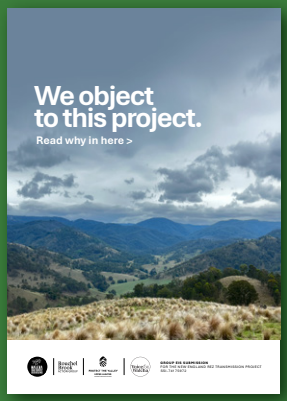
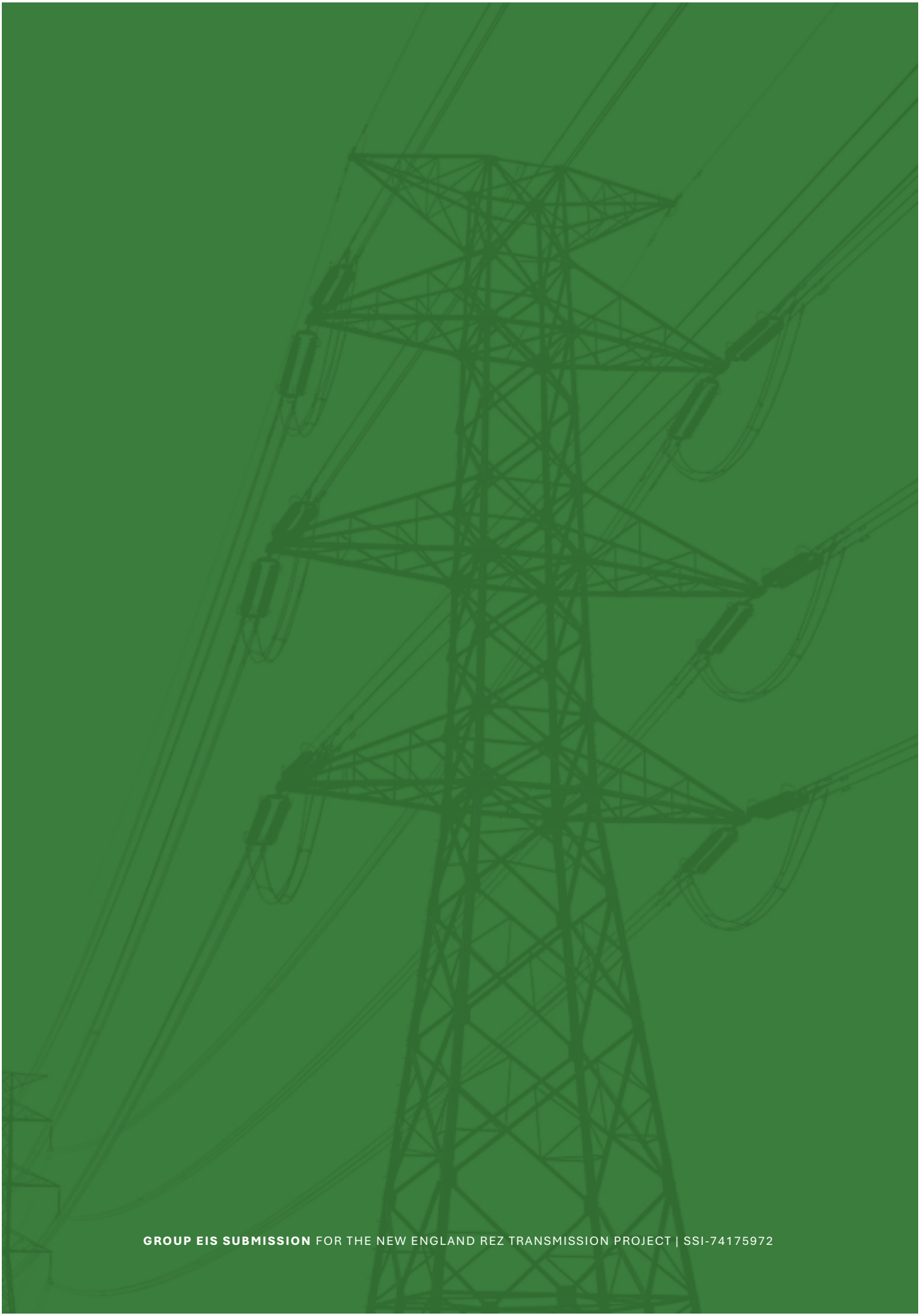
SECTION 7

Forestry

THIS IS **ONE** SECTION OF **TWENTY TWO,**
THAT FORMS PART OF A LARGER GROUP SUBMISSION
TO THE NEW ENGLAND REZ TRANSMISSION PROJECT
SSI-74175972



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GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION 7

Forestry

Key issues we have found ...

