



econetwork
port stephens



17 August 2025

Independent Planning Commission
Suite 15.02, 135 King Street
Sydney NSW 2000

By email to: submissions@ipcn.nsw.gov.au

Dear Commissioners

**EcoNetwork Port Stephens objects to the proposed
RESTART OF REDBANK POWER STATION (SSD-56284960)**

EcoNetwork-Port Stephens is a grassroots community-based environmental and sustainability network comprising over 30 community and environment groups and eco-businesses with a focus on sustainable planning. We are non-party political and do not donate to political parties.

This project threatens biodiversity, isn't carbon neutral, will ultimately undermine NSW's climate and conservation goals, and is not in the public interest.

We object to the Redbank proposal on several grounds:

- 1. Burning biomass is not a green initiative, native vegetation is not waste biomass, and will lead to accelerated clearing**

Native vegetation, primarily from land clearing, will provide the bulk of the 700,000 tonnes of dry biomass annually, in the first four years of operation.

The proposed feedstock for this proposal would be sourced primarily from vegetation cleared under Invasive Native Species (INS) framework in western NSW. These are not weeds. They are native shrubs and trees that are critical habitat for many species, including threatened wildlife. The system permits their clearing is self-assessed, poorly regulated, and widely misused.

Of particular concern is that the proposal would have the effect of accelerating habitat loss in the Cobar Penepine and Brigalow Belt South bioregions, located between 300-500 km west of the development site.

By creating an economic incentive for land holders to clear native vegetation that most likely would not otherwise be cleared, or would be allowed to regenerate, the project accelerates land clearing.

This acceleration is further reinforced when one compares the proponent's requirements and that which current occurs. We support the National Parks Association (NPA) analysis here.

- The proponent claims 500,000 tonnes of 'invasive native species' biomass will be required in Year 1 (at 25 t/ha), which equates to clearing 20,000 ha of native vegetation.
- The NSW published figures for managing 'invasive native species', indicates just 6,219 ha of clearing was authorised – refer¹
- Consequently the project would triple the rate of current land clearing and our biodiversity is already in crisis.

We are seriously concerned that there has been no on-ground assessment of whether the necessary volume of native vegetation can be legally, economically or ecologically sourced.

2. Substantial off-site biodiversity conservation impacts have not been assessed

The Environmental Impact Statement (EIS) fails to assess off-site impacts – The EIS only considers impacts on the 18ha of land the power station sits on, ignoring the potential biodiversity impacts from the thousands of hectares of land clearing required off-site.

3. Carbon accounting under-represents emissions from land clearing

We support the Nature Conservation Council regarding carbon emissions.

- The claim of "*near-net zero*" emissions, due to the regrowth of feedstock, is not supported. Trees cleared for land clearing will not grow back, future growth and carbon storage is lost and other emissions from soils and processing are not counted.
- Verdant claim that burning vegetation bulldozed from agricultural lands will have a neutral effect on greenhouse gas levels; this is false. Burning vegetation will release instantaneous bursts of carbon dioxide in the air.

¹ Latest NSW native vegetation clearing data published (July 2025)
<https://www.environment.nsw.gov.au/news/latest-nsw-native-vegetation-clearing-data-published>

There is no plan to replace the woody vegetation that has been cleared – resulting in a net loss. Burning vegetation is very different to the slow carbon release that occurs when vegetation falls to the ground and rots slowly over time ~ providing nutrients to the soil, and food and shelter for wildlife as it rots.

- The emissions from biomass burning is compared to high emitting coal plants rather than wind and solar, significantly overestimating the emissions benefits.
- The lifecycle analysis of the project shows that the release of ‘CFCs’ which contribute to ozone depletion are more than four times higher than burning coal.
- True net-zero projects should be prioritised over projects that add increased carbon to the atmosphere.

4. The banning of any native vegetation for electricity is a commitment from the NSW Government

NSW Labor has had a longstanding commitment to close the loophole that allows the burning of any native vegetation for electricity “Labor recognizes that burning timber and cleared vegetation for electricity is not carbon neutral and is neither clean or renewable energy”

5. Biosecurity risks

We support NPA’s position that the biosecurity risks have been inadequately addressed, and do not even rate a mention in the Planning Secretary’s assessment report. Transporting 700,000 tonnes of vegetative matter each year over distances of 300-500 km will create an obvious vector for the spread of invasive species and soil pathogens beyond their natural or existing geographical range. This has implications for both the agricultural and biodiversity conservation sectors.

6. Finally, this project is not in the public interest and has no social licence

Today’s society no longer supports massive land clearing. There are more sustainable and environmentally friendly ways to obtain energy through renewable solar and wind resources. Furthermore, it contradicts the urgent need to reduce emissions and protect what remains of NSW’s biodiversity.

Additionally, there will be health impacts through air pollution on a regional community already exposed to poor quality air, further exasperated with the increased traffic movements of B-double trucks (and their environmental and societal impacts).

Finally, we must consider the implications today of every decision that is made to minimise climate impacts and our need to reduce emissions and use all feasible alternatives. In today's political climate, with untested legal grounds², it would not be responsible to approve this project.

Please reject this proposal as the public and environmental interests will not be positively served.

Your sincerely

Sue Olsson
Vice President, EcoNetwork Port Stephens

All correspondence to [REDACTED]

² [World's highest court issues groundbreaking ruling for climate action](https://www.unsw.edu.au/newsroom/news/2025/07/what-does-worlds-highest-court-groundbreaking-ruling-for-climate-action-mean-for-australia). Here's what it means for Australia ... <https://www.unsw.edu.au/newsroom/news/2025/07/what-does-worlds-highest-court-groundbreaking-ruling-for-climate-action-mean-for-australia>