

6/02/2026

Rachael Helsham
Environmental Assessment Office
Locked Bag 5022
Parramatta NSW 2124

Dear Rachael

Forestry Corporation of NSW has reviewed the Narrandera Solar Farm Scoping Report (SSD-102673712) and provides the following comments outlining potential risks and impacts to State forests, forestry operations, and forest users. This response notes the proximity of the proposal to Buckingbong State Forest (~2.7 km south) and Gillenbah State Forest (~3.6 km north).

Forestry Corporation's statutory role is to ensure the sustainable management, and ongoing access to State forests for timber production, fire management, biodiversity, and public use. Based on the Scoping Report, the following risks require detailed consideration within the EIS.

Bushfire risk to State forests

The Project is mapped as Category 3 (medium bushfire risk), with nearby State forests mapped as Category 1 (high bushfire risk). The scale of infrastructure, presence of adjacent Gillenbah battery energy storage system (BESS), Strontian solar farm and Avonlie solar farm, plus the long-term nature of operation, increases ignition risk and consequences presented by wildfire.

Key risks include:

- Potential for bushfire ignition within the solar farm (solar infrastructure, batteries, vehicles and maintenance activities);
- Fire spread from the solar farm into Buckingbong or Gillenbah State forests;
- Constraints on Forestry Corporation performing hazard reduction and/or wildfire suppression activities due to infrastructure sensitivity to smoke, flame/heat, fencing/restricted access.

Forestry Corporation expects:

- A stand-alone Bushfire Assessment Report that explicitly assesses impacts on adjacent State forests, not solely the Project Area; and
- Demonstrated coordination with NSW RFS and Forestry Corporation on asset protection zones, firefighting access, water supply, and operational protocols.

Access and road network impacts

The Scoping Report identifies Kangaroo Plains Road, The Gap Road and Strontian Road as potential access routes, with road upgrades likely during construction.

Key risks include:

- Temporary or permanent disruption to forestry access routes relied on for harvesting, pest control, fire response, apiary and public access;
- Road closures, road damage, or load limits that conflict with forestry operations; and
- Cumulative impacts from multiple renewable energy projects using the same road network in the region.

Forestry Corporation requires:

- Confirmation that no State forest access will be restricted without sufficient consultation and alternative access arrangements; and
- A Traffic Impact Assessment addressing cumulative impacts on forestry operations, access to the State forest and emergency access (including proposed notification periods for any restriction of use of public roads).

Cumulative impacts on State forests

The Scoping Report acknowledges existing and proposed renewable energy developments in the region.

Cumulative risks to Forestry Corporation include:

- Increased pressure on road networks and firefighting resources;
- Progressive fragmentation of the forest-agricultural interface, increasing edge effects, weeds and fire risk; and
- Overlapping construction timeframes potentially constraining Forestry Corporation's operational flexibility.

Forestry Corporation expects cumulative impacts to:

- Explicitly address State forests as sensitive land uses; and
- Consider combined effects of multiple solar and BESS projects on forestry operations.

Ongoing consultation and management arrangements

Given the Project's scale and proximity to State forests, Forestry Corporation considers ongoing involvement essential.



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Accordingly, Forestry Corporation requests that:

- Forestry Corporation be included as a key Government stakeholder during the EIS phase;
- Project design, construction and operational management plans explicitly address State forest protection, access and operations; and
- Any approval conditions include enforceable commitments relating to bushfire management, access, weeds and cumulative impacts.

Please contact Forestry Corporation NSW should further detail be required.

Sincerely

A handwritten signature in blue ink, appearing to read "Jarod Dashwood".

Jarod Dashwood

Land Access Manager - Western
Forestry Corporation NSW