

Mr Cameron Ashe
DPHI Major Projects
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Draft SEARs: Puggoon Solar Farm and BESS SSD-84365208 – DPIRD Agriculture and Biosecurity Advice

Dear Mr Ashe,

I refer to your request of 23 May 2025 for advice on the draft SEARs and Puggoon Solar Farm and Battery Energy Storage System (BESS) Scoping Report for the above proposal at 340 Jacksons Lane, Beryl, Gulgong in Mid-Western Regional Council.

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

It is noted the proposed Solar Farm and BESS will be constructed on ~550ha of land zoned RU1 Primary Production, with Land and Soil Capability Class 5 on the project site. The life of the project is expected to be 30-40 years.

We understand preliminary community consultation raised the loss of productive agricultural land as a concern. The Scoping Report has inconsistent advice concerning the use of the site for agriculture following construction – with the site being unsuitable (page 27) compared to ‘ongoing use of the site’ (page 98).

In terms of the Agricultural Impact Assessment the site’s LSC Classification should include a description of the relative agricultural productivity of the site, locality and region, noting that rural zoned land with LSC Class 5 qualities makes up most of the usable agricultural land in Mid-Western Regional Council, with 23.4% or 204,942 ha. By contrast, LSC 4 land is 11.3% and LSC 3, 3.5%. Combined, LSC Classes 2-5 land makes up 38.9% of agricultural land in rural zones in the LGA, which illustrates the importance of well managed agricultural land for food and fibre production.

We support the requirement for a Land Use Conflict Risk Assessment (LUCRA) and assessment of agricultural land including soil survey as set out in the draft SEARs.

The agricultural land in the immediate locality and associated risks of the project to agricultural biosecurity should be confirmed in the EIS. It is requested therefore that the draft SEARs require preparation of a Biosecurity Management Plan as part of the Construction and Operations Environmental Management Plans. Please refer to DPI’s [Biosecurity Risk Management in Land Use](#)

Planning and Development Guide¹. While the draft SEARs requires assessment of agrisolar, it should be noted that our position is for the site's groundcover to be maintained at 70% during operation regardless of any agrisolar activities.

Further, to enable return to agriculture at the end of the project life, it is our position that the site be decommissioned to a minimum depth of 500mm.

Finally it is suggested the Cumulative Impact Assessment address the impacts of multiple, clustered projects in the Gulgong-Dunedoo corridor from the perspective of agricultural land and industries as the Scoping Report identifies 24 large scale projects within 50km, with three solar farm projects adjoining the project site.

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

Sincerely



Nita Scott

Climate and Natural Resources | Agricultural Land Use Planning
Central West Orana Region

30 May 2025

¹ https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0018/1271241/managing-biosecurity-risks-in-land-use-planning-and-development-guide.pdf