

Ms Natasha Homsey
Senior Environmental Assessment Officer
Department of Planning and Environment
C/o Major Projects Portal

Re: Secretary's Environmental Assessment Requirements– SEARS for SSD 8950984 Burrendong
Wind Farm Development (Dubbo and Mid Western Regional Councils)

Dear Natasha

Thank you for your correspondence of 13 July 2022 and the opportunity to provide updated comments on the draft SEARs for the above revised 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 considers the project may potentially have agricultural impacts, and the ability to rehabilitate the land upon cessation of the development also is an issue.

It is noted that the site is located on lands associated with the Hill End Trough and hence have limitations in relation to their stability in a steep to rolling hill topography. The site is predominantly cleared land that is developed and has been used for productive agriculture, with most of the Project Site being on Land and Soil Capability (LSC) class 6 and 7 land as described in the Scoping Report. Only a small area that will be impacted by the proposed transmission lines to the north will impact on draft State Significant Agricultural Land as available on the DPI website (LSC Class 3 lands).

It is however acknowledged the project site is within the Central West Orana Renewable Energy Zone.

Considering the matters raised and the potential long-term removal of productive agricultural land, the NSW DPI recommends the following specific inclusions should be required to be addressed in the Environmental Impact Statement (EIS):

1. The Scoping Report notes that a soils and land use impact assessment will be undertaken as part of the EIS. We consider that an assessment of the changes likely to result from the proposal on agricultural enterprises and production values during construction and operation is important. As some of the land has been used mainly for livestock production, production statistics in relation to that enterprise as well as general agricultural land capability should be covered and used to inform rehabilitation outcomes. We do note that some lands associated with the proposed northern transmission line are associated with small areas of mapped LSC class 3 lands that may be cropped and that matter should be addressed.
2. A Rehabilitation and Decommissioning/Closure Management Plan - This 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 possible agricultural production, along with the expected timeline for the rehabilitation program. This should also include the commitment to remove all infrastructure above and below ground, to a depth of 500mm. The soil survey undertaken should also use the information collected to inform rehabilitation outcomes.

3. We note that a LUCRA - A Land Use Conflict Risk Assessment will be undertaken in relation to land management issues during and post construction, as per the commitment in the Scoping Report. Information about groundcover management should be detailed in relation to the final construction phase and operational provisions to limit dust and other land use conflict issues.
4. Biosecurity management issues during and post construction must be assessed in relation to potential agricultural impacts (pests, weeds, and disease) including a risk assessment outlining the likely plant, animal, and community risks. The relevant weed or pest animals for a region are addressed in the regional plans or strategies issued by NSW Local Lands Services.
5. Alternative site selection in relation to agriculture impacts is included in the Scoping Report. 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.

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.

Sincerely



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

20 July 2022

Encl: Attachment A: Industry guidelines and resource information

Attachment A: Industry guidelines and resource information

Wind Farms

Title	Website link
Land Use Conflict Risk Assessment Guide	https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/lucra
Infrastructure Proposals on Rural Land	https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/infrastructure-proposals
The land and soil capability assessment scheme: second approximation 2012 (OEH)	https://www.environment.nsw.gov.au/research-and-publications/publications-search/land-and-soil-capability-assessment-scheme
Australian Soil and Land Survey Handbook (CSIRO)	https://ebooks.publish.csiro.au/content/australian-soil-and-land-survey-field-handbook
Guidelines for Surveying Soil and Land Resources (CSIRO)	https://ebooks.publish.csiro.au/content/guidelines-surveying-soil-and-land-resources
Biosecurity Risk Management in Land Use Planning and Development	https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0018/1271241/managing-biosecurity-risks-in-land-use-planning-and-development-guide.pdf