

Darryl Temple
1132 Windellama Road
Gundary NSW 2580

27TH January 2026

The Assessing Officer
NSW Department of Planning, Housing and Infrastructure
Re: Merino Solar Farm – SSD 59155459
Assessment Type: State Significant Development
Location: Gundary & Tirrannaville, Goulburn Mulwaree LGA
Development Type: Electricity Generation-Solar
Capacity: 450 MW Solar PV + 450 MW / 1,800 MWh Battery Energy Storage System (BESS)

Dear Sir/Madam,

I am writing as a resident of the Gundary area for over **55 years** to formally object to the proposed **Merino Solar Farm** at Gundary/Tirrannaville, currently on public exhibition as a **State Significant Development**.

While I support responsible and well-planned renewable energy development, I submit that this proposal is **inappropriate for the chosen location** and presents **unacceptable environmental, social, safety, and land-use impacts** that cannot be adequately mitigated.

1. Inappropriate Scale and Industrialisation of the Rural Landscape

The proposal involves **450 MW of solar generation** and a large-scale **1,800 MWh battery energy storage system**, together with substations, switchyards, transformers, inverters, and extensive operational infrastructure. This represents the **industrialisation of a traditionally agricultural and lifestyle-based rural landscape**, fundamentally altering the character of Gundary and Tirrannaville.

The installation of **approximately 700–760 hectares** of solar panels and associated infrastructure will dominate the landscape, replacing open rural vistas with industrial-scale development. Even the proponent acknowledges that *“the installation of solar panels will inevitably have some effect on the current look of the landscape.”* The resulting visual impact, glare, and loss of rural amenity are incompatible with existing land uses and with the expectations of long-term residents who value the area’s scenic and environmental qualities.

2. Cumulative Impact on the Goulburn Region

The Goulburn region is already being targeted for multiple large-scale renewable energy projects. The addition of another 450 MW facility within a relatively small geographic area creates significant **cumulative impacts**. The Merino Solar Farm is one of several large renewable projects either proposed or operating around Goulburn; together they create a measurable cumulative impact on landscape, infrastructure, environment and community wellbeing that **must be assessed regionally rather than project-by-project**. The Merino

proposal alone would cover 700-760 hectares and deliver ~450 MW of solar and a 450 MW / 1,800 MWh BESS about 6 km south of Goulburn, fundamentally altering the rural landscape of Gundry and Tarranville.

Existing and proposed projects shaping the cumulative footprint.

- Merino Solar Farm (EDPR) — 450 MW solar + 450 MW / 1,800 MWh BESS, site between Tarranville and Gundry, EIS due for public exhibition.
- Gullen Range Wind Farm — operational wind farm of ~165.5 MW located north-west of Goulburn; long ridgeline footprint and associated access tracks are already established.
- Collector Wind Farm — operational 226.8 MW facility on the Culler Range, visible from major transport corridors and contributing to regional cumulative visibility.
- Gundry Solar proposals — local SSD applications and submissions show multiple solar/BESS concepts proposed for Gundry and close to Windellama road, with residents lodging objections citing proximity and landscape impacts.
- Other nearby proposals and community projects — community-scale Goulburn solar initiatives and several earlier proposals (e.g., Yass solar proposal recently shelved) indicate ongoing development pressure across the Southern Tablelands.

Key cumulative impacts are.

- Landscape character degradation
- Increased traffic and heavy vehicle movements
- Loss of local biodiversity
- Reduction in rural land productivity, including livestock and fibre production
- Impacts on community cohesion and property values
- Increased insurance premiums for properties near large-scale energy infrastructure
- Properties in rural-residential and lifestyle areas surrounded by industrial development experience diminished market demand and falling values.
- Uncertainty affecting long-term planning and investment
- Social division as some landholders benefit financially while neighbours bear the impacts

The **Large-Scale Solar Energy Guideline (2022)** requires that projects near regional cities avoid significant conflict with existing residential or commercial uses and must not adversely impact scenic quality or landscape character. Due to its scale and proximity to Goulburn, the Merino Solar Farm breaches these requirements.

