

Ashley Glenn Dwyer

Merino Solar Farm Application Number: SSD-5915545

Assessment Type: State Significant Development

Development Type: Electricity Generation - Solar Local Government

Areas: Goulburn Mulwaree

SUMMARY

I object to this development.

I have structured my objection submission against The State Environmental Planning Policy (Transport and Infrastructure) 2021 (SEPP) legislation: The relevant section on solar farm proposals is 2.42 .

<https://legislation.nsw.gov.au/view/html/inforce/current/epi-2021-0732#sec.2.422.42>

I have also reproduced the relevant excerpt of this legislation in my **REFERENCES** at end of this submission and have *referenced* the Environmental Impact Statement (EIS) and attachments where applicable .

This development should not be granted Consent as the State Significant Solar Farm is located in the Goulburn Regional City SEPP and :

- **FAILS to avoid significant conflict** with existing or approved residential or commercial uses land surrounding the development
- Will have a **significant adverse impact** on the regional city of Goulburn capacity for growth
- Will have a **significant adverse impact** on the scenic quality and landscape character of the area designated by the Developer as a whole footprint, as well as for individual landowners, businesses, and community

The proponent **fails to avoid or mitigate significant conflict with the approved residential or commercial use of the land that is surrounded by this development.**

The **adverse Socio - economic impacts** are significant and outweigh any of the purported individual and community benefits. Even if the proponent offers some mitigations under pressure, they have lost the community's trust and will not attain a social licence to operate.

It is highly evident that this proposed development significantly affects not just me, but several hundred landowners in the immediate vicinity as well as the entire city of Goulburn.

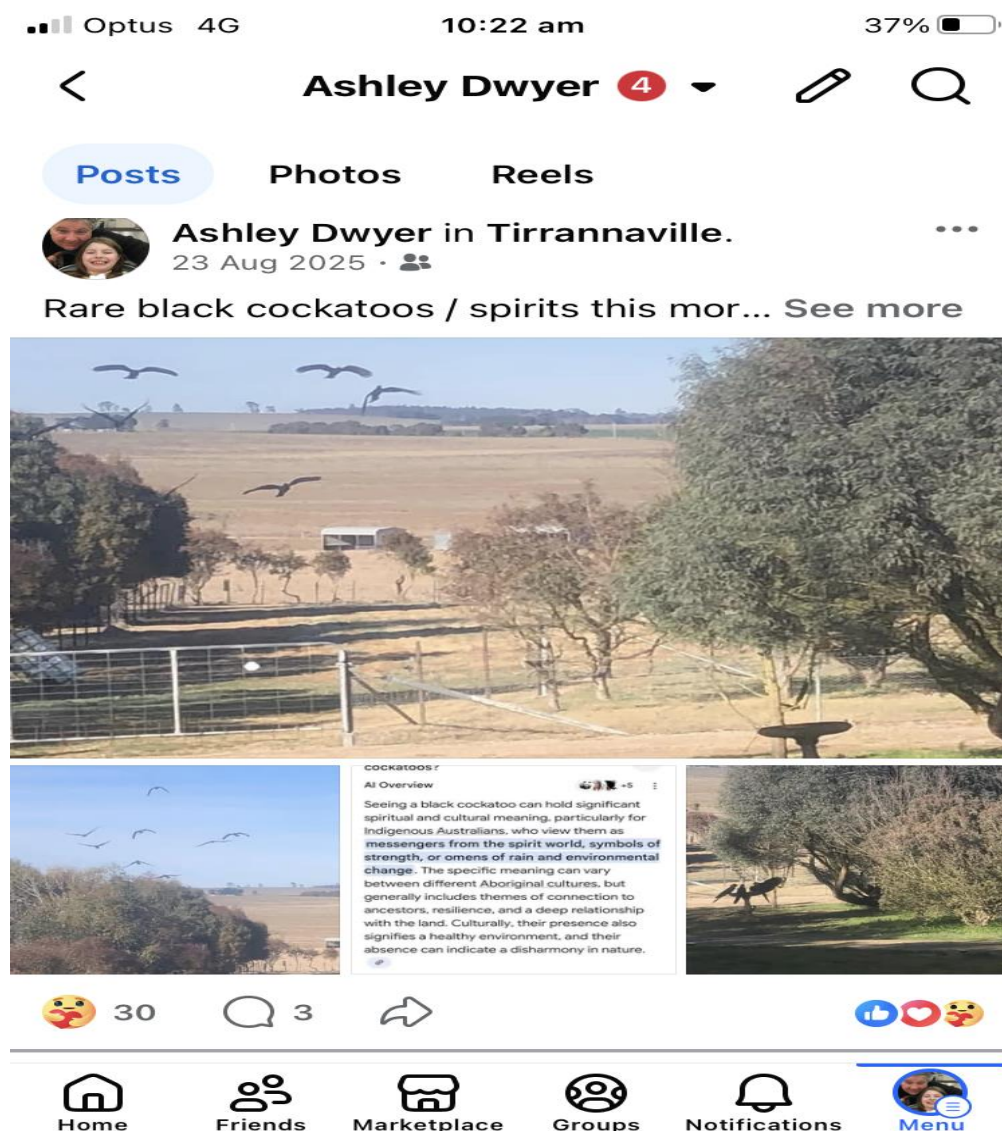
It is highly evident that there is not just one factor negatively impacting landowners and residents, but multiple and at varying degrees and cumulatively. All impact on our lifestyle and sense of place.

It is highly evident that the proponents own technical assessments and EIS are highly flawed and that purported benefits do not outweigh the significant negative impacts especially on existing rural lifestyle land owners and our sense of place .

It is highly evident that the proponent has failed to gain a social licence to operate given the poor and disrespectful consultation from the onset. This is evidenced by the Goulburn Mulwaree Council and State Member objection to this Proposed development along with submissions that will be lodged for this SSD .

I will include in my Submission a number of my ***personal Facebook posts and photos*** as well as ***excerpts from the EIS and reports*** to convey a further sense of the significant conflict.

DETAILED SUBMISSION



Source: My personal Facebook post _ 23 August 2025

This is a South view from my house overlooking my property, Painters Lane and Stage 2 of the Merino Solar Farm.

At PRESENT the resident endangered Black Cockatoos can survey their country – “their presence signifies a healthy environment, and their absence can indicate a disharmony in nature.” what does the FUTURE hold if the Solar Farm progresses ?!

My property

My property is one (1) of 194 Properties identified by the proponent as affected by this development, in addition to the whole City of Goulburn

My property is identified by the Proponent as **R084** in their documentation

My property bounds Painters Lane and Braidwood Rd and directly adjacent to Stage 2 of the Merino Solar Farm along Painters Lane

This proposal has cost me my sense of place — affecting my connection to my property, lifestyle, and community, as well as my mental well-being and financial security

I cannot live on, use or sell my land as I would have if the proposed development proceeds to consent

The development is the wrong, industrial scale project in a rural-residential area, with proximity to the Regional City of Goulburn

Renewable Energy & Regional Cities SEPP mandates the consideration of land-use conflict, growth, and scenic impacts for projects near regional cities including Goulburn. This development severely and significantly impacts me personally , my neighbours, my community and the City of Goulburn.



Ashley Dwyer 4



Posts

Photos

Reels



Ashley Dwyer in Tirrannaville.

10 May 2025 · 2



Merino Solar Farm developer says panels will be "just like sunflowers ... " ... See more



Home



Friends



Marketplace



Groups



Notifications



Menu

Source:

My personal Facebook post _dated 10 May 2025 collage shows an aerial view of my property .

The proponents glossy propaganda "**ITP newsletter of November 2022**" describes the solar panels as akin to a field of nodding sunflowers "**.that track the Sun just like a sunflower**" .

I have a different view and impression on my sense of place from my property !

My personal details and affect

I am 68 years old, retired and legally separated from my wife . I bought this 50-acre Rural lifestyle property in 2022 to live on, and re-establish myself financially, engage socially and promote my well-being.

My family and friends visit me to enjoy the rural ambience and lifestyle.

This development has upended all those plans and enjoyment of why I purchased this property to retire to.

I would not have bought this property in this locale if I had known this development was being proposed. **FAILED** Communication, consultation, transparency , achievement of a social licence. From the very beginning, the community was not adequately informed or consulted.

I provide details of my property, my personal details, and reasons I object in the body of this submission.

This proposal has a significant adverse socio-economic impact on myself, my neighbours, my community and the City of Goulburn.



Source: My personal Facebook post – dated 22 October 2025

At present I can have breakfast on my outside veranda and enjoy the rural vista, tranquillity and farm lifestyle .

My family and I can enjoy the hobby training of my greyhounds and my farm animals - this is my sense of place and why I live here.

