

OUT25/11183

Mr Cameron Ashe  
Department of Planning Housing and Infrastructure  
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**Birriwa Solar Farm, BESS and TWA –SSD- 29508870-Mod-1 (Mid-Western Regional Council)  
DPIRD Agriculture and Biosecurity Advice**

Dear Mr Ashe

Thank you for the opportunity to provide comments on Birriwa Modification project SSD- 29508870-Mod-1. We have reviewed the Modification Report prepared by EMM dated July 2025 and supporting documents.

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.

The proposed modification to the approved 600MW Solar Farm and 600MW Battery Energy Storage System (BESS) and 500 bed TWA will result in an increase to the project's total development site by 257ha to 1,792ha and now include two options for a 900MW BESS, siting flexibility for the solar array, revised traffic arrangements and increase to the TWA to 650 beds.

We note the inclusion of three new Lots and additional part Lot as part of the modification are verified as Land and Soil Capability Class 4 and Class 5 land.

Risks to agricultural production on the modified site and surrounding agricultural land due to the project are acknowledged as concerning the previously raised issues of biosecurity breach, groundcover management, soil erosion and land use conflict. The matters raised in our previous correspondence on the project's EIS, Response to Submissions (OUT24/384) and Draft Conditions of Consent (OUT24/4652) are relevant to the modified project site.

Appendix C of the Modification Report includes measures relevant to agricultural land resources with broad mitigation measures including the requirements for Soil and Water Management Plan, Erosion and Sediment Control Plan, Rehabilitation and Decommissioning Management Plan, and a pest and weed management plan, which are supported.

The Department considers that the following specific matters should also be incorporated into the mitigation measures for the modified project for clarity:

- Biosecurity management issues during and post construction must be assessed in relation to potential agricultural impacts (pests, weeds, and emergency animal diseases) including a risk assessment outlining the likely plant, animal, and community risks. The preparation of a **Biosecurity Management Plan** is recommended as part of the Construction and Operations Environmental Management Plans (C/OMPs). Please refer to DPI's [Biosecurity Risk Management in Land Use Planning and Development Guide](#)<sup>1</sup>.
- We recommend a Groundcover Management Plan be prepared as part of the C/OMPs to detail the grazing and biosecurity approaches to the site including pasture establishment and management and weed and pest control measures specific to the suggested sheep grazing in the Modification Report. Further:
  - Groundcover should be maintained at a minimum of 70% to prevent soil erosion. The Groundcover Management Plan should detail the actions and management practices to re-establish pastures and grazing on the land post construction and during operation.
  - Conversely, where the site will not be used for agricultural purposes, it is reiterated that a minimum of 70% groundcover is maintained to prevent soil erosion via actions described in the groundcover management plan.
- To enable continuation of agricultural activities at the end of the project life, the site should be decommissioned to a minimum depth of 500mm. This will enable the land to return to full production including cropping if required.
- Any subdivision of the site is not to result in additional dwelling eligibilities.

Should you require clarification on any of the information contained in this response, please do not hesitate to contact me at [landuse.ag@dpird.nsw.gov.au](mailto:landuse.ag@dpird.nsw.gov.au)

Sincerely



Nita Scott  
Agriculture & Biosecurity | Agricultural Land Use Planning  
Central West Region

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<sup>1</sup> [https://www.dpi.nsw.gov.au/\\_data/assets/pdf\\_file/0018/1271241/managing-biosecurity-risks-in-land-use-planning-and-development-guide.pdf](https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0018/1271241/managing-biosecurity-risks-in-land-use-planning-and-development-guide.pdf)