Forest impacts are being understated	Economic assessment reduces forest losses to timber revenue, overlooking habitat, recreation, access, firefighting and permanent management costs for public forests.
Forest footprints remain unreconciled	Different chapters present different forest disturbance figures, without clearly reconciling clearing, operational restrictions and the extent of affected public land.
Sensitive forest zones face clearing	The proposed route clears special management and harvesting exclusion areas, without demonstrating why the earlier avoidance objective was not achieved.
Native habitat faces permanent fragmentation	A proposed 140 metre gap through connected native forest threatens wildlife movement, while effective crossing measures remain undefined before approval.
Firefighting access must be protected	Transmission lines, steep terrain and access barriers could constrain firefighting, yet a forest specific suppression strategy has not been demonstrated.
Forest management cannot be deferred	Access controls, road closures, vegetation waste and pest management remain unresolved, creating lasting responsibilities for Forestry Corporation and neighbouring landholders.

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SECTION 7

Forestry

Does the EIS adequately assess the consequences of placing a permanent 500 kV transmission easement through Nundle State Forest and other State forest land, including impacts on forest management, biodiversity, fire response, access, recreation and forestry operations?

EXECUTIVE SUMMARY

The New England REZ Network Infrastructure Project would create a substantial and permanent disturbance through Nundle State Forest. The EIS identifies approximately 160.5 hectares of State forest directly affected by construction, including about 160 hectares in Nundle State Forest, with a larger operational area of approximately 164.5 hectares treated as unavailable for forestry activities. The proposed corridor also affects small areas of Terrible Billy and Hanging Rock State Forests. [1]

The impact cannot be reduced to the value of timber foregone. Nundle State Forest is a working forest, but it also contains areas managed for environmental, cultural and other non-timber values, provides connected native habitat, supports recreation and authorised hunting, and is part of the landscape used for bushfire suppression. The EIS itself identifies the Nundle section as having high existing habitat connectivity and predicts a high connectivity impact because the dual 500 kV lines would create a gap approximately 140 metres wide. [2]

The forestry assessment is also internally inconsistent. Section 12 reports approximately 160.5 hectares of State forest directly affected. The economic chapter assesses 100.4 hectares of production native forest and 62.6 hectares of softwood plantation. The Social Impact Assessment refers to disturbance of only “up to 52 ha” of Nundle State Forest. These figures may reflect different assessment boundaries or land-use classifications, but the EIS does not present a single, clear reconciliation that allows the public or decision-maker to understand the actual forest area to be cleared, restricted or permanently altered. [1, 3, 4]

There is a further concern about route development. During corridor refinement in October 2025, EnergyCo advised Forestry Corporation that it was investigating a route through Nundle State Forest that avoided Forestry Management Zone 2 and Zone 3A land. The exhibited EIS now identifies clearing of approximately 4 hectares of Zone 2 Special Management Zone and 5 hectares of Zone 3A Harvesting Exclusion Zone. The EIS should explain why that earlier avoidance objective was not achieved and what alternatives were considered before accepting impacts to these areas. [5]

The EIS leaves important forestry-specific matters to later consultation and management: detailed construction methodologies, access controls, treatment of merchantable timber, vegetation waste, fauna connectivity structures, weed-contaminated material and operational access. These are not minor implementation details where they determine clearing, fire response, biosecurity, public access and the long-term management of the forest. The Department should require these matters to be resolved and assessed before determination.

