

Nestor Tsambos  
Senior Environmental Assessment Officer  
Department of Planning and Environment  
C/o Major Projects Portal

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Re: Secretary's Environmental Assessment Requirements– SEAR 55968733 – Burroway Solar Farm Development

Dear Mr Tsambos

Thank you for your correspondence of 9 March 2023 and the opportunity to provide comments on the draft SEARs for the above proposal.

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

NSW DPI Agriculture has reviewed the submitted documentation in relation to the above proposal and is satisfied that most relevant issues have been addressed in the draft SEARs. The main item is to consider the revised *Large Scale Solar Energy Guidelines* (Department of Planning and Environment, August 2022, 'LSSEG'), which should also be included as a reference. We offer the following comments to understand the setting and justification for the proposal to consider the agricultural context.

- The site is predominantly cleared land that is developed and has been used for productive agriculture, with the project site being on Land and Soil Capability (LSC) class 3 land as described in the Scoping Report. All the site is also mapped as draft State Significant Agricultural Land as available on the DPI website indicating its intrinsic value.
- Due to the matters raised above, an Agricultural Impact Assessment (AIA) is required as part of the Level 3 assessment as described in the LSSEG. This is a proportionate requirement relative to the proposal's long-term removal of a large amount of LSC classes 3 from production. The AIA should include an assessment of agriculture at the site and locality, and the changes due to the solar development on agricultural enterprises and production values during construction and operation. The AIA should include an assessment of the state-wide scarcity of highly productive agricultural land and the relative amount of LSC classes 3 in the locality and address the cumulative impacts of this proposal and other energy generation and transmission infrastructure in the vicinity. A soil survey and land assessment process is committed to in the Scoping Proposal.
- Alternative site selection in relation to agriculture impacts is not explored in the Scoping Report. We refer to the LSSEG, where it is requested proponents avoid important agricultural land, consider the agricultural capability of the land during the site selection process, and are

strongly encouraged to select sites which have limited potential for sustained agricultural production. Accordingly, the agricultural assessment required as part of the EIS should be detailed and substantial, in justifying site selection against the principles set out in the Guidelines.

- In the operational and decommissioning plans, consideration should be given to underground cabling on the land. Our recommendation is such cabling be buried to a depth greater than 500mm for this land use or be **completely** removed upon decommissioning. This will enable the land to return to full production including cropping.
- The Rehabilitation and Decommissioning/Closure Management Plan should include, but is not limited to, describing the potential design criteria of the final land use and landform, indicators which may be used to guide the return of the land back to agricultural production, along with the expected timeline for the rehabilitation program.
- Biosecurity management issues during and post construction must be assessed in relation to potential agricultural impacts in the EIS.

Potential impacts on limited agricultural resources and the ability to rehabilitate the land to enable continued agricultural investment are important issues requiring careful consideration and assessment. Industry guidelines and resource information (**Attachment A**) should also be provided to the proponent for their consideration when preparing the Environmental Impact Statement.

Should you require clarification on any of the information contained in this response, please do not hesitate to contact me on 0427 949 987 or by email at [landuse.ag@dpi.nsw.gov.au](mailto:landuse.ag@dpi.nsw.gov.au).

Sincerely



Mary Kovac  
Agricultural Land Use Planning Officer  
Ag Strategic Initiatives  
Central West Orana Region

22 March 2023

Encl: Attachment A: Industry guidelines and resource information

## Attachment A: Industry guidelines and resource information

### Solar Farms

Title	Website link
Land Use Conflict Risk Assessment Guide	<a href="https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/lucra">https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/lucra</a>
Infrastructure Proposals on Rural Land	<a href="https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/infrastructure-proposals">https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/infrastructure-proposals</a>
The land and soil capability assessment scheme: second approximation 2012 (OEH)	<a href="https://www.environment.nsw.gov.au/research-and-publications/publications-search/land-and-soil-capability-assessment-scheme">https://www.environment.nsw.gov.au/research-and-publications/publications-search/land-and-soil-capability-assessment-scheme</a>
Australian Soil and Land Survey Handbook (CSIRO)	<a href="https://ebooks.publish.csiro.au/content/australian-soil-and-land-survey-field-handbook">https://ebooks.publish.csiro.au/content/australian-soil-and-land-survey-field-handbook</a>
Guidelines for Surveying Soil and Land Resources (CSIRO)	<a href="https://ebooks.publish.csiro.au/content/guidelines-surveying-soil-and-land-resources">https://ebooks.publish.csiro.au/content/guidelines-surveying-soil-and-land-resources</a>