

31 January 2026

To: NSW Planning DPIE + Land and Environment Court

Formal Objection – Merino Solar Farm (SSD 5915545)
EIS Resident 5: Objection Submission

Dear Planning Assessors, Decision Makers on Merino Solar Farm

Introduction

I am writing to you as Resident 5 as first identified in EIS Reference: Page 54 of PDF (or EIS page 23). I have challenged our property visual and desktop assessment rating as low with both NGH and EDPR since February 2025. At my home August 2025, I had challenging discussions over the neighbour agreement contract that did not reflect the impact on our visual impact. EDPR Mishka Talent said he would investigate after I requested an independent evaluation based on the failure of the topography mapping software. I had no reply from Mr Talent, so I hereby request an independent assessment be directed for a correct assessment outcome.

Refer to: -Annexure A - EDPR Response to Questions - Merino Solar Farm 230286

About: Wayne and Karen Webster

My husband Wayne and I purchased our 100 acre lifestyle block in 1999, we established our home in 2000. We have invested all our spare money, time and everything we had into our parcel of land we fondly refer to as 'Our Castle'. With all the serenity it all brings, living the lifestyle we chose due to our love of the land.

Direct and Real Financial impact on our retirement funding:

We have subdivided 25 acres of our 100 acre property in preparedness of our retirement that we want to pursue next year. Those retirement plans we have dreamed about and made a reality to achieve now, have been compromised by the Merino Solar Farm (MSF) Application. The 25 acres cannot be correctly valued at this time. 12 months now due to the MSF, 2 real estate advised land visual impact to MSF is unstable to put a formal valuation on the land, until a determination is made by NSW Planning.

At that point it will come down to 30-50% loss and what you are prepared to sell it for. **We would like you to consider this in our Neighbour Agreement, where we request your intervention to help us.**

We have been married for 32 years, raised 2 sons, adults now who we one day hoped could inherit our good fortune of owning land in Australia. Today I am broken, knowing all that can be taken away and I will be suffocated by 870,000 solar panels, and impacted by 100 acres of Bess Storage then far too many transmission lines.

EDPR/NGH Community Engagement failures: Social Licence failures:

- I feel somewhat targeted due to my circumstances in advocating against the Merino Solar Farm by EDPR Business Operations Manager Miska Talent.
- EDPR/NGH have included R5 assessment details early, on page 23 of EIS, I believe of my actions taken to object to the SSD application that will be disclosed throughout this document.

The assessment was iterative in that a setback was applied to R5 to reduce the impact level to low. On this basis, no further mitigation, such as the planting of vegetation screening, was required. The residual visual impacts of the Project are low for all private viewpoints”

- R5 was noted as the first impacted resident, I felt it was deliberate to set the benchmark for me, setting the tone that was to follow for through the painful process of reading and understanding 1790 pages of their EIS submission. Followed with Scoping Report documents for me paying particular attention to Visual Impact Assessments Annex F: Followed with State and Solar guidelines all on top of all that.
- **Unfortunately, the NSW Planning Process did not allow me any other option but to investigate EDPR, and formally object to let you know how badly this developer has conducted themselves.**

EIS 2. Strategic context

**Federal Govt - CIS (Capacity Investment Scheme) funding awarded to EDPR
09.10.2025**

The CIS is an Australian Government (taxpayer funded) revenue underwriting scheme was granted to EDPR in an announcement from Minister Bowen

09.10.2025. <https://www.dcceew.gov.au/energy/renewable/capacity-investment-scheme>

- I sent enquiries to Mr Bowen, DEEWR, DPIE 14th October 2025 and again on 30th October and have **NOT had a reply.**
- Tony Mahar AEIC Commissioner undertook a team's meeting with me in regards to our previous complaints lodged on 13.06.2025 & 04.11.25.
- AEIC via Mr Mahar will include our CIS funding enquiry as a complaint that will be included in his investigation and report.
- Outlined to Mr Mahar on the day was my biggest concern that the AEIC report goes directly to Minister Bowen? How is that a fair and just process under our circumstances?

I am advocating for explanation that the CIS funding already being awarded will ultimately impact due process, our community rights, and the principles of independent environmental assessment in NSW.

Questions raised for transparency and explanation to the following:-

- How was EDPR CIS tender awarded before the EIS was submitted or publicly exhibited?
- Does this pre-approval funding compromise or pre-empt the outcome in the NSW SSD planning process?
- What is meant by the statement that the project will proceed under a "new fast-tracked single phase process that should shorten the time frame"?
- What role does DPIE have now in the assessment process if the CIS funding has already been approved?
- Have DPIE been consulted by the Federal Government regarding the 'new fast-tracked single phase process that should shorten the time frame'? where is this written in the guidelines or policy or published for us to understand?
- Why was EDPR allowed further extension after the deadline of 14.10.25 - passing by 3 months to lodgement notice of 14.01.2026.
- Please explain why the removal of the SSD application on the NSW planning portal 14.10.25 for 3 weeks that coincided with the deadline date 14.10.25.
- Why was no notification given via the Major Projects Portal before the SSD application hyperlink was removed to those who had requested to be notified about the project to be kept informed ?
- EDPR are already facing delays over and over again with technical failures, inconsistent communications before the application are even formally lodged,
- Can you please consider how can the Australian public, or any level of government trust EDPR to deliver such a massive infrastructure SSD project in good faith?

While EDPR and its shareholders stand to profit enormously from this development, local communities carry all the risk: social division, visual blight, land devaluation, and long-term land use restrictions. No genuine economic resilience strategy has been presented to support Goulburn's core identity, nor has any structural planning reform been included to address what happens when the project ends and the land is no longer viable.

Refer to : Annexure H - Minister Bowen and AEIC 16.10.2025 - CIS Funding

Refer to: Annexure J - AEIC-ComplaintInvestigation-MSF-18112025

Taxation Benefits EDPR Australia vs EDP Foreign Ownership:, Further economic considerations:

Accelerated Depreciation (Instant Asset Write-Offs)

Under Australian tax law, capital-intensive renewable energy infrastructure such as solar panels, inverters, battery storage (BESS), and transmission infrastructure may qualify for **accelerated depreciation schedules** — allowing the developer to claim significant tax deductions in the early years of the project. This rapidly reduces their taxable income in Australia.

Research & Development (R&D) Tax Offsets

If EDPR claims any development innovation. e.g. new battery integration systems or solar panel design, they may claim **R&D tax offsets**, reducing their tax burden even further, regardless of where the R&D was primarily conducted.

GST Concessions and Refunds

Large infrastructure developers often **recover GST** paid on the majority of construction and operational inputs. This results in substantial cash flow benefits during the build and operational stages.

Renewable Energy Certificates (LGCs)

Under the Renewable Energy Target (RET), EDPR may receive **Large-scale Generation Certificates**, which can be sold or traded for profit. These certificates are considered a form of subsidy or indirect tax benefit.

Carbon Credits or Emissions Avoidance Benefits

Depending on future emissions reduction schemes, EDPR could claim **carbon offset credits** that they can monetise or use to offset liabilities elsewhere — either in Australia or globally via linked carbon markets.

Profit Shifting & Dividend Repatriation Risks

Although the **Merino Solar Farm is nominally operated by EDPR Australia**, corporate profit repatriation structures mean:

- **Dividends** may be paid back to the **parent company in Portugal (EDPR Europe)**.
- **Transfer pricing** mechanisms may be used to shift profits through fees (e.g. for licensing, consulting, engineering, or capital loans from the parent).
- **Interest payments** on intercompany loans can be deducted in Australia, lowering the local tax burden but sending cash offshore.

As a result, **Australian taxpayers will bear the costs of infrastructure (roads, grid upgrades, fire services, etc.)**, while the **economic benefit is exported to foreign shareholders predominantly Portugal and China's economy will benefit**.

2. Strategic context - EIS Page 40-55

Provided to demonstrate what we as residents have to endure to try and understand it all e.g. My CIS funding enquiry requesting transparency with no answer received yet from any Federal or State Government authorities .

