

Mr Anthony Ko, via
Major Projects portal
Anthony.ko@planning.nsw.gov.au

Paling Yards Wind Farm SSD - 29064077

Dear Sir

Thank you for your correspondence of 9 October 2023 and the opportunity to provide comment on the above project.

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.

DPI Agriculture provided suggested SEARs in February 2022 for this project (OUT22/1851) which included consideration of impacts on agricultural resources through a detailed description of the characteristics of agriculture, current and historical uses including land capability and agricultural productivity. However, the issued SEARs did not reflect our full advice, despite the 4,800ha project site being zoned RU1 Primary Production and containing 1,367ha of Biophysical Strategic Agricultural Land (BSAL).

Agriculture is the most represented industry in Oberon LGA in terms of businesses and employment (14.4%). Beef, sheep, lambs and cropping are the largest commodities produced by income and area.

We reviewed the EIS and appendices applicable to agriculture being the LUCRA (Appendix F), Economic report (Appendix T), Decommissioning and Rehabilitation Report (Appendix Y) and Hydrology (soils) (Appendix U) as there is no single report on agriculture provided. While there are some inconsistencies in the amount of land reported affected by construction, DPI has not identified any issues with the methods, assumptions or output in the economic impact statement. We note there is ambiguity on the nature and number of affected landholdings, (rural and 'rural residential') across the project site and locality. Further, if there are other areas of the EIS that refer to agriculture that have been overlooked, we would be happy to carry out a further assessment.

In terms of the location of the 47 Wind Generating Turbines, (WTGs) the EIS refers to avoiding steep slopes in order to limit erosion; however, this results in at least 14 WTGs being on productive agricultural land that is mapped BSAL, Land and Soil Capability Class 3 and draft mapped State Significant Agricultural Land (SSAL) which is not identified in the EIS. 'Micrositing' or flexibility in the location of WTGs is referenced to optimise situation at construction phase, and we suggest avoiding productive agricultural land and activities where possible.

Based on our review of the EIS and Appendices in terms of proposed mitigation of construction and operational impacts, we support the following committed actions, with some suggested amendments:

- The preparation of a Soil and Water Management Plan that also specifies the return of agricultural land to pre-existing land use capability,

- The preparation of a Biosecurity Management Plan, including commitment to and demonstration of the location of exclusion fencing to mitigate weed and pest incursion and protocols for visitors to agricultural land during construction and operation,
- Continual landholder engagement to manage the impacts of traffic disruption and potential biosecurity breach as set out in the LUCRA, and
- Decommissioning and rehabilitation of the site to remove all underground infrastructure to a depth of 1000mm as set out in the Decommissioning and Rehabilitation Plan is supported.

Should you require clarification on any of the information contained in this response, please do not hesitate to contact me on 0487 023 845 or by email at landuse.ag@dpi.nsw.gov.au.

Sincerely



Nita Scott
Agricultural Land Use Planning Officer
Soil and Water
Central West Orana Region

3 November 2023

