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Your ref: SSD-10807896-Mod-1

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Dear Erin

Thunderbolt Wind Farm (SSD-10807896) – Modification 1

Thank you for your request via the NSW Major Projects Planning Portal dated 18 November 2025 to the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) inviting comments on the Thunderbolt Wind Farm Modification-1 report (SSD-10807896-Mod-1, MOD-1).

CPHR has reviewed the MOD-1 report, the associated Biodiversity Development Assessment Report (BDAR) and revised Traffic Impact Assessment. To ensure the biodiversity impacts are adequately assessed and the BDAR is compliant with the Biodiversity Assessment Method (BAM), the following is required:

- Provide additional justification that all vegetation survey points which were conducted outside the development footprint are representative of the vegetation that will be impacted
- Provide quantitative evidence to demonstrate that vegetation is wholly exotic
- De-select 'linear development' in the BAMC

CPHR recommends that the Department of Planning, Housing and Infrastructure (DPHI) requests an updated BDAR that incorporates these recommendations and detailed comments listed in **Attachment A**. The updated BDAR should be provided with the Response to Submissions (RTS).

If you have any questions about this advice, please do not hesitate to contact Rebecca Hobbs, Acting Senior Conservation Planning Officer, via rebecca.hobbs@dcceew.nsw.gov.au or (02) 4224 4135.

Yours sincerely

Sarah Carr
Director North West
Conservation Programs, Heritage and Regulation Group

16 December 2025

Attachment A – CPHR's Recommendations

CPHR's recommendations

Thunderbolt Wind Farm – Modification 1 (SSD-10807896-Mod-1)

1. Provide evidence that vegetation integrity plots conducted outside the development footprint are representative of vegetation which will be impacted

A series of vegetation integrity plots (BAM plots) and rapid flora assessments were undertaken across the proposed development site to identify and map the distribution of Plant Community Types (PCTs). Two out of three BAM plots, and three out of seven rapid flora points were conducted outside the development footprint.

For site 12, a single BAM plot was used for each vegetation zone to inform vegetation integrity assessment. However, the BAM plots used to inform the vegetation zones in site 12 were not located in the corresponding vegetation zones.

Recommendation

- 1.1. Provide evidence that rapid flora assessments and BAM plots which fall outside of the development footprint are consistent with the vegetation zones they have been assigned to. If evidence cannot be provided, collect additional BAM plots for each vegetation zone or assume benchmark.

2. Provide quantitative evidence to demonstrate that grassland areas are wholly exotic

Tables 4.2 and 4.4 of the BDAR present a summary list of canopy, mid-stratum and groundcover species recorded from the stratification of all sites within the 'PCT 0 – exotic' vegetation zone across the Hunter and Peel IBRAs. The groundcover stratum is described as 'dominated by exotics' rather than 'solely exotic', as stated for the canopy and mid-stratum. This indicates that vegetation may be a mix of exotic and native species.

Recommendation

- 2.1. Provide evidence to demonstrate that vegetation is wholly exotic for each site, including raw floristic data collected during rapid vegetation assessments. If evidence and floristic data cannot be provided, assign a best-fit PCT and assess the vegetation zone for threatened species in accordance with the BAM.

3. Select non-linear development in BAM-C

The project has been identified as a linear development in both BAM-Calculator (BAM-C) cases. However, and the accredited assessor has applied a 1500m assessment buffer for assessment, which is the correct for a non-linear development.

Recommendation

- 3.1. For accuracy, remove 'linear development' from both BAM-C cases.