2.1. Energy policies 2.

- 1.1. Paris Agreement
- 2.1.2. Climate Change Act 2022 and Nationally Determined Contribution
- 2.1.3. Australian Government Renewable Energy Target
- 2.1.4. Australian Energy Market Operator – Integrated systems plan
- 2.1.5. NSW Climate Change (NET Zero Future) Act 2023
- 2.1.6. Net Zero Plan
- 2.1.7. NSW Electricity Strategy
- 2.1.8. Electricity Infrastructure Roadmap (2020)

2.2. Land use planning

2.3. Environmental and social context

Appendix D - EDC Cover Letter and Part 1 – development costs

DEEWR, Minister Bowen and DPIE's silence and in a word shows ignorance around working on getting ' **The Policy Right**'. The Development costs on top of CIS funding awarded. can also be viewed as devaluing our right for transparency in the quest to be net zero by 2050, as no one will, nor do they, take responsibility for their actions.

- Governments 2030 vision has failed already
- Merino Solar Farm residents are facing more failures to reach unachievable targets again by 2035
- With both the Goulburn Merino and Gundary Solar Farms directly in the line of fire within the SEPP of Goulburn Mulwaree Council
- All residents either in Gundary or Merino applications will be exposed directly to governments next failures and by the time that occurs it will be too late.
- By 2050 will ultimately only add to our carbon emission targets the land will be gone, where will the infrastructure be decommissioned too ?

Not only is the Government enabling 100% foreign owned developers, that all \$ will go through the stock market to their overseas shareholders, in turn to destroy our land, take our lifestyle and liberties away, now the Government is going to fast track a CIS subsidy scheme to assist them. OMG ironic really – **we need NSW Planning to step up and start slowing down the rate of energy infrastructure approvals until Mr Bowen “gets the policy right”**. How is the Labour government going to get the policy right if they won't listen to get it right .

Fundamental Failures in NSW Planning and Policy

The **systemic failure of large-scale energy infrastructure** applications begins with the current **NSW State and Solar Guidelines**. EDPR repeatedly claims in its EIS to have "met standards as outlined" under these guidelines, tragically and irresponsible, that's all the planning system demands.

The NSW State and Solar Guidelines serve more as a loophole than a safeguard, allowing developers to hide behind vague thresholds and bypass meaningful community engagement or rigorous site suitability.

Throughout the EIS, NGH references these guidelines as justification for nearly every shortcoming, from visual assessments to noise impacts, biodiversity to bushfire risk. The repeated invocation of minimum compliance becomes not only predictable but deeply disturbing.

EDP Renewables, under Section 2.1 of the EIS ("Energy Policies"), proudly references their alignment with global goals, including the Paris Agreement. Yet their behaviour suggests the opposite. Their expectation appears to be that association with Net Zero targets alone should fast-track project approval — regardless of community harm, poor site selection, or long-term environmental risk.

Loss of Confidence, Property Sales, and Economic Decline

It is deeply concerning that the Solar Host property 4066 Braidwood Rd is currently for sale during the assessment period of the Merino Solar Farm SSD.

This fact alone raises serious questions about the integrity and adequacy of the Environmental Impact Statement (EIS). If the proponent's own host landholder and critical adjoining infrastructure owners are seeking to divest rather than remain engaged with the project, it demonstrates a clear loss of confidence in the development and its long-term consequences.

The sale of these properties cannot be dismissed as coincidental. This SSD application has created widespread fear, uncertainty, and distress among residents, landholders, and local stakeholders.

Many impacted residents are already considering selling or have sold their properties purely due to the prolonged assessment timeframe, lack of transparency, and the looming prospect of irreversible industrialisation of the landscape. This is a direct social and economic impact of the project itself, not a hypothetical future risk.

If approved, the Merino Solar Farm will not only displace residents but will also trigger a broader economic decline across Goulburn. Loss of lifestyle residents, reduced property values, diminished tourism appeal, pressure on infrastructure, and the erosion of community cohesion will have long-term consequences that extend far beyond the project boundary. These impacts are not adequately acknowledged or assessed in the EIS.

The fact that property owners closest to the development are seeking to exit should be treated as a material planning consideration. It indicates that the development is not socially sustainable, does not maintain community confidence, and fails to meet the standard of a genuine social licence to operate. An EIS that does not account for this level of community destabilisation is fundamentally incomplete.

Link to real estate Solar Host property 4066 Braidwood Rd:

https://www.realestate.com.au/property-other-nsw-tirrannaville-700303600?campaignType=external&campaignChannel=other&campaignSource=share_link&campaignName=share_link

Future CIS solar energy funding options – It's time to rethink our future for Solar Energy Infrastructure – Investigate other investment opportunities.

- Fund solar SSD applications with reputable developers to install the 870,000 solar panels on rooftops
- Starting in Sydney and Canberra, roll out to every Capital city across Australia
- Instead of 100 acres of BESS, the developer enables a home inverter system instead.
- Direct connection to the grid will immediately lessen the load on Australia's energy crisis
- In turn provide relief to consumption rates
- Everyday Australians will benefit through lower energy prices.
- Enable CIS funding to grow and strengthen our nation's wealth first.
- Reward Australian residents, companies and businesses to invest in solar rooftop installation
- Work with the Master Builders Association for safety controls to fast track risk assessment processes
- NSW Planning is delegated the authority to fast track planning approvals required
- Reward the developer for investing into Australia's future economic growth
- Reward the developer for showing innovation and respect for our land
- Reward the developer to use Solar in the way it was intended, on our roof – not taking over our landscapes
- As you travel through Canberra, or Sydney, identify for yourself how many **Government roof tops are not capturing solar sun** to reduce energy in their high consumption workplace as a starting point.
- Government should be putting them on 'their own backyard' silly me, they don't need to as they have 'roof tops' to fill first, do this before invading our lands.

Refer to: Annexure H - Minister Bowen and AEIC 16.10.2025 - CIS Funding

EIS - Section 5 Engagement

In my role in advocating against the development, I started representing the Merino Solar Farm Objection Group (MSFOG), I first wrote to Goulburn Mulwaree Council on 4 March 2025 to requesting advocacy in objecting to this SSD application. Since that time, I have documented and communicated with Council staff Scott Martin and Stephanie Mowle who visited my home, observing our visual impacts firsthand. I kept Scott Martin informed as EDPR continued to control the consultation process with no transparency and failure in their communications. Including the announcement of CIS funding awarded to EDPR with questions to Minister Bowen, DEEWR and DPIE.

I had meetings with Scott Martin at Goulburn Mulwaree Council Office, last contact in September 2025 when EDPR advised EIS lodgement was on 30 September 2025. However, once again EDPR were allowed extension after extension, well after their deadline had passed allowing another 3 ½ months to 14 January 2026 EIS lodgement.

Missing Residential Addresses – Annexure F ‘Memo’ (Scoping Report)

One of the most egregious failures is the omission of 89 resident addresses from the EIS visual assessment data and Scoping Report Annex F

I identified the missing addresses in February 2025, I have not found any mention of my enquiries to NGH, . Refer to EIS pages Community Engagement 5, especially considering my communications with EDPR spanned over 4 months with EDPR (Una Danovitch and Mishka Talent) .

The missing addresses is identified as 89/194 = 46% of the EIS has not been communicated in Scoping report data or now the EIS.

Data extracted from Annexure F ‘Memo’ in the Scoping Report document submission.

This issue was first raised publicly by me after the community meetings in February 2025.

- I then conducted a 60 minute recorded phone interview with Ross Mackie of NGH to ask why these addresses were missing and discussed the non-compliance along with the compound effect the missing addresses will have on submission.
- NGH advised me and my husband twice, that the data was lost during the transition of project ownership from ITP to EDPR.
- NGH escalated the matter to EDPR, but after prolonged email exchanges with Mishka Talent and Una Danovitch, I was advised that **“the other addresses were more sensitive than mine.”**
- I asked directly: **“Why?”** – No satisfactory explanation was ever provided so then lodged complaint formally to AEIC to be investigated.

