

Julia.green@planning.nsw.gov.au

Attention: Ms Julia Green

Re: Secretary's Environmental Assessment Requirements– SEARs SSD-52217961 – Solar Development
1198 and 1598 Sandy Creek Road, Dunedoo

Dear Julia

Thank you for your correspondence of 16 December 2022 and the opportunity to provide comments on the draft SEARs for the above proposal. NSW Department of Primary Industries (DPI) Agriculture collaborates with our stakeholders to protect and enhance the productive and sustainable use and resilience of agricultural resources and the environment.

NSW DPI Agriculture has reviewed the submitted documentation in relation to the above proposal and considers the project may potentially have significant agricultural impacts.

It is noted that the entire 730ha site is Land and Soil Capability Class 3 land with 215ha of Biophysical Strategic Agricultural Land. The entire site is also mapped State Significant Agricultural Land according to the NSW DPI draft SSAL map.

The Large Scale Solar Energy Guideline 2022 (LSSEG) provides that 'Applicants should avoid siting solar energy projects on important agricultural lands as far as possible'. This site meets the definition of important agricultural land.

In addition to the matters required to be assessed in a Level 3 assessment under the LSSEG it is recommended the following is also addressed in the Environmental Impact Statement (EIS):

1. Further details of the proposed 'agri-solar' program.
2. Detailed justification for site selection.
3. Detail the likely traffic impacts on the surrounding agricultural land uses and provide detail of proposed mitigation measures.
4. Where the land contains sodic soils detail the proposed management practices which should ensure that any trenching through sodic soils during construction is to include soil amendment with Gypsum at a minimum rate of 10t/ha (actual rates to be determined following soil testing (Clay content, ECEC and EC)).
5. Outline any impacts to water use for agriculture and measures to mitigate against these impacts.
6. Undertake a biosecurity risk management plan that will include details on monitoring, preventing, eliminating, or minimising the introduction, presence, spread or increase of plant or animal diseases, weeds and pest animals. Biosecurity management issues during and post construction must be assessed in relation to potential impacts.

7. The depth of proposed cables/ pipes is to be stated. Note that NSW DPI recommends a depth >500mm which will allow greater opportunity for agricultural activities, particularly cropping, following decommissioning.

Industry guidelines and resource information (**Attachment A**) should also be provided to the proponent for their consideration when preparing the Environmental Impact Statement.

We note and support the commitment to undertake a Land Use Conflict Risk Assessment with neighbouring landowners and the Department's Biodiversity and Conservation Division in the draft SEARs.

Should you require clarification on any of the information contained in this response, I have arranged for Mary Kovac, Agricultural Land Use Planning Officer to assist you. Mary can be contacted on phone number or by email at landuse.ag@dpi.nsw.gov.au.

Sincerely



19/1/23

Tamara Prentice
Manager Agricultural Land Use Planning
Strategic Policy and Initiatives, Grafton

Encl: Attachment A: Industry guidelines and resource information

Attachment A: Industry guidelines and resource information

Solar Farms

Title	Website link
Land Use Conflict Risk Assessment Guide	https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/lucra
Infrastructure Proposals on Rural Land	https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/infrastructure-proposals
The land and soil capability assessment scheme: second approximation 2012 (OEH)	https://www.environment.nsw.gov.au/research-and-publications/publications-search/land-and-soil-capability-assessment-scheme
Australian Soil and Land Survey Handbook (CSIRO)	https://ebooks.publish.csiro.au/content/australian-soil-and-land-survey-field-handbook
Guidelines for Surveying Soil and Land Resources (CSIRO)	https://ebooks.publish.csiro.au/content/guidelines-surveying-soil-and-land-resources
Biosecurity Risk Management in Land Use Planning and Development	https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0018/1271241/managing-biosecurity-risks-in-land-use-planning-anddevelopment-guide.pdf
Landholder Biosecurity and Utility Service Providers	https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0020/1241732/PUB20-475-PrimeFact_Landholder-Biosecurity-and-Utility-Service-Providers.pdf