

Department of Planning, Housing and Infrastructure (DPHI)
C/- Major Projects Portal

Attention: Cameron Ashe, cameron.ashe@dpie.nsw.gov.au

Cobbora Solar Farm (SSD- 29491142) Environmental Impact Statement

Dear Sir,

I refer to your request of 29 August 2025 for advice on the Cobbora Solar Farm (BESS and TWA) Environmental Impact Statement (EIS).

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

The Department's advice is guided by section 4.15(1) of the *Environmental Planning and Assessment Act 1979 (EP&A 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 *EP&A Act* emphasise the facilitation of ecologically sustainable development (ESD) in land use decision-making. This includes the promotion of responsible resource management that benefits present and future generations, including food security.

The EIS, Appendices, and SEARs applicable to agriculture have been reviewed. The following advice is provided on the key agricultural issues:

Agricultural land

- Land and soil capability (LSC) on the ~3,000ha development footprint is classified as LSC Classes 3 and 5 in accordance with the Land and Soil Capability Assessment Scheme (Second Approximation)¹. There is also approximately 610ha of draft mapped State Significant Agricultural Land (38%). Soil verification justified the preparation of an Agricultural Impact Assessment (AIS) in accordance with the *Large Scale Solar Energy Guideline (LSSEG)* (Appendix P).
- The EIS states the land with a history of cropping and livestock grazing is zoned RU1 Primary Production; and the project disturbance site includes 873ha of LSC Class 3 land. Appendix P estimates a combined lost agricultural production of \$466,480 pa (Dubbo Regional LGA) to

¹ <https://www.environment.nsw.gov.au/resources/soils/20120394lsc2s.pdf>

\$516,329 (Warrumbungle LGA) over 1,600ha of the development footprint. This equates to an annual \$/ha ratio of \$321.1/ha or ~\$513,600 over 1,600ha.

- It is noted that the EIS uses ABS data that generalises land quality from across the LGAs without accounting for productivity differences. It uses 'grazing land' (Dubbo 422,45ha, Warrumbungle 472,231ha), which is derived from two categories: 'improved pastures' (Dubbo 208,697ha, Warrumbungle 260,916ha) and 'other land' (Dubbo 213,761ha, Warrumbungle 211,316ha). 'Other land' is likely to include less productive land, for example grazing native vegetation. This lack of differentiation undermines the accuracy and credibility of the EIS assessment due to the high quality land over half of the subject site.
- There is limited information regarding the management of the remaining ~1,400 ha of the Cobbora site that is not proposed for solar development. If the productivity assumptions are applied, this could equate to an additional ~\$449,400 in annual lost agricultural production—further compounding the overall impact.
- LSC Class 3, which has the least limitations, accounts for 35.8% of all land zoned for primary production in the Dubbo Regional LGA (LSC Class 2 is 0.1%). In contrast, rural land classified as LSC Class 3 constitutes the minority of usable agricultural land in Warrumbungle Shire Council, making up 12.7%, (LSC Class 2 is 4.1%).
- Appendix P of the EIS provides soil verification for 69 test sites which are used for analysis. The soil verification has determined that the disturbance footprint comprises four soil types: Sodosols, Chromosols, Kandosols and Dermosols, and includes LSC Classes 3, 4, and 5 land. As noted, LSC Class 3 land, the most agriculturally productive on the site, occupies over 50% of the 1,608ha development footprint (873ha). The Department is concerned that impacts on productive land have not been avoided as per the LSSEG, which states that following determination of agricultural quality and capability, the results should be used to design the project layout, thereby avoiding impacts on productive land.
- The EIS justifies the project's use of productive agricultural land by referencing the total land area across both LGAs and a DPE 2022 reference to an estimate that only 0.06% of NSW land (~40,000 ha) is needed for renewable energy development (p.248). However, this comparison overlooks the concentrated nature of development in the Elong Elong/Cobbora corridor. It is possible that close to 40,000 ha may already be committed to large-scale renewable projects within the Central West Renewable Energy Zone alone.

Agrisolar

- The EIS consistently states that a 'nominal' loss of agricultural production is expected partly due to re-establishment of sheep grazing over 1,200ha of the 1,600ha project site during operation.
- Appendix P includes an Agrisolar Management Plan; however, it contains no firm commitment to implementing agrisolar—only a commitment to 'investigate' its potential. This contrasts with the emphasis placed throughout the EIS on agrisolar as a means of offsetting agricultural production loss and, by extension, mitigating cumulative impacts.

Land Use Conflict Risk Assessment (LUCRA)

- Appendix P includes a LUCRA, which reviewed the project upon the risk categories of ground disturbance, noise, dust, traffic, biosecurity, water supply, workforce and the Temporary Workers Accommodation (TWA).
- The TWA (no scale indicated) is to be situated on Sandy Creek Road, and the EIS does not assess the potential land use conflict issues with surrounding or adjoining properties. Conflicts may be significant, if temporary changes to local amenity and agricultural operations through (at least) biosecurity risks due to this development. Therefore, there should be specific arrangements in place to ensure the TWA does not exacerbate any potential localised impacts to rural land and community.