I have reported this failure formally on behalf of the Merino Solar Farm Objection Group (MSFOG) :

- Complaint lodged with AEIC on 16 June 2025.
- Ongoing letters sent to parliament representatives: McBain, Scully, Nanvar, Prins – February 2025 to today.
- Ongoing communications to Wendy TUCKERMAN, MP Goulburn Electorate Office as shared situation awareness – February 2025 to today.
- Communication to Council starting 4 March 2025 and will be ongoing past the EIS closing date.

Refer to: Annexure L – 89 Missing Resident Nos identified

Refer to: Annexure I - AEIC- MSFSSD5915545-R5ComplaintLodged16062025

Social Licence : Compliance & Privacy Act provisions - Potential Breach

The omission of 89 known addresses (as identified missing in *Annexure F, Table 2 – Memo, Scoping Report*) likely constitutes a **breach of the NSW Large-Scale Solar Energy Guideline (2022) and/or Secretary's Environmental Assessment Requirements (SEARs)**, which require:

- Identification of all impacted landowners/residents within a relevant buffer (4–10 km),
- **Genuine early and ongoing engagement with identified stakeholders.**

If these addresses were obtained via official channels, as we know **they were identified and paid for through a land registry searches , this means by purchase**, but then omitted from formal consultation, signals non-compliance with community engagement obligations, especially if the data was clearly available or if it not disclose and the **addresses were lost**, then would be classed as a **deliberate action of non-disclosure**.

- **Australia is also governed under Privacy Laws to ensure private data purchased by Land Registry are governed for the intent set out in the data registry search application.**
- **Our property address was purchased years ago; we were never notified by we were identified in the land search data. Is that a breach of my privacy as well? it may not to you reading this document, but it does to me.**

By excluding known affected residents could be seen as a withholding of information or unfair exclusion, particularly if:

- Landowners were unaware of being listed in the visual/amenity studies
- They were not notified or consulted despite being named in internal planning data of an NSW Solar SSD application.

This creates grounds to argue failure to act with procedural fairness, especially under the NSW Planning Portal guidelines which imply **minimum standards of transparency and inclusiveness**. I have been asking NGH and EDPR since February 2025 to provide truth and transparency.

In simple terms I request DPIE to request formally with EDPR to find out the truth.

- **Have the addresses been lost, YES or NO?**
- If **Yes**, EDPR, EDPR have breached compliance and non-disclosures.
- If **NO**, why were they not then provided in the EIS submission ?
- It would then be required EDPR provide the addresses to for example to Goulburn Mulwaree Council to make immediate contact
- Extension of time granted for 89 residents to be included in SSD Community Engagement
- Opportunity to lodge a submission after the closing date of MSF SSD application.
- All costs are invoiced to EDPR.

Questions that remain unaccounted for since February 2025:

- If 89 residents have NOT had one piece of their Community Engagement correspondence mailed:

or

- Or at no opportunity for the property address to receive any notice of a resident inclusion in an SSD application:
- If they are identified within 4km of the solar site :
- Included in an NSW Planning SSD Application

How can EDPR EIS results be adequate on their Community Engagement and be deemed suitable to hold a social licence?

- 46% of the resident address data is absent in EIS:
- Ripple effect being the Community Engagement Failure from the beginning
- MSFOG Evidence : - I refer you to the MSFOG Resident Survey results (see attachment) that clearly gives evidence to support our reporting, that EDPR community engagement has failed.
- Results indicate 60% of MSF residents have not been contacted by EDPR/NGH as they report in their EIS - **NOT AT ALL** .

Summary NGH Community engagement

Overall, the NGH community Engagement report captured in essence mine and the MSFOGroup complaints /concerns/risks we there in part not full. I believe they have presented them relatively fairly. But their own engagement was not visible as truth.

What is not accurate is their own community engagement with residents: They came to Goulburn for a total 2 days in February, rushed, unprepared, and expected all residents to fit in with this time frame which was unreasonable to achieve.

I don't understand how this can be seen as compliant Community Engagement under any SSD application standards:

Throughout the EIS NGH summary the mention of EDPR outcomes are definitely bias toward the applicant EDPR as you would expect as they are being paid to report this way

Refer to: Annexure M - MSFOGroup Survey Results - CE Failure

Refer to: Annexure N - Social licence emerges as critical issue

Appendix F5 - Landscape Character and Visual Impact Assessment - Redacted - Neighbour Agreement Misconduct by EDPR

Refer to EIS Section 2.5.3 on “Negotiated Landowner Agreements”:

“No receivers will be exposed to greater than low amenity impacts... as such, there are no negotiated landowner agreements in place.”

- I request this to be confirmed with EDPR as accurate – MSFOGroup data differs
- We were approached for a neighbour agreement.
- Negotiations started at my home with Mishka Talent:
- Proceeded then through our solicitor that lasted a mere **13 days** before EDPR’s legal counsel, Eunice Wells, **terminated discussions**.
- EDPR’s letter (12 September 2025) claimed we did not qualify for compensation and **implied our legal representative breached conduct rules** – a deeply inappropriate and intimidating response. (refer to attachments)

This conduct exemplifies the bullying and dismissiveness we have experienced throughout the application time frame. EDPR’s repeated claim that we experience only “low” impacts is not only false but used tactically to avoid obligations.

We requested EDPR Mishka Talent at F2F Meeting in August 2025 when he presented our neighbour agreement, to have our visual assessment **redone by an independent**. As evidence of the accuracy of the risk rating that is flawed: No further emails were received, EDPR don’t care about residents – it’s all on their terms to meet their own business objectives.

Visual Assessment failures

Refer to EIS 2.3.3. Community profile and nearby receivers

“Overall, 188 non-associated receivers and 6 associated receivers were identified within 4km of the Project Site (Figure 2-5).

*The six Project-associated dwellings EDPR host receivers) are: R1 at Lot 12 DP1011058: R39, **all solar panels**: at Lot 5 DP1124660: R81 at Lot 1 DP593528: R86 at Lot 12 DP631837: R87 and R88 at Lot 2 DP1140024, **BESS storage and Transmission lines**.*

Note: In your overall assessment findings have you ever noticed that there is no visual impact on the host properties – they inflict onto their neighbours instead ?

The next impacted resident referred to in EIS was ours as Resident 5 on the same page

“Visual impacts are considered in Chapter 6.5, however impacts to all identified receivers have been identified as ‘low visual impact’. This is contingent upon one set back area, now reflected in the Development Footprint. In summary:

There were 22 dwellings near the northern section of the Project area and nine dwellings near the southern section that required intermediate assessment”

Evidence collected by me for MSFOG via direct communication to residents:

- Merino Solar Farm Objection Group data collected equates to being approx. 50 residents with visual /noise impact that have not been identified in EIS reporting:
- Until all 194 residents' data is provided by EDPR we estimate approx. 40 residents with visual impact spanning over both Merino and Gundry SSD applications:

Scoping report Annexure F indicated 37 visual assessments.

- Why was the number reduced to 22 with no new consultation data used to verify the EIS data due to the take-over to EDPR and 4 years with no further assessments done in real time:
- **The visual assessment numbers should have increased, not decreased!**

There has been no presence of NGH in any community consultation since February 2025: It's like NGH vanished, this proved again we were just a tick the box business objectives in the **process of a paid contract with EDPR .**

Desktop Assessment Failures

- Desktop-based topography assessments have been inaccurate from the beginning.
- Impact risk ratings were artificially downgraded.
- The EIS ignored nearby residents, failed to communicate at all impacted residents and continues to stand before Council and in effect try to deceive us all by not including the addresses of all the 194 properties identified in their EIS.
- I refer to Mudgee Solar Farm that was rejected by Land and Environment Court: findings: Merino Solar Farm has the same developer and the same flawed topography mapping software used.

