamp Oak Riparian Forest Total | 51 |
| Greater Sydney Enriched Grey Myrtle Dry Rainforest Total | 2 |
| Hunter Coast Foothills Apple Forest Total | 13 |
| Hunter Coast Foothills Apple-Ironbark Grassy Forest Total | 6 |
| Hunter Coast Foothills Spotted Gum-Ironbark Grassy Forest Total | 0 |
| Hunter Coast Lowland Apple-Bloodwood Forest Total | 7 |
| Hunter Coast Lowland Scribbly Gum Forest Total | 47 |
| Hunter Coast Lowland Spotted Gum Moist Forest Total | 18 |
| Hunter Coast Ranges Turpentine Wet Forest Total | 52 |
| Hunter Escarpment Foothills Ironbark Forest Total | 18 |
| Hunter Escarpment Grey Box Forest Total | 11 |
| Hunter Estuarine Melaleuca nodosa Scrub Total | 0 |
| Hunter Range Blue Gum Gully Forest Total | 12 |
| Hunter Range Colluvial Apple-Gum Forest Total | 1 |
| Hunter Range Creekflat Apple-Red Gum Forest Total | 11 |
| Hunter Range Grey Gum-Stringybark Forest Total | 10 |
| Hunter Range Ironbark Forest Total | 115 |

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|------------------------------------------------------------------|-------------|
| Hunter Range Sheltered Grey Gum Forest Total | 21 |
| Hunter Range Turpentine-Grey Myrtle Gully Forest Total | 34 |
| Hunter River Oak Mesic Forest Total | 3 |
| Hunter Valley Rusty Fig Dry Rainforest Total | 1 |
| Lower Hunter Spotted Gum-Ironbark Forest Total | 49 |
| Lower Hunter Tuckeroo Riparian Rainforest Total | 2 |
| Lower North Creekflat Mahogany Swamp Forest Total | 1 |
| Lower North Hinterland Riparian Dry Rainforest Total | 19 |
| Lower North Hinterland River Oak Forest Total | 3 |
| Lower North Ranges Riparian Turpentine Forest Total | 5 |
| Lower North Ranges Turpentine Moist Forest Total | 52 |
| Lower North Riverflat Eucalypt-Paperbark Forest Total | 10 |
| Lower North Spotted Gum-Mahogany-Ironbark Sheltered Forest Total | 40 |
| Lower North Wet Gully Palm Rainforest Total | 14 |
| Lower North White Mahogany-Spotted Gum Moist Forest Total | 5 |
| Namoi-Upper Hunter River Red Gum Forest Total | 7 |
| Northern Foothills Blackbutt Grassy Forest Total | 42 |
| Northwest Sydney Sandstone Grey Myrtle Dry Rainforest Total | 12 |
| Quorrobolong Sand Flats Forest Total | 0 |
| Southern Lower Floodplain Freshwater Wetland Total | 0 |
| Sydney Basin Creekflat Blue Gum-Apple Forest Total | 2 |
| Sydney Basin Warm Temperate Rainforest Total | 4 |
| Sydney Coastal Sandstone Gully Forest Total | 2 |
| Sydney Enriched Sandstone Moist Forest Total | 15 |
| Sydney Hinterland Peppermint-Apple Forest Total | 38 |
| Sydney Hinterland Red Gum Riverflat Forest Total | 3 |
| Sydney Hinterland Turpentine Sheltered Forest Total | 12 |
| Sydney Hinterland Turpentine-Apple Gully Forest Total | 3 |
| Sydney Sandstone Coachwood-Grey Myrtle Rainforest Total | 8 |
| Warkworth Sands Woodland Total | 26 |
| Watagan Range Turpentine-Mahogany Grassy Forest Total | 8 |
| Not native vegetation Total | 552 |
| Native vegetation | 898 |
| Grand Total | 1450 |

53 plant community types will be affected by the HTP preliminary route as proposed by EnergyCo.

Below we set out the Plant Community Types to be cleared by HCEC's preferred option (5) which as well as avoiding impacts on 12 less PCT's would avoid 380ha of native vegetation loss concentrated in areas of State Forest.