Contents

1. Scale and nature of the State forest impact 3

2. The EIS does not present one consistent forestry footprint 4

3. Avoidance of special-management and harvesting-exclusion areas has not been demonstrated 4

4. Nundle State Forest is a major habitat-connectivity corridor 5

5. The economic forestry assessment is too narrow 5

6. Bushfire risk and aerial firefighting within the forest 6

7. Easement access, illegal use and ignition risk 6

8. Vegetation waste, weeds and biosecurity 6

9. Roads, construction access and closures within State Forests 7

10. Recreation, authorised hunting and pest management 7

11. Long-term forest management consequences 8

Deficiencies 8

1 | Scale and nature of the State forest impact

The EIS Land chapter states that construction, including easement clearing, would directly impact approximately 160.5 hectares of State forest: approximately 160 hectares of Nundle State Forest, 0.1 hectares of Terrible Billy State Forest and 0.4 hectares of Hanging Rock State Forest. The project area itself intersects a larger area of Nundle State Forest—about 289 hectares—before the disturbance footprint is applied. [1]

Within Nundle State Forest, the EIS assigns the approximately 160 hectares of clearing to Forestry Corporation management zones as follows. [1]

Forestry Management Zone	EIS description	Approx. clearing
Zone 2 – Special Management	Selective or low-impact forestry while protecting identified environmental or cultural values	4 ha
Zone 3A – Harvesting Exclusion	Harvesting excluded due to identified environmental, cultural, operational or other constraints	5 ha
Zone 4 – General Management	State forest managed for a range of forest uses and values; timber production is not the primary objective	78 ha
Zone 5 – Hardwood Plantation	Commercial hardwood plantation forestry	0.01 ha
Zone 6 – Softwood Plantation	Commercial softwood plantation forestry, typically pine	73 ha

This breakdown is important because almost half of the Nundle clearing is not softwood plantation. The project would clear substantial native forest in Zone 4 and would also disturb Zone 2 and Zone 3A land specifically identified for special management or harvesting exclusion. Describing the forest impact primarily as a small regional loss of timber production understates the nature of the land being affected.

The SEARs expressly required an assessment of impacts on Crown lands including State Forests, and separately required an assessment of the economic impacts to State Forests. Those are different requirements. An economic estimate of timber revenue does not discharge the broader obligation to assess impacts on the State forest estate and its environmental, operational and community values. [6]

2 | The EIS does not present one consistent forestry footprint

The EIS uses materially different forestry areas in different chapters and technical reports:

- Section 12 Land: approximately 160.5 ha of State forest directly impacted by construction, including about 160 ha in Nundle State Forest. [1]
- Section 15 Economic: approximately 100.4 ha of production native forest and 62.6 ha of softwood plantation affected during construction and operation. [3]
- Social Impact Assessment: Nundle State Forest described as disturbed by "up to 52 ha", with different figures also stated for Terrible Billy and Hanging Rock State Forests. [4]

The BDAR describes approximately 160 ha of subject land within Nundle State Forest and records about 5.5 ha subject to harvesting exclusion. [2]

Some difference can be explained by the use of different concepts—project area, disturbance footprint, production forestry land and operational easement. However, the EIS does not provide a single reconciled table or map showing how these figures relate spatially. The discrepancy is too large to leave the reader to infer the explanation.

The Department should require a single forestry impact schedule and map distinguishing: project area; construction disturbance; permanent operational easement; actual vegetation clearing; vegetation retained beneath conductors; each Forestry Management Zone; plantation versus native forest; roads and tracks; and areas temporarily unavailable during construction. The same schedule should be used consistently across the Land, Biodiversity, Social, Economic, Bushfire and Transport assessments.

3 | Avoidance of special-management and harvesting-exclusion areas has not been demonstrated

In October 2025 EnergyCo advised Forestry Corporation that, although the revised corridor would cross approximately 11 km of Nundle State Forest, it was investigating a corridor that avoided Zone 2 Special Management and Zone 3A Harvesting Exclusion land. The exhibited EIS now identifies approximately 4 ha of Zone 2 and 5 ha of Zone 3A clearing. [5]

That change needs a clear explanation. Zone 2 and Zone 3A designations exist because particular environmental, cultural, operational or other constraints have already been recognised in forest management. The EIS should identify the precise values or constraints associated with every affected Zone 2 and Zone 3A area, map them, explain why avoidance was not achieved, and demonstrate the alternatives considered before accepting the impact.