Community engagement – Visual and Desktop assessment

Page 6: 1.3

Figure 1-1 Hay bales and witches' hat indicating the maximum height and marking the closest point of the project

- \$1.3 Billion dollar development and they used a hay bale and a witch's hat – wow.
- Why is there no reference to the hay bale at the furthest point of the solar panel visual imagery as the reference point for measure.
- Topographic mapping flawed from the beginning using a flat surface display photo montage – that's why all were rated as risk assessment LOW - no mitigation required.
- Figure 1-2 Hay bales and witches' hat indicating the maximum height and marking the closest point of the project
- Where is the hay bale to reference height at the top of the visual imagery to see the point of measurement that encompass the 3.5 metre visual climb of the gradient and ungulated hill ?
- The mapping software used is depicting the panels on a flat surface, and image pushed back not capturing the truth of the panels gradient / ungulated hill climb. The panels will grow 3.5 metre in height from the first row from airport end to the visual end point at the top of the hill. Note they didn't put hay bale at the top as reference point.
- All resident visual assessments have been manipulated from the beginning due to this flaw in the visual assessment :
- **This is why were all deemed as LOW risk, so they do not have to compensate us in neighbour agreement process: refer to Page 20 Table 4-2 Landscape character magnitude of change levels**

EIS 6.5.3. Potential visual impacts (Stage 4)

“Detailed assessment A detailed assessment was undertaken for the six identified dwellings. A summary of the detailed visual impact assessment is included in Table 6-17 below, with the full assessment included in Appendix F of the Landscape Character and Visual Impact Assessment.

The assessment was iterative in that a setback was applied to R5 to reduce the impact level to low. On this basis, no further mitigation, such as the planting of vegetation screening, was required.

Photomontages from | 208 NGH Pty Ltd | 230286 - Final v1.1 Environmental Impact Statement Merino Solar Farm NGH Pty Ltd | 230286 - Final v1.1 | 209 specific residential receivers were provided to those most affected by the Project but are not reproduced in the EIS.

The residual visual impacts of the project are low for all private viewpoints”

SEE: Table 6-17 Summary of detailed visual impact assessment for private dwellings (Source, Iris 2025)

Resident 5 request an independent assessment to be conducted: - new visual, desktop and noise assessment

R5 visual assessment scoping report Annex F – page 6

TABLE 1 – PRELIMINARY VISUAL ASSESSMENT RESULTS – SOUTHERN SITE AREA

- **Lists 731 metres** Distance to site boundary (metres)

R5 visual assessment EIS

Table 6-21 Receivers assessed for noise (as per Figure 6-26)

- **Lists 800 metres** Distance to site boundary (metres)

Request immediately: With our evidence based on a flawed visual and desktop assessment conducted by the developer, I hereby request an independent be re-engaged to have a true visual and desktop redone to prove our home will be severely impacted by both visual and noise risks.

Request for DPIE Intervention – Neighbour Agreement Misrepresentation and Engagement Failures

Request for DPIE Intervention – Neighbour Agreement Misrepresentation and Engagement Failures

As Resident 5, I formally request DPIE's intervention and oversight in any future negotiations regarding Neighbour Agreements if SSD 5915545 is approved. The negotiation process to date has been marked by **misinformation, procedural shortcomings, and a complete breakdown in trust** with the proponent, EDPR.

A **Goulburn Post** article dated **03/02/2026** quotes an EDPR spokesperson stating false information into Goulburn and community :

"Furthermore, all 11 neighbours have been invited to participate in our community benefit sharing fund, comprising payments up to \$160,000 per year, a direct monetary benefit aligned to CPI over the project's 35-year lifespan."

This statement is **factually incorrect and misleading**. The spokesperson appears to conflate two entirely separate schemes:

- **Neighbour Agreements**, which are private legal contracts offered directly to landowners.
- **Community Benefit Sharing Funds**, which are public funds typically administered by local councils.

I think the EDPR might have inadvertently referenced the BESS host properties \$160,000 pa payment: Now that that has been disclosed could we ask how much the solar host property is getting please: Estimated over and above \$500,00 per year maybe. Now the host property is up for sale, very cowardly, timing is everything:

Neighbour Agreements and Community Benefit Sharing Funds these as I understand are not interchangeable?

In our case:

- **My husband and I were offered a Neighbour Agreement**, not inclusion in a Community Benefit Fund.
- The contract we received included **no monetary amount**, with only a verbal offer provided by EDPR's Mishka Talent at our home the next day.
- We were told we would receive **\$4,000 to seek legal advice**, with a **verbal offer of \$10,000 per annum**—an unverified and non-binding amount that left us with uncertainty and anxiety.
- Mr Talent and I had a difference of opinion on the accuracy of the visual and desktop assessment that rated our property as LOW
- We then engaged a solicitor.
- Negotiations were over 13 days later, I provide as evidence the letter exchanges, and bullying tactics even targeted down to our solicitor, as evidence EDPR should not hold a social licence.
- **This was not a negotiation**; it was a pressure-filled exchange with no transparency, no written clarity, and no consideration of our rights.

We were never given the opportunity to participate in the Community Benefit Fund .

If we are eligible for any of compensation, **I would strongly prefer it be delivered through the Community Benefit Fund**, administered independently, to avoid further distressing engagement with EDPR.

For me personally, **this is not about the money**. But for my husband and sons, the issue is about equity and the economic flow-on effect. If residents like us are to bear the social and environmental burden of such a project, **then it is only fair that we share in the economic benefits**.

This is particularly true given that EDPR's profits from the Merino Solar Farm will ultimately **leave Australia** via Portugal and China through international stock markets, while **residents spend locally** on their land, house, sheds, vehicles, farming equipment, and everyday living costs. I strongly recommend that intervention by planning directs EDPR pay all impacted residents that will stay and stimulate our domestic economy.

I respectfully request DPIE ensure that:

- All neighbour engagement is conducted **fairly, transparently, and independently overseen**.
- Misrepresentations like the one published in the Goulburn Post are corrected.
- EDPR is held to account for failing to distinguish between benefit schemes.
- **No contract is allowed to proceed without clear terms, equity across residents, and informed consent.**

Refer to: Annexure B - Merino_R05- VisualAssessment1

Refer to: Annexure C - Merino_R05- VisualAssessment2-Subdivision

Refer to: Annexure D - EDPR Neighbour Agreement to R5 15082025

Refer to: Annexure E - Letter RMB Lawyers to EDPR 03092025

Refer to: Annexure F - EDPR Letter to RMB Lawyers- 12092025

Refer to: Annexure G - NA- SWPlanningPaulScullyViaStephenBaliMP09122025

Refer to: Annexure K - WendyTuckermanLetter to EDPR re Agreement

Refer to: Annexure M - MSFOGroup Survey Results - CE Failure

AEIC complaint lodged for investigation

I have lodged **three formal complaints** with the Australian Energy Infrastructure Commissioner (AEIC):

1. **13 June 2025** – Community engagement failures, Goulburn Airport, resident impacts across both SSDs (refer to attachments) .
2. **Neighbour agreements** – Mishka Talent closed negotiations after 13 days, without any resolution. (refer to attachments)
3. **CIS funding awarded** without transparent process (refer to attachments)

All complaints lodged are currently under investigation by AEIC .

- **4 November 2025** Teams meeting with Commissioner Tony Mahar indicated they were meeting with EDPR on **6 November 2025** to address these concerns in their investigation.
- I was advised by Belinda AEIC via phone 15.01.2026, AEIC Commissioner and Deputy Commissioner meeting together to discuss the SSD application and the MSFOGroup will be communicated to after. **I expressed our appreciation. Advised again Gundry and Merino Solar Farms are “sitting ducks in a broken process” to ultimately fail 2035 deadlines once again.**
- Sadly, I believe when AEIC investigation reaches Minister Bowen desk, he will most likely throw it in the bin with the all the others received right across Australia over the years. AEIC was created in November 2024 but does not have any jurisdiction to do anything either.
- **I shout praise to the Commissioner**, as AEIC have been the only Federal & State Government Office that has replied to any of our correspondence and had the courage to meet with me and R30 via Microsoft teams.

