



Your ref: SSD-72383210
Our ref: DOC26/30400

Rita Hatem
Senior Environmental Assessment Officer
Department of Planning Housing & Infrastructure

By email: Rita.Hatem@planning.nsw.gov.au

Dear Rita

Forbes Solar Farm – SSD-72383210 – Environmental Impact Statement

Thank you for your Major Projects Portal request dated 23 January 2026 seeking advice from the Conservation Programs, Heritage & Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the Environmental Impact Statement (EIS) for Forbes Solar Farm.

We have reviewed the exhibited Biodiversity Development Assessment Report (BDAR) and EIS against the Secretary's Environmental Assessment Requirements (SEARs) provided by the Department of Planning, Housing and Infrastructure (DPHI) dated 24 June 2024.

We consider that the BDAR is likely to underestimate the biodiversity impacts of the proposal and is therefore not compliant with the Biodiversity Assessment Method (BAM). Our key issues are:

- the Superb Parrot (*Polytelis swainsonii*) species polygon requires further review
- the Plant Community Type (PCT) allocation and use of the scattered tree module, and
- exclusion of ecosystem credit species

Our assessment and advice are included **Attachment 1**. CPHR will review the updated BDAR and BAM-C cases during the Response to Submissions (RTS) stage.

CPHR commends the proponent on their site selection and avoidance of impacts to biodiversity.

If you have any further questions about this issue, please contact the Conservation Planning and Assessments team – North at rog.nw@environment.nsw.gov.au.

Yours sincerely

Allison Treweek
Senior Manager North
Conservation Planning and Assessments
Conservation Programs, Heritage and Regulation Group (CPHR)

20 February 2026

Attachment 1 - CPHR Assessment Summary for Forbes Solar Farm Environmental Impact Statement (SSD-72383210)

In preparing this advice CPHR has reviewed the following documents:

- Forbes Solar Farm Biodiversity Development Assessment Report, NGH Pty Ltd, 10 November 2025. (BDAR)
- Forbes Solar Farm Environmental Impact Statement, NGH Pty Ltd, 17 November 2025. (EIS)

1.	<i>The species polygon for the Superb Parrot may require revision</i>	There are two trees identified in Figure 5-8 as Superb Parrot 'suitable nest trees (species detected around tree)', which have not been included in the species polygon. These trees have been assessed under the Streamlined Assessment Module for Scattered Tree Assessment, which cannot be used where there is a record of a candidate species credit species incidentally using the tree. Recommended action: <i>Ensure that all trees identified as being used by the Superb Parrot are not assessed using the scattered tree module. Confirm that all suitable nest trees have been buffered and any impacted associated native vegetation zones within 100m of these trees is included in the superb parrot species polygon. Update the BDAR and BAM-C with any changes.</i>
	<i>Extent and Timing</i>	<i>Pre-determination</i>
2.	<i>The Plant Community Types (PCTs) and scattered tree assessment requires revision</i>	CPHR provided advice via the BOS Help Desk for the project on 11 April 2025, recommending that the Kurrajong trees present may be characteristic of PCT 80 and should not be assessed as planted native vegetation. Recommended action: <i>Further consider the presence of PCT 80 and assess impacts to the identified Kurrajong trees using the full BAM or the Streamlined Assessment Module for Scattered Tree Assessment (whichever is relevant). Update the BDAR and BAM-C with any changes.</i>
	<i>Extent and Timing</i>	<i>Pre-determination</i>
3.	<i>Exclusion of predicted of ecosystem species not supported by suitable evidence</i>	Multiple species have been removed from Tab 4 of the predicted list (ecosystem credits) generated from the BAM-C, including Little Pied Bat (<i>Chalinolobus picatus</i>) and Varied Sittella (<i>Daphoenositta chrysoptera</i>). Although this is unlikely to have impacted the credit totals, the removal of these species is not consistent BAM Section 5.2.2. Recommended action: Revise the BDAR and BAM-C case to ensure that ecosystem credit threatened species assessment complies with BAM Section 5.2.2.
	<i>Extent and Timing</i>	<i>N/A</i>