

Andy Nixey
Principal Planning Officer

C/-Major Projects Portal

Daroobalgie Solar Farm (SSD-10387)- Response to Submissions (RtS)

Dear Mr Nixey

Thank you for your correspondence of 7 December 2022 and the opportunity to provide comment on the above proposal's response to submissions.

The NSW Department of Primary Industries (DPI) Agriculture collaborates and partners with our stakeholders to protect and enhance the productive and sustainable use and resilience of agricultural resources and the environment.

We note the RtS has addressed the requirements identified in our response of the environmental assessment (March 2022). Comments to the RtS response on Pages 11-12 is reviewed in the following.

- 1. Agricultural productivity of the site should be recorded – advise 10 years of data including yield and an estimate of gross production information.**

The RtS has listed 10 years of yield and production numbers. This is presented as raw information and does not show its context or gross margin returns. However, it does present baseline information to be used for final land rehabilitation outcomes in returning land back to agricultural use. These figures coupled with prevailing growing conditions can be used for this purpose with the appropriate management of the site post construction, and other parameters such as land and soil capability, and soil reinstatement, to achieve land conditions that are equivalent or better preconstruction to inform final land rehabilitation outcomes.

This information indicates the productive nature of the project site and the loss of agricultural production that will occur because of this development.

As the site is used for cropping, the removal of all below ground infrastructure including electrical cabling should be removed to a depth of 1000mm.

- 2. A stock management component is required to be incorporated into the Site Management Plan (SMP) if grazing is to be undertaken on site.**

Site Management Plan should detail groundcover management during operational phases (i.e. grazing).

The RtS notes the Site Management Plan will be incorporated into the project's Construction Environment Management Plan.

A Site Management Plan should account for the management of the site **post** construction including reinstatement of land and soil after construction, revegetation details and how this will be managed

and reported on during the operational phase of the project. This may include land sharing with agriculture (including arrangements for watering, fencing and handling issues), slashing or chemical control or a combination of these.

Ideally groundcover should be maintained at a minimum of 70% to prevent soil erosion by the development through a Site Management Plan. Details on the final construction, reinstatement of the land, and appropriate vegetation establishment and management should be included, especially if agriculture is considered. That would also include the current and potential impact of the proposal on the site as per the Meat and Livestock Guide 2.02 Assessing groundcover (<https://mbfp.mla.com.au/pasture-growth/tool-22-assessing-groundcover/>) or Soil Knowledge Network Inc (<https://www.nswskn.com/Solar%20farms/> and <https://www.nswskn.com/groundcover/>).

3. Erosion and sediment control measures to consider ameliorating any disturbed soils on site with gypsum due to sodicity.

This is to be considered as part of the erosion and sediment control plan, as part of the project's Construction Environmental Management Plan and considered appropriate.

Should you require clarification on any of the information contained in this response, please do not hesitate to contact me on 0427 949 987 or by email at landuse.ag@dpi.nsw.gov.au.

Sincerely



Mary Kovac
Agricultural Land Use Planning Officer
Ag Strategic Initiatives
Central West Orana Region

20 December 2022