The SEARs require the EIS to demonstrate the application of the avoid, minimise and offset framework for biodiversity impacts, and to assess impacts on Crown land including State Forests. A route refinement that moved from stated avoidance of these management zones to direct clearing requires transparent justification. [6]

4 | Nundle State Forest is a major habitat-connectivity corridor

The biodiversity assessment gives the Nundle section particular significance. For the Forest Way, Niangala to Forest Way, Hanging Rock section, which includes Nundle State Forest, the BDAR describes existing habitat connectivity as "High". It states that 7.7 km of the 12.7 km section traverses good-condition, intact native vegetation, mostly within the General Management Zone, connected to extensive native vegetation in nearby State forests and nature reserves. [2]

The BDAR also rates the project's connectivity impact in this section as "High". It states that the dual 500 kV lines would create a 140 m wide gap and that the terrain and vegetation density would allow little vegetation retention because almost all trees would encroach the safe operating buffer. Threatened species recorded in this area and potentially affected by connectivity loss include koala, spotted-tailed quoll, southern greater glider, yellow-bellied glider and several woodland birds. [2]

This evidence is important to the forestry assessment because Zone 4 should not be treated as low-value land simply because timber production is not its primary objective. In this location, the EIS itself identifies intact native forest with high connectivity value. The forestry section must therefore be read together with the biodiversity assessment, not reduced to commercial timber hectares.

EnergyCo records consultation with Forestry Corporation about fauna connectivity structures, retention of habitat features and vegetation waste. The EIS should identify the structures proposed, their location, design standard and effectiveness, rather than defer the practical solution until after approval. [2]

5 | The economic forestry assessment is too narrow

Section 15 estimates forestry impacts by applying statewide average revenue rates to approximately 100.4 ha of production native forest and 62.6 ha of softwood plantation. It estimates foregone forestry revenue of about $74,844 per year and concludes the impact is immaterial at the regional scale. [3]

That calculation may be relevant to direct timber output, but it is not an adequate assessment of the project's impact on State Forests. It does not value or resolve:

- loss and fragmentation of connected native forest habitat;
- impacts on land already subject to special management or harvesting exclusion;
- changes to long-term forest access, road networks and harvesting patterns;
- firefighting constraints created by transmission infrastructure and access controls;
- weed and biosecurity risks from large-scale clearing and vehicle movement;
- recreation, hunting and pest-management effects; or
- ongoing management costs imposed on Forestry Corporation by the presence of a permanent high-voltage easement.

The conclusion that the forestry impact is "immaterial" at a regional or State scale should not be allowed to stand as a proxy for the planning significance of the impact at Nundle State Forest. A localised impact can be significant even where its contribution to statewide forestry revenue is small.

6 | Bushfire risk and aerial firefighting within the forest

The forestry notes raise a practical concern that requires much more explicit treatment: the proposed lines cross steep, heavily forested country with a history of large, high-intensity fires. Forest fires can produce very high fire intensities and flame lengths under adverse conditions, while steep gullies and limited ground access can make aerial suppression particularly important.

The SEARs require the project to assess public-safety and bushfire risks, describe vegetation management within the easement, and assess impacts on aerial fire control. [6] The forestry-specific question is not only whether the transmission line can survive a fire, but how the line and its easement alter the ability of Forestry Corporation, RFS and other agencies to fight fire in and around Nundle State Forest.

The EIS proposes that forest cover may be retained in some lower parts of deeper gullies where conductor clearance permits. Retained vegetation may assist ecological connectivity, but it also means the operational fire environment beneath the lines must be understood. Conversely, complete clearing of a wide easement may create new access, ignition and human-use risks. The EIS must assess both sides of this management problem.

EnergyCo should identify the sections where transmission infrastructure will constrain fixed-wing or helicopter firefighting, how those constraints overlap with terrain where ground attack is difficult, and what alternative suppression strategy has been agreed with FCNSW and RFS. It should also demonstrate that gates or barriers proposed for access control will not delay emergency entry or evacuation.

7 | Easement access, illegal use and ignition risk

A permanent cleared utility corridor through public forest can change how people access and use the land. The forestry advice identifies the practical risk of rubbish dumping, illegal trail-bike use, damaging four-wheel-drive access and additional bushfire ignition points along utility easements.

These are foreseeable operational impacts. If EnergyCo proposes fencing, gates, bollards or other barriers, the EIS should show their locations and explain who controls them, how authorised forestry and emergency access is maintained, how public access is managed, and who is responsible for maintenance and enforcement over the life of the project.

This cannot be resolved by a generic statement that access will be managed in consultation with Forestry Corporation. Access controls can themselves have environmental and emergency-management consequences. The Department should see the proposed access-control strategy before determination.

