

EcoResolve



Environment & Design

Response to Submissions – Brewongle Solar Farm BDAR Edify Energy



Prepared for: Adam Smith – Edify energy

M: 0424 256 951

E: adam.smith@edifyenergy.com

Prepared by: Arne Bishop - Ecology Director - EcoResolve Pty Ltd

M: 0401 630 475

E: arne@ecoresolve.com.au

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1 Introduction

EcoResolve was engaged by Edify Energy to prepare a Response to Submissions (RTS) received from Conservation Programs, Heritage & Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) in relation to the Streamlined Biodiversity Development Assessment Report (SBDAR) of Brewongle Solar Farm (SSD – 64834490) in Bathurst, NSW (hereafter referred to as ‘the Project’). CPHR provided recommendations in response to the SBDAR on 09th July 2025. EcoResolve has thoroughly reviewed these recommendations and aims to provide an appropriate response in this report as well as update the S-BDAR as required.

2 Study Area

The Project is associated with the Brewongle Solar Farm (SSD – 64834490) located approximately 12 kms south-east of Bathurst at 315 Tarana Road, Brewongle. The Project involves the construction, operation, and decommissioning of approximately 192,000 solar panels and associated infrastructure, including a substation, transmission line connection, and a Battery Energy Storage System. The Project will involve modifying up to 151.3 hectares of predominately non-native vegetation.

3 Biodiversity Response to Submissions Summary

This response to submissions addresses comments from CPHR (**Table 1**) between current and desired outcomes associated with the existing SBDAR (EcoResolve, 2025). The comments and EcoResolve’s response to them are detailed in **Table 1**.

4 2026 RFI

A further RFI from Department of Planning, Housing and Infrastructure (DPHI) was received on 28 January 2026. Responses to the RFI relevant to biodiversity have also been presented in **Table 1**.



Table 1 – Conservation Programs, Heritage & Regulation Group (CPHR) issues and proposed recommendations and EcoResolve response

