



Our ref: DOC25/1026105-7
Your ref: SSD-66542218

Mr Nestor Tsambos
Team Leader, Energy Assessments
Department of Planning, Housing and Infrastructure
nestor.tsambos@dpie.nsw.gov.au

Dear Nestor

Whitehaven Solar Farm – response to request for further information

Thank you for your request via the NSW Planning Portal dated 25 November 2025 to the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEE) inviting comments on the response to the request for further information (RFI, dated 25 November 2025) for the Whitehaven Solar Farm.

CPHR acknowledges that partial loss is being applied to 2.87 ha (identified as Management Zone 2) to account for asset protection from bushfires and to avoid shading of solar panels.

The RFI states that select clearing will occur using chainsaws to limit disturbance, with groundcover attributes being maintained through management measures outlined in Table 16 of the Biodiversity Development Assessment Report. It is unclear how retained vegetation will be managed to maintain the proposed future vegetation integrity (VI) score in the partial loss zone (Management Zone 2). Specific management activities, in addition to the commitment not to mow, should be described in the Biodiversity Management Plan (BMP) to ensure VI is maintained throughout the life of the project.

The RFI document does not provide an ecological justification for the proposed future VI scores in Management Zone 2, just that the scores are 'conservatively less'.

To address these issues, we recommend the conditions capture:

- the future VI score for each vegetation zone
- the need to complete BAM plots within 3 months of clearing and construction of the infrastructure to determine the VI score following disturbance
- the number of BAM plots required in each vegetation zone
- the requirement that BAM plots will need to be completed for the life of the project to confirm that the future VI score is being maintained
- consequences of the future VI score dropping below that listed in the conditions.

In addition, the BMP must state what management activities will occur in Management Zone 2 to assist in the maintenance of the future VI score, which should include the preparation of a Trigger Action Response Plan (TARP).

If you have any questions about this advice, please do not hesitate to contact Liz Mazzer, Senior Conservation Planning Officer, via liz.mazzer@dcceew.nsw.gov.au or (02) 6883 5325.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Sarah Carr', with a stylized, cursive script.

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

12 December 2025