Whitehaven

25 November 2025

Department of Planning, Housing and Infrastructure
Attention: Nestor Tsambos, Team Leader Energy Assessments
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Via the Major Projects Portal

Dear Mr Tsambos,

RE: WHITEHAVEN SOLAR FARM (SSD-66542218) – RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION DATED 20 NOVEMBER 2025

This letter is in response to a request for additional information from the NSW Department of Planning, Housing and Infrastructure (DPHI) dated 20 November 2025. The correspondence requested additional information regarding the use of partial loss, addressing written and verbal feedback from the Conservation Programs, Heritage and Regulation (CPHR) Group.

Further Explanation and Justification of Partial Loss

As part of the Whitehaven Solar Farm (the Project) there is a need to clear for asset protection (from bushfires) and to avoid solar panel shading issues, consistent with the *Large-Scale Solar Energy Guideline* (Department of Planning and Environment, 2022) and *Planning for Bush Fire Protection – A guide for councils, planners, fire authorities and developers* (NSW Rural Fire Service, 2019).

As described in Section 1.2 of the Biodiversity Development Assessment Report (BDAR) (Resource Strategies Pty Ltd [Resource Strategies], 2024), Management Zone 2 is a partial clearing management zone for asset protection/removal of shading issues. This would involve only removal of trees/shrubs by chain-saw rather than heavy machinery, resulting in no ground disturbance. Management Zone 2 is shown on Figure 3 of the BDAR (Resource Strategies, 2024). No lawn mowing is proposed in Management Zone 2. However, grazing is proposed as part of agrisolar practices, similar to the current use of the Project land. As described in Section 5.2 of the BDAR (Resource Strategies, 2024), adoption of a partial clearing management zone where only trees and shrubs would be removed leaving understory and ground cover is a key impact minimisation measure of the Project, in accordance with the Biodiversity Assessment Method (BAM) (Department of Planning, Industry and Environment [DPIE], 2020).

Management Area 2 is mostly Category 1 – Exempt Land, with only 0.43 hectares (ha) of mapped woodland, and 2.44 ha of derived native grassland. The derived native grassland is in suboptimal condition with a vegetation integrity score of 35.1-36.9 out of 100. There is a very minor area (0.43 ha) of woodland in Management Zone 2 (scattered patches regrowth with and without trees/tall shrubs). Plant Community Types (PCTs) and quantities in Management Area 2 are listed in Table 3 of the BDAR (Resource Strategies, 2024).

Plate 4 of the BDAR (reproduced as Plate 1 below) shows an example of the cleared grassland paddocks. The Project site is across a number of paddocks that are highly disturbed from past agricultural practices that have included historical clearance of native vegetation.

Plate 1: Example of Derived Grassland (Poor) (PCT 101) in the Paddocks (Resource Strategies, 2024)

The BAM (2020) states the following requirement for partial loss:

> *2. The future value of the attributes may be amended to reflect the impacts from partially clearing a vegetation zone. Including areas such as asset protection zones and easements. The assessor must map these areas of the vegetation zone as a separate management zone and refer to these areas in the BDAR or BCAR. The BDAR or BCAR must specify how the remaining attributes will be maintained. If it is likely they will continue to degrade, full loss should be assumed. The future value of an attribute must not be higher than the current observed value for that attribute.*

As described in Section 3.4 of the BDAR (Resource Strategies, 2024), within Management Area 2 (Partial Clearance [Ongoing Maintenance]) (Figure 3 of the BDAR [Resource Strategies, 2024]), it is assumed that trees, shrubs and regeneration would be removed for construction and maintenance. As such, the future value of the attributes for trees and shrubs (all shrubs conservatively removed including even low shrubs that would not be removed) were amended to zero. This is considered both conservative and reasonable because:

1. select clearing would be undertaken via chain-saw so trees and shrubs are the attributes that would be lost (Section 1.2 of the BDAR [Resource Strategies, 2024]);
2. other groundcover attributes would be maintained through management measures outlined in Table 16 of the BDAR (Resource Strategies, 2024) (e.g. site induction/access, clearing limits and weed control); and
3. the future vegetation integrity (VI) scores (after trees and shrubs removed) are conservatively less than the current VI score of the surrounding derived native grassland (Table 15 of the BDAR [Resource Strategies, 2024]) as shown in Plate 2.