Issue verbatim	Issue summary	Issue category	Accountability	Edify Energy Responsibility	Consultant scope (EcoResolve)	Response to Submissions (EcoResolve)
Conservation Programs, Heritage & Regulation Group Issues						
<p>1. The area of the development footprint varies between the EIS and the Streamlined Biodiversity Development Assessment Report (BDAR).</p> <p>The BDAR states that the project will impact 151.3 hectares of land. In contrast, the EIS (page 3) states that the Project area is 299 hectares with an anticipated impact area of approximately 153.2 hectares (considered the maximum impact area on page 21).</p> <p>This discrepancy may be due to the BDAR not considering the proposed transmission line from the project substation to the existing transmission line on the northern side of Salt Water Creek, and an associated access track and vehicular waterway crossing referenced in the EIS and aquatic ecology report.</p>	<p>Recommendation</p> <p>1.1 Clarify the maximum extent of impact assessed and ensure all proposed infrastructure has been considered in the BDAR. If the impact area is different to that stated in the BDAR, revise the BDAR and provide an updated GIS shapefile for the correct area.</p>	SBDAR	EcoResolve/ERM	N/A	<p>Clarify with ERM the impact area. EcoResolve to update mapping with amendments where applicable.</p>	<p>SBDAR</p> <p>Report amended to include this revised text to align with the EIS report.</p> <p>The Project Area is approximately 154 ha, the Project will involve modifying up to 151.3 ha of vegetation, including 0.48 ha of PCT 3376 – Southern Tableland Grassy Box Woodland (Figure 3). This native vegetation will be the subject of this Biodiversity Development Assessment Report (BDAR).</p>
<p>2. The BDAR should provide further information to justify the assessment of areas as Category 1 Exempt Land.</p> <p>The BDAR uses Category 1 – Exempt land to justify application of the BAM Appendix C small areas streamlined assessment module.</p> <p>Clearing of native vegetation on land that meets the definition of Category 1 – Exempt land (as defined under the <i>Local Land Services Act 2013</i> (LLS Act)) does not require assessment or offsetting under the <i>Biodiversity Conservation Act 2016</i>. However, prescribed impacts (BAM Chapter 6) and potential impacts to Commonwealth Matters of National Environmental Significance (<i>Environment Protection and Biodiversity Conservation Act 1999</i>) must still be considered.</p> <p>The assessor has assessed most of the development footprint as Category 1 – Exempt land ((LLS Act). The BDAR does not fully explain how Category 2 – Regulated land criteria were determined to be absent from that land. When present, most Category 2 criteria have precedence over any Category 1 criteria when determining the appropriate land category. Note that BAM vegetation integrity scores are not part of the definition of any land category criteria under the LLS Act.</p> <p>Critically endangered flora and critically endangered ecological communities (CEECs) are Category 2 – Sensitive Regulated criteria (clause 108(2)(b), <i>Local Land Services Regulation 2014</i> (LLS Regulation)). State-wide comprehensive mapping of all CEECs and critically endangered species of plants is not currently published on the transitional or draft Native Vegetation Regulatory (NVR) maps.</p>	<p>Recommendation</p> <p>1. For areas assessed as Category 1 – Exempt land, provide sufficient site-based assessment to demonstrate the presence or absence of:</p> <p>a) the Box Gum Woodland CEEC – specifically assessing the site characteristics against the NSW Scientific Committee Final Determination. Supply all floristic data used in the assessment, noting the dates the data was collected and the seasonal conditions.</p> <p>b) critically endangered plants (supported by recommendations 4.1 to 4.3 of this submission)</p> <p>2. Assess any areas containing critically endangered ecological communities or critically endangered plants as Category 2 – Sensitive Regulated land. Use this information to reassess the eligibility of the Small Area – Streamlined Assessment Module. Provide an evidence-based justification using BAM Appendix C, Table 12.</p>	SBDAR	EcoResolve	N/A	<p>EcoResolve to provide Rapid Data Point (RDP) and BAM data to justify the presence and absence:</p> <ul style="list-style-type: none"> - Box Gum Woodland CEEC against the NSW Scientific Committee Final Determination. Providing all floristic data used in the assessment. - Critically endangered plants <p>EcoResolve to provide further justification with reference to the Final Determination.</p>	<p>SBDAR</p> <p>Report amended to address issues raised.</p> <p>1. a) The majority of the Subject Land has been assessed as Category 1 – Exempt Land as the vegetation has been categorized as belonging to PCT 0 (non-native vegetation). Data from the 19 RDPs collected across the Subject Land has been added to Table B3, Appendix B. Further, Table 1 included in Section 1.6 outlines the vegetation integrity score for Cat 1 land justification. Together these data support the classification of the vegetation on the majority of the Subject Land as PCT 0, thereby justifying its classification as Cat 1 Land.</p> <p>A small area of the subject land (0.48 ha) has been assessed as commensurate with the CEEC Box Gum Woodland and has thus been categorised as Category 2 – Sensitive Regulated Area. Table B2, BAM plot BHTS1, Appendix B provides floristic evidence to support this categorisation. Appendix D provides further justification for the classification of 0.48 ha of land as CEEC Box Gum Woodland.</p> <p>1. b) NA - No threatened flora species were found on site. Appendix B, Tables B2 & B3 provide the floristic data to support this.</p> <p>2. The area of CEEC Box Gum Woodland to be cleared is 0.48. In accordance with BAM Appendix C Table 12, the maximum clearing limit for application of the small area development module for lots with a minimum lot size of 100 ha is <3 ha. As only 0.48 ha of land will be cleared, the area is able to be</p>