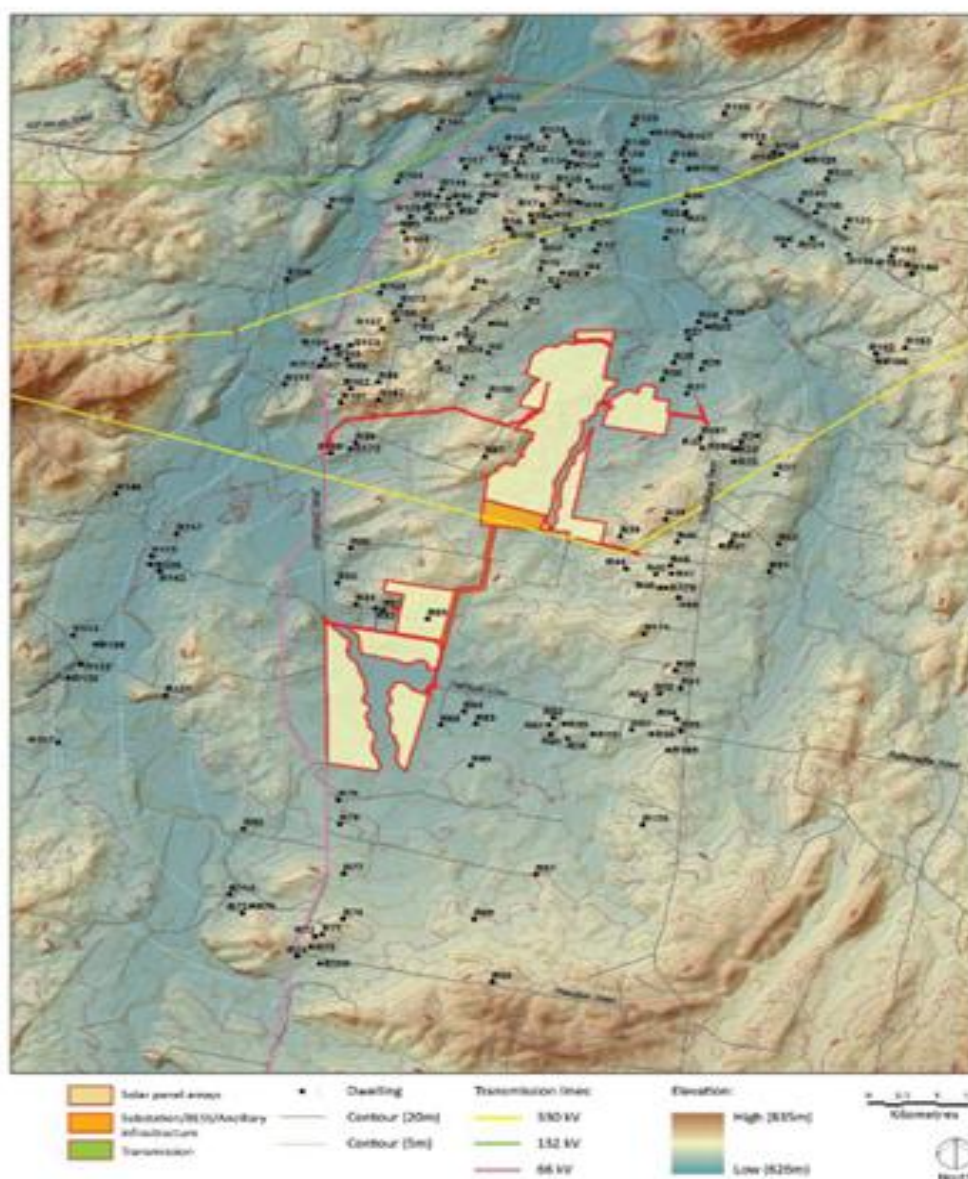
My sense of place will be significantly impacted if the Merino Solar Farm goes ahead

1. Proponent FAILS to avoid significant conflict with existing or approved residential or commercial uses land surrounding the development

The proponent has **failed to avoid significant conflict** with existing and approved residential uses on land surrounding the development.

My situation exemplifies this failure. I provide detailed background on my property and the local community (Painters Lane) to illustrate the land-use conflicts created by the proposal. This conflict is also evident across the rest of the proposed development area and Goulburn.

Source: Screenshot excerpt from IRIS Merino Solar Farm Landscape Character and Visual Impact Assessment _ Figure 4-2 Topography at page 23



My Property (R084) and Painters Lane:

My property is located at 45 Painters Lane, Tirrannaville NSW 2580. It directly adjoins the Stage 2 site along ~500 m of Painters Lane from the Braidwood Road corner. The property is 20 hectares, zoned RU1 (Primary Production) with a dwelling entitlement (I pay residential council rates).

My property is one of about 200 similar rural lifestyle properties in this area (mostly 10–40 ha hobby farms). This is a rural-residential enclave on Goulburn's fringe.

I have Development Approval and Construction Certificate for a substantial 5-bedroom house and a completed Rural Workers shed .

My house site is typical of the rural lifestyle properties - situated on the high point of the property, out of flood zone, to take in the expansive rural views .

The proponent has not even excluded **TOPOGRAPHY ridgelines** from having solar panel infrastructure up to the boundary and literally at my front property entrance (**R084**), as well as neighbours **R083** and **R082**.

My sense of place will be significantly impacted if Stage 2 Merino Solar Farm is granted consent.

I cannot financially justify completing the build of the house given the substantial adverse landscape impact of the proposed Stage 2 of the Merino Solar Farm.

Immediate Neighbours:

Nearly all my immediate neighbours along Painters Lane are opposed to this development. In short, aside from the paid hosts, the entire community here is against this proposal

For example, to my east is property **R083** which sold recently (\$1.118m vs \$1.45m when advertised)

Further east is **R082**, which also recently sold (\$1.1m vs \$1.8m when advertised) . Both properties sold at substantial loss due to the impact of the proposed Solar farm on our doorstep and well below the market expectations

Next along are two host properties including **R081** and an adjoining property with **no R reference** number as owner has decided not to build on that property and host instead. Both properties will host panels and transmission infrastructure – as hosts, they cannot object

Further eastward (**R065 through R054**), every other Painters Lane resident opposes this development. Those able to are lodging objections

To my north is another neighbour **R85** (who will object)

To my south and adjoining Stage 2 southern boundary is **R79** who will object .

In the case for **R79**, EDPR / IRIS has excluded a property and landowner who adjoins an extensive boundary With Stage 2 (see IRIS technical report page A-3) and is significantly impacted for visual landscape and visual impact , which in turn dramatically affected the landowners sense of place . This is a major flaw in IRIS technical assessment and a major flaw in EDPR consultation and engagement.

To my west are broadacre grazing lands with homesteads – those owners do not support the development (see proponent’s own stakeholder map).

All these properties are extensively impacted for 2 years development phase in the immediate area i.e. Braidwood rd. plus, corner with Painters Lane. All are impacted by potential grassfires and no exits.

Directly south of me is the Stage 2 host property (~360 ha) abutting my boundary and Painters Lane.

This development **FAILS to avoid or mitigate conflicts or adverse impacts at the individual landholding , precincts and whole footprint.** There has been no meaningful attempt to include avoidance (stated in their EIS to be their “...first action “ ; or mitigation measures by the proponent to date. (*refer EIS Executive Summary page xxx i.e. Executive page 30*)

Yes, they have removed about 8 hectares of planned panels from behind **R82** due to high visual impact assessment, but not before adding several hundred hectares to the footprint since the Scoping Report, plus doubled the size of the BESS, and may put transmission lines underground vs above ground – all expansion of footprint without consultation with impacted neighbours.

In stark contrast, every reasonable avoidance (e.g. setbacks and exclusions areas); or mitigation measure (e.g. tree screenings, Painters Lane tar and seal, and avenue plantings and a viewing park to beautify and enhance the landscape) proposed by myself and other land owners has been rejected out of hand by the proponent .

The EIS now details further conflicts since the Scoping report, with the proponent stating they will:

- put a 2.4 m high chain wire , topped with double barb wire, security fence around the entire boundary before doing anything else (**refer pages 45-46 of EIS**) . Welcome to Alcatraz – visually sympathetic to established landscape – NOT !!.
- setbacks for the solar panels to be 30 m (**refer pages 49 -50 of EIS**) vs all reasonable local government guides on setbacks that avoid or mitigate conflict (e.g. Goulburn Mulwaree Development Control Plan (DCP) which outlines good planning principles for the local area that are completely disrespected by the proponent on their stated basis that the development is State Significant Development (SSD) (**refer page 67 of EIS**) and therefore overrides the DCP . It should however not neglect and negate good local planning principles
- potentially remove vast number of long term, successful existing exotic Radiata Pine (Pinus Radiata) windbreaks as proponent considers them Weed (**refer EIS -Appendix B Consolidated mitigation measures page Bii - Table ref B5**) and (**refer Landscape Character and Visual Impact Assessment by IRIS September 2025 page 8**) - “all trees within the disturbance footprint would be removed”
- add 5 new access points off Painters Lane into Stage 2 as cannot go off Braidwood rd. into Stage 2 (and not upgrade Lane to tar and sealed etc)
- stated “ acceptable for Painters Lane to remain unsealed...” (**refer page 47 of Traffic Impact Assessment by Amber**) as 2 years construction phase, for 6 days pw 7 am – 6pm is considered by the proponent as “temporary” !! (**refer page 47 of Traffic Impact Assessment by Amber**) . Their own transport consultant states “unsealed roads would typically be considered for sealing when they accommodate between 200 and 500 vehicles per day (VPD) Painters lane is expected to attract an additional 344 trips per day which is within the range for consideration of sealing the road .” (**refer pages 46 -47**). EDPR last newsletter before EIS stated they would tar and seal Painters Lane and then re-nigged in the EIS .

