

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

Attention: Rita Hatem

Brewongle Solar Farm (SSD-64834490) – Response to Submissions – DPIRD Agriculture and Biosecurity Advice

Dear Ms Hatem,

Thank you for the opportunity to review and provide advice on the Response to Submissions package for the proposed Brewongle Solar Farm (SSD-64834490).

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

We have reviewed the Submissions Report and associated documents, and make the following comments:

- The Department welcomes well-planned attempts at implementing agrisolar schemes, including commitments made to the scheme and to a Grazing Management Plan in the Submissions Report. As successful implementation of agrisolar in NSW remains low, we caution against using it as a meaningful mitigation and justification of impacts to agricultural productivity. This is particularly the case given the quality of land resources being impacted (e.g. Land and Soil Capability [LSC] Class 3 land), which typically can support high value cropping activities.
- As noted in the Submissions Report, where pursued the balance of land management outcomes should be towards long-term soil and groundcover management to aid

rehabilitation at end of life. The groundcover management target of 70% should therefore also be maintained in grazed areas as much as possible.

- Commitments made here, including to a Grazing Management Plan, a 70% groundcover target, and a rehabilitation objective of returning the site to its pre-existing land use and LSC classes should be explicitly stated in an updated schedule of mitigation measures. Note existing phrasing of Mitigation Measure SA7, which only requires rehabilitation to a level agreed with the landholder may be inconsistent with these goals depending on ownership of the site at the time.

Should you require clarification on any of the information provided, please do not hesitate to contact me by email at landuse.ag@dpird.nsw.gov.au.

Sincerely

A handwritten signature in black ink, appearing to read 'Milo Kelly', with a large, sweeping flourish underneath the name.

Milo Kelly

Agricultural Land Use Planning Officer

Agriculture & Biosecurity | Agricultural Land Use Planning