



Our ref: DOC26/342626-10

Your ref: SSD-85362210

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

13 July 2026

Subject: Ebor Battery Energy Storage System (SSD-85362210)

Dear Mr Ashe,

Thank you for your Major Projects Portal request dated 17 June 2026 seeking advice from the Conservation Programs, Heritage and Regulation Group of the NSW Department of Climate Change, Energy, the Environment and Water on the State significant development (SSD) application for the Ebor Battery Energy Storage System (BESS), Ebor (SSD-85362210).

As of 1 July 2026, the Development Coordination Authority (DCA) became fully operational. Its primary role is to act as a single point of contact for NSW Government technical and statutory inputs into the planning and development system. Biodiversity is one of the DCA's core technical areas, with some of the previous roles and responsibilities undertaken by CPHR having transferred to the DCA – Biodiversity Advisory.

Biodiversity Advisory has reviewed the Environmental Impact Statement (EIS) and the relevant accompanying technical reports in accordance with the Secretary's Environmental Assessment Requirements (SEARs) dated 27 June 2025.

The project is for the construction and operation of a 100 MW / 870 MWh BESS and associated infrastructure, including the substation and switching yard, access roads, and a transmission line to connect to the existing transmission line system. The project is located in Ebor which is in the Armidale Regional Council Local Environmental Area.

We consider that the EIS does **not** meet the SEARs for biodiversity. The Biodiversity Development Assessment Report (BDAR) is to be amended as set out in **Attachment 1 and 2**.

In summary, our key issues are:

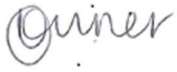
- The vegetation zones should be separated to distinguish the difference in vegetation condition across the site. The assessor must update the Biodiversity Assessment Method - Calculator (BAM-C) based on these refined zones and provide the revised ecosystem credit obligations.

- The identified discrepancies between the plot data entered into the BAM-C and the field survey forms requires rectification.

A summary of our key assessment advice is provided in **Attachment 1**. Detailed comments are provided in **Attachment 2**.

If you have any questions regarding advice on biodiversity matters, please contact Biodiversity Advisory via technical.advisory@dphi.nsw.gov.au.

Yours sincerely,



Nicky Owner
Team Leader Planning
Technical Advisory – Biodiversity

Enclosure:

Attachment 1 – DCA Key Assessment Issues – Ebor BESS (SSD-85362210)

Attachment 2 – DCA Detailed Comments for Ebor BESS (SSD-85362210)

Attachment 1 - DCA Key Assessment Issues – Ebor BESS (SSD- 85362210)

Key Assessment Issues

DCA – Biodiversity Advisory provides the following comments on the proposed development.

Item		DCA – Biodiversity Advisory comment
1	Delineation of vegetation zones	The Biodiversity Development Assessment Report (BDAR) indicates the Plant Community Types (PCT) within the development footprint are in a uniform condition state, and that no structural variation or disturbance history was observed that would warrant subdivision of the PCTs into multiple vegetation zones. As a result, only one vegetation zone was assigned to each PCT, resulting in a total of two vegetation zones across the site. However, during the site inspection on 8 July 2026, DCA-Biodiversity Advisory staff observed the condition of PCT 3288 differed between the road reserve (which contained multiple vegetation community strata) and the vegetation in the adjacent paddock (which mainly comprised remnant trees). Vegetation zones are to be mapped in accordance with Section 4.3.1 of the Biodiversity Assessment Method (BAM), which specifies the assessor must: • stratify areas of each PCT that are in different broad condition states into separate vegetation zones (e.g. sections of vegetation in good condition should be separated from sections that have been significantly degraded or where strata layers are absent). • describe each vegetation zone in the BDAR to accurately reflect significant and distinct differences in condition. PCT 3288 does not appear to be in a uniform condition state across the site, and as such should be separated into two vegetation zones to reflect its differing condition states. Additionally, the mapping of the vegetation zones should be refined to ensure that all tree canopies in this area have been captured. This reassessment is likely to alter the Vegetation Integrity (VI) scores for the site, and in turn may change the ecosystem credit obligations calculated by the Biodiversity Assessment Method - Calculator (BAM-C). Recommended actions: 1. Amend the vegetation zones to reflect the variation in condition of PCT 3288 across the site. 2. Update the BAM Calculator (BAM-C) based on these refined zones and provide the revised ecosystem credit obligations. 3. The mapping of vegetation be revised to include all the relevant canopy trees.