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<p>The presence of CEECs and/or critically endangered plants must be considered for site-scale refinement, regardless of published map products. Presence of any of these entities would require a Category 2 – Sensitive Regulated land designation.¹</p> <p><small>DPE (2023) <i>Determining native vegetation land categorisation for application in the Biodiversity Offset Scheme</i>. 6 April 2023</small></p> <p>Targeted threatened flora surveys have been undertaken (including for the critically endangered <i>Caladenia attenuata</i>) within the Category 2 – Regulated land in the development footprint and in a small portion of draft Category 1 – Exempt land outside the development footprint. However, as explained under Issue 4 below, additional information is required to confirm survey adequacy.</p> <p>The accredited assessor has determined that the White Box, Yellow Box, Blakely’s Red Gum woodland and derived native grassland (Box Gum Woodland) CEEC is present on a small portion of the development footprint, which they have assessed as Category 2 land. However, the assessment has not described and justified how the extent of the CEEC on the site was determined.</p> <p>The NSW Scientific Committee Final Determination for the Box Gum Woodland CEEC2] provides the definition of the community. The final determination:</p> <ul style="list-style-type: none"> • includes the derived native grassland formation – absence of tree species does not automatically exclude an associated plant community type from the CEEC listing • discusses varying land uses and condition states in relation to the CEEC and does not require the vegetation to be predominantly native. There are no references to BAM vegetation integrity scores. • notes that floristic composition and abundance may vary significantly in the derived native grassland form of the CEEC, and those areas may be dominated by only a few of the listed characteristic species at any one time. <p>In an email dated 13 November 2024, CPHR advised the accredited assessor that:</p> <ul style="list-style-type: none"> • collection of data on the draft mapped Category 1 – Exempt land should focus on first determining and justifying presence or absence of CEEC and critically endangered flora. • land category assessments should be supported by 						<p>assessed using the small area method.</p>

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<p>evidence from site-based floristic assessment to demonstrate presence or absence of those entities to confirm at the site scale whether the criteria for Category 1 – Exempt may be met.</p> <ul style="list-style-type: none"> floristic assessment to examine presence or absence of CEEC did not need to comply with the Interim Grasslands and other Groundcover Assessment Method, but should comprehensively explain how the presence/absence of Box Gum Woodland CEEC has been determined with reference to: the diagnostic criteria adopted (referencing the NSW Scientific Committee Determination) explanation of the desktop and field methods used the data used to determine presence/absence against the diagnostic criteria. <p>Three BAM plots have been undertaken assessing draft mapped Category 1 – Exempt land, with only one plot completed within the development footprint. The BDAR indicates that ‘rapid data points’ (RDPs) were surveyed, however floristic data has not been provided for these. We are unclear on what season the floristic data was collected in and whether the site was likely to be at its most native at that time. There is no discussion of the site characteristics against the Box Gum Woodland CEEC final determination.</p>						
<p>3. Mapping of ‘non-native’ vegetation must be based on evidence meeting the provisions of BAM section 4.1.2, where land is not designated Category 1 – Exempt land.</p> <p>To meet the provisions of section 4.1.2 of the BAM on Category 2 – Regulated land or non-rural zoned land where the LLS Act does not apply, the BDAR must justify why the areas excluded from assessment are considered to not support any native vegetation. Otherwise, the vegetation integrity of the vegetation present must be assessed via the BAM. The BAM applies regardless of the proportion of native to exotic species.</p> <p>The BDAR indicates two locations where road works are proposed:</p> <ul style="list-style-type: none"> site access works at Tarana Road: mapped as Category 2 – Regulated land on the draft NVR map Tarana Road – O’Connell Road intersection: non-rural 	<p>Recommendation</p> <p>1. For land shown on the draft NVR map as Category 2 – Regulated land and mapped in the BDAR as ‘non-native’:</p> <ul style="list-style-type: none"> a) provide evidence that no Category 2-regulated criteria apply, and the site meets Category 1 – Exempt criteria, or b) supply evidence showing the site is 100% exotic or contains no vegetation. <p>2. Supply evidence showing the site is 100% exotic or contains no vegetation for:</p> <ul style="list-style-type: none"> a) land shown on the transitional NVR Map as Category 2 – Vulnerable Regulated land b) non-rural zoned land mapped in the BDAR 	SBDAR	EcoResolve	N/A	EcoResolve to provide RDP data to justify 100% exotic and is not deemed Category 2 – Regulated land at the Tarana Road sites, as well as the Solar Farm Easement Study Corridor.	<p>SBDAR</p> <p>1 & 2. RDP data has been added to the S-BDAR in Appendix B, Table 3. The floristic data and photos support the classification of the land as Category 1- Exempt Land, meeting the provisions of BAM section 4.2.2.</p> <p>The floristic data collected at RDP 13 and RDP 1 demonstrate the exotic nature of the vegetation along the Salt Water creek line and within the Solar Farm Easement Study Corridor. RDP data from 16, 17 and 18 provide floristics justifying mapped exotic vegetation alongside Tarana Road and the Tarana Road-O’Connell Road intersection.</p>