Add to these significant technical errors in the ***“Traffic Impact Assessment” by Amber 8 August 2025*** , that in themselves should mean that at the very least that Stage 2 cannot be granted consent .

I am aware of these issues and errors in the Assessment due to local knowledge and experience of driving and living on Painters lane and using the Braidwood Rd intersection several times a day . There may be other such assessment errors in the broader footprint area that others may have identified .

By way of example from their own ***“Traffic Impact Assessment”***, the corner of Braidwood Rd and Painters Lane view south to Braidwood has been assessed as “existing sight distance south is greater than 300m” (***reference 7.2 Table 25 Safe Intersection Sight Distance Assessment . page 61 of TIA by Amber)***

In fact, there is a rise and dip approximately 60 m south of the intersection that totally obscures car traffic.

Add to this issue of clear site, the extensive and high fog times, glare, 100 kmph zone, black spot, wildlife and livestock , tractors , single lanes, high existing traffic volumes then add the type, volume, duration of construction vehicles and vehicle loads.

This is a **catastrophic death trap** if Braidwood rd. and Painters Lane and the intersection are used by the proponent for the construction period as they describe. All flow on traffic treatments and recommendations in the Assessment is therefore irrelevant .

Construction traffic along Braidwood Road has additional death trap intersections for locals entering Braidwood Road such as at Tirrana lane at Tirrana .

Other traffic hazards NOT included in the ***Traffic Impact Assessment*** are:

Mundy Bridge – Sloane Street and Braidwood Rd – road overpass for Sydney to Melbourne rail line is braced to hold cracked brickwork at present and I consider will collapse with additional traffic for the construction period as described by EDPR.

The 2.7m clearance Underbridge on Sloane St leading to Braidwood Rd is not planned to be used as a route during Construction, but is the site of approximately 3 decapitations of caravan air conditioners by road users using this underpass on route between Braidwood Road and Sydney / Melbourne . If / **WHEN** a construction truck inadvertently goes that way it will obliterate that overpass of the Sydney to Melbourne rail line .

The addition of Solar Farm construction traffic for 2 years will result in risks to road users and local residents that will result in accidents and death .

OTHER CONFLICTS that cannot be successfully avoided or mitigated :

Heavy metal leakage and infrastructure damage e.g. Hail, fire event resulting in Environmental contamination to soil, air, water . My property is immediately downstream from Stage 2 and the Saltpetre Creek. I cannot continue livestock grazing of cattle and sheep. I cannot continue to agist horses. I cannot safely train my greyhounds. I cannot safely use my dam and tank water for human consumption .

Fire – specifically grassfire _ does occur in this high fire risk area. This will be exacerbated with a land use that can ignite the grass and extreme difficulty to control . In a hot, windy environment it is nearly impossible to stop a grass fire quickly spreading and destroying all in its path including me, my home, my property, my animals. I have existing green belt areas and fire hydrants and ground fire breaks on my property, but a fire from the solar panels could not be escaped . I have 1 entrance / exit from my property and that is on to Painters Lane .

Hazards – the *“Preliminary Hazard Analysis by PANDO Consulting dated August 2025* is alarmingly awry in its Risk Assessment .*see page 31 section 9.3* . I concur that fire events (plus toxin poisoning) are relevant hazards. I strongly disagree with risk profile of “considered tolerable” ; and that “...highest likelihood for these events is rated as very unlikely , indicating that while such incidents have been heard of in the industry, they are not expected to occur”. Well, read about the catastrophic fire event at Dubbo / Wellington NSW Solar farm amongst others !

And “...negligible potential for offsite fatalities or injuries.” and “project deemed these risks tolerable.” . What a uncomprehensible disrespect for humans, livestock, native animals and birds as well as property in this high bush and grass fire prone environment in close proximity to a large rural inland city and rural lifestyle properties, with a confirmed history of **CATASTROPHIC** outcomes with recent fires. **Sufficient in itself to not grant consent**

Visual glare with panels along both sides of Painters Lane and especially the dominant knobby hill at my entrance to also have panels to the boundary , make driving along Painters Lane extremely hazardous. On TOPOGRAPHY ridgelines requirements alone, these should be excluded from having panels let alone the glare resulting in traffic accidents

Other objection submissions will cover in detail the risks of the BESS including proximity to the **airport** and risk to aircraft and surrounding neighbours. The self-interest position of the airport owner does not offset the valid concerns raised by objectors especially neighbours.

Land devaluations – majority are lifestyle land owners and our properties are our Superannuation and long-term lifestyle. The properties have taken a conservative 35% drop in value.

Noise assessment – I cannot understand the assumptions and assessment at all. Additionally, the Data used for my house and property location in relation to the Solar Farm are wrong.

I bought my property for the quiet rural ambience and know I would tolerate a few cattle moo; some traffic along adjacent roads, and car and Bike noise from One Race Way . I bought in to this location knowing these noises existed and can be tolerated without affecting my enjoyment of sense of place.

However, I cannot understand the Noise assessment done by the Proponent and their assumptions. By way of example to assume that “3 pieces of noisiest equipment will operate at the same time creating a certain noise level” seems a ridiculous assumption for how many pieces of equipment will be in operation at one time. I base this critique of assumptions and resultant noise assessment in part on their being “**500 employees** working 7 am to 6 pm 6 days a week for 2 years”. Perhaps most will have passive “lolly pop” traffic control roles !!!!

The assessment states existing area is Rural. It is not Rural - it is rural lifestyle along with existing accepted developments that have made significant compliance measures to their activities such as One Race Way car and bike events that generate significant noise.

The ***Renzo TONIN Merino Solar Farm Construction and Operational Noise Assessment page 4 table*** has my property **R84** house site located 630 m WEST of the solar panels. In fact, the closest panels will be some 300m to the South, and some 40 m from my southern property boundary . Additionally, the road use of unsealed Painters Lane during construction and resultant additional noise, is on my south boundary . This is a Major technical flaw in Data for my noise assessment .

I have no other impression other than the **additional** construction and operational noise will be intolerable for my enjoyment of my rural lifestyle sense of place , especially with prevailing winds from the south to my property.

My dogs, and horses in particular will also not be able to tolerate those noises and levels, making my use of the property for the reasons I live here impossible. Again, destroyed my sense of place and reasons I chose to live here.

Landscape and Visual Assessment is incorrect for my **property R84**, and for **public view points of Painters Lane**. Photos to support this are in the EIS for my property **R84** and public view points for Painters Lane. I can supply more as required and an on-site inspection is welcomed.



Figure 4-7 Mulwaree River and Gundry Creek rural valley LCZ – character images

Merino Solar Farm
Landscape Character and Visual Impact Assessment

Page 27

Source: Screenshot excerpt from IRIS Merino Solar Farm Landscape Character and Visual Impact Assessment - page 27

First photo is south east view from my property (**R84**) approved house site overlooking Painters Lane , Stage 2 and Saltpetre Creek and on to timbered mountains in background

Second photo is south west view from my neighbours property (**R83**) house site overlooking my property, Painters Lane , Stage 2 and Saltpetre Creek and on to timbered mountains in background

This is further compounded since the Scoping Report now that the EIS includes:

- addition of the 2.45 m chain wire perimeter security fence
- reduced setbacks
- no screenings or exclusion areas
- removal of Radiata Pines windbreaks
- additional 5 access points to stage 2 off Painters Lane
- additional and type and durations of traffic planned during construction stage
- not tar and sealing Painters Lane
- Potentially above ground transmission lines

Incorrect assessment by IRIS

Landscape character sensitivity level should be **MODERATE – HIGH** *refer Table 4-1 page 19*

Landscape character magnitude of change should be **VERY HIGH** *refer table 4-2 page 20*

Landscape Impact level should therefore be **HIGH** see table 4-2 page 21, **not LOW** as assessed by *IRIS refer table 4-5 page 30*

Section 4.2.2 page 27 includes a photo taken from property **R84** , taken at my planned , approved house site looking South East over my property and on to the planned Stage 2 solar farm, Saltpetre Creek and further on to the timbered mountains .

Also is photo from my neighbours **R83** ,looking South West, over my neighbour and my property and on to Stage 2 , then Saltpetre Creek, and timbered mountains to the West

I will supply further photos but the Landscape character sensitivity in my location of **R84** is **MODERATE to HIGH** , not LOW as assessed by IRIS - *refer Table 4-4 page 29* .

The Magnitude of change is **HIGH** , not LOW as assessed by IRIS *refer Table 4-4 page 29*.

I will be looking at several hundred thousand panels, rising above Painters Lane to an elevation of approx. 40 m . This will extend over approx. 4 km to the distant hills and includes a dominant knobby hill at my front entrance to the property. This will be viewed from a future house site that rises in elevation some 20 m above Painters Lane. There will be some exclusion areas for Solar Farm Infrastructure due to the Saltpetre Creek.

