3 December 2021

The General Manager

Singleton Council

Email: council@singleton.nsw.gov.au

Dear General Manager,

Australian Plants Society NSW Objection to amended DA183/1993.2 / 5.1993.183.2 at 112 Long Point – West Road, WARKWORTH Lot 450 DP 1119428 for S4.56 Modification to allow use of biomass as a fuel source

The Australian Plants Society NSW Limited (APS NSW) is committed to growing, conserving and promoting Australian native plants.

We strongly oppose the original Development Application, as well as the amended Development Application Modification (DAM), and strongly urge Singleton Council and the Land and Environment Court to reject the application.

Our primary focus is the impact of sourcing the required biomass from native forests within 300 – 400 kilometres of the power station.

Supply of this biomass will likely have a highly damaging impact on the native forests and the plants, birds and animals within them, particularly when these forests are already under severe pressure.

The issues we see are:

Our eastern forests and fauna are already under threat

- The forests of eastern Australia are considered a global biodiversity hotspot due to the large number of native species not found anywhere else in the world. They are threatened due to pressure from land clearing and fragmentation (Broadhurst & Coates, 2017).
- For the Hunter region alone, there are already 160 flora, fauna and ecological communities under threat (NSW Office of Environment & Heritage, n.d.). These include:
    - Birds, such as the regent Honeyeater, the Powerful Owl, the Swift Parrot and the Red Goshawk.
    - Animals such as the Spotted-tailed Quoll, Brush-tailed Rock-wallaby and koala.
    - Flora such as *Eucalyptus castrensis* (Singleton Mallee), many rare and threatened species of orchids, *Grevillea parviflora* subsp. *parviflora, Persoonia pauciflora* (North Rothbury Persoonia), *Pomaderris queenslandica* (Scant Pomaderris) and *Syzygium paniculatum* (Magenta Lilly Pilly).
    - Endangered ecological communities such as the Central Hunter Ironbark-Spotted Gum-Grey Box Forest; the Hunter Valley Footslopes Slaty Gum Woodland; the Hunter Floodplain Red Gum Woodland; and the Lower Hunter Spotted Gum-Ironbark Forest.
- Land clearing is increasing with 50% of it in 2018 unexplained (NSW Government EPA, 2021) (NSW Department of Planning Industry and Environment, 2018).
- Recent legislation around native vegetation removal may exacerbate land clearing, particularly if a market for such product is created.
- Our forests were severely damaged in the 2019/2020 bushfires, putting many forest systems, plants and fauna at increased risk. In the 2019-2020 fire season, 35% of the NPWS estate was burnt, 39% of NSW State Forest, 30% of the Sydney Basin bioregion, 30% of rainforest and alpine complex vegetation types and almost 20% of highly organic peat soils (NSW Department of

Planning Industry and Environment, 2021). Half of NSW's forest and national park area is classified as vulnerable.

- With hotter temperatures, losses of species due to habitat loss are increasing (NSW Government Natural Resources Commission, 2021), particularly in forests that are already under stress.

Removing large volumes of 'woody waste' from forests is likely to damage the health of the forest and further risk the survival of flora and fauna

- Our native species need healthy forests and ecosystems to survive (McElhinny, et al., 2006). A healthy forest includes a rich understory of perennial species, including grasses and shrubs, and logs and branches on the ground. These provide critical habitats for many native animals (Van Dijk, et al., 2020). Sourcing such a large supply of biomass annually may lead to substantial losses in structural complexity of forests and decline of vulnerable species.
- Managing for forest 'productivity' can have an adverse effect on biodiversity due to the loss of structural complexity (NSW Government EPA, 2010).
- Repeat harvesting creates coarse woody debris that is smaller and less decayed. Such material does not encourage biodiversity, unlike logs which are larger, with hollows and are in a more decayed state. (NSW Government Department of Primary Industries, 2017). There is no clarity on how this woody debris will be retained and protected on sites harvested for biomass. Drawing on such woody waste will likely cause irreversible declines in unique Australian native species.
- Forestry Council has indicated its intent to clear fell and intensively log 140,000 hectares of coastal public forest between Grafton and Taree. Clear felling as opposed to selective logging, can be highly damaging to native habitat due to loss of hollow bearing trees, impact of mechanical equipment on soil and loss of understorey (Lindenmayer & Ough, 2006). Regeneration is reliant on replanting which can lead to loss of biodiversity.

Summary

This application does not address the upstream impacts of sourcing biomass from native forests and the significant negative impact on native flora and fauna.

As such, sustainable sourcing of biomass cannot be assured.

Supply of biomass in the quantities required will have a high likelihood of reducing biodiversity, causing extinctions and destroying much of what gives the Hunter Valley and and NSW its distinctive landscape.

This project should undergo a full Development Assessment process, where the significant impacts on forests and native fauna and flora can be thoroughly considered.

Yours sincerely,

Heather Miles, President

Australian Plants Society NSW Ltd

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