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<p>land which is exempt from the provisions of the LLS Act.</p> <p>Both footprints are mapped as plant community type 0 in the BDAR, however insufficient evidence is supplied to support the application of section 4.1.2 of the BAM. The spatial data indicates RDPs at these locations, however CPHR does not have access to the RDP data. In the case of the Tarana Road – O’Connell Road intersection, we are unclear whether the proposed works would extend beyond the existing road.</p> <p>Similarly, as noted in Issue 1 the development footprint may also extend into land mapped by the Department as Category 2 – Vulnerable Regulated land, where the requirements of section 4.1.2 of the BAM would also need to be met for the land to be mapped as ‘non-native’ and excluded from vegetation zones.</p>	<p>as ‘non-native’ vegetation.</p>					
<p>4. Some inconsistencies and lack of detail presented for the species credit species assessment make it difficult to confirm adequacy.</p> <p>The small areas streamlined assessment module (BAM Appendix C) requires application and documentation of BAM s.5.2 for candidate species credit species at risk of serious and irreversible impact (SAII), and any other species credit species recorded incidentally on the site.</p> <p>This assessment and outcomes should be clearly presented in the BDAR and align with the BAM-C case. Species credit species may still be generated where the VI score is below the threshold for ecosystem credit generation. This assessment may also be relevant to the assessment of prescribed impacts on Category 1 – Exempt land.</p> <p>There is some confusion within the threatened species assessment in the BDAR, and between the BDAR and the BAM-C case. The BDAR includes minimal information on the selection of candidate species credit species carried forward for further assessment. The extent of suitable habitat present across the development site is not detailed for all species. Habitat extent is needed to demonstrate the adequacy of survey coverage, and to support conclusions relating to prescribed impacts. Due to this, CPHR has been unable to verify survey adequacy against the Department’s published survey guides and Threatened Biodiversity Data Collection (TBDC). To enable a review of the adequacy of the threatened species assessment the BDAR must,</p> <ul style="list-style-type: none"> clarify the process undertaken for selecting the 	<p>Recommendation</p> <p>4.1 Comprehensively document application of BAM s.5.2 in the BDAR to meet the minimum information requirements for ‘habitat suitability for threatened species’ in BAM Appendix L, Table 27. Apply this to Category 2 - Regulated land and also use it on Category 1 – Exempt land to ensure the threatened species assessment supports prescribed impact conclusions.</p> <p>4.2 Ensure the final list of candidate species credit species for further assessment, and reasons for any exclusions, align between the BDAR and BAM-C case.</p> <p>4.3 Revise the BDAR to ensure it defines the extent of habitat deemed suitable for all target species credit species, including the supporting reasoning and evidence. Include reference to the Department’s survey guidelines and any additional TBDC survey specifications when justifying survey method and effort for each species.</p>		EcoResolve	N/A	EcoResolve to update BDAR with further justification of species removed from candidate species list.	<p>Amended species list (section 4.2) to reflect BAM candidate species report - Large Bent-winged Bat, Regent honey eater, Brush-tailed rock wallaby removed. Justification for species removal from candidate species list supplied in Section 4.2, Table 6.</p> <p>A section has also been added detailing the degraded condition of the land and its current use as agricultural land. References Appendix B table B3 to provide justification/evidence.</p> <p>Large-eared Pied Bat and Brush-tailed rock wallaby removed as the BAM-C candidate species list no longer contains these species to ensure alignment between BAM-C and BDAR.</p>

