

Mr Nestor Tsambos
DPHI Major Projects

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Brewongle Solar Farm SSD-64834490, Environmental Impact Statement

Dear Sir,

I refer to your request of 21 May 2025 for advice on the Environmental Impact Statement (EIS) for the proposed 90MW Brewongle Solar Farm and 90MW/180MWh BESS located at 315 Tarana Road, Brewongle in Bathurst Regional LGA (Lot 1 DP126035, Lots 1-2 DP1236901, Lot 1 DP1206130, Lots 126-7 DP755784).

Agriculture plays a vital role in supporting state, regional and local economies and communities. The NSW Department of Primary Industries and Regional Development, Agriculture and Biosecurity Branch (the Department) collaborates with our stakeholders to protect the productive and sustainable use of agricultural resources and enhance environmental resilience.

The Department's advice is guided by s.4.15(1) of the *Environmental Planning and Assessment Act 1979* (the Act), where a consent authority is required to evaluate a project's potential environmental, social, and economic impacts and the public interest. Sections 1.3(a) and (b) of the Act emphasise the facilitation of ecologically sustainable development (ESD) in land use decision-making. This includes responsible resource management that benefits present and future generations, providing food and fibre security.

The EIS and Appendix M (Soils and Agriculture Impact Assessment, SAIA) have been reviewed in the context of our advice for additional SEARs provided on 29/11/2023 (OUT23/19596), concerning:

- Details on agrisolar arrangements and pasture management given the site's cropping history
- Biosecurity management during and post construction
- Decommissioning
- Rehabilitation and groundcover management

Our assessment of the EIS and SAIA has identified the following:

- Agricultural productivity losses due to the 170ha project site are estimated as \$70,047 per annum; and secondary productivity losses of \$152,618 per annum for the life of the project (30 years).

- These impacts are regarded by the EIS as ‘negligible’ in the context of the Bathurst Regional LGA’s agricultural ‘land use coverage’, on the basis that associated *‘landholders will be financially compensated’* and *‘farming practices are expected to continue across the balance of the land’* unimpacted by the project. However there is no evidence provided in support of this information.
- The project site contains some of the most fertile and scarce mapped agricultural lands in the Bathurst LGA, including rare Land and Soil Capability Class 2 land (coincident with Biophysical Strategic Agricultural Land and draft mapped State Significant Agricultural Land) now avoided by the project layout.
- Land Use Conflict Risk Assessment, cumulative impact and land use impact mitigation strategies refer to the deployment of agrisolar as an ‘offset’ to lost agricultural production over the disturbance site. However there is no planning, preparation or commitment to ‘agrisolar’ in the EIS, being regarded as opportunistic and optional.

The following advice on the EIS is provided. Key considerations for DPIRD are the maintenance of the productive agricultural resources and implementation of measures to limit land use conflict with adjoining agricultural enterprises:

- Groundcover during the operational and decommissioning phases should be maintained at a minimum of 70%. If ‘agrisolar’ is deployed, a Grazing Management Plan should detail measures and management practices to re-establish vegetation and grazing on the land post construction and during operation. Conversely, if the site will not be used for agricultural purposes, it is reiterated that 70% groundcover is maintained to prevent soil erosion.
- In terms of monitoring groundcover management, it is recommended that the agricultural productivity of the site (including carrying capacity, stock numbers from current farm records) along with land and soil capability assessment and prevailing climatic conditions are established as a baseline and reported annually in line with a 70% groundcover target to determine the efficacy of land management and rehabilitation objectives.
- It is recommended that a Biosecurity (Pest and Weed Management Plan) is prepared, including management of pedestrian and vehicle movements during construction and operation to prevent the distribution of weeds and pests and therefore potential impacts on agricultural productivity at the site and locality. The Department’s Biosecurity Risk Management in Land Use Planning and Development Guide is a useful resource.
- Decommissioning – our position is for the removal of all solar-related structures and ancillary infrastructure from the site to a minimum depth of 500mm to enable cropping and pasture re-establishment, allowing the return of the site to pre-existing land use and land and soil capability classes.

The Department considers the availability of productive agricultural land for food and fibre production for future generations as an important and equal consideration in land use decision making. The conservation of the agricultural resources on the subject site during all stages of the proposed project is a reasonable expectation in the circumstances to enable future agricultural production.

Should you require clarification on any information provided, please contact Nita Scott, at 0487023845 or by email at landuse.ag@dpird.nsw.gov.au.

Sincerely

A handwritten signature in blue ink, appearing to read 'Nita Scott', is positioned above the printed name.

Nita Scott
Agricultural Land Use Planning
Agriculture & Biosecurity

17 June 2025