However, the impact of size and scale of infrastructure, coupled with a rise and fall topography with ridge lines, and the sheer geographical area of Stage 2 for my property **R84** are significant and **HIGH** .

A duration of 35 years lease for the Solar Farm is beyond my lifetime and enjoyment of place window. Reversibility is not applicable for me as I will be dead .

Figure 5-2 Visual reference for Scenic Quality values has all the Landform, Vegetation, Waterbodies, Social and Cultural, and Human presence features that attract a **Moderate to HIGH Scenic Quality** in relation to my property **R84**.

While the desktop review **Table 5-7** identified my property **R84** to proceed to intermediate assessment *see page 37, Table 5-10 at Page 40* has used ratings I strongly disagree with, along with highly flawed on-site photo montage taken on a cloudy day, with dead and subsequently removed trees in the foreground, and the number of occupied cells not being reflective of the effect of the scenic quality (should be at least MODERATE) not Low, magnitude level should be HIGH not Very Low and determined visual impact should be at least MODERATE or above not LOW result

The Impact assessment is therefore **Highly flawed and severely understated** .

Public view points Painters Lane

Section 5.3 page 41 is heavily flawed for view point 5 –Painters Lane and view point 6 Painters Lane and therefore severely understated, and lacking appropriate exclusions and mitigation measures .

In essence the wrong and inappropriate viewpoints have been used to take photos from and the resultant assessment and strategies are therefore far lower than actual .

The more appropriate view points on Painters Lane would be:

- at intersection of Braidwood rd. and Painters Lane proposed access point to Stage 2 with a view east and south along Painters Lane . This is presently where road mail boxes are located for residents and a proposed future access point to the Stage 2 development; and
- At the 90-degree bend on Painters Lane outside **R81** with a view to the West along Painters Lane towards Braidwood Road intersection.

Both these public points would then show the Panels on the Stage 2 to be a higher view point sensitivity than Very Low; A higher Scenic Quality than Low; a higher visual sensitivity than Very Low; a high number of Occupied Cells; a higher Magnitude level; and a higher visual impact than LOW to very Low.

The trees on Painters Lane boundary of R82 and R83 and host properties are negligible to screen the view of panels and transmission lines on R81 and the adjoining host property with no R reference number . The fact that R81 and adjoining property are hosts plus the major host on south of Painters Lane does not preclude the effect the Merino Solar Farm infrastructure has on Public Access viewpoints of users of Painters Lane.

Public access would see road users traverse through this proposed solar panel infrastructure and be highly impacted by their landscape and visual appreciation of Painters Lane as well as safety severely compromised if Painters Lane is not tar and sealed and setbacks and exclusions areas for panels and screenings .

I therefore strongly disagree with the proponents assessment of **LOW** and do nothing

MY OWN AVOIDANCE AND MITIGATION STRATEGIES

I have had to consider and plan to implement **my own on site avoidance and mitigation strategies** in response to the Merino Solar Farm development. These are at significant cost and effort to me. This is to address real as well as perceived and risks and impacts denied by the proponent to date .

Most of these Conflicts will still exist in full or residual , even if the proponent undertakes their own avoidance and mitigation as a result of the EIS submission and assessment.

For example:

- I cannot justify completing the build of my approved 5-bedroom house on the site with a new panorama of 700,000 solar panels within 300 metres of the doorstep, (instead of the existing uninterrupted rural landscape). My alternatives include to give up, or seek a new DA at cost and effort to build elsewhere on the property with less conflict and impact
- I cannot risk agistment of the cattle, horses, sheep and my hobby training of my greyhounds due to possibility of environmental contamination of my land. The proponent denies toxins, leeching and damaged panels to cause environmental contamination through the air, soil and waterways from the Merino Solar Farm Stage 2 through my property and on to the Mulwaree river
- I have no known mechanism supplied by the proponent to measure air quality and noise and dust that will be exceeded at some points during the construction and maintenance period
- I have no financial means to seek compensation and redress for land devaluation that has already occurred due to the real and perceived impact of living adjacent to a solar farm
- I have no reasonable escape route WHEN a grass fire from the solar panels occurs
- This is not an exhaustive list of examples, but they highlight that conflict, risks and impacts can be denied, avoided, and mitigated “till the cows come home” but will mean my property is still significantly impacted by this development
- Additionally, the residual risks such as grass fire are **CATASTROPHIC** - Sufficient to mean the development does not gain consent .

Community Division - Conflict:

The **Merino Solar Farm Objection Group** and **Save Gundary Plains Action Group** have formed to support affected landowners. The development has bitterly divided the community – it has no “sense of place” with anyone except perhaps the few hosts who stand to benefit financially. This social division is **evidence of a failed social licence**.

Painters Lane Usage and Traffic - Conflict

Painters Lane is a narrow gravel road (with two flood-prone causeways) used by local residents for property access.

I personally drive this lane about three round-trips to Goulburn each day (training greyhounds at the Goulburn track and errands), plus ~2 round-trips weekly to Nowra for greyhound racing – an indication of how regularly residents rely on this lane.

Any construction or operational use of Painters Lane by the solar farm will significantly disrupt our daily lives and hobbies/businesses. My own routine would be heavily impacted by convoys of heavy vehicles, road damage, dust, noise.

Even the proponent's proposed mitigations (road upgrades, etc.) as stated in their last Newsletter prior to lodging the EIS would only partially reduce these conflicts and impacts, not eliminate them. The proponent has even subsequently removed that mitigation in the EIS despite earlier pledges and their own Traffic Impact Assessment findings.

Traffic and Access Conflicts

The project's footprint and access plan has changed dramatically after the Scoping stage – now Stage 2 can only be accessed via tiny Painters Lane, and then only with significant upgrade to the lane.

At minimum, Painters Lane must be widened and tar and sealed to handle construction.

The proponent has labelled this proposed upgrade a "community benefit" in their materials, but in reality, it's a basic necessity due to their project and should be entirely at the proponent's expense (ratepayers should not foot the bill for an industrial development's haul road).

I have even suggested community enhancements if the project were to proceed – for instance, planting an avenue of trees along Painters Lane and establishing a viewing park on the prominent hill (so the public can "appreciate" the solar farm if the proponent truly believes it will resemble "fields of nodding sunflowers" or a glimmering lake akin to Lake George).

These suggestions (admittedly made partly in irony by me) were aimed at turning the project's glossy PR claims into tangible outcomes. All such suggestions were flatly rejected by the proponent.

Painters Lane's junction with Braidwood Road will require major re-engineering to be safe for turning heavy vehicles, especially given the limited sight distance (a rise and dip hide oncoming traffic from the south). This fact of no clear vision to the south of Braidwood Road has been totally missed and incorrectly assessed by the proponent and their technical assessment – a Major and potentially catastrophic fail in technical assessment

The proponent's plans now show four separate Stage 2 access points off Painters Lane – it is actually 5 or 6 access points now to access R81 and the un - numbered adjacent host properties for panels and transmission line (versus one main access in earlier plans off Braidwood Road). This will mean construction traffic will be entering and exiting at multiple locations along the lane. This intensifies the hazard and inconvenience for residents.

Severe dust, noise, and glare issues are anticipated along the lane during construction – for example, glare off panels installed on the dominant hill by my gate could blind drivers on Painters Lane if that hill isn't kept clear of panels.

Even after construction, if panels remain close to the boundary, ordinary traffic will face sunlight reflection “strobe” effects when driving by the entire boundary of Painters Lane . At Scoping report stage the proponent said panels would be located within ~10 m of the boundary. The EIS intimates the set back now to be 30 m , but now the additional feature of a 2.4m chain wire security perimeter fence. Too close. Too dangerous.

The Industrial , prison style perimeter fencing will further destroy the landscape and amenity of Painters Lane and the surrounding land holdings .

It is largely unknown how, and with what approvals the proponent intends to transmit power from Stage 2 across Painters Lane (then via transmission lines ideally underground vs above ground to the BESS)

The 2 causeways will require upgrades due to flooding, and strengthen and widen .

If Stage 2 is approved, I insist that substantial setbacks, exclusion zones, rural low level perimeter fencing , flood and animal proofed , and vegetative screening along Painters Lane be conditions of consent – especially excluding panels on the hill at my entrance (per the NSW solar siting guidelines for **TOPOGRAPHY** on avoiding ridgelines).

This TOPOGRAPHY requirement by State Planning to exclude ridgelines is another major flaw in the proponent's technical assessment , instead they state they will maximise their footprint and fence it off and work out the detail later !!

The residual visual and safety impacts on neighbours and road users will be totally unacceptable. To date, the proponent has dismissed all requests for setbacks, exclusion of the hill, and boundary plantings to screen the visual destruction of the landscape and amenity that will be caused by the Stage 2 Merino Solar Farm.

“Unliveable” Landscape Outcome for Adjacent Landowners - Conflict.

The proximity and scale of this project stand to make my property effectively unliveable for its intended purpose as my permanent residence .