Plant Community Types to be cleared by HCEC's preferred option (5)

| Plant Community Types | Area (ha) |
|-----------------------------------------------------------------|------------------|
| Central Hunter Ironbark Grassy Woodland Total | 39 |
| Central Hunter Ironbark-Spotted Gum Forest Total | 8 |
| Central Hunter Slaty Gum Grassy Forest Total | 0 |
| Central Hunter Swamp Oak Riparian Forest Total | 21 |
| Coastal Creekflat Layered Grass-Sedge Swamp Forest Total | 8 |
| Coastal Creekline Dry Shrubby Swamp Forest Total | 1 |
| Coastal Valleys Swamp Oak Riparian Forest Total | 15 |
| Hunter Coast Foothills Apple Forest Total | 23 |
| Hunter Coast Foothills Apple-Ironbark Grassy Forest Total | 22 |
| Hunter Coast Foothills Spotted Gum-Ironbark Grassy Forest Total | 65 |

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|------------------------------------------------------------------|-------------|
| Hunter Coast Lowland Apple-Bloodwood Forest Total | 34 |
| Hunter Coast Lowland Grey Myrtle Wet Forest Total | 1 |
| Hunter Coast Lowland Scribbly Gum Forest Total | 83 |
| Hunter Coast Lowland Spotted Gum Moist Forest Total | 24 |
| Hunter Coast Ranges Turpentine Wet Forest Total | 9 |
| Hunter Coast Sandy Creekflat Low Paperbark Scrub Total | 1 |
| Hunter Escarpment Foothlopes Ironbark Forest Total | 3 |
| Hunter River Oak Mesic Forest Total | 2 |
| Hunter Valley Whalebone Dry Rainforest Total | 1 |
| Kurri Sand Heathy Woodland Total | 11 |
| Kurri Sand-Clay Woodland Total | 8 |
| Lower Hunter Lowland Ironbark-Paperbark Forest Total | 8 |
| Lower Hunter Red Gum-Paperbark Riverflat Forest Total | 2 |
| Lower Hunter Spotted Gum Scrubby Transition Forest Total | 6 |
| Lower Hunter Spotted Gum-Ironbark Forest Total | 43 |
| Lower Hunter Tuckeroo Riparian Rainforest Total | 2 |
| Lower Hunter Yellow Bloodwood Forest Total | 1 |
| Lower North Creekflat Mahogany Swamp Forest Total | 12 |
| Lower North Foothills Ironbark-Box-Gum Grassy Forest Total | 0 |
| Lower North Ranges Turpentine Moist Forest Total | 1 |
| Lower North Riverflat Eucalypt-Paperbark Forest Total | 12 |
| Lower North Spotted Gum-Mahogany-Ironbark Sheltered Forest Total | 3 |
| Lower North White Mahogany-Spotted Gum Moist Forest Total | 3 |
| Namoi-Upper Hunter River Red Gum Forest Total | 3 |
| Northern Creekflat Eucalypt-Paperbark Mesic Swamp Forest Total | 2 |
| Northern Paperbark-Swamp Mahogany Saw-sedge Forest Total | 6 |
| Quorrobolong Sand Flats Forest Total | 5 |
| Southern Lower Floodplain Freshwater Wetland Total | 0 |
| Sydney Coastal Sandstone Riparian Forest Total | 9 |
| Warkworth Sands Woodland Total | 21 |
| Not native vegetation Total | 1080 |
| Native vegetation Total | 518 |
| Grand Total | 1598 |

Personal communications received from a representative of consultants EMM at an Energy Co. information session hosted in Millfield on December 7 by HCEC Coordinator, affirmed that areas of vegetation categorized as old-growth in Pokolbin State Forest would not be impacted by the project.

We recommend that the preliminary route be amended to conform with Option 5 presented in this submission, entirely avoiding impacts on Pokolbin and Corrabare State Forests.

We wish to request meeting with representatives of EnergyCo. as soon as convenient to confirm the status of Pokolbin old-growth in relation to the project and to discuss options for avoiding the biodiversity impacts outlined in this submission.