

The NSW Greyhound Breeders, Owners & Trainers' Association



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11th August 2025

To Whom it may concern,

Re: Objection to Merino Solar Farm – SSD-5915545

Submitted by:
New South Wales Greyhound Breeders, Owners and Trainers Association (NSW GBOTA)

Introduction

The New South Wales Greyhound Breeders, Owners and Trainers Association (NSW GBOTA) formally objects to the proposed Merino Solar Farm (State Significant Development SSD-5915545) in its current form.

As a statewide advocacy body, we represent the interests of greyhound owners, breeders, trainers, and participants across New South Wales. This proposal raises serious concerns for our members, their animals, and the ongoing viability of greyhound racing operations in the affected area.

Our position follows a detailed review of the proponent's documentation and material prepared by affected residents. The evidence demonstrates that the development poses unacceptable risks and conflicts with established rural and animal-based land uses.

Risk to Animal Welfare

Greyhounds are highly sensitive, high-performance animals that require calm, stable environments. The proposed development presents significant threats to their welfare. Heavy metals such as cadmium, lead, and nickel could leach from degraded solar panels and battery infrastructure, contaminating soil and water sources relied upon by animals. Cobalt exposure from degraded components could cause inadvertent breaches of regulatory thresholds, with serious consequences for participants.

There is also the risk of lithium-ion battery fires, which can burn uncontrollably for days and produce toxic smoke and residue. Limited emergency access to the site would exacerbate the impact of such events on nearby animals and properties. These risks are long-term and cannot be adequately mitigated.

Noise, Dust, and Environmental Disruption

The construction phase would bring extended periods of heavy machinery use, pile-driving, and frequent truck movements over an estimated two-year period. Such disruption would create high levels of noise and vibration, directly affecting greyhound training and rest.

In the operational phase, constant low- to mid-frequency noise from cooling systems, transformers, and solar tracking mechanisms would continue to disturb animals. Airborne dust and particulates generated during construction and maintenance could infiltrate kennels, exercise yards, and water sources, creating respiratory and hygiene issues.

Incompatible Land Use and Planning Conflicts

The Merino Solar Farm is incompatible with surrounding rural land uses. In some areas, buffer zones between the facility and animal enterprises are as narrow as 10–30 metres, offering no meaningful separation. The development would significantly disrupt rural amenity and impair the operational needs of nearby greyhound facilities.

The proposal also conflicts with strategic planning priorities for rural residential growth and peri-urban development within 10 kilometres of Goulburn, threatening the long-term vision for the region.

Property Devaluation and Economic Impact

Approval of the project would likely cause a substantial reduction in property values—estimated at 30% or more—for rural holdings in the immediate area. The diminished marketability of properties for future animal-based or rural use would strand the investment of current owners.

A reduction in local participation in the greyhound industry would weaken regional networks and harm the economic stability of associated clubs and enterprises.

Lack of Social Licence and Community Engagement

The consultation process has been insufficient and inequitable. Many directly affected landholders have not received meaningful engagement, comprehensive risk assessments, or mitigation plans.

This lack of transparency undermines trust and fails to meet the standards expected for developments of this scale.

Conclusion

The NSW GBOTA strongly opposes the Merino Solar Farm in its current form. The project endangers greyhound welfare, disrupts established animal-based operations, conflicts with planning objectives, and threatens rural amenity, property values, and economic resilience.

We urge the consent authority to refuse the application and ensure that any future large-scale renewable projects are located well away from animal enterprises and rural residential zones.

The NSW GBOTA is available to provide further evidence or input on the relationship between greyhound racing, animal welfare, and land use planning.

Yours sincerely

A handwritten signature in cursive script that reads "Geoff Rose".

Geoff Rose
Chairman

NSW Greyhound Breeders Owners & Trainers Association Limited