

Jennifer Whelan

3 July 2026

The Chair
Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
SYDNEY NSW 2000

By submission portal / email

Re: Submission on the Sundown Solar Farm proposal — impacts on “Warrawee”, [REDACTED]; identified as Property R14 in the applicant’s submission)

I am writing regarding the proposed Sundown Solar Farm and its associated road works on Spring Mountain Road, Swan Vale. I am the owner of Warrawee, [REDACTED] and this submission is made on behalf of both the property owner and the property manager.

Spring Mountain Road dissects Warrawee, splitting the property into two parcels on either side of the road. Our cattle have right of way across the road, and our staff, contractors and vehicles rely on Spring Mountain Road and its bridge crossing of Swan Brook as our only access in and out of the property, connecting to the Gwydir Highway.

1. Fencing and Cattle Grids

Due to the current usage of the road and the vast increase in traffic the current fencing is not adequate. At a minimum we personally would require approximately 3kms of fencing to ensure a safe cattle free passage. This also works on the assumption that the current fencing that is adequate currently sits on the property boundaries. If this is not the case then we would have to refence the entire road to ensure that we maintain grazing over the entire portion of our owned land.

The applicant also proposes installing wider cattle grids on the road, understood to be 8.7 metres in width, and has referred to only one grid replacement. Under current arrangements, responsibility for maintaining these grids, and the road within approximately 7 metres of each grid, would fall to us as landholders.

- How will handover of the grids and road occur to ensure they remain fit for purpose, and what input will we have into their suitability, installation and ongoing maintenance. We have no capacity physically or monetarily to manage the ongoing maintenance of large cattle grids outside the normal scope of a primary production enterprise.
- If we are required to maintain the grids following construction, what right do we have to refuse their installation or specification?

2. Road — Width, Traffic Volume

The applicant's proposal includes widening Spring Mountain Road. We note the road width has been described elsewhere as 7.8 metres of gravel, which appears inconsistent with the 8.7 metre figure referenced in relation to the cattle grids; we ask the applicant to confirm the correct and final road width. The road is currently a quiet rural gravel road servicing a small number of family farms. The applicant's own material refers to up to 400 contractors engaged on the project, and up to 460 vehicle movements per day, including heavy trucks and buses.

- How will the applicant protect our family, staff, contractors and cattle from the safety risk created by a significant increase in traffic volume and speed on a road our cattle must cross to move between yards, paddocks and water?
- How will the applicant manage the sightline risk at points where the road must be crossed?
- How is the applicant intending to deal with accidents or incidents on the road involving our staff, our cattle, or our property, including liability, veterinary costs, and replacement of any animal injured or killed?
- How will the applicant ensure we retain safe, unhindered access to all parts of our property throughout construction, given our need to move cattle and staff across the property at times dictated by animal husbandry, not by construction scheduling? At a minimum we would require 3 common crossing points along the road. These crossing points could be required to be used at any time of the day or night due to animal needs and weather conditions. This is incredibly important as the risks involved in this type of task at night are high without adding into the mix high traffic levels and dark roads.

3. Bridge Crossing (Swan Brook)

Spring Mountain Road crosses Swan Brook via a bridge that provides our only access to the property. The applicant's material to date does not explain how the bridge will be replaced or upgraded, nor how access will be maintained for our family, staff and stock vehicles during that work.

This access is vital to the operation of the property and is required to be traversed by heavy vehicle, including 2 deck cattle trucks. This also has to be done when required and cannot operate on a schedule.

4. Dust

Warrawee's house, sheds, cattle yards and grazing paddocks are all close to Spring Mountain Road. Dust generated by significantly increased traffic will affect our home, our equipment, our pastures and our cattle. Dust is known to contribute to bovine respiratory disease and acute interstitial pneumonia in cattle, that reduce weight gain and saleability of stock, and to affect pasture growth. In addition, dust creation from the high usage of the road adds to our liability as employers. If the *Sundown Solar Farm* traffic significantly increases dust on Spring Mountain Road, it is arguably a WHS risk being introduced by a third party. On this basis, we need the developer to demonstrably manage it, and to be very receptive and responsive to our needs when we or our staff are operating on the property in relation to dust suppression matters, as we will be the party to carry the compliance burden for exposure.

The applicant has indicated it is prepared to seal the road, for approximately 150m, where it passes our house, sheds, yards and animal holding facilities. Our experience with dust from the road would indicate this is insufficient and we require a greater distance sealed to minimise the impact on our infrastructure and staff. We also need a commitment from the developer to engage proactively and quickly with us if dust is being unduly raised whilst we are working in the area.

We believe that at a minimum 500m of high-quality bitumen would be required to effectively dampen the dust to an acceptable level.

Conclusion

Warrawee is a single, operating cattle property that is physically dissected by Spring Mountain Road. The matters raised above — fencing and grid integrity, road safety and access via the Swan Brook bridge, and dust impacts on our staff, family and livestock — go directly to our ability to safely and viably continue operating this property during and after construction.

We respectfully ask that the Commission consider each of the matters raised in this submission, and that any approval include binding conditions addressing fencing and grid specification and maintenance responsibility, road and bridge access continuity, and a funded dust suppression and compensation regime, before construction commences.

Whilst we are happy to work with the developer in overcoming issues, we should not have to bear the cost, either now, or into the future, for any impacts on our property or staff as a result of the development and would hope the developer is of the same understanding.

We are happy to discuss any of the above directly and can be contacted on the details above.

Yours sincerely,

Jennifer Whelan
Owner, Warrawee