8 | Vegetation waste, weeds and biosecurity

Clearing through approximately 160 hectares of Nundle State Forest will generate a large volume of vegetation. The EIS states that merchantable timber within the disturbance footprint is assumed to be lost during construction, while discussions with Forestry Corporation would consider opportunities for commercial harvesting. [1] The biodiversity consultation record also identifies vegetation-waste management as an issue discussed with Forestry Corporation. [2]

The residual material may include weed-contaminated vegetation and soil. The EIS needs to identify what weeds are present in the affected forest areas, how contaminated material will be segregated, the lawful destination or treatment method, and the vehicle-cleaning and hygiene controls applying to machinery moving between work fronts.

If weed-contaminated waste must be taken to a licensed facility, that facility and its acceptance capacity should be identified before approval. Otherwise the assumed waste pathway is not demonstrated. The same applies to large volumes of clean woody biomass: proposed reuse, mulching, chipping, burning, stockpiling or transport off site should be quantified and assessed for fire, traffic and biosecurity consequences.

9 | Roads, construction access and closures within State Forests

State forest roads serve more than Forestry Corporation operations. They are used for fire management, recreation, authorised hunting and access through the forest. Construction traffic, road upgrades, stringing activities and temporary closures can therefore affect multiple users.

The EIS should provide a forest-specific access and traffic plan showing which existing FCNSW roads are used, which are upgraded or widened, which new tracks are created, the duration and timing of closures, alternative access routes, and the notice to be given to Forestry Corporation, local residents, businesses and forest users. The plan should distinguish short-duration stringing exclusions from prolonged construction access restrictions.

Where roads are altered for project use, EnergyCo should identify the required standard at handback and who bears the cost of long-term maintenance or rectification. Roads designed for forestry operations should not be left carrying additional drainage, erosion or maintenance liabilities created by transmission construction.

10 | Recreation, authorised hunting and pest management

The EIS acknowledges that Nundle State Forest is used for recreation, including bushwalking and authorised hunting, and identifies Ponderosa Park as a public recreation facility. [1, 4] The project does not directly cross the main picnic area, but the relevant issue is broader than the picnic ground.

Authorised hunting contributes to control of deer, pigs and other pest animals in State forests. Extended closures or exclusion areas during a multi-year construction program may reduce hunter access and displace pest animals onto neighbouring private land. The EIS should assess the duration and spatial extent of hunting restrictions and consult with Forestry Corporation about likely pest-management consequences.

Where project restrictions materially increase pest-management pressure on adjoining landholders or require additional control programs, responsibility for those costs should be identified. Recreational access impacts should also be communicated in advance with clear closure periods and alternative access arrangements.

11 | Long-term forest management consequences

The transmission corridor is not a temporary construction disturbance. The operational easement is a permanent land-management change. Section 12 states that approximately 164.5 hectares of State forest land would indicatively be affected by the operational area and assessed as unavailable for forestry activities, even though not all vegetation within the easement would necessarily be cleared. [1]

The project will therefore create a new permanent interface between electricity infrastructure and a working public forest. The EIS should show how harvesting, replanting, road maintenance, prescribed burning, wildfire response, pest control, recreation and biodiversity management can continue safely around the infrastructure for its operating life.

These arrangements need to be expressed as enforceable project commitments, not simply matters for future consultation between the Network Operator and Forestry Corporation. The planning decision should define the outcomes to be maintained after the project is transferred to its long-term operator.

Deficiencies

The EIS identifies a substantial State forest impact but does not provide a coherent forestry assessment that brings together land use, biodiversity, bushfire, traffic, waste, recreation and long-term forest management. The principal deficiencies are:

- no single reconciled forestry footprint across the Land, Economic, Biodiversity and Social assessments;
- no clear explanation for the change from the earlier stated intention to avoid Zone 2 and Zone 3A land to an EIS design that clears both;
- insufficient recognition of the high habitat-connectivity value of the native-forest section through Nundle State Forest;
- an economic assessment focused narrowly on statewide timber revenue rather than the full suite of forest values and management costs;
- no sufficiently detailed forest-specific bushfire and aerial firefighting strategy;
- access-control measures, emergency access and responsibility for illegal use left unresolved;
- vegetation waste, weed-contaminated material and disposal pathways not demonstrated at the level required for a project of this scale;
- insufficient detail on State forest road use, closures, notification and handback; and
- recreation, hunting and pest-management consequences not adequately assessed.

