



# Billabong Branch

Chairperson  
Secretary  
Treasurer  
Postal  
Email  
Phone

Peter Campbell  
Sharon Feuerherdt  
Kellie Penfold  
PO Box 2 CULCAIRN NSW 2660  
ssjrc@bigpond.com  
0427 798 948

27 February 2020

Planning Services  
Department of Planning, Industry and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Sir/Madam

Submission – Culcairn Solar Farm SSD 10288

NSW Farmers members have raised significant concerns about large scale solar developments covering extremely large areas of productive farmland in the area of Billabong Branch in Greater Hume Shire.

A view has been formed that the loss of production caused by large scale developments cumulatively with the impact of severe drought in NSW, fires and Murray Darling Basin issues may cause further negative impacts to food production in our state. Farmers are already suffering in other areas of NSW through increased costs and lack of availability of fodder and grain exacerbated by recent fires.

Last year, this branch made representation to NSW Department of Primary Industries advocating the importance of completing the Riverina Murray Important Agricultural Land Mapping (IAL) project. This continues to remain outstanding for determination. It is understood that the NSW Draft Solar Guidelines for State Significant Development references Important Agricultural Land and Land with Soil Capability (LSC) Classes 1, 2 & 3 as being areas of constraint for development.

Significant concern was raised during the Draft IAL consultation period regarding outdated and incorrect soil data. Our branch strongly cautions the NSW Government against the use of the Land and Soil Capability Assessment Scheme with the EIS referring to the land for this development as class 4 land under that scheme. Previous Rural Land Capability Mapping (K A Emery) had determined the land proposed for the Culcairn Solar Farm as Class 1 under that scheme.

Under the category Descriptions and the Land Management Considerations noted within the Second Approximation of the Land and Soil Capability Assessment Scheme, much of the land in this area and, most importantly, the lands suggested for this development, appears incorrect due to strong cropping capacity.

Our branch strongly recommends that prior to the determination of any large scale development in our area that the Department of Primary Industries should **determine** the Riverina Murray Important Agricultural Land Mapping project using the appropriate measures outlined in their guidelines, including stakeholder engagement from **local industry professionals**. This will ensure that reliable cropping land is retained to ensure continued food production into the future.

Our members hold the opinion that productive and consistent food and fodder sources in this area should be protected due to favourable climatic conditions, reliable rainfall, ability to produce and the strong support of outstanding services to agriculture and location to freight.

It should be noted that Greater Hume Shire have provided a thorough submission to the NSW DPI in regards to the IAL project <https://www.greaterhume.nsw.gov.au/News/Current-News/Important-Agricultural-Lands-Mapping-DPI>. In addition, the recommended report contained within the Greater Hume Council meeting agenda for 19 February 2020 advises the following:

*“Inspections by Council of the development site and adjacent land would indicate that it is high quality agricultural land. Council has been advised that this land will be mapped as important agricultural land under the Riverina Murray Draft Important Agricultural Land Mapping project which also indicates it is high quality agricultural land. Due to its impending status as important agricultural land, the site could be considered constrained under the Department of Planning, Industry and Environment’s Large Solar Energy Guidelines.”*

It is understood that these developments are permissible under the Infrastructure SEPP however your attention is drawn to the State Environmental Planning Policy (Primary Production and Rural Development) 2019 that includes the following aims:

- (a) to facilitate the orderly economic use and development of lands **for primary production**,*
- (b) **to reduce land use conflict** and sterilisation of rural land by balancing primary production, residential development and the protection of native vegetation, biodiversity and water resources,*
- (c) to identify State significant agricultural land for the purpose of ensuring the ongoing viability of agriculture on that land, having regard to social, economic and environmental considerations,*
- (d) to simplify the regulatory process for smaller-scale low risk artificial waterbodies, and routine maintenance of artificial water supply or drainage, in irrigation areas and districts, and for routine and emergency work in irrigation areas and districts,*
- (e) **to encourage sustainable agriculture**, including sustainable aquaculture,*
- (f) to require consideration of the effects of all proposed development in the State on oyster aquaculture,*
- (g) to identify aquaculture that is to be treated as designated development using a well-defined and concise development assessment regime based on environment risks associated with site and operational factors*

In addition, the Greater Hume Shire LEP (2) particular aim (b) **is to protect and retain productive agricultural land**

The Riverina Murray Regional Plan strongly boasts of our regions agricultural wealth and recognises the multiplying benefits of the agricultural supply chain. In the 2019 season, with a significant period of drought, minimal water allocation to irrigators and now devastating fires, this area provided a huge amount of fodder and grain supporting those in need in our state.

