

Mr Kurtis Wathen
Department of Planning Housing and Infrastructure
C/- Major Projects Portal

Stratford Pumped Hydro and Solar Environmental Impact Statement (SSI-73368213)

Dear Mr Wathen

Thank you for your correspondence of 30 September 2024 and the opportunity to provide advice on the Environmental Impact Statement (EIS) for the Stratford Pumped Hydro and Solar Project.

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 has reviewed the EIS for the project. Based on the assessment, the EIS is considered to have covered the main potential impacts to agricultural resources and productivity, and land use conflict risk. We understand that the project will be established on 560ha of land currently used for agriculture or on land that will be returned to agricultural use post-rehabilitation of the mine, of which 300ha is post-mining land use. A total of 12ha will be permanently removed for agriculture use with the remaining 548ha to have a temporary change for up to 50-100 years.

The proposed mitigation measures are generally adequate. We also note the overarching commitment to returning the site upon decommissioning to its pre-development land and soil capability and agricultural land use.

Agrivoltaics (agriculture and solar) is considered as part of the EIS, however, no commitment to undertaking agrivoltaics is provided. This reduces the ability to co-use the land for agriculture. The EIS explored sheep grazing as a potential co-use of the land and notes that *the implementation of agrisolar as part of the Project is especially applicable given the current land use, the suitable conditions for sheep grazing and the established sheep and lambing industries and infrastructure with the MidCoast LGA*. By grazing the site and capitalising on the productive land, this also reduces bushfire risk and helps control weeds.

The biosecurity risk assessment and proposed mitigation and management in the Project's construction and operational Environmental Management Plans are appropriate, however, should be adjusted to include emergency animal diseases should agrisolar be reconsidered as part of the proposal.

The Department provides the following additional recommendations for the proposal:

- If grazing on the site is undertaken, a Grazing Management Plan should be prepared to detail how the management of livestock on the site will be undertaken. The design of the solar infrastructure will greatly influence the productivity potential of grazing operations and the ability to maintain land, water and soil resource health.
- A commitment to maintain a minimum groundcover target of 70% across the site (during operation) which will support and promote other long-term land and soil resource health and water management commitments. This target should be maintained in the case that grazing is implemented at the site.
- The proponent should commit to the removal of all above and below-ground (to a depth of 500mm) infrastructure upon decommissioning unless there is significant justification for retaining it. This is consistent with the key principles for decommissioning and rehabilitation from the Large-Scale Solar Energy Guideline 2022 (pg. 31).
- The EIS should also include the decommissioning mitigation measure that stock fences, dams and access tracks are to be reinstated to accommodate a post-project land use of grazing.

Should you require clarification on any of the information contained in this response, please do not hesitate to contact me by phone at 0412 424397 or by email at landuse.ag@dpird.nsw.gov.au.

Sincerely



Selina Stillman
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28 October 2024