The Merino Solar Farm's EIS does not, in its current form, demonstrate that the Goulburn region will not be disproportionately burdened by industrial-scale energy infrastructure.

3. Traffic, Construction and Safety

Construction of the project will generate **hundreds of daily vehicle movements**, including heavy vehicles, B-doubles, and shuttle buses. Local roads such as **Windellama Road, Braidwood Road, and Painters Lane** are not designed for such traffic volumes and are already in poor condition.

If construction overlaps with other proposed developments (such as the Gundry Solar Farm), cumulative traffic impacts would be severe.

Key concerns include:

- Increased risk to pedestrians, cyclists, and school children
- Poor visibility during winter fog, increasing accident risk
- Road damage, congestion, and reduced safety
- Delays to emergency services
- Inadequate mitigation measures
- Local roads fundamentally unsuited to the proposed traffic volumes
- Heavy vehicle traffic on rural roads not designed for industrial loads

These issues remain inadequately addressed in the project documentation.

Without coordinated scheduling and infrastructure upgrades, the region bears the cost while developers benefit.

4. Biodiversity and Habitat Loss

The Gundry–Tirrannaville corridor contains important habitat areas, native grasslands, and wildlife movement pathways. Development across **700–760 hectares** will require extensive clearing and fencing, with likely impacts on threatened species and ecological communities.

Although historically grazed, the land still contains remnant native vegetation and provides habitat for local fauna.

Large-scale clearing for solar infrastructure risks:

- Loss or modification of terrestrial habitats
- Impacts on threatened flora and fauna, including disruption of fauna corridors
- Spread of noxious weeds
- Significant cumulative biodiversity impacts when considered alongside other regional projects.

The EIS must demonstrate that biodiversity impacts are genuinely **avoided**, not merely offset elsewhere. Based on the information provided, this requirement has not been met.

5. Fire and Safety Risks

The inclusion of a **450 MW / 1,800 MWh lithium-based BESS** introduces substantial fire and safety risks. Large-scale battery systems carry inherent risks of thermal runaway, hazardous material release, and fires that are extremely difficult to extinguish.

These risks are heightened in a rural setting with limited firefighting resources and longer response times, particularly given that local brigades are **not staffed full-time**.

A further concern is the practical difficulty of firefighting within a large-scale solar facility. Solar farms contain extensive high-voltage electrical infrastructure, meaning traditional water-based firefighting methods cannot be safely deployed. The interaction of water and electricity presents a serious hazard to firefighters and onsite personnel.

The dense layout of solar arrays also creates potential entrapment risks. Narrow access corridors and fixed panel structures may impede evacuation and emergency response, particularly in low-visibility or rapidly evolving fire conditions.

The community has not been provided with sufficient detail regarding:

- Emergency response capability
- Fire containment strategies
- Hazardous materials management
- Worst-case scenario modelling
- Site access during emergencies
- Adequacy of onsite fire suppression systems
- Training and specialist resources required for BESS fire response

Approval should not be granted until these matters are comprehensively and transparently addressed.

6. Insufficient Community Consultation

While some community engagement has occurred, many residents — including myself — remain unaware of the full scale and implications of the project. Despite my property being **approximately 500–600 metres** from the proposed development boundary, I have received no direct correspondence from the proponent.

Information has instead been obtained through neighbours. This does not constitute meaningful consultation. A project of this magnitude requires clear, transparent engagement and demonstrated social licence, which is currently lacking.

7. Decommissioning and Long-Term Responsibility

The proponent must provide a comprehensive decommissioning and rehabilitation plan supported by legally enforceable financial guarantees. History demonstrates that project

proponents can become insolvent, leaving communities and governments responsible for abandoned infrastructure.

Without robust bonding and accountability mechanisms, the long-term burden may fall on residents and ratepayers.

