



OUT19/1055

24 January 2019

Joanne Tarbit
Development Assessment Planner
Griffith City Council

Email: Joanne.Tarbit@griffith.nsw.gov.au

Dear Ms Tarbit

Yoogali Solar Development DA 291 - 2018

Thank you for the opportunity to provide comments on the above project.

The NSW Department of Primary Industries (DPI) Agriculture is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend.

The Statement of Environmental Effects (SEE) remained silent on the fact that the project land is rated as Class 3, as per the *Land and Soil Capability Assessment Scheme (OEH 2012)* and defined as "High Capability Land" and an important agricultural resource. Moreover, the land is currently irrigated and has access to extensive irrigation infrastructure.

The proponent may wish to access this mapping at <https://geo.seed.nsw.gov.au>

The Draft Large-Scale Solar Energy Guidelines (pp13-14) define land class 1-3 as potential areas of constraint for solar developments. High quality agricultural land with access to irrigation is an extremely limited and valuable resource in NSW. Irrigated agricultural land has been estimated to comprise less than 1% of all agricultural land in NSW. As a result, the site should be retained for ongoing agricultural production and the development located elsewhere.

Section 4.4 Visual and Scenic Amenity of the SEE commencing on page 27 Concludes that *"the visual impact of the proposed works are assessed to be moderate and high to moderate for the viewpoints identified in this assessment. The solar farm would not be visible from dwellings within the vicinity of the site. Impacts on visual and scenic amenity would be generally limited to being positioned within the crop fields of these farms. These impacts are considered acceptable given the nature of the proposed development and that it will contribute to renewable energy generation"*

It is not clear from the SEE how the proponents have concluded that the development would not be visible from the adjacent dwellings.

It is also not clear how they came to the conclusion that the impacts are "acceptable" and there has been no mitigation methods suggested for impacts on the adjacent property owners. The SEE is also silent on any consultations that have been undertaken. This is a significant oversight given the local impact of the development.

Many rural landscapes have been maintained in their current condition for well over a century. Whenever these landscapes are modified and in particular, transition from agricultural use to an industrialised form of landscape, land use conflict often results. For this reason, It is likely that a Land Use Conflict Risk Assessment (LUCRA) is warranted. More details can be found at <https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/lucra>

Another aspect that the SEE did not address was a broad outline of the decommissioning and rehabilitation process including objectives and approaches used to achieve these objectives. The provision of this information can assist a consent authority to evaluate the proposal as it binds the proponent to achieving particular outcomes, even if the detailed decommissioning and rehabilitation plan will not be prepared until much closer to the time.

Should you require clarification on the information contained in this response, please contact me on (02) 6938 1906.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lilian Parker', with a stylized flourish at the end.

Lilian Parker

Manager Agricultural Land Use Planning