Item		DCA – Biodiversity Advisory comment
	<i>Extent and Timing</i>	<i>Pre-determination</i>
2	Error during entry of plot data into BAM-C, and upload of spatial files.	The plot data gathered and recorded in the field appears to have been entered incorrectly into the BAM-C, with the data for Plots 1 and 2 interchanged. As the BAM-C uses vegetation type and condition data to calculate vegetation integrity scores, which are in turn used to determine the biodiversity credit obligation, this error is to be corrected and the biodiversity credit obligation recalculated. In addition, Appendix K -Table 27 of the BAM specifies the minimum information required to support the assessment, including the submission of GIS shapefiles. The required GIS shapefiles have not been uploaded to the BOS Portal, as required by the BAM. Recommended actions: 1. Plot data is re-entered into the BAM-C to reflect the information recorded in the field survey forms. 2. The accredited assessor for the project is reminded of the requirement for spatial data to be uploaded to the BOS Portal, for the review of the consent authority, as set out in the BAM.
	<i>Extent and Timing</i>	<i>Pre-determination</i>

Attachment 2 – DCA Biodiversity Advisory - Detailed Comments for Ebor BESS (SSD-85362210)

The Biodiversity Development Assessment Report (BDAR) at Appendix 6 of the Environmental Impact Statement (EIS) does **not** currently meet the Secretary's requirements for biodiversity. Specific comments on the BDAR and related sections of the EIS are set out below.

Biodiversity Development Assessment Report and Environmental Impact Statement

Vegetation Zones

The Biodiversity Development Assessment Report (BDAR) indicates the Plant Community Types (PCT) within the development footprint are in a uniform vegetation condition state, and that no structural variation or disturbance history was observed that would warrant subdivision of the PCTs into multiple vegetation zones. As a result, only one vegetation zone was assigned to each PCT, resulting in a total of two vegetation zones across the site.

However, during the site inspection on 8 July 2026, DCA-Biodiversity Advisory staff observed the condition of PCT 3288 differed between the road reserve (which contained multiple vegetation community strata) and the vegetation in the adjacent paddock (which mainly comprised remnant trees).

Vegetation zones are to be mapped in accordance with Biodiversity Assessment Method (BAM) Section 4.3.1 which specifies the assessor must:

- stratify areas of each PCT that are in different broad condition states into separate vegetation zones (e.g. sections of vegetation in good condition should be separated from sections that have been significantly degraded or where strata layers are absent).
- describe each vegetation zone in the BDAR to accurately reflect significant and distinct differences in condition.

PCT 3288 does not appear to be in a uniform condition state across the site, and as such should be separated into two vegetation zones to reflect its differing condition states. Additionally, the mapping of the vegetation zones should be refined to ensure that all tree canopies in this area have been captured.

This reassessment is likely to alter the Vegetation Integrity (VI) scores for the site, and in turn may change the ecosystem credit obligations calculated by the BAM -Calculator (BAM-C).

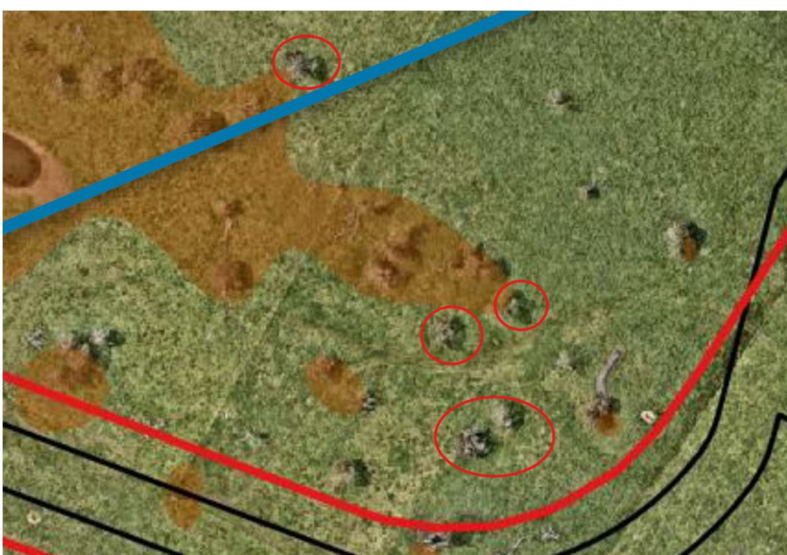


Figure 1 Demonstrates the discontinuity in the vegetation mapping of PCT 3288

Recommended Actions:

