



**Nature Conservation Council**  
The voice for nature in NSW



## **Submission on the Hunter Transmission Project Environmental Impact Statement**

**24 September 2025**



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## About NCC

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 200 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

[www.nature.org.au](http://www.nature.org.au)

## For further information about this submission, please contact:

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## Acknowledgement

The Nature Conservation Council NSW acknowledges that we live and work on the land of First Nations . This land has been cared for since time immemorial by Traditional Owners, whose sovereignty was never ceded. We pay our respects to the Traditional Owners past and present of the many Countries within so-called New South Wales.

We respect the leadership of Traditional Owners in caring for Country, and support the development of treaties that meaningfully empower them to do so. We acknowledge the dispossession of First Nations People and the harm inflicted on people and Country since colonisation began. We acknowledge that colonisation is an unjust and brutal process that continues to impact First Nations people today. As people living and working on First Nations Country it is incumbent on us to play our part in righting the historical and ongoing wrongs of colonisation. Indeed, our vision of a society in which nature and communities thrive together depends upon it.

The Nature Conservation Council of NSW (NCC) respects and supports all First Nations people's right to self-determination as outlined by the UN Declaration of the Rights of Indigenous Peoples (UNDRIP), which extends to recognising the many different First Nations within Australia and the Torres Strait Islands. NCC commits to maintain open lines of communication and to build respectful mutual relationships with First Nations people in all the work we do and wherever possible, seek aligned outcomes with and support the goals of First Nations groups.

We commit, as an organisation, to empower and work together with First Nations people to protect, conserve and restore the land, waters, air, wildlife, climate and culture of the many First Nations people in NSW.

To whom it may concern,

## **Submission: Hunter Transmission Project Environmental Impact Statement**

NCC welcomes the opportunity to provide feedback on the Environmental Impact Statement (EIS) for the Hunter Transmission Project (HTP).

### **The HTP is a critical project in NSW's transition to renewable energy.**

It is essential in delivering renewable energy generated in the Central-West Orana and New England Renewable Energy Zones (REZs) to the eastern seaboard. The HTP has already faced delays and is not expected to come online until November 2029. Delivering the HTP without further delays is a precondition for NSW remaining coal-fired power plants to close on schedule and to meet the state's emission reduction targets.

### **A timely renewable energy transition is necessary to safeguard nature and communities in NSW.**

Climate change poses one of the biggest risks to nature, through impacts including drought, bushfires, storms, ocean acidification, sea level rise and global warming. Many plants and animals cannot adapt to the effects of climate change. [NSW has 1018 plant and animal species and ecological communities that are at risk of extinction](#), with climate change, habitat destruction, and invasive species the key drivers.

The bushfires and floods over the last few years have given us a taste of what is to come if we don't take action to prevent climate change. The Paris accord states that to limit global warming to 1.5 degrees and prevent catastrophic climate events and mass extinction we must reduce emissions by 43% by 2030. NSW has legislated emissions reduction targets (based on 2005 levels) of a 50% reduction by 2030, 70% by 2035, and 0% (achieving net zero emissions) by 2050.

NSW's ongoing reliance on coal-fired power means more blackouts and higher energy-prices. We need to build renewable energy generation, storage, and transmission in a timely manner to reach our emissions reductions targets, minimise the impacts of climate change on our environment, provide reliable energy for our state, and bring down energy prices to alleviate cost of living pressures.

### **The HTP falls short of nature positive goals**

While NCC appreciates the important role that the HTP plays in the state's renewable energy transition, the impacts on species and ecological communities are very significant. We are concerned that the design process resulted in the route being diverted off cleared private land and into critically endangered ecological communities (CEECs) in state forests. For example, the proposed route cuts through the [known breeding bonds of the endangered Littlejohn's tree frog](#), presenting a serious threat to their habitat.

It does not appear that a cost-benefit analysis has been undertaken to enable proper comparisons of the various route options, considering the full range of social, economic and environmental costs and benefits. There should be stronger consideration of alternative routes that would substantially avoid the losses to biodiversity and cultural heritage of the proposed route.

As [Ken Henry's review of NSW biodiversity laws found](#), all development must move to a nature positive framework. Nature positive means there has been an improvement in the diversity, abundance, resilience and integrity of ecosystems from an agreed baseline.

Achieving a nature positive future, as the NSW government has committed to in the [NSW Plan for Nature](#), includes halting and reversing biodiversity loss, setting targets for landscape conservation and restoration, and requiring genuine avoidance of impacts before biodiversity offsets are considered.

These principles have not been adequately upheld in the in the HTP EIS. The total greenhouse gas emissions from the project during construction are estimated to be up to 644,384 tonnes of CO<sub>2</sub>-e per year (EIS Section 22.2.3, page 953). Around 20% of total emissions are attributable to native vegetation clearing. **These emissions should be offset through carbon credits, or preferably, avoided by considering an alternative option that involves much less clearing of native vegetation.**

## **NCC's principles and recommendations for a nature positive renewable energy transition**

As outlined in our joint statement, [Strengthening NSW Renewable Energy Zones](#), signed alongside 16 organisations from the Hunter and New England REZs, our key recommendations for the NSW government are:

- Genuine engagement and consultation with First Nations communities must remain a central part of the planning, construction, operations and decommissioning of renewable energy projects
- Identify ecological protection and restoration priorities for each Renewable Energy Zone and require developers to contribute to specific nature positive environmental regional outcomes
- Develop regional community benefit plans and strengthen developer consultation with communities

## **Offsets do not compensate for the biodiversity impacts of the HTP**

Should the project proceed on the route as outlined, it should be acknowledged that offset liabilities generated cover only the directly impacted species and ecological communities and do not reflect indirect impacts on loss of habitat continuity or cumulative impacts.