Cumulative impacts and agricultural production

- Appendix P acknowledges some cumulative agricultural impacts from the Cobbora Solar Farm, including reduced productivity, secondary processing, and support services due to inhibited land use. These impacts are moderated by referencing the broader scale of agriculture in the region and suggesting that industry critical mass and infrastructure are unlikely to be affected ‘in the foreseeable future’. However, this justification overlooks the localised and cumulative nature of land use change in the immediate area.
- The EIS identifies the approved Sandy Creek Solar Farm directly adjoining the site to the south, and 2km beyond, the Dapper Solar Farm. Adjoining all three solar projects is the Spicers Creek Wind Farm.
- The EIS does not clearly identify the scale or agricultural value of these projects. For example, the approved Sandy Creek Solar Farm (SSD-41287735) covers 1,702 ha, including 944 ha (56.5%) of LSC Class 3 land. The Dapper Solar Farm (SSD-52217961), currently under assessment, spans 730 ha— all LSC Class 3 land— including 215 ha of BSAL, and proposes a 350-bed TWA. The approved Spicers Creek Wind Farm (SSD-41134610) includes 117 turbines on 17,731 ha.
- The two adjoining solar farms will impact approximately 2,398 ha of highly productive agricultural land. The Spicers Creek Wind Farm will remove an additional 1,520 ha from production. Combined, the 1,600 ha Cobbora Solar Farm footprint will result in a cluster of around 4,000 ha of land under solar array.
- There is also no explanation of the interaction of the proposed TWA as part of the Cobbora Solar Farm project with the Dapper Solar Farm 350 bed TWA in proximity (within 5-10km).
- The EIS notes (p248) that all projects’ impacts will be managed individually, and in terms of lost agricultural production, there is an opportunity for ‘dual use land use’ and as such the ‘*overall cumulative impact to agriculture is expected to be low*’, and as such, there will be negligible cumulative impacts from the Cobbora Solar Farm project.
- The Department holds significant concerns that these statements appear to contradict the fundamental purpose of cumulative impact assessment. Furthermore, the consistent reliance on agrisolar as a mitigation strategy for agricultural production loss remains unproven. To date, agrisolar is largely experimental and opportunistic and is unlikely to offer a sustainable solution over the typical lifespan of such projects, despite current perceptions.

- The Department is concerned that the subject project’s location within a cluster of other developments, combined with the lack of commitment to agrisolar, will have long-term effects on local agricultural production and the community.
- Appendix P lists 16 large-scale renewable energy projects within 50 km of the Cobbora Solar Farm, mainly to the south-east and east. However, at least 11 additional projects to the west—including the operational Wellington (North) and (South) Solar Farms on LSC Class 3 land and BSAL—were not considered. This omission raises concerns about the completeness of the cumulative impact assessment, particularly regarding potential impacts on agriculture.
- The Department encourages consideration of cumulative impacts of all proposed projects in proximity to the Cobbora Solar Farm that have been or are to be issued SEARs, such as Hampden Park, Maryvale and Boree Solar Farms.

Suggested actions for the protection of agricultural values

Based on the remit to protect agricultural values at and in the vicinity of the project, the Department makes the following recommendations for the Department’s consideration:

- A thorough analysis of the cumulative impacts from all large scale renewable projects within 50km of the site. This refers to at least 11 additional projects to the west of the project site, and others with recently issued SEARs.
- Notwithstanding the lack of commitment to agrisolar, it is important that the following actions are included as part of the construction and operational environmental management plans (C/OEMPs), nominally including:
 - The Agrisolar Management Plan (or Grazing Management Plan) outlines mitigations detailing appropriate grazing practices such as stocking rates, groundcover management and biosecurity arrangements during construction and operation. The plan should also include details on the placement and planning of agricultural infrastructure, as well as long-term pasture management, including establishment, management, and grazing methods.
 - Groundcover to be maintained at a minimum of 70% to prevent soil erosion. The 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 a minimum of 70% groundcover is maintained to prevent soil erosion via actions described in the groundcover management plan.
 - In terms of monitoring groundcover management, it is recommended that the agricultural productivity of the site (including carrying capacity, stock numbers from previous farm records), along with land and soil capability assessment and prevailing climatic conditions, be established as a baseline and reported annually in line with a 70% groundcover target to determine the efficacy of land management and rehabilitation objectives.

Biosecurity

- Mitigation measures include the development and implementation of an **agricultural biosecurity management plan**, which should also focus on pedestrian and vehicle movements during construction and operation, as these may affect the distribution of weeds

and pests and therefore potentially impact agricultural productivity at the site and locality. Such a plan should also apply to the TWA facility on Sandy Creek Road. The Department recommends that the Biosecurity Risk Management in Land Use Planning and Development Guide be referred to the proponent for further information.

Decommissioning and rehabilitation

- A proportionate and reasonable mitigation measure, given the commitment to agricultural land preservation outlined in the EIS is for site decommissioning to remove all underground infrastructure to a depth that permits the re-establishment of livestock grazing on improved pastures and cropping at the end of the project life. This would involve removing solar-related structures and ancillary infrastructure from the site to a minimum depth of 500mm and returning the site to pre-existing use and land and soil capability class as committed in the EIS.

The continued availability of agricultural land for food and fibre production, essential for current and future generations, is also an important, independent, and equal consideration in ESD decision making.

Should you require clarification on any information provided, please contact Nita Scott, Agricultural Land Use Planner, Central West and Orana Region, by email at landuse.ag@dpiird.nsw.gov.au.

Sincerely

L Parker

Lilian Parker
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Esigned 1 October 2025