I have an approved Development Application and have commenced building a substantial five-bedroom home at the northern (rear) end of my block, some 300 m from the proposed panels, on a rise ~20 m above Painters Lane. The house site enjoys a sweeping 180° panoramic vista to the south – exactly where Stage 2 is proposed.

Today, that landscape is open grazing land rising gently ~40 m to distant forested mountains. If Stage 2 is built, that 360 ha panorama (with ~700,000 panels and industrial infrastructure) will fill my view.

Additionally, a dominant hill is at my front gate rising some 20 m above Painters Lane and where the proponent plans to install panels .

The project currently allows for no meaningful setbacks or green buffers around my property. In other words, my rural outlook (landscape) would be replaced by a wall of solar panels and metal fencing almost on my fence line. This outcome has destroyed the sense of place and amenity I sought in buying and moving to this property and community .

I cannot justify investing the remaining ~\$500,000 to finish building my home under these circumstances, because that home’s value and enjoyment would be severely compromised by an industrial facility on the doorstep. Spending that money might literally be throwing it away – a completed house with a “solar farm factory” view could be worth next to nothing.

I have already halted construction on my house and am exploring alternatives (like repositioning a smaller dwelling further from the boundary and planting screening trees) just to salvage some use of my land.

These personal “Plan B” measures will cost me significantly (new design, DA amendments, landscape works), and none of them can truly offset the loss of the panoramic rural landscape that was the reason I purchased this property.

I have repeatedly pleaded for common-sense mitigations – exclude the dominant hill from panels, honour Council’s Development Control Plan setbacks from boundaries, plant screening vegetation – but every request has been dismissed by the proponent leading up to the lodgement of the EIS.

As things stand, if this project proceeds unchanged, I fear my property will become unusable for its intended residential and hobby purposes.

Hobby & Livestock Impacts - Conflict

I am a retiree who intended to enjoy rural residential life here – I keep my greyhounds (mostly retired pets, training a few for racing) and also planned to continue to agist horses and other livestock on my pastures.

Approximately 15 ha of my 20 ha is grazing land I use for my own animals and for agisting others' horses, cattle and sheep.

Already, the mere prospect of this development has caused real losses. The owners of horses I was agisting have removed their animals, explicitly because they don't want them subjected to 2+ years of construction disturbance next door (heavy machinery, noise) or the longer-term unknowns of a solar farm (heat, glare, potential toxicity).

I anticipate losing current cattle agistment as well – the paddocks they graze are linked to the watercourse that flows from the Stage 2 site, under Painters Lane, and through my dams before continuing to the Mulwaree River (part of Sydney's water catchment). Those livestock owners have serious concerns that construction runoff or, worse, a chemical leak or panel contamination, could poison the water their animals drink and pastures they graze.

In fact, all of us with livestock are now faced with alarming uncertainties. If the dam water or soil becomes contaminated by this solar farm, can we even allow animals to graze or drink here?

As a responsible dog trainer, I know that if my greyhounds ingest toxic heavy metals (like cadmium or lead from broken panels) via water, soil, or dust, it could show up in their bodies.

This isn't theoretical – the Greyhound Welfare & Integrity Commission has documented a case where racing dogs had elevated cobalt levels due to environmental contamination, leading to the trainer's suspension and fines. I will **attach this report**.

Peak Greyhound Bodies in NSW will lodge their own objection submissions detailing these and other reasons they will object to this development. (**see separate submissions from those peak bodies**)

I genuinely fear that continuing to train my dogs on this land could jeopardize my trainer's license if contaminants from the solar farm enter their system.

To be clear, no amount of on-site mitigation by me can eliminate these risks.

I can (and will) install extra rainwater tanks and filtration system for my dogs' and my drinking supply (because I will not trust my dams and tank water if 700,000 panels are uphill from the water supply to my dams). I can plant trees and water them to keep a green fire buffer. I can slash paddocks more often if grazing animals leave (at significant cost) to reduce fire fuel.

But I should not have to overhaul my farm management to cope with an intrusive neighbour. My property was fully capable of supporting my hobbies and my small-scale agistment of horses, sheep, cattle until this project cast a shadow (literally and figuratively) over it.

I bought the property due to proximity to Goulburn with like, compatible land users as neighbours . The property provides buffer areas between myself and adjoin neighbours with compatible land uses. We have neighbour arrangements in place that including agistment of livestock across the adjoining properties, access gates, etc. I accepted existing land use such as One Race Way for cars, and bikes a few kilometres up Braidwood Road, and large-scale silos for grain storage on broad scale agricultural land

HOWEVER, I did not purchase the property to have an Industrial scale solar factory superimposed on the landscape – being total incompatible with existing land use.

UNSALEABLE - Conflict

I have had my property appraised since the announcing of the EIS process. There is at least a 30% devaluation on the basis that the Solar Farm proceeds.

I purchased the property in December 2022 for \$850,000 plus stamp duty . I have spent over \$200,000 on the property by way of internal infrastructure improvements such as fencing, water supply, irrigation, outbuildings. The property market has increased over the last 3 years for hobby farms in close proximity to Goulburn, and especially if have a building entitlement such as mine.

The local real estate agent had viewed the property prior to going on the market and was very familiar with it and like properties. This year, she appraised my property at \$750,000, which is well over a 30 % devaluation.

I bought property off the back of a marital legal separation and have had to start again financially on my own, which includes a substantial mortgage on this property.

I cannot sell financially as with devaluation and repay mortgage I have virtually nothing to start again.

The property **R83** adjacent has been put on the market at time EIS was announced. The property has dropped in asking price from \$1.48m to \$1.2M and sold last week for \$1.118m

The next property **R 82** originally went on market for \$1.8 m and sold for \$1.1m late last year

These are just some Examples that counter the proponents assertions that there is no evidence of land devaluations.

2. Will have a significant adverse impact on the regional city of Goulburn capacity for growth

“Wrong Place, Wrong Scale” – Impacts on Goulburn’s Growth & Amenity

Beyond the immediate neighbours, this development threatens broader impacts on the Goulburn community and its future growth.

The entire southern Rural Lifestyle area of Goulburn where the Solar Farm footprint is proposed has colloquially become known as **Goulburn Industrial Park**.

The highlight features are:

- the BESS , aka “Chernobyl 2.0” ready to spew days of toxic material over all of Goulburn City
- 1.6million Solar Panels unable to be extinguished if lightning and grass fire ignites the Host properties,
- Grass and bush Fire spreading into not only adjacent neighbours, but fear repeat of fires started in the area extending to the coast unable to be extinguished,
- **CATASTROPHIC** consequences for human and livestock, and native animal loss of life, as well as property and infrastructure .
- No mitigation can contend with this size of solar Infrastructure without residual **CATASTROPHIC** consequences.

Goulburn Mulwaree Council’s notes that while the site is zoned RU1, it consists of many small “lifestyle” farms (10–40 ha) that function as rural residential lots. In effect, the proposal places an overwhelming industrial facility in the middle of a rural residential community on the fringe of a regional city.

The Merino Solar Farm would be one of the largest solar projects in Australia, sprawling across ~760 hectares (Stages 1 & 2) – which is about two-thirds the area of Goulburn City itself.

Stage 1 alone (360 ha) comes within 6 km of Goulburn’s CBD (the Post Office) and directly borders Goulburn’s small airport. More **than 200 rural-residential properties lie within 4 km** of the site.

The entire southern approach to Goulburn – historically open grassland vistas – would be dominated by metal and glass.

The scale and proximity of this project to a city of 26,000 people is unprecedented in NSW.

It is no surprise, then, that the NSW Government's new planning framework acknowledges this exact scenario. Large renewable projects near regional cities need extra scrutiny.

Goulburn was recently included in the Infrastructure SEPP (Renewable Energy & Regional Cities) – meaning any solar farm within 10 km of a city centre must consider the city's growth strategy, scenic landscape qualities, and avoid land-use conflicts.

By those measures, Merino Solar Farm is plainly “the wrong project in the wrong location.” It conflicts with existing planned land uses (rural lifestyle zone), it mars scenic landscape character (as detailed earlier), and – critically – it may constrain Goulburn's future urban expansion and attractiveness.

In my Turraville precinct, the RU1 properties with building entitlement cannot be further sub divided, so as to maintain that unique and well sort after small scale rural lifestyle properties close to Goulburn. However, for properties like mine I cannot financially justify proceeding to a house build with the significant impact and land use conflict from the proposed adjoining Solar farm.

Some specific concerns about city impacts and growth capacity.

Fire and Safety Risks to Goulburn

As detailed later in the fire section, this project introduces new fire and hazardous material risks (e.g., a massive battery system) to the edge of Goulburn. A worst-case incident (battery fire, grassfire spreading through solar panels) could directly affect Goulburn City, blanketing it in toxic smoke or worse.

This is not a hypothetical – we have seen overseas battery fires take days to control and trigger air quality alerts for miles around. Locating such a risk 6 km from a major regional centre raises serious questions for disaster planning and could impede other developments near town due to heightened fire risk considerations.

Deterrent to Residential Growth

Goulburn's future growth areas could be southward – precisely where this project sits. Who will build a new home or tourism venture next to 1.2 million panels and a “Battery City”?

