



OUT20/13433

Mr Lander Robinson
Department of Planning, Industry and Environment
Major Projects Website

Dear Mr Robinson

DPI Agriculture Assessment – Dunedoo Solar Farm Proposal (SSD 8847) Warrumbungle Shire

Thank you for the opportunity to provide comment on the above proposal as per your referral dated 15 October 2020. The NSW Department of Primary Industries (NSW DPI) Agriculture is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend.

I note that 30% of the proposed development footprint is identified as Biophysical Strategic Agricultural Land (BSAL). BSAL is land with capacity to be highly productive and is limited to only 3.5% of the State. As per the Large Scale Solar Guidelines government's position is that solar developments should be located to avoid high quality agricultural land where possible. As such DPI requests information as to why the development footprint has not avoided that BSAL in this instance.

The EIS states that the land is used for cropping and grazing, however no indication appears to be given as to how much of each is present. Irrigated cropping land comprises only 2.3% of the State but accounts for the vast majority of production. It is requested that advice is provided as to the area of the development footprint used for irrigated cropping, dryland cropping and grazing in a typical season, and what options to avoid the irrigated cropping land in particular have been considered.

It is also recommended that the following are considered should the application be conditionally approved:

- The soils information notes the need to maintain perennial vegetation on the site during the operation of the solar farm. A pasture management regime needs to be implemented to ensure the soil is protected from erosion and degradation through the life of the solar farm.
- A weed management plan is identified as part of the construction and operation phases of the development. This would ideally also have a link to the groundcover management of the site. It would be useful to consult with the Central West Local Land Services and the landholders in the immediate area to work in with this plan and the adjacent lands.

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- The decommissioning environmental management plan needs to outline how pre-construction landuse and land quality can be achieved. This plan should include current productivity measures for use in measuring rehabilitation outcomes. Records over a number of seasons should be used to determine current productivity, yields on identical soil landscapes in the locality may need to be used if the site is put to solar before this can be measured.
- The development notes that underground cabling would be removed to 0.5m deep. It is recommended that all below ground infrastructure be removed to enable an unconstrained return to cropping post solar farm.

Should you require clarification on the information contained in this response, please contact Mary Kovac, Agricultural Landuse Planning Officer on phone 68811250.

Yours sincerely



Christine Tumney
Group Director Agricultural Resources

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