

Department of Planning, Housing and Infrastructure (DPHI)
C/- Major Projects Portal

Attention: Kirsty Vogel

Sundown Solar Farm – SSD8911 – Inverell Shire

Dear Ms Vogel,

I refer to your request for advice on the response provided to the Request for Further Information for the Sundown Solar Farm, dated 22 October 2025.

Agriculture plays a vital role in supporting state, regional, and local economies, as well as strengthening the social bonds and character of rural communities. The NSW Department of Primary Industries and Regional Development, Agriculture and Biosecurity (the Department) collaborates and partners with our stakeholders to protect and enhance the productive and sustainable use and resilience of agricultural resources and the environment.

The Department's advice is guided by section 4.15(1) of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, which requires a consent authority to evaluate a project's potential environmental, social, and economic impacts, as well as the public interest. Sections 1.3(a) and (b) of the *EP&A Act* emphasise facilitating ecologically sustainable development in land use decision-making and promoting responsible resource management that benefits present and future generations.

The Department has reviewed the Addendum Submissions Report and the accompanying documentation. The Department thanks the proponent for considering our previous comments, which are addressed in the Addendum and updates to relevant documents.

The Department raised concerns in our letter of 18 July 2025 that impacts on productive land have not been avoided as per the Large-Scale Solar Energy Guideline (LSSEG), despite design revisions having been undertaken. The Department notes that the Environmental Impact Statement (EIS) outlines that site selection was based on the predominance of Land and Soil Capability Assessment Scheme (LSC) (Second Approximation) Class 4 land and above (pages 10 and 20). However, it is also noted that more than 50% of the site is classified as LSC Class 2 and 3. Approximately 3ha of Class 2 land, the highest capability land in the LGA and comprising just 2% of land in NSW, remains within the disturbance footprint. While the Addendum describes this area as negligible in the broader LGA context, the Department maintains that LSC Class 2 should be avoided at all costs, considering the scarce nature of this valuable finite resource.

The Department acknowledges the Report's commitment to ensuring the proposed project is compatible with ongoing sheep grazing activities post construction. The commitment includes

design considerations such as appropriate panel mounting heights to reduce the risk of damage from livestock, enhance visibility to support mustering operations, and facilitate mechanical slashing beneath the panels when necessary.

The Department notes that the design will be informed by the principles outlined in Agrivoltaics Handbook: A Guide for Solar Developers and Landholders (Bomm and Stark, 2025), which provides relevant guidance on integrating solar infrastructure with agricultural land use.

Should you require clarification on any information provided, please contact Lilian Parker, A/Manager Agricultural Land Use Planning, on 0412 424 397 or by email at landuse.ag@dpird.nsw.gov.au.

Sincerely

L Parker

Lilian Parker

A/Manager, Agricultural Land Use Planning

Agriculture & Biosecurity | Agricultural Land Use Planning