

Cameron Ashe
Environmental Assessment Officer
Department of Planning Housing and Infrastructure
C/o Major Projects Portal

Re: Gundry Solar Farm – SSD-48225958 – Environmental Impact Statement – DPIRD Agriculture and Biosecurity Advice

Dear Mr Ashe

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed Gundry Solar Farm (SSD-48225958).

The Department of Primary Industries and Regional Development, Agriculture and Biosecurity (the Department) collaborates with our stakeholders to protect and enhance the productive and sustainable use and resilience of agricultural resources and the environment.

The Department has reviewed the EIS and associated documentation and provide the following comments.

- The site is primarily cleared and used for grazing sheep, cattle and calves on rotation for breeding and fattening. Occasional cultivation and pasture improvement are also undertaken, and the site includes a range of farm improvements to support these activities, consistent with agricultural production in the surrounding area.
- Following on-site verification demonstrated in the Soil and Agricultural Impact Assessment (SAIA; Minesoils, 2024), the site has been found to contain areas of land and soil capability (LSC) classes 3 and 4. Each class, but class 3 in particular, is in relatively short supply throughout the state and is typically suitable for higher-productivity agricultural uses such as cropping. However, their size and fragmentation within the site may limit this opportunity.
- According to conservative estimates from the SAIA, the proposal would result in the loss of 702 hectares of agricultural land and approximately \$280,624 in agricultural production annually over its 40-year lifespan and possibly beyond if extended. This estimate is based on the Department's gross margin budgets for Merino ewes. The impact on agricultural productivity may be reduced if farming continues at the site, either within the development footprint as part of an agrisolar scheme or outside of it, as is currently being considered.

- When including three other State Significant Development (SSD) solar projects that have been developed, approved, or proposed in the Goulburn-Monaro Local Government Area (LGA), the combined loss would amount to 1,968 hectares of agricultural land and \$786,708 in annual production. This represents approximately 2% of the roughly \$41.11 million generated annually in the LGA from cattle, sheep, lamb, and wool products, based on data from the 2022-2023 fiscal year (AgTrack).
- When considering SSD solar projects in the surrounding LGAs of Yass Valley, Upper Lachlan Shire, and Queanbeyan-Palerang, the cumulative loss would total 6,065 hectares and \$2,424,484 in productivity.
- The Land Use Conflict Risk Assessment appears thorough in scope and is generally based on stakeholder consultation. Risk reduction to acceptable levels will depend upon implementing the mitigation measures described and ongoing consultation and registration of emergent issues.
- Exploration of agrisolar (in this case, grazing of sheep) is supported. However, it is noted that success is highly dependent on factors such as solar infrastructure layout and design and appropriate agreement and designation of responsibilities and liabilities between solar farms and agricultural enterprise operators. The proposed Sheep Grazing Vegetation Management Plan will be essential to achieving this. The priority, however, should be on sustainable groundcover management to ensure the long-term health of soil and water resources if the agrisolar scheme is unsuccessful.
- Whether impacts to agriculture are temporary will depend upon appropriate soil management practices during construction and operation. Excavated topsoil should be maintained throughout the project following the methodology described in the Soil and Agricultural Impact Assessment by Minesoils (June 2024). A groundcover target of 70% under normal conditions should be implemented, even where grazing is undertaken.
- Similarly, long-term/ongoing impacts will depend upon how the site is decommissioned and rehabilitated. The commitment in the EIS to removing all infrastructure (if the lifespan is not extended) and installing cables a minimum of 600mm below ground is noted. The Decommissioning and Rehabilitation Management Plan should explicitly aim to return the site to its 'pre-development agricultural productivity potential'. This should include consideration of the capability for cropping at any relevant part of the site.
- It is noted that the Biodiversity Management Plan will include consideration of pests and weeds. This should include specific consideration of agricultural pests and weeds and extend throughout the site, including throughout the development footprint, pasture, and boundaries with surrounding agricultural land. Weed management strategies must be mindful of potential conflict risk with neighbouring properties, particularly where spraying is employed.
- Where agrisolar grazing is pursued and undertaken by a separate operator, pest and weed management responsibilities should be clearly designated.

- The Accommodation and Employment Strategy should consider the local agricultural labour force, relevant specialist contractors, and the seasonal requirements of local agricultural industries to minimise impacts.

Should you require clarification on any of the information in this response, please do not hesitate to email us at landuse.ag@dpird.nsw.gov.au.

Sincerely

A handwritten signature in black ink, appearing to read 'Milo Kelly', with a stylized flourish at the end.

Milo Kelly
Agricultural Land Use Planning Officer
Soils and Water | Agricultural Land Use Planning
South East and Tablelands Region

12 December 2024