Some real estate agents have already observed buyers pulling out due to the proposal (even for rural properties well outside the city boundary).

The perceived industrialization of Goulburn's surrounds may discourage the very population and investment growth our regional city is striving for.

Traffic Through Goulburn

Construction will funnel thousands of heavy truck movements through Goulburn's streets (Sloane St, Hume St, etc.), carrying panels, posts, transformers, and batteries between the Hume Highway and the site. Goulburn already endures substantial heavy traffic to Braidwood Road (a key route to Port Kembla and the coast).

This project would add significantly to noise, congestion, and road wear in the city – effectively using Goulburn as a transport corridor. That has community costs and could necessitate future road upgrades or a bypass (issues beyond the proponent's site, but directly caused by the project's logistics).

The Mundy bridge on Sloane St over the railway line will not cope with this type, volume, duration of additional construction traffic.

The Braidwood rd. / painters Lane intersection will be a death trap _ see my earlier comments

Goulburn Airport and Future Industry

The site immediately borders Goulburn Airport. This raises potential aviation safety issues (glare, turbulence, restrictions on runway expansion) which other objectors with expertise are addressing. It suffices to say that plonking a glinting solar array and tall substation infrastructure next to an airport is highly questionable – indeed, I understand there are significant concerns that may breach Civil Aviation Safety Authority guidelines (these will be covered in separate submissions). If Goulburn hopes to grow its airport or attract aviation-related industry, this solar farm could hinder those plans.

In short, the project is too close to a growing regional city.

The benefits of proximity (easy grid connection, easy highway access, few landholders to negotiate with) all accrue to the proponent, while the harms of proximity (visual blight, land-use sterilization, safety risks, stunted expansion) fall on the community. This is an inequitable outcome.

A project of this magnitude belongs in a remote location or carefully sited renewable energy zone – not on the doorstep of established homes and a regional hub.

I have already amended my Will to account for my incineration instead of cremation, in the event of a grassfire to me and my property . ***Just find 6 ounces of ash !!***

Too Big

An overwhelming industrial scale development that is intrusive and destructive on the landscape The Merino Solar Farm will be one of the largest proposed in Australia.

In the immediacy for my property Stage 2 alone is spread over 360 hectares ,with some 700,000 solar panels and associated infrastructure, with common boundary of Painters Lane for approximately 500 meters, and within approximately 300 meters of the building site for my approved 5-bedroom house which was sited to take advantage of the uninterrupted , sprawling country vista.

Goulburn city has a population of approximately 26,000 people, most of who live in a 5 to 10 km radius from the proposed development - and all of whom will be affected by this development in some way.

The proposed Merino Solar Farm will cover 1850 acres - around 2/3 the size of Goulburn city itself. The site will house up to 1.2 million solar panels that will be attached to galvanised steel posts some 3 metres from ground level. .

The site will also include a large substation; and a series of Battery Energy Storage Systems (known as BESS) utilising lithium batteries and inverters housed in shipping containers. The following is a direct quote from EDP in relation to questions from a neighbouring resident regarding the size of this accompanying infrastructure: "The BESS capacity is 450MW, with a 4-hour duration, making a total BESS size of 1800 MWh. The BESS will be made up of shipping containers, each of which will likely have a storage capacity of about 5MWh [360 containers in total]. The substation and BESS area will be approximately 32 hectares in total. [80 acres]"

Construction is expected to take around 2 years.

During this time, freight (earth moving equipment, up to 1.2 million solar panels, substation and BESS materials and containers, hundreds of thousands of large galvanised ground posts) will be trucked to the site via thousands of truck movements on and off the Hume Highway - that is, through Goulburn via Hume and/or Sydney Road and Sloane Street, onto Braidwood Road and/or Windellama Road to the site.

Once onsite, roads will be constructed, a substation built, BESS placed across the landscape and finally, pole driving equipment will ram hundreds of thousands of galvanised posts into the beautiful landscape of Goulburn's treeless plains. This is a huge industrial scale development that will impact this area for decades to come.

I detail later the specific impacts for me, My neighbours and users of Painters Lane .

Fire - increased risks for fire fighters and toxic fallout to wider community

My property , the other 200 land owners in the proposed footprint, Goulburn residents and potentially everyone between Goulburn and the Pacific Ocean will have unacceptably higher risk from Fire and toxic fall out. This is a high fire danger area especially grass, with high winds and difficult to access areas and limited escape routes.

A large enclosed development such as Merino will not be able to be extinguished and will spread to neighbouring properties such as mine unimpeded and present real risk to life, property and infrastructure.

No reasonable mitigation has been established and outcome in the worst case is **CATASTROPHIC**. – no need to give me a Cremation , will not even find my Ashes !!!!!

There are a range of issues raised should a fire spark onsite or travel to the site from a neighbouring property. Should this occur local RFS, Fire & Rescue NSW (FRNSW) and Energy Safe NSW may all be called upon to respond. Access is a key issue - this is due to the industrial perimeter fencing, which inhibits immediate access to where the fire is located onsite, complicated by the panel layout which impedes the capacity to move freely around the site.

This is particularly significant in this case given the fierce winds we experience at Turrillville and the fact that grass fires move so quickly.

Solar panels can pose fire hazards due to electrical malfunctions, overheating, and potential surface fires. Common causes include faulty installations, damaged or inadequate wiring, and even animal activity. Furthermore, the large-scale nature of solar farms, coupled with potential for bushfire risks, can make these sites particularly vulnerable to fire incident

Another concern is fire engulfing the BESS containers which house industrial scale lithium batteries and inverters. In response to the Merino SEARs in June 2023, FRNSW noted: “There is currently insufficient information available regarding the fire safety and emergency response management aspects of the project. FRNSW notes the Scoping Report details a 300MW, 4-hour duration BESS. It is the experience of FRNSW that BESS facilities present special problems of firefighting when responding to and managing an incident.”

FRNSW has requested these, and other fire safety issues, be addressed in the forthcoming EIS. Proponents response is unsatisfactory to deal with possible consequences which are **CATASTROPHIC**.

Approving and then saying sorry YET AGAIN to loss of human, livestock, native flora and fauna and property is unacceptable

Then there is the toxic fallout. Lithium battery fires on solar farms have occurred around the world, for example, in 2023 a lithium-ion battery fire in a solar farm by Lake Ontario in New York state took four days to extinguish. The fire sparked air quality alerts as large amounts of potentially toxic smoke affected the community

<https://ctif.org/news/solar-farm-lithiumion-battery-fire-took-four-days-extinguish>

Closer to home, a BESS battery fire in Qld, also in 2023, recommended residents stay indoors as fire crews took advice from Tesla to allow the fire to burn out over a number of days

<https://www.theguardian.com/australia-news/2023/sep/27/tesla-lithium-battery-fire-bouldercombe-energystorage-site-project-rockhampton>

Both of these examples took place on solar farms that are much smaller than the Merino development – given the huge size of the proposed development and its proximity to Goulburn there is a very real threat that toxic fumes could blanket not only the surrounding properties but also the city of Goulburn during a fire event.

Noise - onsite & within the Goulburn CBD

For my property, I will have 2 years of construction activity on my doorstep , then 35 years of ongoing noise from the panels and associated infrastructure,

Our common boundary of Painters Lane will have 5 access points off Painters Lane into Stage 2 for the daily construction period.

Winds from the South as well as open plains, and proximity will mean that all noise will have an impact well above any level the proponent will present as documented studies. Without permanent ear muffs for myself and my dogs, there are no suitable mitigation strategies to address noise above set standard acceptance levels. Another reason to not provide Consent based on significant conflict with existing or approved residential or commercial use of my land,

This development will lead to a huge number of truck movements through the city of Goulburn. Goulburn is already subject to noise and pollution from freight traveling through the city due to the lack of more direct Hume Highway access to and from Braidwood Road which has become a substantial freight corridor to Port Kembla and the South Coast more generally in recent years

This development will add substantially to this traffic causing both increased noise and pollution to Goulburn residents and potential for increased accident events between Goulburn and the solar farm site.

It is anticipated that construction materials would be delivered to the site from Port Botany or Port of Melbourne, suggesting truck movements will occur at both ends of Goulburn and on to Braidwood Road via Sloane Street.

In addition, there will be many months of noise associated with the ramming of hundreds of thousands galvanised I beams across the site with heavy machinery, each rammed 1.8 metres into the ground as pictured below. The panel posts will then be attached to these ground stays.

All of this happening 6 kilometres from the CBD with the lack of trees across the entire area exacerbating the noise impact across the region.

Once operational, the noise will be ongoing, for example:

- Every 15 minutes the panel rotating drivers operate
- Noise from each BESS is over 50dB - the BESS containers, all 360 of them, including air conditioners, run 24 hours a day, 365 days a year
- The batteries themselves make an incessant 'Clicking' sound
- The substation will emit a very audible, constant hum Hundreds of thousands of galvanised I beams across the site will be rammed 1.8 metres into the earth with heavy machinery – the solar panel framework will be attached to these beams

Too Close - to ME and to the large regional city of Goulburn

The provisions of the SEPP should be sufficient for this Development not to be granted consent.