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<p>candidate species targeted in surveys,</p> <ul style="list-style-type: none"> detail the extent of suitable habitat for these species on the site, and demonstrate alignment with the candidate species lists and provide evidenced-based reasons for inclusion/exclusion in the BDAR and BAM-C. <p>Specific comments on the Bathurst grassland earless dragon are provided under Issue 5 below.</p>						
<p>5. The adequacy of the habitat assessment for the Bathurst grassland earless dragon cannot be confirmed based on the available information in the BDAR.</p> <p>The CPHR input into the SEARs for this project (DOC23/1049018-3 dated 1 December 2023) recommended that the proponent engage with us early to discuss survey and assessment requirements for any SAll entities, including the Bathurst grassland earless dragon (<i>Tympanocryptis mccartneyi</i>).</p> <p>The extent of habitat assessed as potentially suitable for the critically endangered Bathurst grassland earless dragon has not been adequately defined and justified in the BDAR (see Issue 4 above). The pitfall trapping survey undertaken does not align with the current survey requirements or the specified optimal survey period for this species. Survey requirements were updated shortly before commencement of surveys for this species on the site and the surveys progressed without advice from CPHR on the proposed survey method.</p> <p>At this stage we are seeking additional site details to inform our consideration of this issue.</p> <p><u>Habitat suitability</u></p> <p>Regardless of the final land categorisation for the site, the BAM requires assessment of prescribed impacts on threatened species, including on Category 1 – Exempt land, where that land may be threatened species habitat. The BDAR currently advises that no prescribed impacts are anticipated due to no threatened species being detected and the habitat on the site being fragmented and in poor condition.</p> <p><u>Bathurst grassland earless dragon habitat requirements</u></p> <p>Whilst thought to be a grassland specialist, the species has been found along railway tracks, with weedy <i>Paspalum</i> grass thickets and</p>	<p>Recommendation</p> <p>5.1 Provide additional site information representing the range of variability across the impact area, to help inform the availability of suitable Bathurst grassland earless dragon habitat across the site (regardless of land category), including:</p> <ol style="list-style-type: none"> additional site photos (georeferenced) observation of soil conditions (including presence of habitat features such as embedded rocks and soil cracks) floristic data (such as RDP results) demonstrating vegetation composition and structure, and observations of bare ground, cryptograms and rock. consideration of land use history (including description of the primary production activities that have taken place). <p>5.2 Describe in more detail the pitfall trap survey undertaken for the Bathurst grassland earless dragon including soil conditions, pitfall size, arrangement use of drift fencing, and date of commencing survey preparations.</p> <p>5.3 Ensure that any future surveys for the Bathurst grasslands earless dragon are undertaken in accordance with the current requirements of the TBDC.</p>	<p>SBDAR – Threatened Fauna Survey</p>	<p>EcoResolve</p>	<p>N/A</p>	<p>EcoResolve to provide further information on the availability of the suitable habitat for Bathurst Grassland Earless Dragon (BGED) as well as more detail on the surveys undertaken.</p>	<p>5.1 a) Additional site photos have been added as an appendix to the S-BDAR (Appendix B, Table B3).</p> <p>b) Observations of soil conditions, ground cover and habitat features have been added as an appendix to the SBDAR (Appendix B, Table B3).</p> <p>c) Floristic data of the RDPs have been added as an appendix to the S-BDAR to give a more comprehensive picture of the habitat within the Project area (Appendix B, Table B3).</p> <p>d) Land use has been added as an appendix to the S-BDAR (Appendix B, Table B3).</p> <p>The additional information added to Appendix B of the S-BDAR (detailed above) demonstrates that the Project area does not contain habitat that is suitable for the BGED. Namely, there is not an abundance of small depressions in the earth associated with partially embedded surface rocks, which are of key importance as burrows for the BGED. Further, the BGED is known to rest under rocks or cracks in the earth, or in thickets of <i>Paspalum</i> grasses, all of which are not common in the Project area. Finally, the current and historic use of land within the Project area is not conducive to the presence of the BGED. Frequent tilling/ploughing for cropping upturns stones and destroys any potential burrow holes, while pesticides used can be toxic. Further, grazing by livestock causes disturbance of grass clusters and reduces cover.</p> <p>5.2 A detailed description of the pitfall trap survey undertaken for the BGED has been added as an appendix (Appendix F) to the S-BDAR</p> <p>5.3 Agreed - moving forward EcoResolve will undertake any future surveys for the BGED in accordance with the current requirements of the TBDC.</p>

