



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

8 April 2024

Major Projects
Department of Planning
Locked Bag 5022
Parramatta NSW 2124.

To Whom it may concern,

Submission as an objection to the restart of Redbank Power Station - SSD-56284960

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with over 850 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission, the Society advocates for the protection of the Greater Blue Mountains World Heritage Area.

The Society has serious concerns with the proposal to burn 850,000 tonnes of woody material per year in the Redbank Power Plant (the proposal) near Singleton by the euphemistically-named company, Verdant Earth. The Society believes this proposal will result in the clearing of large tracts of shrubland, woodland and forest in the Hunter, Sydney, Central Coast and Central West regions of NSW.

Clearing ecosystems to burn wood is not ecologically sustainable, nor does it “decarbonise the electricity system”.

Current private land clearing laws permit clearing of so-called “invasive native species”. This proposal shall make clearing of native vegetation viable where landholders deem this vegetation to be “invasive,” but where it was previously uneconomic to clear it. In other words, the proposal will facilitate removal of up to 850,000 tonnes per year of native vegetation within the Redbank power plant’s working circle of about 300km radius from Warkworth, near Singleton.

This proposal will cause extensive and needless environmental damage. The bushland buffers to the Greater Blue Mountains World Heritage Area and of other national parks will be cleared. Bushland on sandstone ridges that was previously uneconomic to clear will be

removed, causing extensive erosion and loss of sandy soils. The resulting sediment will then choke nearby streams.

The burning of native vegetation for electricity needs to be banned, in accordance with NSW Labor election platform. As this removal of native vegetation and resultant environmental damage arising from this proposal shall occur beside major population centres, it will be in the public's eye. The consequent damage will thus be a constant public concern.

Burning native vegetation for electricity produces about twice as much CO₂ as burning coal because it is a less dense fuel and more broadly distributed across the landscape. The collection of this wood material would require more fossil fuel to bring it to the Redbank power plant. The fuel must then be dried before it is burnt.

The proponent's subsequent claim that the native vegetation will regrow is more a pious hope than a reality. Native trees on poor sandstone soils may take centuries to mature, and the intention of landholders to clear land means that regrowth is an unlikely contingency.

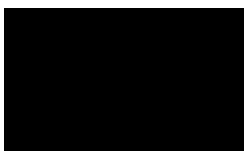
The alternative source of fuel, producing wood as a crop suffers from being of low energy density and thus requires a higher proportion of fossil fuel to collect and bring to the power plant than energy dense coal. The removal of an entire crop for wood products reduces carbon that would otherwise be returned to the soil. Such a feedstock for electricity generation will generate no less CO₂ than burning coal and is unlikely to be economic unless supported with fossil fuel transport subsidies.

Land clearing causes the largest loss of habitat in NSW, and this proposal shall accelerate clearing by introducing the practice to land previously uneconomic to clear. The exemption in the [Protection of the Environment Operations \(General\) Regulation 2022](#) that allows certain types of native vegetation and woody waste from the definition of native forest biomaterials means that native vegetation can be used in electricity generation, in direct contradiction to the intention of the regulation (see clause 138). This regulation permits vegetation cleared in accordance with the Land Management Code for Native Species, a self-assessment code that has been responsible for the acceleration of land clearing in NSW. The proposal would provide a funding source to accelerate yet more clearing.

The Redbank power plant proposal would consume almost twice as much wood as the Eden woodchip mill, but source the wood from woodlands and forests that are far less productive than the South East Forests. In consequence, more land will be cleared of native vegetation more quickly than in the South East Forests as there will be little regrowth, and consequently there would be more public concern about this new clearing. The proposed alternative plant-based fuels are unlikely to be economic to grow on farms and will also generate more CO₂ than burning coal.

Thank you for the opportunity to comment on this proposal.

Yours sincerely,



Annette Cam
President
Blue Mountains Conservation Society

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