

Submission in Objection to the Merino Solar Farm Proposal - (SSD-5915545)

Location: 6km South of Goulburn, NSW

Submitted by: Merino Solar Farm Objection Group

Representing: 157 Objectors from the local community

Date: 8 February 2026

Introduction

The Merino Solar Farm Objection Group (MSFOGroup) comprises 157 individual members from within a 4 kilometre area of the proposal and from the wider Goulburn region. The MSFOGroup lodge this formal objection to the Merino Solar Farm SSD application, and express concurrent concerns over the adjacent Gundry Solar Farm SSD application. There are 300+ families living within 4 km of one or both solar farm boundaries, some of whom have only recently been made aware of these projects - some of whom who may still be unaware. The Gundry Solar Farm SSD application is still under assessment by NSW Planning despite the EIS public exhibition period closing more than 12 months ago.

These dual large-scale energy proposals will have a cumulative and overlapping impact on local residents, many of whom are identified in the Environmental Impact Statements (EIS) for both applications.

The social and community engagement failures by EDPR and its consultant NGH Consulting in regards to the Merino Solar Farm proposal have been persistent and damaging. Community engagement exercises were selective, superficial, and dismissive of genuine stakeholder concerns.

Formal Grounds for Objection

Non-compliance with NSW Transport and Infrastructure SEPP – Section 2.42

The Merino Solar Farm Objection Group formally objects to the proposed Merino Solar Farm development on the basis that it is in direct conflict with the **NSW Transport and Infrastructure State Environmental Planning Policy (T&I SEPP), Section 2.42**.

Section 2.42 of the SEPP requires that electricity generating developments:

- be **located to avoid significant conflict with existing or approved residential uses**, and
- be **appropriately sited having regard to surrounding land uses**, including rural residential communities.

The proposed Merino Solar Farm fails to meet these requirements.

1. Incompatible Land Use in a Rural Residential Area

The proposed development is located within and immediately adjacent to a **rural residential community**, not an isolated industrial or infrastructure precinct. This area consists of established family homes, multi-generational properties, small-scale farming, lifestyle blocks, and

long-term residents who have deliberately chosen this location for its rural amenity, safety, peace, and residential character.

The industrial-scale nature of the proposed solar farm is fundamentally incompatible with:

- existing residential land uses
- the established rural-residential character of the area
- long-term habitation and family living
- community cohesion and stability

This represents a **direct conflict** with the intent and requirements of Section 2.42 of the T&I SEPP, which clearly requires developments of this nature to be sited so as to avoid significant conflict with residential uses.

2. Failure to Avoid Conflict with Existing Residential Uses

Rather than avoiding conflict, this proposal **creates it**.

The development footprint, scale, visual dominance, land use transformation, and industrialisation of the landscape impose unavoidable impacts on nearby residents, including:

- loss of rural amenity
- visual intrusion
- land use incompatibility
- disturbance to community character
- disruption to long-established residential lifestyles

This is not an example of sensitive siting — it is an example of **industrial infrastructure being inserted into a residential rural landscape**, in clear contradiction to SEPP planning principles.

3. Inadequate and Tokenistic Community Consultation

The consultation process has been wholly inadequate and does not meet the spirit or intent of genuine community engagement.

Key concerns include:

- Over **194 neighbouring residents** are directly affected
- Most residents received their **first correspondence in September 2025**, despite the scale and significance of the proposal
- Consultation has been **tick-a-box in nature**, focused on procedural compliance rather than meaningful engagement
- Community concerns have not been genuinely addressed
- Residents have not been treated as stakeholders, but as obstacles to be managed

This approach has eroded trust and social licence and demonstrates a failure to respect the lived reality of the community impacted by this proposal.

4. Significant Community Stress and Psychological Harm

The proposed development has caused **widespread stress, anxiety, and psychological distress** within the local community.

Residents are experiencing:

- fear of loss of home amenity
- uncertainty about future property values and liveability
- anxiety about environmental, safety, and land-use impacts
- emotional distress from industrialisation of their living environment
- breakdown of community cohesion and trust

This is not an abstract planning issue — this is a real and ongoing **human impact** affecting families, elderly residents, children, and long-term locals.

Planning systems must consider **social impacts** alongside environmental and economic factors. The social harm being caused by this proposal is significant and unacceptable and is not adequately addressed by the NSW Planning process.

What is being asked of residents affected by both SSD applications is unreasonable — to participate in multiple parallel planning processes, to endure application fatigue, and to absorb the mental and emotional toll of uncertainty on a rolling basis over many years. The planning system's failure to recognise the cumulative social burden of these overlapping applications within the same SEPP region is unconscionable. The disjointed timelines, inconsistent messaging, and fragmented processes have fractured trust and strained neighbourly ties across Gundry, Turraville, and surrounding communities.

Conclusion

The Merino Solar Farm proposal:

- **Directly conflicts with Section 2.42 of the NSW Transport and Infrastructure SEPP**
- Is located within a **rural residential area**
- Has **not been sited to avoid significant conflict with existing residential uses**
- Represents inappropriate land use planning
- Has failed to achieve social licence
- Has caused demonstrable harm to community wellbeing
- Has relied on inadequate and tokenistic consultation processes

- Is sited across 8 smaller properties to reach the required land mass, thus affecting a large number of neighbouring property owners who reside on much smaller properties that will be overwhelmed by the sheer size of this development.

This development is **not appropriately located, not socially sustainable, and not compliant with state planning policy.**

Formal Position

On behalf of the **Merino Solar Farm Objection Group** and the **157 residents we represent**, we formally request that this proposal be:

REJECTED on the grounds of:

- Non-compliance with NSW T&I SEPP Section 2.42
- Land use incompatibility
- Failure to avoid conflict with **residential** uses
- Inadequate community consultation
- Significant social and psychological harm to the community
- Absence of social licence
- Unsuitable location for such a large scale project

This proposal represents poor strategic planning, poor site selection, and poor community integration, and should not proceed in its current form or location.

Sincerely,

MSFOGroup Coordinators

On behalf of our 157 members