



Your ref: SSD-8911
Our ref: DOC25/532405-8

Ms Kirsty Vogel
Senior Planning Officer Assessments
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Vogel

Subject: Sundown Solar Farm – Response to Submissions – SSD-8911 (Inverell Shire)

Thank you for your referral in the NSW Major Projects Portal dated 30 June 2025 seeking advice from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the Response to Submissions for the Sundown Solar Farm project.

We have reviewed the RTS against the Secretary's Environmental Assessment Requirements (SEARs) provided by the Department of Planning, Housing and Infrastructure to the proponent on 14 August 2020 and CPHR's advice on the Environmental Impact Statement (EIS) provided to you on 26 September 2023.

CPHR considers that further work is required for the proponent to meet the Secretary's requirements for biodiversity.

The remaining key issue relates to the proposed perimeter fencing. The proposed fencing locations are not presented in the documentation, and therefore it is unclear if the associated impacts have been assessed in the Biodiversity Development Assessment Report.

Further actions are recommended in **Attachment A** to address this remaining issue.

All plans required as a Condition of Approval that relate to biodiversity or flooding should be developed in consultation with, and to the satisfaction of, CPHR.

CPHR will provide advice on Matters of National Environmental Significance under separate cover.

If you have any questions about this advice, please do not hesitate to contact Mr Dimitri Young, Senior Team Leader Planning North East, CPHR, via dimitri.young@environment.nsw.gov.au or 6659 8272.

Yours sincerely

GABRIELLE PIETRINI
Director North East
Conservation Programs, Heritage and Regulation Group

25 July 2025

Enclosure: Attachment A - CPHR comments on Sundown Solar Farm (SSD 8911) - Response to Submissions

ATTACHMENT A CPHR comments on Sundown Solar Farm (SSD 8911) - Response to Submissions

In preparing this advice CPHR has reviewed the following documents:

- Sundown Solar Farm Submissions Report, EMM June 2025.
- Sundown Solar Farm Revised Biodiversity Development Assessment Report, EMM June 2025.

Detailed feedback about the Applicant's response to the CPHR EIS submission is provided in the table below.

Issues that are not listed below are considered by CPHR to be resolved.

CPHR RTS 1	Issue	Further detail on the proposed perimeter fencing is required
	Detail	Project design revisions proposed in the RTS include a perimeter fence around the PV modules. The Amended BDAR states the perimeter fence layout was designed to ensure that connectivity values would be maintained in the study area, however the location of the proposed fencing is not presented in any figures. To confirm the proposed perimeter fencing would not impact habitat connectivity and that it is within the development footprint assessed in the Amended BDAR, mapping of fence locations and details on the proposed type of fencing and crossing points are required.
	Recommend	Prior to determination, further detail of the proposed perimeter fencing is provided to demonstrate any associated impacts have been assessed.