The EIS biodiversity assessment does not go beyond the Biodiversity Assessment Method (BAM). This focuses on threatened species impacts for the purpose of calculating offset credit liabilities under the Biodiversity Offset Scheme. It fails to consider wider biodiversity impacts such as fragmentation of intact natural areas, movement barriers (such as vehicle tracks), habitat and population thresholds, impacts on non-threatened species, and disturbance effects, such as fire, pests and weeds.

The offset calculations, therefore, significantly underestimate impacts and the biodiversity credit liability for the HTP should be higher than the amount calculated by the BAM.

The NSW government has acknowledged the offsets scheme under the BCA is not fit for purpose and is undertaking reform. NCC does not believe offsets can compensate for impacts, however for as long as the offset regime prevails, we believe that offset credits should go beyond compensating for harm. For example, if 141 Ha of Central Hunter Grey Box–Ironbark Woodland are set to be impacted, we believe 282 Ha of local Central Hunter Grey Box–Ironbark Woodland should be protected.

### **Greater targets, ambition and clarity are needed to protect and restore biodiversity**

The [Hunter Conservation Investment Strategy](#) sets out strategic conservation priorities and actions for the region, for offsets retirement and beyond.

NCC welcomes the development of the Regional Conservation Investment Strategies (the Strategies), not only for the Hunter but for all REZs in NSW. Regional level planning for conservation helps consider cumulative impacts on biodiversity in the region across developments and allows for frontloading biodiversity considerations and habitat continuity into planning for REZs.

However, the regional conservation investment strategies need to be strengthened by including:

- no go areas for development and linking more directly to the planning system
- specific and ambitious conservation and restoration targets
- clear funding commitments for actions in line with the Strategies that go over and above offset funds
- opportunity for public consultation and input to the development and review of the Strategies

There should be limits on “broader conservation actions” related to target species and ecological communities as it is not appropriate for offset money to be used for research, for example. There must be on-the-ground conservation outcomes.

### **Priority should be given to extending and rationalising key conservation reserves in the Hunter**

We believe it will be challenging to retire so many offsets via biodiversity stewardship agreements in a timely manner. The likelihood of retiring the total offset liability within the 3-year Strategic Offset Delivery Agreement (SODA) delivery period via biodiversity stewardship agreements appears slim.

Priority should therefore be given to extending and rationalising key conservation reserves within the region, consistent with the Hunter Conservation Investment Strategy and [areas identified as significant climate corridors](#). This should not rule out other options where practical. A focus on reserve acquisitions will allow for greater habitat connectivity and resilience, compared with stewardship agreements that are likely to include geographically separate sites.

Sites that are worthy of consideration are outlined in the table below:

Name	Owner / status	Comment	LGA	Area (approx)
Sugarloaf	Hunter Central Coast Dev. Corp.	Former BHP land at West Wallsend, west of motorway. Would improve integrity of Sugarloaf SCA. Environmental investigations currently in progress by Hunter Central Coast Development Corporation.	Lake Macquarie	700 ha
Link Road Forest	Private	Adjacent to Newcastle Link Road; significant native vegetation remnant on periphery of Newcastle urban area; links to Blue Gum Hills Regional Park	Newcastle / Lake Macquarie	
Upper Cockle Creek	Private	Extensive lands with significant biodiversity value	Lake Macquarie	
Fassifern	Centennial Coal	Extensive lands with significant biodiversity value	Lake Macquarie	
Awaba	Crown, power station and mining land	Numerous conservation studies and proposals since 1968. Imminent closure of Eraring Power Station will enable these proposals to be realised.	Lake Macquarie	1,500 ha
Morisset	Biraban LALC	South of Morisset Peninsula. Adjoins Lake Macquarie SCA. Possible co-management, Part 4A NPW Act	Lake Macquarie	600 ha
Tomalpin	Private	Also known as the 'Hunter Economic Zone' (HEZ), Development impractical due to site constraints and high biodiversity significance. Regent honeyeater habitat. Extension to Werekata NP	Cessnock	3,000 ha
Cessnock	Crown	Scattered sites. Potential to rationalise boundaries of Werekata NP	Cessnock	500 ha



Ellalong	Private	Important wetland habitat at Ellalong Lagoon. Potential corridor linking Werekata and Watagan NPs	Cessnock	500 ha
Heaton	State forest	Potential transfer of Heaton and Awaba SFs to NPWS. Connection and rationalisation of Sugarloaf SCA and Watagans NP	Cessnock Lake Macquarie	4,300 ha
Wollombi	State forest	Potential transfer of Pokolbin and Corrabare SFs to NPWS (includes Corrabare Flora Reserve)	Cessnock Singleton	19,000 ha
Olney	State forest	Potential transfer of Olney and Watagan SFs to NPWS. Connection and rationalisation of Watagans NP and Jilliby SCA.	Wyong Lake Macquarie	20,000 ha

**Thank you for the opportunity to participate in this consultation.**

Your key contact point for further questions and correspondence is Eve Altman, Clean Energy Campaigner, available via [ealtman@nature.org.au](mailto:ealtman@nature.org.au) and (02) 9516 1488. We welcome further conversation on this matter.

Yours sincerely,

**Jacqui Mumford**  
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