These matters are relevant to the impacts the Minister is being asked to approve. They should be resolved before determination rather than deferred to detailed design, contractor methodology or later consultation with Forestry Corporation.

> POSITION SOUGHT

The Department and Planning Minister should not determine the application until EnergyCo has provided a reconciled and forestry-specific assessment addressing the following matters. General assurances that details will be resolved with Forestry Corporation during detailed design are not sufficient.

Reconcile the forestry footprint

Provide one map and schedule reconciling the project area, disturbance footprint, clearing footprint and operational easement across every affected State forest. Show Forestry Management Zones, native forest, plantations, retained vegetation, access tracks and road works. Explain the 160.5 ha, 163 ha and 52 ha figures used in different parts of the EIS.

Explain why Zone 2 and Zone 3A are now being cleared

Identify the values and constraints associated with each affected Zone 2 and Zone 3A area, explain why the October 2025 avoidance objective was not achieved, and demonstrate the route and design alternatives considered to avoid these areas.

Demonstrate how habitat connectivity will be maintained

Map the high-connectivity forest corridor and identify the final clearing width and vegetation-retention areas. Provide the location and design of fauna connectivity measures and demonstrate their likely effectiveness for the threatened species identified by the BDAR.

Provide a forest-specific bushfire and aerial firefighting plan

Identify where the transmission line restricts aerial attack, where ground access is limited, how retained vegetation beneath lines will be managed, and what alternative suppression arrangements have been agreed with FCNSW and RFS. Demonstrate that gates and barriers will not delay emergency response.

Resolve long-term access control

Show proposed gates, fences, barriers and access points. Identify who controls and maintains them and how dumping, illegal vehicle use and ignition risks will be managed while preserving forestry, firefighting and authorised public access.

Provide a vegetation and weed-waste plan

Quantify merchantable timber and residual vegetation by type. Identify weeds and contaminated areas, machinery hygiene controls, treatment and reuse methods, licensed receiving facilities and available capacity. Assess haulage and fire risk associated with stockpiles or off-site disposal.

Provide a State forest road and closure plan

Identify every FCNSW road and track affected, the upgrades proposed, closure periods, alternative access, notification requirements and handback standards. Assess effects on fire operations, recreation, hunting, neighbouring residents and local businesses.

Assess recreation, hunting and pest-management impacts

Define the duration and area of public and hunting restrictions and assess whether reduced access will increase deer, pig or other pest pressure on the forest and adjoining properties. Identify responsibility for additional pest-control measures where required.

Assess the full long-term cost to forest management

Do not limit the assessment to foregone timber revenue. Identify additional FCNSW management, access, road, fire, biosecurity and operational costs caused by the permanent easement and establish how those costs will be met over the life of the project.

Make forestry commitments enforceable

Translate the agreed FCNSW arrangements into measurable project commitments and, where appropriate, conditions of approval. Matters necessary to establish the scale or acceptability of the impact must be resolved before determination, not left to the future Network Operator or contractor.

If EnergyCo cannot demonstrate that the permanent transmission easement can be constructed and operated through Nundle State Forest without unacceptable impacts on forest values, fire management and long-term forest operations, the route through the State forest should be reconsidered before approval.

Source references

[1] EnergyCo, New England REZ Network Infrastructure Project EIS, Section 12 Land, particularly sections 12.2.6.1, 12.3.5.1 and 12.4.5.1 (State forests).

[2] EnergyCo, Technical Report 1 – Biodiversity Development Assessment Report, particularly consultation with Forestry Corporation, habitat-connectivity assessment around Nundle State Forest, and section 8.4.2 State Forests.

[3] EnergyCo, New England REZ Network Infrastructure Project EIS, Section 15 Economic, sections 15.2.3 and 15.3.3 Forestry.

[4] EnergyCo, Technical Report 4 – Social Impact Assessment, discussion of Nundle, Terrible Billy and Hanging Rock State Forests and recreational use.

[5] EnergyCo correspondence to Forestry Corporation NSW, 2 October 2025, New England REZ corridor update, stating the investigation of a corridor avoiding Forestry Management Zones 2 and 3A within Nundle State Forest.

[6] NSW Department of Planning, Housing and Infrastructure, Planning Secretary's Environmental Assessment Requirements for SSI-74175972, 7 April 2026, including Biodiversity, Land, Hazards, Economic and Engagement requirements.

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