Note: No response has ever been received to emails sent to **Minister Bowen, DEEWR & DPIE on questions raised on CIS funding**. DPIE has never replied to any correspondence sent on MSF application **at all**

Refer to: Annexure H - Minister Bowen and AEIC 16.10.2025 - CIS Funding

Refer to: Annexure I - AEIC- MSF-R5ComplaintLodged16062025

Refer to: Annexure J - AEIC-ComplaintInvestigation-MSF-18112025

Refer to: Annexure N - Social licence emerges as critical issue

Community Benefit Scheme – Discrimination & Social Impact

The Community Benefit Scheme has further alienated residents and hurts me on a personal level. And fuels more social impacts for all of Goulburn: For example:

- The Goulburn Group, who publicly supports the project, will receive \$20,000 per year.
- Impacted residents opposing the project – those who must live with the consequences – are offered nothing.

This scheme amounts to discriminatory bribery used to manufacture support and divide the community.

Example of MSFOG social impact via Facebook : Goulburn Group Community Benefit sharing (EIS page 31 & 32)

- MSFOG Facebook page – their members reported our page; MSFOG Facebook page was taken down after Goulburn Group hijacked our Facebook page and was congratulating EDPR on winning CIS funding 09.10.2025:
- When MSFOG gently responded their hijacking was inappropriate behaviour, we instead made the choice to simply 'block' the individual persons posts.
- MSFOG Facebook page was multiple times reported by individuals and MSFOG Facebook was page taken down at the end October.
- I will never be able to provide you with evidence, as Facebook also operates under the Privacy Act. To validate my deep concerns on social media and the impact it can generate
- I ask assessors to visit the Goulburn Group Facebook page: Posts on the Goulburn Mulwaree councillor's decision to oppose the MSF 27/01./2025.
- Councillors were identified by name and criticised for being Labour party officiated. Energy Infrastructure supporters that use bullying tactics have no right to alter due processes that then untimely fuels more community and social impacts. In my experience it becomes a REAL tactic.

Appendix E: Community and stakeholder engagement

Appendix E.1 Neighbourhood Letter November 2024

Appendix E.2 Neighbourhood Letter January 2025

Appendix E.3 Neighbour Letter September 2025.

EDPR must provide evidence that correspondence was sent to all the 194 residents.

Appendix E.4 Newspaper Advertisement 8 Feb 2025

Appendix E.5 Newspaper Advertisement 15 Feb 2025

Appendix E.6 Poster outside Coles:

Below a visual reading height - unless you're a child or a dwarf

Appendix E.7 Poster Community Notice Board

Woolworths? Of course, it was put there. I don't know where that is even situated in Woolworths and I shop there every week.

Appendix E.8 Poster Outside Café - Which Café ?

My Summary of events: this was a box ticking exercise that enabled EDPR to tick their own boxes so they could lodge EIS – didn't matter to EDPR if this failed:

Appendix E.9 Project Newsletter February 2025

Appendix E.10 Project Update September 2025

Appendix E.11 Project Fact Sheet

Appendix E.12 Project FAQ

Appendix E.13 Project Business Cards

Appendix E.14 EDM 1 – 20 November 2024

Appendix E.15 EDM 2 – 02 February 2025

Appendix E.16 EDM 3 – 26 February 2025

Appendix E.17 EDM 4 – 19 September 2025

Appendix E.18 Online Community Survey – No mention of survey in appendix

- **EDPR must provide evidence that correspondence was sent to all the 194 residents.**
- **Appendix E1-E18 = Refer to MSFOG Resident Survey Results**
- **E.18 Online Community Survey = Refer to MSFOG Resident Survey Results**
- **How was the survey communicated to the community, other than those who had contacted EDPR themselves ? No consultation was conducted.**
- **MSFOG Resident survey results = 60% said NO contact ever received**

Refer to: Annexure M - MSFOG Group Survey Results - CE Failure

Appendix F6 - Noise and Vibration Impact Assessment

EIS Table 6-23 Predicted construction noise levels for receivers B1 to R64

EIS Table 6-29 Operational noise compliance at all receivers

For the past four years, I have endured constant noise from the host property's tractor spraying chemicals across the solar site, I can hear his operations, some by private contracted weed sprayers, often operating day and night.

On discussions with neighbouring residents who had lodged their own complaints with the **NSW Environment Protection Authority (EPA)** due to the chemical exposure and associated disruption, yet no resolution or investigation outcome has ever been provided.

If I can hear a tractor working on the hosts current farmland from dusk to dawn, how can it be reasonably claimed — under **Appendix F6 – Noise and Vibration Impact Assessment**, that I will not be exposed to significantly increased levels of noise during the construction and operation of an industrial-scale solar farm comprising **870,000 solar panels, 100 acres of BESS battery infrastructure?**

These assumptions lack credibility, and any attempt to downplay the cumulative noise effects on residents like me is both inaccurate and dismissive of lived experience. The operational noise of inverters, battery cooling systems, and increased heavy vehicle traffic will only worsen existing impacts. No mitigation has been offered. This is unacceptable.

6.7. Transport and access

Appendix F7 - Traffic Impact Assessment

The proposed Merino Solar Farm will introduce significant traffic volumes during both construction and decommissioning phases, with heavy machinery, transport vehicles, and workforce commuting along roads not designed for such industrial use.

Gretta Road will be used by the curious observers as it would be the only road access view to the Southern Site, that has the most visual panel area for view to the public. Gretta Rd would therefore need to be included in road maintenance and upgrading.

The direct impact will be on connected arterials feeding into Goulburn CBD, single lane from highway exit, most are narrow, often single-lane, and to the side all rural-access roads that would not hold the weight of transport during construction and decommissioning.

Goulburn's population is alone going to increase due to its location, already now during peak hours, these routes are already exposed to congestion. Introducing high-frequency vehicle movements, particularly during construction, poses serious risk of traffic incidents, access delays, and road closures, particularly along North and South Highway entry and exits, Windellama Rd, Braidwood Rd will congest Goulburn's CBD to a standstill.

I will rely on Goulburn Mulwaree Council detailed review of this risk under Appendix F7 – Traffic Impact Assessment. However, as a resident, I strongly object to the assumption that local infrastructure can safely absorb this increased traffic load without significant investment, planning, and long-term maintenance commitments from EDPR than what has been identified inside their EIS.

Refer to: Annexure P - Map-MerinoSolarFarm v Goulburn-GMCOverlay

Goulburn Airport – Serious oversight in EIS risk assessments

Aviation Safety Risks – Proximity to Goulburn Airport

I raise serious concerns about the Merino Solar Farm's close proximity to Goulburn Airport, as little as 30 metres from the airport boundary, the lack of meaningful consultation or aviation-specific risk assessment.

Despite clear guidance in the NSW Large-Scale Solar Energy Guidelines (Appendix C, Section 5.6 and Table 7) requiring worst-case solar glare assessments for all aviation approaches within 5 km, no independent or peer-reviewed glare assessment appears to have been undertaken for Goulburn Airport.

This is particularly alarming given the airport's "uncontrolled" classification, meaning oversight by CASA is minimal, and the responsibility for risk mitigation lies entirely with the developer and planning authority.

This solar farm's placement so close to a functional regional airport, used by light aircraft, helicopters, creates unacceptable visual hazard risks for pilots during take-off and landing.

The risk is not hypothetical: glare, visual bulk, and turbulence from heat plumes off 3–5 m solar arrays are well-documented aviation hazards. These panels are located directly in the flight path and visible from multiple surrounding rural properties, including my own.

As noted in multiple aviation studies, solar installations near runways can cause temporary loss of visual references, creating critical safety risks — especially in an environment with no air traffic control tower.

