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15 August 2025

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

Dear Cameron

**Subject: Gundry Solar Farm (SSD 48225958)
Review of Response to Submissions & Amendment Report**

Council has reviewed the proponent's Response to Submissions (RtS) for the Gundry Solar Farm and acknowledges the effort made to address issues raised during the public exhibition period. However, Council maintains its objection to the proposal on the basis that the RtS does not adequately resolve the concerns raised by Council and the community.

Outstanding Concerns

Despite adjustments to the project footprint and inclusion of impact assessments, Council considers that the following issues remain unresolved:

1. Site Suitability and Unavoidable Impacts

The EIS itself acknowledges that the project will result in some unavoidable environmental and social impacts. Despite proposed mitigation, the documentation fails to demonstrate that the site is fundamentally suitable for a development of this scale and nature. The location's agricultural value, landscape sensitivity, and proximity to residential and environmentally sensitive areas make it inappropriate for industrial-scale solar infrastructure.

2. Loss of Agricultural Land

The site comprises productive farmland with historical and economic significance. The proposed development represents a permanent shift away from agricultural use, contrary to local land use planning objectives.

3. Visual and Landscape Impact

The Gundry Plains hold cultural and scenic value. The proposed mitigation measures do not sufficiently preserve the visual integrity of the landscape, particularly for nearby residents.

4. Community Wellbeing

Council remains concerned about the mental health impacts on affected landholders and the broader community. The Social Impact Assessment lacks depth in addressing long-term social cohesion and wellbeing.

5. Bushfire Hazard

The site's location in a bushfire-prone area raises serious safety concerns. Council is not satisfied that the fire risk mitigation strategies are sufficient or enforceable.

6. Noise and EMF Exposure

Community concerns regarding operational noise and electromagnetic radiation have not been fully addressed, and further independent review is warranted.

7. Letter of Offer

Negotiations between Council and Lightsource BP in relation to the terms of the proposed Planning Agreement have not resulted in an agreed Letter of Offer to date.

Additional Comments

Traffic & Transport

1. In the event that consent is granted, delivery of oversize and/or overmass (OSOM) and any heavy vehicle or single unit truck movements should be restricted to occur outside school bus hours and school drop off times in consultation with the local bus company.
2. The heavy vehicle component will increase the likelihood of road pavement damage. Therefore in the event that consent is granted, it is recommended that either road maintenance contributions be sought for the local roads used as part of the haulage route in accordance with Council's adopted Local Infrastructure Contributions Plan or that the proponent enter into an agreement to undertake a preliminary dilapidation report on the roads and agree to upgrade to the required standard and repair any accelerated damage. A detailed pavement analysis will be required by Council for local roads prior to any works commencing to establish the life and condition.
3. Access to the development site is proposed by an upgraded entry at the existing property entrance, 961 Windellama Road. As the majority of traffic during the construction and operational phases of the project will be to and from Goulburn, a Basic Left Turn (BAL) treatment is proposed and is considered appropriate. Safe Intersection Sight Distance (SISD) is available on each approach to the entry point. It is proposed to construct the upgraded entry at the commencement of the project to facilitate heavy vehicle turning movements. A Section 138 Roads Act 1993 application with accompanying design plans is required to be lodged with Council as the Road Authority for assessment prior to commencement of construction.

Project Timing & Worker Accommodation

While the lodged EIS acknowledged there would be some unavoidable impacts, there are two key changes to the proposed project that will increase the impact on the Goulburn Mulwaree LGA.

1. The change to the timing of the project; and
2. The reduced local employment target from 35% to 5%

The updated construction timing is showing a start date of Q4 2025/Q1 2026 with construction anticipated to last 18-24 months (January 2026 - June/December 2027). This also assumes a construction workforce of 400.

In April 2025, following delays with property acquisition and site access in Bannaby, HumeLink East changed their construction approach to commence from the western end of the project. As a result, while the construction workforce is reduced, it will now be centered around the period June 2026 to June 2027 and the workforce accommodated in the Goulburn Mulwaree and Upper Lachlan Shire LGAs rather than in camps located within the Upper Lachlan LGA. Their average peak workforce of 100-140 will be required from June 2026 to February 2027.

The Marulan Solar Farm is estimated to commence in 2025 and take 18 months, also crossing into the amended timeframe. This project estimates a workforce of 300 during construction.

While the amendment report provides detailed information in Tables 2.4, 2.5 and 2.6 on available accommodation during the project period, HumeLink also has accommodation requirements listed in its SIMP. This includes reserving 225 rooms in Goulburn for the stated period.

With a limited number of rooms available in the LGA, there will be significant pressure placed on the short-term accommodation market's ability to also accommodate our tourism and overnight stay visitors should rooms be allocated for both projects during this period.

Information that Council have provided to other projects in respect to accommodation shortages includes:

- Consideration must be given to times when locally significant events in Goulburn or surrounds are taking place that rely heavily on the availability of accommodation. Examples of events that have been conformed during the anticipated construction period include but are not limited to the IOGKF Gasshuku in November (500+ people travelling from around Australia and internationally), Goulburn Racing Club race meetings and a school reunion (100+).
- A number of regular events can fill all existing accommodation. For example, State Championship Hockey, Police Academy attestation parades and Motor Sport events at One Raceway. Not being able to accommodate for these events will negatively impact the local visitor economy, including the ability to maintain some of these events as regular and return attractions to the LGA.

- Council is concerned that Goulburn is likely to experience a number of SSD developments entering the construction phase at once, substantially increasing the risk of losing all available short-term accommodation to projects not necessarily in our LGA. For example a number of SSD projects are being proposed within the Upper Lachlan LGA that will rely upon the services found within Goulburn (including accommodation).
- There should also be consideration given to regular accommodation users such as healthcare workers, ARTC, Essential Energy and other civil contractors and trades.

The amendment report also states that the local employment target has been reduced to 5% from 35% following stakeholder engagement and assessment. We appreciate the acknowledgement that consultation with Goulburn Mulwaree Council to inform the AES highlighted limited local employment capacity at the present time, due to low unemployment, a tight construction market, limited skilled workforces, with local businesses currently struggling to fill roles. However, by reducing this percentage to 5%, there will be additional workforce then requiring accommodation. Which will then add to the issues highlighted above.

Suggested mitigation measures that have been provided to other proponents include the funding of a local coordination role (modelled on 'Orange360' - cited as a useful precedent for workforce and accommodation coordination in regional areas) for accommodation and event scheduling. This regional coordination role could be jointly or solely funded by approved SSD projects. This role could be embedded in an existing body, such as the Canberra Region Joint Organisation, or Regional Development Australia Southern NSW and ACT, or established as a new initiative, to proactively manage cumulative social and workforce impacts across affected LGAs.

Council Objection

Regardless of the information provided above, Council reiterates its opposition and objection to the Gundry Solar Farm proposal. The final assessment of this project must not disregard the legitimate concerns raised by Council and the community. We urge the Department to give full weight to these issues in its determination and to ensure that local voices are meaningfully considered in the planning process.

If you require any further information, please contact me on (02) 4823 4480.

Yours sincerely



Scott Martin
Director Planning & Environment