Hunter Bird Observers Club
Affiliated with BirdLife Australia

Hunter Bird Observers Club Inc
PO Box 24, New Lambton, NSW 2305
www.hboc.org.au
ABN 62 415 889 446

Director
Resource Assessments, Development Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124.

EXHIBITION OF CRITICAL STATE SIGNIFICANT INFRASTRUCTURE APPLICATION
KURRI KURRI LATERAL PIPELINE PROJECT - Application No SSI-22338205

Hunter Bird Observers Club Inc. (HBOC) was established in 1976 and currently has a membership of 400 members. Although the Club is based in the Hunter region, NSW, membership includes members from other areas in NSW and from interstate.

HBOC objects to any form of development in the Kurri Kurri woodlands, including any development associated with a gas-fired power station, because of the area's rich biodiversity. As will be shown, such development puts at risk the survival of endangered and vulnerable bird species. We have particular concerns about the inadequacy of the Biodiversity Development Assessment Report (BDAR) submitted for this project.

Our objections are:

BDAR

The report doesn't have a list of fauna species which were recorded during field surveys. This is not acceptable for a BDAR, and is especially unusual given that a list of recorded flora has been provided in the report. There is no indication what threatened fauna species, if any, were detected during field surveys.

1.3.2 Access Limitations

The BDAR states that "*Biodiversity surveys were limited at times to areas of the Development Footprint where access was restricted by current property owners. Consequently, seasonal targeted surveys and vegetation mapping could not be completed in some areas"* (Page 4, under *1.3.2 Access Limitations*). Surveys were conducted only from Aug 2021 to Feb 2022 so the presence of seasonal species such as Swift Parrots would not have been detected.

2.1 Targeted Threatened Species Surveys

Page 35, under *2.1 Targeted Threatened Species Surveys* states that "*Where gaps in the adequacy of species credit species survey remain, the proponent proposes to complete additional surveys to account for these gaps"*. No timeline is provided on when these additional surveys would be conducted. There is not much point if it's after the development goes ahead. Will the development be delayed until the proponent organises these surveys?

The gaps that must be filled before the surveys can be considered adequate are listed in the BDAR as:

- *targeted threatened flora parallel transects for summer seasonal species-credit species including a previously inaccessible property at the eastern end of the Development Footprint comprising approximately 1.2 ha of PCT 1592 – thinned/disturbed condition*
- *stag-watching and searches for active hollows by threatened owl species, including nocturnal spotlighting and call playback for threatened owl species, koala and bush-stone curlew within suitable habitat. Suitable habitat includes areas where there are hollows that could potentially be used by threatened owls for breeding, which accounts for approximately 11 ha within PCT 1568, PCT 1592 ad PCT 1691, where suitable hollows have been recorded. Suitable habitat for the koala includes areas containing regionally relevant feed trees, which equates to approximately 25 ha of the Development Footprint within PCT 1568, PCT 1590, PCT 1592, PCT 1598 and PCT 1619. Suitable habitat for the bush stone curlew consists of approximately 31 ha of the Development Footprint in areas associated with PCT 1568, PCT 1590, PCT 1592, PCT 1598, PCT 1619 and PCT 1736. The proposed storage pipeline construction footprint has been adequately surveyed previously.*
- *targeted threatened frog surveys in areas of suitable habitat including areas mapped as freshwater wetlands, drainage lines and dams within the Development Footprint*
- *micro-bat trapping for individuals recorded using habitat within two culverts to determine species and assess evidence of breeding.*

These "gaps" target a large suite of threatened species. A comprehensive BDAR should have the majority of threatened species covered by appropriate surveys.

3.2.3 Threatened Ecological Communities (TECs)

The BDAR identifies a number of Threatened Ecological Communities (TECs) that will be affected by this development. Although the amount of each is relatively small, the cumulative effect would have a serious effect on the birdlife of this area which is vital to the survival of some endangered and vulnerable species such as Regent Honeyeater, Swift Parrot, Glossy Black-Cockatoo and Gang-gang Cockatoo.

Recognised TECs within the development footprint include:

- Freshwater Wetlands on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions – 5.35 ha
- Lower Hunter Spotted Gum Ironbark Forest in the Sydney Basin and NSW North Coast Bioregions – 49.9 ha

- River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions – 3.33 ha
- Hunter Lowland Redgum Forest in the Sydney Basin and New South Wales North Coast Bioregions – 1.68 ha
- Kurri Sand Swamp Woodland in the Sydney Basin Bioregion – 2.48 ha

The amount of vegetation in the development footprint (from Table 2.2 of the BDAR) is 67.58 ha. The total area of development footprint designated as Threatened Ecological Communities (TEC) is 62.74 ha which is 93% of the total vegetation in the development footprint ! This is not an acceptable outcome.

3.3.1 Ecosystem-Credit Species

Ecosystem-Credit Species (i.e. species determined by the Biodiversity Assessment Method (BAM) Calculator to potentially occur within the development footprint) include Regent Honeyeater, Glossy Black-Cockatoo, Little Lorikeet, White-bellied Sea-Eagle, Barking Owl, Powerful Owl, Masked Owl and Grey-crowned Babbler. In addition to these bird species, other Ecosystem-Credit species include Koala, Grey-headed Flying-fox, Spotted-tailed Quoll, Eastern False Pipistrelle, Eastern Coastal Free-tailed Bat, Little Bent-winged Bat and Large Bent-winged Bat. The BDAR claims that "Breeding habitat for these species is fairly limited in the Development Footprint". We question this assessment for two main reasons:

1. The species listed as Ecosystem-Credit Species are vast, with different ecological functions and habitat requirements. To provide a blanket-statement stating limited breeding habitat is a gross oversimplification of the habitat requirements for all species generated by the BAM Calculator.
2. A search on the NSW BioNet Atlas for the area encompassing the development footprint reveals multiple records of many of these species from the last 10 years within a 10 km radius, demonstrating that they clearly depend on the overall locality for their habitat requirements.

5.3.1 Regent Honeyeater SAII Assessment

Page 110 under *5.3.1 Regent Honeyeater SAII Assessment* states that "*Important habitat identified in the Development Footprint comprises a very small fragment (0.46 ha) within the storage pipeline construction footprint surrounded by matrix of cleared/regrowth vegetation. Large areas of remnant vegetation mapped as important habitat surrounding the matrix of cleared/regrowth vegetation adjoin the Development Footprint and have been deliberately avoided. There is approximately 1,728 ha of important habitat mapping within 10 km of the storage pipeline and therefore, the proposed impact represents a negligible reduction (0.03%) in the area of important habitat for the regent honeyeater in the local area".* While this is true, each development is considered individually and at a static point in time whilst not considering other contiguous or future developments. For example much of the surrounding land is zoned as RU2 – Rural Landscape. There is no guarantee that it won't be cleared in the future.

In conclusion, Hunter Bird Observers Club strongly opposes this development based on the ecological importance of the area and the inadequacy of the Biodiversity Development Assessment Report.

Tom Kendall and Robert Stewart

On behalf of the Conservation Sub Committee
Hunter Bird Observers Club Inc. 6 May, 2022

Contact: conservation@hboc.org.au