The NSW Government agreed to include Goulburn in its Infrastructure State Environmental Planning Policy (SEPP) Renewable Energy and Regional Cities Legislation. This means that large-scale renewable energy projects within a 10km of a commercial centre will be subject to higher level planning assessment. They must consider an areas growth strategy, scenic and landscape qualities, avoid land-use conflict, among other impacts. Other submissions will detail this issue.

Established Zoning and land use

Council also notes that while the land under the Merino proposal is currently zoned RU1, it has been subdivided in previous years such that it includes many smaller holdings of 10 – 40 hectares that are more accurately characterised as ‘lifestyle’ blocks. Many of these will share a boundary fence with both Stage 1 and Stage 2

Stage 2 directly bounding my property has additional planning factors, being that the properties on the northern boundary of Painters Lane have been subdivided with RU1 with building entitlement, a precinct of life style properties within easy proximity of city of Goulburn, all with compatible land use .

Compatible land use does not include a large scale industrial solar farm on the boundary, EVEN with “ nodding sunflowers following the Sun” or happy sheep eco grazing amongst panels with 4% increase in wool production and happiness; and weed control , and bio diverse exclusion zones . Old mate the land owner and host can put his own livestock away in future when they stray onto Braidwood Rd and Painters Lane.

The development is a mere 6 kms from the Goulburn Post Office. The proximity to Goulburn benefits the proponents as it is close to transport links (Hume Highway), close to existing high voltage power networks (no need to upgrade or build connecting corridors), and the site is relatively clear being grasslands that were identified as valuable grazing pastures when explorers first came through this area in 1820. The proximity to Goulburn is however, problematic for the surrounding community.

More than 200 properties with homes and families are within 4 kms of the site and are directly impacted. The development will be located on leased land across 7 or 8 adjoining properties each surrounded by neighbouring properties, some of which are only 10 hectares.

Despite requirements for public consultation by the proponent to ensure they have a social licence to operate, the vast majority of affected residents have not been directly contacted by the proponents public consultation consultants, nor received any detailed information about the proposal from the developers.

The proposed development borders the Goulburn Airport – other submissions will detail the issues with this and not rely on the Airport owners self-interest that he is OK with it / nothing to see here.

Accommodation and Employment

The EIS attachment ***“Accommodation and Employment Strategy”*** authored by NGH dated ***November 2025*** contains several factual findings that I would concur with , but a final analysis that is far off the mark for the reality that this scale and type of construction development will have on the local unemployment and on the local rental accommodation.

As proven elsewhere in NSW , the reality is that the vast majority of construction employment will come from outside Goulburn (rather than come from local labour market) , and place an unacceptable pressure on the already Goulburn tight rental market.

This will lead to unacceptable accommodation outcomes, such as lease ending evictions for existing renters . This is a huge fail and risk.

3. Will have a significant adverse impact on the scenic quality and landscape character of the area designated by the Developer as a whole footprint, as well as for individual landowners, businesses, and community

The development has a highly significant impact on the scenic quality and landscape character of the area designated by the Developer as a whole footprint, as well as for individual landowners, businesses, and community.

Property devaluation is denied by the proponent, and in contrast the proponent claims that properties increase in value. **The real estate market is a very sound indicator of the significant negative impacts of this proposal.** Properties such as mine in the affected area have overnight been appraised at 30 % less in sale value based on the proposed development affecting the scenic quality and landscape character of the area.

In Painters Lane, Turraville directly opposite Stage 2 of the development, I provide 3 examples. Other Submissions will highlight other examples across the development.

My property at 45 Painters Lane, Turraville (**R084**) was purchased in December 2022 for \$850,000 plus Stamp Duty. I have spent over \$200,000 on property infrastructure improvements such as fencing, water supply , drainage . The property owes me \$1.1 million. Property values have also increased in the last 3 years. These rural residential lifestyle properties with building entitlement and proximity to Goulburn are well sought after in today's property market. My property has been appraised at \$750,000 on the basis of the proposed Solar Farm being directly opposite my property - **An overnight loss of 30% = SIGNIFICANT**

My Neighbours property (**R083**) was purchased at same time as my purchase for \$1.2 million. It has been on the market for \$1.45 million and sold last week for \$1.118 million, since the announcement of the EIS .

The next neighbour (**R082**) was on the market prior to the EIS at \$1.8 million and sold in July 2025 for \$1.1million.

The next 2 properties in Painters Lane are hosts so PERHAPS according to the developer they may have increased in value ! but the proponent runs a business model of lease land rather than purchase.

Indeed, I proposed that proponent buy my property (**R084**) as well as **R083** and **R082** at market asking price . I cannot live, use, enjoy or sell my property as I had intended based on this proposed development coming into my sense of place. The Socio-Economic affect cannot be understated and is Highly Significant.

I have told the Proponent that they can find my property entrance by the Gum tree with a hangman's noose in the first branch. I have also told the proponent they can find me there if this proposed development does not go away .

Additional to the effect on my mental health, financially I purchased the property off the back of a marital separation, and trying to reestablish myself financially and socially and establish a lifestyle as a single person. This entailed a significant mortgage on the \$900,000 purchase. With latest appraisal as \$750,000 less the mortgage, my net financial value as a 68-year-old self-funded retiree is devastated _ **SIGNIFICANT ?!** – I say YES.

The proponent states that 194 properties have been identified as affected by this proposal. All are significant properties and most having established houses and gardens and buildings. Even if assume an average property value of \$1.5 million, and assume 30% appraisal devaluation, then this is a loss of **\$87 million in the property values OVER NIGHT**. Many treat their property as a Superannuation fund – **SIGNIFICANT ?!** – I say YES.

The proponent's Visual Impact Assessment (VIA) is fundamentally flawed and understates the true impact on landscape values. – see my earlier comments

I wish to highlight several key issues:

Ignoring Topography in Visual Assessment

The proponent's technical assessment considered relative heights of houses and panels but essentially assumed a flat terrain. In reality, the 360 ha Stage 2 site undulates significantly (with elevation differences of 40+ m) and sits immediately adjacent to homes that themselves were built on rises to enjoy broad view of the landscape.

Most rural homes here are on elevated spots to take in the panorama – meaning they will look out over and across a sea of panels, including panels placed on high points.

The desktop modelling failed to capture this, as it took a straight-line view to the “highest panel” and declared many impacts as low or moderate.

Only when the proponent's team came on-site at my property did they realize the scale, elevations and undulations of what would actually be seen – they were visibly shocked at how 360 hectares of panels draped over hills would dominate my view. (Yet inexplicably, the VIA still concluded my impact would be “Low” – a conclusion I strongly dispute, as it defies what was witnessed on-site.)

Visual Buffer Neglect.

The NSW Large-Scale Solar Guideline (**TOPOGRAPHY**) explicitly says to avoid siting panels on prominent hills or ridgelines that increase visibility.

Goulburn Mulwaree's own planning controls would ordinarily require substantial setbacks and screening for any use near property boundaries.

Additionally, Stage 2 plans to incorporate Agri grazing of sheep on the 360 hectares. Given the likely number of sheep, the Goulburn Mulwaree Development Control plan has additional set back requirements from residences and boundaries for this scale of livestock farming. . For instance, the plan puts panels on the most prominent hill in the area (the first hill you see entering this valley).

None of the common mitigation measures – like leaving that hill as open space, or planting shelterbelts of trees to screen the site – have been incorporated.

This maximizes visual impact for me and for everyone traveling Painters Lane or living opposite the site. It's a glaring breach of best-practice siting and it significantly worsens the landscape impact.

The proponent has ignored all these reasonable planning principles, stating that "this is a State Significant Development" and ignoring requirements of the SEARS.

Perimeter Fencing and Lighting

The project entails enclosing ~1850 acres with security fencing. For residents within a few hundred metres (some homes would be only ~150 m away), this means direct views of a long industrial chain-link fence, with rows of metal and glass panels visible above it (panels will be ~3 m tall).

These elements are utterly out of character in our pastoral landscape.

Moreover, the substation (32 ha) and BESS (~80 acre) compounds will likely have lighting at night for security – introducing light pollution (glow and glare) into an area known for clear night skies and starry nights. Even the perimeter fence may have lighting or at least reflect vehicle headlights.

We cherish our "big sky" sunsets and dark night sky here; those will be marred by the presence of a lit industrial site. The proponent did not adequately address this night-time visual impact in the EIS.

Incomplete and Misleading Visual Representations.

No photo montage can truly convey the visual magnitude of this project – as I mentioned, even the proponent’s own team was surprised when seeing it in person. The montages and line-of-sight analyses provided (which led to “Low” ratings in many cases) are, in my view, misleadingly optimistic.

I invite all decision-makers to visit my property and others around it to experience first-hand what the visual and landscape impact would be. A field visit will show that this solar farm isn’t some minor glint on the horizon – it’s a sweeping industrial expanse in direct view of many homes.