The Goulburn Airport operator "Ferrara" has previously been charged under WHS laws in a skydiving fatality incident (Nine News, 18 Nov 2025). This reinforces the need for rigorous oversight and independent aviation risk assessment, not assumptions based on modelling or desktop reviews.

Myself and other impact residents have already contacted CASA and received dismissive responses. I call on the Department to intervene and demand EDPR conduct a new, independent aviation risk assessment, including:

- Solar glare modelling for all aircraft types under worst-case seasonal and time-of-day conditions.
- Engagement with CASA, local pilots, and emergency air services.
- Clear avoidance zones for aircraft that must fly over or near the solar farm.
- That the avoidance will not divert over my home
- Consideration of future logistics by EDPR.

My home lies within direct sightlines of the proposed development and near the extended runway approach path. I will be exposed to the same glare, noise, and aviation risk as any pilot or airport user. Without mitigation or consultation, this development poses a clear safety hazard to both the airspace and surrounding community.

Appendix F1 - Biodiversity Development Assessment Report Biodiversity and Personal Connection to the Land

Appendix F1 – *Biodiversity Development Assessment Report* is too complex and technical for me to respond to in full. I can speak from lived experience. Our property is home to a rich array of native wildlife, birds, and beneficial insects, which we have encouraged and protected for decades.

My passion is gardening and growing native species, including the *Eucalyptus macarthurii*, an endangered native species, I have successfully cultivated and continue to plant for the next generations to enjoy. My garden is my retreat; it is not just ornamental but a living habitat supporting biodiversity.

The Merino Solar Farm will compromise my personal and ecological sanctuary. The heat island effect created by over **870,000 solar panels**, combined with cleared land and altered drainage, will likely increase reptile activity, potentially change the habitat balance and make the land more hostile for humans, wildlife, kangaroos, birds to navigate through. How can Kangaroos for example navigate a solar farm without causing major damage.

No part of the Environmental Impact Statement reflects the importance of our individual contributions to biodiversity conservation or enjoyment and value our gardens and natural surroundings provide.

To me, this is not just about loss of visual amenity. It's about the irreversible damage to a living, breathing environment that we, as landowners, have carefully nurtured, one that no developer can mitigate, report or can ever replace. We cannot reproduce our land like lollies.

Appendix F2 - Aboriginal Cultural Heritage Assessment Report- Redacted

- If someone is going to benefit from the SSD application Community Benefit Scheme, I would request **Aboriginal Cultural Heritage** be paid double for ultimately destroying their land in the process.

Appendix F3 - Agricultural Impact Assessment

Agricultural Impact: Chemical Leaching and Livestock Enterprise Risks

Our property supports a working livestock, including sheep and cattle, forming the foundation of our family's rural way of life. The introduction of 870,000 solar panels and over 100 acres of battery energy storage systems (BESS) poses serious risks to the sustainability of this land, particularly in relation to chemical leaching from panel runoff and fire retardants, which can infiltrate soil and waterways. These risks are magnified over the 30+ year operational lifespan of the project, especially during construction and post-decommissioning phases. I refer again to Sydney Catchment Authority not being more invested in the outcomes.

The Agricultural Impact Assessment (Appendix F3) fails to meaningfully address these concerns. It overlooks how contamination may affect grazing rotation, pasture quality, and livestock health, especially given the scale and proximity of the proposed development to our paddocks and water sources. These are long-term, irreversible threats to both our farm's productivity and Australia's broader agricultural resilience.

Given escalating global instability, the preservation of arable land must be treated as a national security priority. Replacing high-value agricultural zones with large-scale solar infrastructure ignores this imperative. Our land is not a disposable asset — it is a critical and irreplaceable resource that feeds Australians and supports rural economies.

Appendix F4 - Soil and Land Classification Verification

No comment

Appendix F8 - Flood Assessment

No comment

Appendix F9 - Preliminary Hazards Assessment

Pando Consulting Pty Ltd was engaged by NGH Consulting Pty Ltd to complete a Preliminary Hazard Analysis (PHA) for the Merino Solar Farm (on behalf of EDP Renewables (EDPR))

- **This document is designed to evaluate all the risk factors of the Merino Solar Farm**
- **If the data in the EIS is inaccurate then the ripple effect is the risk assessments are fabricated words on paper to tick a box for EDPR.**

Climatic Unsuitability of Goulburn for Large-Scale Solar Infrastructure

Goulburn, NSW, averages approximately **89 clear solar days per year**, based on long-term Bureau of Meteorology (BoM) observations. This means that for **more than 75% of the year**, the region experiences cloud cover, fog, or inclement weather, significantly reducing the efficiency of solar photovoltaic (PV) energy generation.

Despite this climatic limitation, the Merino Solar Farm proposes to install **870,000 solar panels across 1,800 acres**, supported by a 100-acre Battery Energy Storage System (BESS). The feasibility of this scale of development must be questioned when the region's natural solar resource is so limited.

Why Goulburn Is Ill-Suited for Solar Farms:

- **Low Solar Yield:** Compared to NSW's inland or western regions (such as Broken Hill or Dubbo), Goulburn's solar radiation levels are substantially lower. This compromises the return on energy generation for any grid-scale solar farm.
- **Grid Efficiency Concerns:** Sub-optimal weather conditions increase reliance on BESS systems to balance supply, which raises **battery lifecycle costs**, grid instability risks, and long-term emissions due to production, transport, and maintenance.
- **Misalignment with Net-Zero Goals:** Installing vast arrays of solar panels in a low-yield region contradicts the goal of efficient, sustainable renewable energy development. It risks **producing more emissions through construction, maintenance, and land clearing than the energy it offsets**.
- **Land Misuse:** Prime grazing and mixed-agriculture land should not be sacrificed in a location where the energy return on investment is so poor. This is **not sustainable** and contradicts Australia's food security and land conservation priorities.

This region is demonstrably not suited for utility-scale solar infrastructure based on scientific, agricultural, and economic logic.

A truly sustainable energy transition must prioritise **solar-on-roof**, not marginal rural climates like Goulburn that simply don't deliver efficient solar generation.

For 276 days of the year, our climate reduces too little or zero solar sun that will produce the benchmarks they are predicting.

Every day I will have to wake up I will have to bear the consequences of looking at 870,000 solar panels, knowing they are not producing energy because they are in the wrong location.

Refer to: Annexure O - BOM Table - 89 solar days Goulburn

Appendix F10 - Bushfire Assessment Report : Social and Community Direct Impacts

I refer to **Appendix F10 – Bushfire Assessment Report** and the recognised risks associated with large-scale solar facilities, including documented concerns regarding fire ignition, fire spread, overheating, and emergency response limitations (see *Mitigating the risks of fires and overheating in solar facilities*, APA Planning & Law).

I wish to place on record the **very real social and community impacts** associated with bushfire risk arising from the Merino Solar Farm proposal. Known to me personally are impacted residents identified in the EIS as **R2, R3, R7, R9, R30, R34, R42, R55, R143**, as well as **four unidentified residents** who, despite proximity, were not properly identified or assessed for visual, noise, or bushfire impacts. All of these residents, directly or indirectly, would be exposed to **heightened bushfire risk** should this development proceed.

The **Gundry Bush Fire Brigade**, identified in the EIS as Resident 101, 26 Yattalunga Road, Tirrannaville NSW 2580), identified is a **volunteer-run rural fire service** and would be among the **first responders** to any incident associated with the Merino Solar Farm. I entrust they will report a more technical report, but social impact must be taken into consideration.

- **These volunteers are not remote stakeholders, they are my neighbours, my friends, and members of my community.**
- **Defending a Solar Energy Infrastructure toxic fire is very different**
- **For the brigade members this would be a factor of burden to carry running to save their community**

The social impact of this cannot be overstated. Knowing that a large-scale energy infrastructure project would place **local volunteer firefighters at increased risk**, beyond what any volunteer should reasonably be expected to endure, causes significant distress and anxiety within our community. These are people who already give their time freely to protect others, not individuals who should be expected to respond to **industrial-scale fire risk created by a private commercial development**.