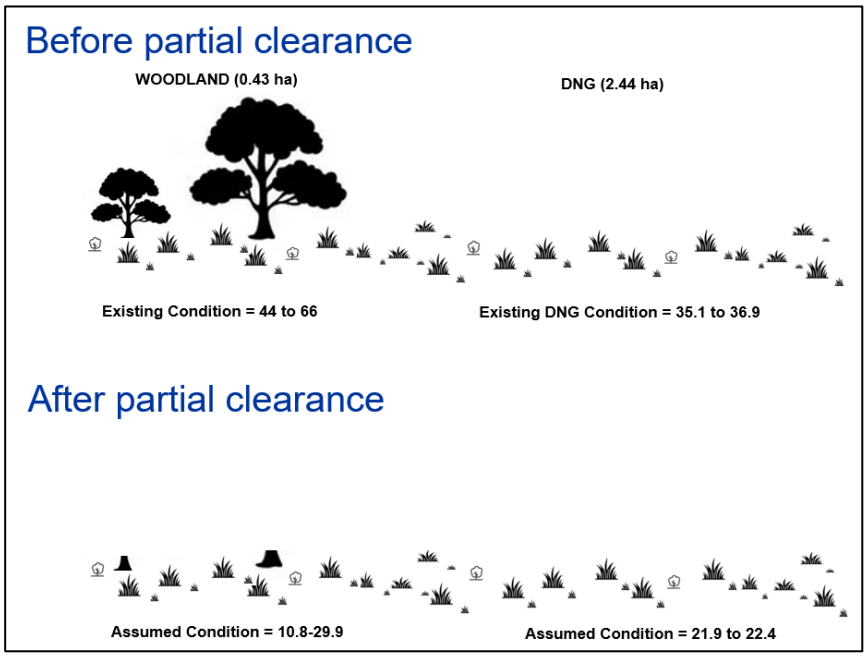

Plate 2: Example of Vegetation Condition and Vegetation Integrity Score Ranges Before and After Partial Loss

It is recognised that scoring of partial loss in the Biodiversity Assessment Method Calculator (BAM-C) must include a reduction in VI score that is proportional to the amount or degree of partial clearing and associated future management. It must reflect any likely degradation from changed land-use patterns (e.g. increased threats) and/or future management proposed (e.g. to enable recruitment). However, as noted above, the Project is across a number of paddocks presently used for agriculture including livestock grazing and dry land cropping. As described in Section 3.8 of the Project Environmental Impact Statement, the Project's design would include accommodation of agrisolar practices, particularly sheep grazing, which would be subject to an initial trial to confirm suitability and carrying capacity on the Project land.

Summary and Conclusion

In summary, full loss of vegetation is not required for asset protection/removal of shading issues. The BAM (DPIE, 2020) requires that reasonable impact minimisation is considered, and this would apply in this situation as it is reasonable for the asset protection/removal of shading issues to occur via selectively clearing trees and shrubs via chainsaw, noting it relates to 0.43 ha of woodland with scattered trees. The site is highly disturbed from past agricultural practices (including past clearance) and the minimal partial clearance required for this Project is manageable with standard vegetation management measures and commitments described in Table 16 of the BDAR (Resource Strategies, 2024). The assumed future VI scores are conservatively less than the current VI score of the surrounding derived native grassland, meaning that the partial loss impact is likely to be less than conservatively assumed.

If you have any questions in regard to the above responses, please contact me via the enclosed details. We look forward to DPHI finalising their assessment.

Yours sincerely,

Scott Mitchell
Manager – Approvals
smitchell@whitehavencoal.com.au

REFERENCES

Department of Planning and Environment (2022) *Large-Scale Solar Energy Guideline*.

Department of Planning, Industry and Environment (2020) *Biodiversity Assessment Method 2020*.

NSW Rural Fire Service (2019) *Planning for Bush Fire Protection – A guide for councils, planners, fire authorities and developers*.

Resource Strategies Pty Ltd (2024) *Whitehaven Solar Farm Project Biodiversity Development Assessment Report*.

Resource Strategies Pty Ltd (2025) *Whitehaven Solar Farm Submissions Report*.