8. Water Catchment Impacts

The proposed development is located within an important water catchment area supporting downstream users and ecosystems. Large-scale ground disturbance across **700–760 hectares**, combined with soil compaction, vegetation removal, and extensive infrastructure, poses significant risks to water quality, erosion, sedimentation, and altered surface-water flows.

While solar panels are often described as “clean technology,” many contain trace amounts of hazardous substances, including heavy metals. Over time, weathering and degradation may allow contaminants to enter surrounding soils and waterways. In a catchment context, even low-level contamination presents an unacceptable long-term risk.

Key concerns include:

- Increased sediment runoff into creeks and drainage lines
- Potential contamination from fuels, oils, chemicals, heavy metals, and battery-related materials
- Disruption of natural water movement
- Reduced infiltration due to soil compaction and impermeable surfaces
- Long-term hydrological impacts on neighbouring properties and downstream users

Water catchment areas warrant a higher level of protection, and industrial-scale development of this nature is incompatible with that objective.

9. More Suitable Locations Exist

The project is proposed outside the five designated **Renewable Energy Zones (REZs)**, despite NSW Government policy encouraging energy infrastructure to be concentrated within REZs to minimise environmental and social impacts.

The **Large-Scale Solar Energy Guideline** emphasises careful site selection to avoid high-value agricultural land, sensitive landscapes, and areas of significant community opposition.

Large-scale solar developments are more appropriate in:

- Already disturbed industrial areas
- Locations with lower biodiversity value
- Regions with existing high-voltage infrastructure
- Rehabilitated mining land
- Areas with lower agricultural and scenic value

The Gundry and Tirrannaville areas does not meet these criteria.

10. Local Burden, No Local Benefit

The Merino Solar Farm delivers benefits that are overwhelmingly regional and state-wide in nature, while imposing significant and enduring impacts on the immediate Gundry and Tirrannaville community. The project's energy output feeds into the National Electricity Market and provides no demonstrable improvement to Goulburn's local energy security, pricing, infrastructure, or community services. In contrast, the burdens including loss of rural landscape character, visual intrusion, noise, traffic, construction disturbance, cumulative industrialisation, and long-term amenity degradation fall entirely on the residents living adjacent to the site. This imbalance is neither acknowledged nor justified in the proponent's documentation. A project that confers diffuse, large-scale benefits must not be approved where the concentrated and permanent costs are borne solely by a small rural community without meaningful offset, mitigation, or local advantage. The proposal therefore fails to meet principles of equitable impact distribution and responsible regional planning.

11. Community Connection and Rural Lifestyle

The Gundry and Tirrannaville area is deeply valued by those who call it home. Its open paddocks, sweeping views, and largely unspoiled natural character create a strong sense of place that is increasingly rare in regional NSW. Residents are drawn to this landscape because it offers what urban environments cannot: space to breathe, quiet surroundings, and a genuine connection to the land. Many people choose this district after years of city living, seeking a lifestyle defined by tranquillity rather than congestion. These qualities underpin the community's identity and wellbeing.

Daily life here is shaped by the landscape itself. Locals speak warmly of early mornings watching the mist lift from the gullies, of evenings when the sky turns golden as the sunsets, and of wildlife moving freely. These moments are not occasional luxuries but fundamental aspects of life in Gundry and Tirrannaville. They are the reasons people invest in property here, raise families here, and remain for decades.

This is a community built around its landscape. The natural beauty of the district is not merely an aesthetic feature; it is central to the identity, wellbeing, and way of life of its residents. Any development that **diminishes this character** risks undermining the very qualities that make the area so cherished and that have drawn people to live here and remain for generations.

12. Conclusion

For the reasons outlined above, I strongly oppose the Merino Solar Farm in its current form and location. The proposal presents unacceptable environmental, social, safety, and land-use impacts that cannot be justified or adequately mitigated.

I respectfully request that the Department refuse the application or require the proponent to identify a more suitable location that does not impose disproportionate impacts on the Gundry, Tarranville, and broader Goulburn communities.

Thank you for considering this submission.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Darryl Temple', written in a cursive style.

Darryl Temple