Further compounding this risk is the fact that the Merino Solar Farm site and surrounding communities sit within land governed by **Sydney Catchment Authority protections**, where contamination from fire, chemical runoff, battery storage failure, or firefighting suppression activities presents **serious downstream water quality risks**. Any bushfire incident involving solar infrastructure or battery energy storage systems within this catchment area has implications **well beyond the site itself**, extending to broader environmental and cause disruption with more public health concerns.

From a social perspective, this proposal places an **unacceptable psychological burden** on residents, emergency volunteers, and the wider community. It creates fear not only of property loss, but of injury, loss of life, contamination, and irreversible environmental damage. These impacts are not adequately acknowledged, mitigated, or honestly represented within the EIS.

Refer to article: <https://apapl.com.au/mitigating-the-risks-of-fires-and-overheating-in-solar-facilities/>

Appendix F12 - Accommodation and Employment Strategy

The Accommodation and Employment Strategy included in the EIS under Appendix F12 is fundamentally misleading in all areas and fails to account for the realities of offshore corporate ownership, local employment barriers, and long-term economic displacement.

EDP - 100% Foreign-Owned Corporation

EDP Renewables is a multinational energy giant headquartered in Portugal, listed on the Lisbon stock exchange. As such, all project profits will ultimately be channelled back to its overseas shareholders via global financial markets. There is no long-term reinvestment plan into the Goulburn region. The economic benefits outlined in the employment strategy serve corporate interests—not the community.

Inaccurate Representation of Local Employment Benefits

The strategy outlines local employment as a benefit of the project. However, it omits key facts:

- Workers will be brought in under international labour arrangements, including **subclass 457 (Temporary Skill Shortage) visas**, a known practice in the construction of other large-scale energy projects across Australia.
- Skilled labour shortages in renewable infrastructure are likely to be filled by non-local, fly-in-fly-out (FIFO) workers, particularly due to the **close proximity of the Goulburn Airport**, which could be used to fly workers in and out.
- Local employment will be minimal, maybe a few short-term (during construction), and likely restricted to low-skill, casual roles—not the long-term jobs the region actually needs.

Strain on Local Accommodation and Services

There is no comprehensive plan on how the influx of temporary workers will be accommodated. This could put significant pressure on Goulburn's limited housing and rental market, driving up costs for residents and displacing vulnerable populations who already struggle to secure housing.

Unacknowledged On-Site Worker Accommodation Risks

It is of significant concern that neither the Merino Solar Farm Environmental Impact Statement (EIS) nor Appendix F12 – Accommodation and Employment Strategy – provide any **transparent declaration** of how and where up to 400+ workers will be housed during construction or operation. However, based on local knowledge and observation, **both the Goulburn Airport and the host property “Pelican Sheep Station” appear to have existing or potential infrastructure that could be used for workforce accommodation.**

There is a strong likelihood that accommodation plans. Including temporary worker camps or “dongas” (Humpy-style structures) ,

Evidence from other Australian sites reveal these options are being quietly incorporated into the broader project footprint without proper declaration.

If such high-density worker housing is being planned on or near the site, the following **serious risks must be addressed:**

- **Fire risk:** Pop-up accommodation with limited infrastructure can rapidly become a fire hazard, especially in a region already subject to bushfire vulnerability. If placed near battery energy storage (BESS) compounds or dense solar panel clusters, the consequences could be catastrophic.
- **Health and safety oversight:** Worker villages in remote or semi-remote settings must comply with strict guidelines. Without formal planning approval, these arrangements would bypass important **public health, planning, and building safety standards.**
- **Community impacts:** Influx of workers into rural areas without transparent consultation or impact mitigation increases risks of **strain on local services, traffic, and emergency response** — particularly in areas like Gretta Rd, which is already constrained by narrow rural lanes.
- **Visual and amenity impacts:** On-site accommodation compounds will further degrade the landscape and compound existing amenity impacts, especially if constructed without community knowledge or design standards.

Given these concerns, we call on the Department to investigate whether EDPR or its contractors have existing or future plans to utilise the Goulburn Airport or the Pelican Sheep Station for housing project-related workers.

If so, this represents a **major omission in the EIS and a breach of trust with impacted communities**, and should trigger **further public consultation and an updated risk assessment**

Social Impacts

Dual Solar Farm Proposals in Goulburn SEPP simultaneously

Cumulative effect of **Gundry & Merino Solar Farms within 2 km of each other**: A total of 3,600 acres (1460ha), 14.6sq km, well over a million panels, over 300 family homes within 4km of one or both developments.

Both the **Merino Solar Farm and Gundry Solar Farm** as referred to ‘as only one of these developments can ultimately proceed in GMC SEPP’.

It is gut-wrenching to consider how any of us — across either SSD application — can respond to this question without deep emotion. It’s known to be the elephant in the room, that I prayed would never have to go outside.

I would not be writing this objection tonight, nor would the Merino Solar Farm Objection Group (MSFOG) even exist, if it were not for the strength, leadership, and courage of the “Save Gundry Plains – Bugger Off Campaign”, led by Stan Moore and a group of deeply committed residents who once again advocated and attended the meeting to support the MSFOG.

Gundry Solar Farm residents have fought tirelessly, with dignity and purpose, not just for their own protection but for the broader Goulburn community. Their willingness to stand up first, to question a broken process, and to do so publicly, has empowered others. including myself and the residents now facing the Merino Solar Farm proposal.

My thoughts are with those who find themselves within both SSD boundaries, residents caught in the crossfire of overlapping proposals. How must they feel, knowing that no matter how this plays out, there is no good outcome for anyone?

I want to acknowledge the Gundry objection group —Stan Moore in particular — as resilient, unselfish, and principled. They have consistently put aside personal anguish to advocate for the greater good, to restore fairness to this process, and to protect the long-term integrity of our region. Stan stood before you with dignity and conviction, speaking on our behalf that both solar farms are in the wrong location.

It is not just land, or views, or property value at stake. It is our social fabric — the cohesion of neighbours, the safety of future generations, and the legacy we leave behind that will define us .

Impacted households are being required to engage with multiple SSD processes, differing timelines, inconsistent consultation practices, and unclear government communication. This has undermined trust in both developers and planning authorities and has fractured long-standing community cohesion across Gundry, Tirrannaville, and surrounding districts.

The planning framework must recognise the **cumulative social impacts** of running overlapping SSD processes in the same SEPP area. It is neither reasonable nor fair for residents to endure repeated engagement cycles, duplicated objection processes, and ongoing uncertainty when only one project can ultimately be approved.

Personal Mental Health and Social Impact Statement

As one the primary coordinator of the Merino Solar Farm Objection Group (MSFOG), I wish to place on formal record the significant toll this process has had on my personal life, physically, mentally, and emotionally.

Over the past year, I have carried the weight of this advocacy on behalf of my neighbours and community. What began as an investigation into Community Engagement, has now become an all-consuming burden. The distress caused by the scale and proximity of this project cannot be overstated:

- **870,000 solar panels** evoke the feeling of suffocation, as if the life we built is closing in around us and will dominate our skyline.
- **100 acres of Battery Energy Storage System (BESS)** infrastructure will be introduced near our homes.
- Noise, visual intrusion, fire risks, and the prospect of 35+ years of industrial activity are not abstractions, they are everyday fears.
- The **construction phase alone** I live with the creeping dread that no matter where I turn on my property, the visuals will never be out of sight or out of mind. Even the most cherished family gatherings have become overshadowed by conversations about the solar farm. It has changed how I feel for my future my home, once my sanctuary, is now a spotlight that I will be exposed to until the day I die.

I am not a professional advocate. I am a resident, a daughter, a mother, a wife, a neighbour, who has taken on a role she should not of had to, take on a role that government and developers have failed to fulfil as our only way to do that is put ourselves through hell and back to meet the standards of what you need to have in your assessment.by lodging this objection submission.