Our branch queries whether the economic analysis for this project adequately reflects the loss of agricultural production including associated expenditure through local communities and the multiplying economic effect post farm gate through the supply chain, from the manufacturing of agricultural machines and products through to the purchase of food products by the end consumer, associated employment and other benefits.

The “Do Nothing Approach” in the EIS document is not a valid argument. Placing these developments appropriately in less arable areas would have the advantage of achieving both an economic benefit whilst also retaining the food production capacity.

It is noted that Renewable Energy Action Plan – goal 2 is to “Build community support for renewable energy”. Unfortunately, in order to gain community acceptance, developers in our area appear to have taken the marketing approach to offer community funds to towns rather than to use funds towards the mitigation of impacts to affected neighbours which has seen a fracture of communities and works against this goal. In addition, the conflict between landowners undertaking developments and neighbours is immense.

The possible mental health impact these developments may bring to previously strong farming communities should be carefully considered due to industrialisation and the loss of rural amenity and peaceful lifestyle from huge construction activities.

NSW Farmers strongly advocates the NSW Right to Farm Policy designed to ensure a cohesive approach to agricultural planning to avoid conflict or interference to agricultural practice. The Principle of the NSW Right to Farm Policy states that the NSW Government recognises the value of agriculture for growing food and fibre for domestic and international markets and is concerned about potential loss or impaired use of agricultural land. Agriculture is important to local, regional, and state economies and communities. This document acknowledges that **“Only 11% of NSW is used for higher productivity agricultural uses such as cropping (dryland 9.6%, irrigated 1.3%) and horticulture (0.2%)”**.

Our branch of NSW Farmers acknowledges that primary producers are on the front line of seasonal variability exacerbated by a changing climate. Of the impacts that may be brought about by climate issues, food production could be hit hardest. With this in view, Billabong Branch strongly believes that the best net benefit should be achieved through placing these developments in communities with arid or poorly producing land and targeted renewable energy zones with these features. Infrastructure to allow development in these areas such as transmission lines must become a serious priority of the NSW Government to allow this to occur.

NSW Farmers solar policy promotes that there should be clear guidelines and regulation for the development, operations and decommissioning of Solar Farm Energy Generation which avoids negative impacts on current and future neighbouring landholders. Some issues include increased heat, bushfire hazard, weeds, insurance, drainage, dust, noise and livestock impact. At this point our members are clearly concerned by the lack of evidence in relation to the impacts of large scale solar. Proven research needs to be conducted by the developers before further developments proceed around prime agriculture **based on the massive scale** of these developments in similar environmental conditions.

Proven mitigation measures need to be undertaken at the responsibility of developers to overcome all impacts. We are concerned that this extremely large development in such a productive area will bring additional impacts which may have previously been unseen.

In order to ensure impacts are not endured by our members we believe that a responsibility of NSW Planning is to ensure that independant ground truthing of data occurs and that a primary consideration contained within the EIS is proven, true mitigation measures or appropriate compensation to address impacts to the production and livelihood of neighbours with agricultural interest. There is concern that due to the financial return achieved by environmental companies in completing EIS documents that wording may be intended to be construed in developers favour.

There is concern that the wording in the EIS document in relation to the retention of agriculture and sheep production may be ambiguous for marketing reasons and not reflect the true intention or capacity of sheep production on these properties after development. There would be few producers that could undertake sheep production without hay or grain and when this is removed from production where will these products be sourced. Without the cropping potential of the land, the ability to make hay or fodder, or grow dual purpose crops, the ability to continue sheep production to a capacity close to that prior to the development would appear incorrect.

It should be noted that as farmers are not skilled in interpreting documents of this complexity and with the timeframes provided may find it difficult to provide evidence based agronomic data to refute the claims of the proponent. We believe that independent agronomic data and analysis by experts should be provided on the capability of the land proposed for this particular development not just the region.

Further, the recent fires revealed impacts to energy generation of high voltage lines. We understand that Transgrid are currently in the development phase of an interconnector between Wagga Wagga and South Australia that will open up opportunities to develop less productive areas of the state and remove pressure on the capacity of the current infrastructure.

We thank you for your consideration and appreciate your efforts to ensure the protection of agricultural land and reduce impacts to neighbouring agricultural producers.

Peter Cambpell  
Branch Chairperson