1. Amend the vegetation zones to reflect the variation in condition of PCT 3288 across the site.
2. Update the BAM-C based on these refined zones and provide the revised ecosystem credit obligations.
3. The mapping of vegetation be revised to include all the relevant canopy trees.

BAM-C data and GIS shapefile submission

The plot data gathered and recorded in the field appears to have been entered incorrectly into the BAM-C, with the data for Plots 1 and 2 interchanged. As the BAM-C uses vegetation type and condition data to calculate vegetation integrity scores, which are in turn used to determine the biodiversity credit obligation, this error is to be corrected and the biodiversity credit obligation recalculated.

In addition, Appendix K -Table 27 of the BAM specifies the minimum information required to support the assessment, including the submission of GIS shapefiles. The required GIS shapefiles have not been uploaded to the BOS Portal, as required by the BAM.

Recommended Actions:

1. The plot data is re-entered into the BAM-C to reflect the information recorded in the field survey forms.
2. The accredited assessor for the project is reminded of the requirement for spatial data to be uploaded, for the review of the consent authority, as set out in the BAM.

Land Categorisation – Category 1 – exempt land

Section 1.3 of the BDAR states Category 1 - exempt land does not occur within this assessment area. However, the Draft Native Vegetation Regulatory Map shows that Category 1 is present across a large portion of the site (Figure 2). It should be noted that this is incorrect and the BDAR be amended to reflect that Category 1 land is present, yet no further assessment is required as there is not any Critically Endangered Ecological Communities (CEEC) known to be present on the site.

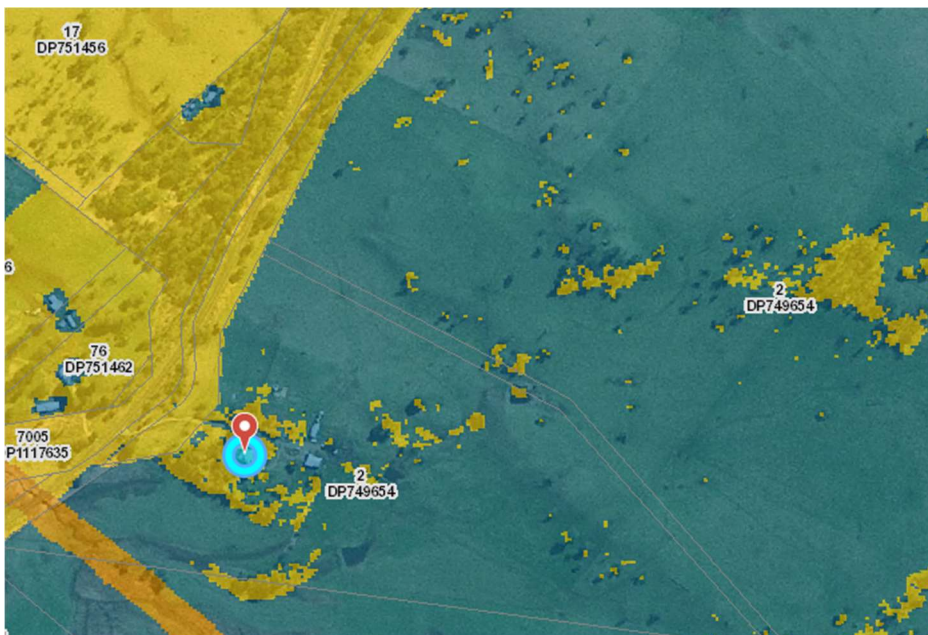


Figure 2 Depicts the Draft Native Vegetation Regulatory Map Land Categorisation