The name Karen meme causes its own impacts on its own for me. I never really asked for this role. I became contact for the Merino Solar Farm Objection Group because someone had to step up to understand it all. Thankfully Gundry Solar Farm came to our rescue to help us prepare to understand how to read the documents.

I've received no formal support, only silence from departments and supporters of the project. I once believed government and politicians were there to represent us, I now know the truth. I've been labelled a NIMBY, criticised behind closed doors, and spoken about as if I have a personal agenda, and yes, I do. I am a nimby but I'm also a farmgirl at heart, my defence will always lay with protecting my land, our forefathers went to war to fight for our land and freedoms, are we going to give that up so easily to foreign ownership energy infrastructure re developers on an application that does not meet the standards. .

I don't post on social media. I made a deliberate choice to hold my dignity with no media coverage. I just quietly work through thousands of pages, answer calls from distressed residents, and send emails with information to help, so others feel less alone in this broken process. The silence I keep from my family and friends is not because I don't feel it all; it's because the weight of it has become so constant, there is no point talking about it anymore, we have to do something to enact change. **I would like to have a voice now to help the policies right, that's why I went to the AEIC Commissioner.**

I request planning authorities ensure cumulative social impacts as a high risk factor.

- Full consideration of cumulative social impacts.
- Consistent and transparent engagement standards across both proposals, and
- Show and recognise the health impacts
- Respect that in asking this question can have consequences on social impacts.
- Full transparency if **only one** solar farm will proceed within the Goulburn SEPP, following the councillor's question to Stan Moore 20/01/2025 GMC Public Forum meeting.

Until both applications are assessed, community trust over the long term will continue to deteriorate, and social licence for large-scale energy development in this region will remain fundamentally compromised.

Regional communities in the face of adversity always support each other. How we feel and how we can alter any outcome, is absolutely out of our controls. Helpless is mostly how I feel.

I made a promise to myself in February 2025 I would do all that's in my control, creating an Emergency Management Incident Action Plan to follow to identify all the risks and factors surrounding mine and all residents' risks. If the application is approved, I'll be able to sleep at night that I at least tried. This now isn't advocacy. It's sheer survival for me to get to the 11 February 2026.

Broader social impacts

I have watched communities all over Australia plead their resistance to major energy infrastructure projects, only to see them approved despite overwhelming opposition by residents.

Crookwell Wind Farm as my prime example, the town where I was born, raised and return to my family 45km away. I witnessed this a long time ago, now I'm facing the same and nothing has been done to improve Energy Infrastructure Community & Social Engagement practices since then, is yet another failure in our government's hands.

Australia's carbon emissions are already low by global standards, yet we are pursuing a Net Zero by 2050 policy that is unrealistic, poorly defined, and not even properly written under any policy, the state and solar guidelines used in these assessments are outdated and allow developers to use to their discretion around compliance issues.

Evidence strongly suggests this project will increase, not reduce, our overall carbon footprint while costing billions of dollars and destroying productive agricultural land and rural communities.

EIS Page 84: Decommissioning

In meeting with AEIC, Commissioner Tony Maher on the 4th November 2025, he openly acknowledged to R30 and Karen Webster that it's the local councils that bear the financial burdens of these developments.

His words were *"I feel sorry for local councils"*. On that basis alone, I respectfully ask you to advocate for a lot more than they are offering Council in the Community Benefit Funding, as what they are offering is no less than offensive considering they are spending \$ 1.3 Billion dollars on the development itself.

GM Council is going to need a lot more \$ to mitigate the fallout on the Goulburn community over the next 35 years plus'.

To include the decommission cost set out from the beginning, calculated and included in the development's costs now, paid at the beginning, then on decommission CPI indexed calculated for final payment by the developer at that time". Council is going to need it.

Appendix G1 - Draft Waste Management Plan

I am not an over educated person, but it doesn't take a lot to know that the draft waste management plan are merely words on paper to tick a box and enable EDPR to submit.

- Merino Solar Farm application was lodged on Wednesday, 14 January 2026:
- On Friday 16.1.2026 our property was severely damaged in a hailstorm event.
- We had a 16 solar panel installation capture on our shed roof.
- The whole system including panels, inverter is either smashed to pieces broken, x-rays show complete microfractures and was rendered unsafe.
- There was damage to the electrical with exposed wires, that was described as a flaw that could have ignited, we were just lucky.

Let me be conservative in my calculation. I will approximate half the solar panels across all my neighbours I have spoken to, were either fully or partially compromised or rendered 'broken'.

- **Assuming 870,000 panels were laid**
- Hailstorm **destroyed half** of the solar panels on site in **one storm**
- That equates to **435000 solar panels to be replaced overnight**
- **I request a defined plan on where EDPR and Goulburn Mulwaree Council would combat such quantity of waste to disposal of 435000 panels overnight**
- **Sydney Catchment Authority** is again putting their population at risk of contamination based on this scenario alone.

Under the assessment rules I request that DPIE: -

- Recognise the full scope of these community engagement failures.
- Demand answers and accountability from EDPR and NSW Planning over the 89 impacted residents missing from EIS SSD Solar application documents
- Request EDPR to provide DPIE with the missing 89 address so communications can be sent to them now and the opportunity to be included in the assessment submission process .
- **Reject EDPR's Social Licence to operate due to sustained non-compliance shown to impacted residents and the Goulburn community.**

For mention to MP. Hon Paul Scully

- NSW needs urgent intervention from the only decision makers who have the **power and courage to STOP** our precious land being consumed by solar panel, **show initiative for realistic goals that can be achieved and put solar panels directly on roof tops.**

In Closing

In my investigation over the past few months, I expect the majority of the Goulburn Community do not even know or understand they are exposed to both Gundry or Merino Solar Farm dual SSD applications, as unless it is in your backyard no one seems to care.

Let this submission be more than a document. Let it be a plea for justice, for transparency, and for true democratic participation in the future of the Goulburn region.

- **Protect or land and the rights of all Australians caught in the crossfire of Net Zero by 2050 and its cost to all Australians in its FAILING STATE.**

I am fully aware I have no control over the outcomes, the quest to Net Zero is bigger than Resident 5 in MSF SSD application, but you do hold the powers and a duty to protect Australia's future, I request you to object the application on the grounds I have reported, that the developer EDPR does not hold enough reputation to hold a social licence

EDPR has not met, even to the minimum standards set out in the NSW State and Solar Guidelines that NGR have reported as doing throughout their reporting in the EIS.

Please hold both EDPR and NGH responsible for lodging a NSW SSD application knowing their visual and desktop assessment mapping was flawed, giving a FALSE impact assessment rating.

I request you object to the SSD application.

Thank you

Karen Webster

124 Gretta Rd, Brisbane Grove 2580

Resident 5, Merino Solar Farm EIS

Annexures attached as evidence:-

- Annexure A** - EDPR Response to Questions - Merino Solar Farm 230286
- Annexure B** - Merino_R05- VisualAssessment1
- Annexure C** - Merino_R05- VisualAssessment2-Subdivision
- Annexure D** - EDPR Neighbour Agreement to R5 15082025
- Annexure E** - Letter RMB Lawyers to EDPR 03092025
- Annexure F** - EDPR Letter to RMB Lawyers -neighbour agreement 12.09.2025
- Annexure G** - NA-SWPlanningPaulScullyViaStephenBaliMP09122025
- Annexure H** - Minister Bowen and AEIC 16.10.2025 - CIS Funding
- Annexure I** - Annexure I - AEIC- MSF-R5ComplaintLodged16062025
- Annexure J** - AEIC-ComplaintInvestigation-MSF-18112025
- Annexure K** - WendyTuckermanLetter to EDPR re N.Agreement
- Annexure L** – 89 Missing Resident Nos identified
- Annexure M** - MSFOGroup Survey Results - CE Failure
- Annexure N** - Social licence emerges as critical issue
- Annexure O** - BOM Table - 89 solar days Goulburn
- Annexure P** - Map-MerinoSolarFarm v Goulburn-GMCOverlay