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<p>in vacant paddocks with tall pasture grass. They may prefer areas with a more open structure (small patches of bare ground between grasses and herbs) and burrows excavated by wolf spiders (associated with partially embedded surface rock), are thought to be of critical importance.</p> <p>Two BAM plots are located within the development footprint, with a further two BAM plots located outside of the footprint. RDPs are mapped but the data is not currently available to CPHR. The available BAM plot data may give the impression that the habitat is not particularly suitable for the Bathurst grassland earless dragon, but without an understanding of the flora more broadly and other conditions (e.g. presence of rock, spider burrows, prey invertebrate species) across the remainder of the site, CPHR cannot be certain of the extent of potential habitat for the species.</p> <p>Aerial imagery does indicate that much of the site has been tilled/worked and/or pasture improved, which may significantly reduce habitat suitability for the Bathurst grassland earless dragon, but the scale/severity of these impacts on the species are not fully known. Aerial imagery also indicates parts of the site that are potentially less impacted by previous cropping or pasture improvement activities.</p> <p><u>Survey method</u> Specific survey requirements for the Bathurst grassland earless dragon have been updated. The changes were uploaded to the TBDC on 14 October 2024. This was communicated to assessors in the BAM-C release notes dated 28 October 2024,4 which highlighted that:</p> <ul style="list-style-type: none"> the 'Survey Comments' field in the Threatened Biodiversity Data Collection (TBDC) for the Bathurst grassland earless dragon had been updated the survey months for the Bathurst grassland earless dragon had been revised from October-April to March-May. <p>The current TBDC requirements for this species supersede the previous generic survey requirements provided for grassland earless dragons in the NSW DCCEE Threatened Reptile Survey Guide (2022), and pitfall trapping is no longer recommended. The TBDC currently requires a combination of arthropod tubes and tiles deployed over a 10-week period, with the optimal survey period for this species being March-May and encourages site by site discussion on survey design with the Department.</p> <p>Whilst the assessor advised (email to CPHR dated 9 October 2024) of their intent to use the pitfall trapping method for this species (no survey dates were specified), they also commenced surveys less than two weeks later. Surveys were completed prior</p>						

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<p>to receiving CPHR’s response which highlighted the changed requirements and invited further consultation with the Department on the site-specific survey design.</p> <p>It is acknowledged that the surveys for this species were undertaken around the time that the survey advice in the TBDC changed and that significant forward planning, resourcing and preparations for the surveys were likely already commenced. CPHR request that where the assessor is required to undertake future surveys for this species, the surveys be undertaken in compliance with the current requirements of the TBDC.</p> <p>CPHR request additional information from the assessor on the pitfall sampling undertaken, including description of the habitat within which the survey was undertaken, to inform our further consideration of this issue.</p>						
<p>6. The BDAR does not include an assessment of potential serious and irreversible impacts (SAIL) on Box Gum Woodland CEEC.</p> <p>Box Gum Woodland CEEC has been identified within the development footprint. Box Gum Woodland is an entity likely to be at risk of SAIL, within the meaning of clause 6.7 of the <i>Biodiversity Conservation Regulation 2017</i>. Entities at risk of SAIL have additional assessment requirements under BAM.</p> <p>The BDAR must assess impacts to entities at risk of SAIL that would be impacted by the proposal, in accordance with Section 9.1 of the BAM. This requirement applies to the application of the small areas streamlined assessment module, regardless of VI score.</p>	<p>Recommendation</p> <p>6.1 Revise the BDAR to meet the requirements of Section 9.1 of the BAM for the Box Gum Woodland CEEC as an entity likely to be at risk of SAIL.</p>	SBDAR - SAIL	EcoResolve	N/A	EcoResolve to update BDAR with assessment of SAIL on Box Gum Woodland CEEC.	<p>The below passage has been added to ensure that section 6.1 of the S-BDAR meets the requirements of 9.1 of the BAM.: <i>As the Project will involve the complete removal of all vegetation within the Project footprint, changes to the vegetation integrity are represented by the reduction of all VI components and scores to 0 (Table 16). However, even though the proposed works will result in the reduction of the VIS to 0, no ecosystem credit offset liability will be required. This is because the initial condition of the patch (VIS = 6.7) is well below the threshold requiring offsets (≥ 15 for EECs) and the entity is not considered to be at risk of an SAIL (Appendix E).</i></p> <p>Further, an assessment of the likelihood of an SAIL to the BC Act-listed Box Gum Woodland CEEC has been added to the S-BDAR as an Appendix (Appendix E)</p>
<p>7. Native vegetation cover percentage is likely to be underestimated</p> <p>Sections 3.1.2 and 3.2 of the BAM require the assessor to estimate the extent of woody and non-woody native vegetation cover within the assessment (1500 metre buffer) area. Native vegetation cover is to include regrowth, derived native grasslands and plantations that are comprised of plants native to New South Wales (BAM glossary). Guidance is provided in section 2.3 of the BAM Operational Manual – Stage 15 (pages 12-15) and the Department’s BDAR template guidance6 (page 3).</p> <p>Native vegetation cover is an important filter for candidate threatened species within the BAM-C. Errors in this part of the assessment may impact the final credit obligation. The BDAR and spatial data provided indicates that native vegetation cover was</p>	<p>Recommendation</p> <p>7.1 For future assessments, including updates to the BDAR, we encourage the assessor to note:</p> <ul style="list-style-type: none"> a) the guidance provided on pages 12-15 of the BAM Operational Manual – Stage 1 on assessing native vegetation extent within the 1500m buffer. b) that fine scaler scale vegetation mapping is generally required in addition to the SVTM and draft NVR map sources, including a reasonable justification for areas excluded as non-native. c) that the SVTM attribute ‘not classified’ does not necessarily indicate absence of 					<p>In the case of this S-BDAR, without doing further fieldwork (on-ground veg mapping) finer scale mapping that provides detail beyond the SVTM is not possible. For future assessments, however, all these recommendations have been noted and EcoResolve will ensure that on-ground veg mapping of the 1500m occurs so that finer scale maps can be produced.</p>

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<p>estimated using the NSW DCCEEW State Vegetation Type Map (SVTM). The BDAR reports that native vegetation cover within the 1500m buffer was calculated as 1.42% (0-10% cover class).</p> <p>It appears that the native vegetation cover percentage within the assessment area has been underestimated. We have reviewed the spatial data provided and note that there are several areas that appear to contain woody native vegetation that have not been included in the native vegetation cover class mapping. The BDAR does not indicate how non-woody native vegetation has been assessed, considering the guidance in the BAM Operational Manual. The spatial data does not include the native vegetation assessed on the development site in the assessment of native vegetation extent. The SVTM does not capture all native vegetation, woody or non-woody. The SVTM attribute '<i>not classified</i>' should not be interpreted as no native vegetation present. Category 2 – Regulated land mapping can also be used as an additional desktop information source, within an assessment of native vegetation cover (taking into account the purpose of the draft NVR map and how categories are assigned under the NVR map method).</p> <p>If reassessment of the native vegetation percent cover within the buffer area were to result in an increase in the cover class applying to the project (i.e. if the estimated percent cover increased to over 10%), there may be a change to the predicted threatened species list within the BAM-C. However, in this case, it appears unlikely that a primarily desktop-based review for the purposes of section 3.1.2 and 3.2 of the BAM will result in a reassessed native vegetation percent cover above 10%.</p>	<p>native vegetation.</p>					
<p>DPHI RFI January 2026</p>						

Issue verbatim	Issue summary	Issue category	Accountability	Edify Energy Responsibility	Consultant scope (EcoResolve)	Response to Submissions (EcoResolve)
Conservation Programs, Heritage & Regulation Group Issues						
<p>Submit the following information:</p> <ul style="list-style-type: none"> assessment of biodiversity impacts associated with works along the OSOM route; a clear description of the changes made to the BDAR; 	-	SBDAR	EcoResolve	-	Provide the requested information including updates to the SBDAR	<p>EcoResolve assessed all areas of modification along the proposed OSOM vehicle route. One area of vegetation disturbance was identified. EcoResolve applied the streamlined assessment module for planted native vegetation (Appendix D of the BAM 2020). No potential impacts to threatened biodiversity were identified.</p> <p>OSOM-related updates include:</p> <ul style="list-style-type: none"> Added section 1.6 describing the OSOM route Added section 3.3 detailing the vegetation assessment Added section 4.1 applying Appendix D.2 of the BAM (threatened species) <p>All other SBDAR updates include:</p> <ul style="list-style-type: none"> Additional text clarifying project impact area added to executive summary and section 1.4 RDP data added Table B3, Appendix B Vi data and justification added to section 1.6 Added justification for removal of SAll species from assessment in Section 4.2, Table 6. Added Appendix F describing pitfall trap survey for Bathurst grassland earless dragon Additional text in section 6.1 relating to Box Gum Woodland SAll assessment Added Appendix E with BGW SAll assessment <p>For further details, see this column above</p>