Only an on-site appreciation of the topography and sightlines can fully inform the judgment of visual and landscape impact. (I note that the proponent dramatically increased the project footprint after the initial Scoping phase – essentially “maximizing” the impact – and only offers mitigation if forced to. This strategy suggests the VIA was geared to justify a pre-decided layout, rather than shape the layout to minimize impact.)

In summary, the visual and landscape harm from this development is **significant and unacceptable**. The area’s character – rolling open plains with scattered farms – would be transformed into a solar power plant district. The planning principle should be: if a project of this scale can’t be done without devastating the visual landscape and violating siting guidelines, then it shouldn’t be done here at all.

It is particularly relevant that the scope and size of the development have dramatically increased since the Scoping report. It is highly evident that the proponent is running a project strategy to maximise the footprint of the infrastructure and then undertake mitigation and avoidance if required as part of the EIS process.

The proponent announced this development with motherhood statements in a glossy newsletter dropped to RMBs addressed “Dear Resident” Failed consultation from the onset.

The proponent made feel good statements about solar panels being “just like sunflowers that follow the Sun throughout the day”.

The proponent made statements of there being no evidence of land devaluation. By way of these submissions and associated evidence this will be proved CLEARLY FALSE

The proponent has claimed association with rural land use by way of the **Merino Solar Farm** Company name including marketing and social licence attempts with **MERINO** and **FARM** and to **Agri graze** where the area with sheep that will be 4 % more productive . Show me the sheep ??? and adherence to new regulation for sheep grazed in proximity to Solar Infrastructure.

Show me the setbacks required under Goulburn Mulwaree Council Development Control Plan as to grazing this number of sheep on 360 hectares under Stage 2 opposite me. – proponents position of Solar panels meters from the boundary and 300 meters from my residence does not cut it for that issue alone for set backs

The proponent has undertaken desk top and on-site assessments of residences identified as being visually and landscape affected to a level of Moderate or above . This included *TOPOGRAPHY data* and on-site photography but no action in the EIS to avoid the areas for Solar panel Infrastructure as required by the Guidelines for **TOPOGRAPHY** .

Other environmental Impacts that affect landscape character

Environmental Impacts (Contamination, Heat, Flora/Fauna)

The environmental impacts of this project are complex and not well understood by the proponent or regulators, especially given the novelty and scale. The EIS paints a reassuring picture – essentially claiming that after construction, “no further environmental impacts are expected.”

I strongly challenge that claim. Below I highlight a few environmental impact mechanisms that contradict the proponent’s assertions

Soil/Water Contamination from Panel Materials

The NSW Planning Large-Scale Solar Guideline FAQ (Mar 2023) states: “The metals in solar panels...cannot be easily released into the environment... the use of metals in solar panels has not been found to pose a risk... Panels would need to be ground to a fine dust to release contaminants.” The implication is that broken or weathered panels won’t leach toxins. This is simply not true over the long term.

A peer-reviewed 2021 study by University of Stuttgart researchers (“Leaching via Weak Spots in Photovoltaic Modules”) demonstrated that over time (>1 year exposure), significant amounts of toxic elements can leach out from solar panels through points of damage or degradation. They specifically found it is possible to leach all or most of certain (toxic) metals from panels given prolonged exposure – and they caution that short-term tests (1-day or 1-week) grossly underestimate leaching, which accelerates over months and years. (I have referenced this study in full at the end of my submission.)

In plainer terms: hail, lightning, or fire – all very plausible here – could crack panels and rainwater could leach out heavy metals like lead, cadmium, etc., into the soil and waterways. Over 40 years and a million+ panels, this risk is real, not negligible.

Why this matters.

My dams (and others’ dams downstream) could become contaminated. Local farm dams eventually feed into creeks, the Mulwaree River, and even Sydney’s water catchment. I cannot in good conscience let my dogs or livestock drink from water that might carry cadmium or lead. Nor could my neighbours.

Accredited livestock producers are obligated to pull their stock off contaminated pasture/water. This means if any contamination occurs, the surrounding agricultural use of land could be paralysed – animals couldn’t graze or be sold, and land value would plummet further. The proponent offers no persuasive contingency for this, other than bland assurances that it “won’t happen.” The evidence (see the Stuttgart study) suggests otherwise.

Bottom line: The EIS's stance of "no contamination risk" is outdated and false. This issue alone – the potential for long-term soil/water contamination – is enough to render the project fatally incompatible with this area's farming and rural lifestyle. I simply cannot take that risk.

Heat Island Effect ("Heat Bank").

Large solar farms create localized heat-island effects. Panel arrays absorb and reradiate heat, and hinder cooling winds over the surface. Studies (including a 2016 Scientific Reports/Nature empirical study) have found night-time air temperatures over a solar farm were 3–4°C higher than in nearby natural areas – contrary to models that predicted cooling. Australia has no official study on this phenomenon yet, but international examples indicate that on hot summer days my area could see a noticeable increase in ambient temperature for several hundred metres beyond the site.

For neighbours like me (and certainly for my animals), this is significant – it means hotter nights, more heat stress in an already hot, dry climate. This effect wasn't meaningfully addressed in the EIS. Over 760 ha of panels, the heat retention could be substantial.

I bought and intended to build here expecting open areas that cool at night. Instead, I might get a "heat bank" next door that radiates warmth into the evening. This has implications for human comfort, livestock, and even wildfire behaviour (hotter surfaces can worsen fire intensity). Again, wrong scale in the wrong place – if this were in an uninhabited desert, who cares about a heat island; but here, it directly affects people and animals.

Wildlife and Habitat Loss.

The EIS suggests that once construction is over, "no further biodiversity impacts are expected." That's a cynical way of saying the ecosystem will be so altered that nothing remains to be impacted.

During construction, they will clear virtually all ground cover, fell trees, remove rocks – effectively sterilizing 1850 acres of habitat. Many native species (birds, reptiles, mammals) that rely on that mix of grass, shrubs, hollow logs, etc., will be killed or displaced. Some may flee to our properties, only to be fenced out or find no refuge. Others will be trapped inside the new perimeter fence with no shelter (except rows of panels, which offer no food or nesting sites). The EIS downplays this by focusing on "no threatened species extinction" – but the local ecological community will be devastated.

I have seen echidnas, wombats, goannas, rosellas, raptors, and more thriving on this land. After construction, few will remain on the site except perhaps pests (rabbits, foxes, mice) that ironically might proliferate under the panels where human access is limited. The proponent's token "biodiversity areas" are small and fragmented; they will not support the original biodiversity in any meaningful way.

Personal note: I frequently observe native wildlife on my property – I have photos of kangaroos grazing, native birds in my trees, even the occasional lace monitor or swamp wallaby. The thought that the adjoining land will be rendered mostly devoid of such life is heartbreaking.

The landscape character here isn't just about "views" – it's about the living environment. This development will replace a lively rural ecosystem with an artificial industrial monoculture of steel and silicon. Humans might rationalize that trade-off for clean energy far out west, but doing it amidst a community like ours magnifies the loss. It's not just "no further impact" on wildlife – it's **no wildlife, full stop**.

Bushfire Risk & Emergency Management

I live in a high bushfire danger region – hot, dry winds and volatile grasslands. The introduction of vast amounts of combustible material and electrical equipment increases fire risk. The RFS and FRNSW have already flagged that fighting a fire on a solar farm (especially with a big BESS) is a special challenge. If a bushfire starts on or enters the site, the environmental consequences – toxic smoke, water runoff contaminants, and of course loss of flora/fauna – could be **catastrophic**.

One cannot separate "environmental" impacts from "safety" impacts in this context; a major incident would straddle both. Yet, the proponent's documentation on fire and environment treats each in isolation and underestimates both.

In summary, the environmental impacts of this project in this location are unacceptable. They have been understated by generalized statements in the EIS that do not hold up to emerging evidence or local context.

Panel contamination is a real hazard, heat island effects will stress the local climate, and the local ecosystem will be irreparably damaged. These issues reinforce that the scale and nature of this development are fundamentally incompatible with a populated, mixed-use rural environment.

My property and surrounding area are the natural home for numerous native species and animal, mammals, bird and plants. The bio diversity study will not do justice to the impact for each land holding as well as collective area, due to the size, scale, and risks of the proposed development. Again, wrong scale in the wrong place .

Again, sufficient reason not to grant consent due to significant impact on the landscape character where the land is owned by the native species, and humans are temporary custodians that need to respect the existing owners and.

I have several photos and videos to share of these native birds, animal, and mammals on THEIR Land – being the property at 45 Painters Lane Tirrannaville that I as a human have temporary Custodianship of .

Fire Risks and Emergency Management Failures

Fire risk is both a safety issue and an environmental issue; I address it separately here due to its critical importance.

My property and the broader locality are classified as high fire danger, primarily for fast-moving grass fires. I routinely experience fierce winds (Tirrannaville is known for gusty conditions) and have limited escape routes. I maintain my own fire preparedness – cleared firebreaks, a dam-fed fire pump, etc. – but the introduction of this project would create a fire scenario beyond anything local residents can mitigate.

Key concerns include:

Solar Farm Fire Incidents Are Hard to Fight:

A large, fenced solar farm is not readily accessible to firefighters. The proponent's plan includes security fencing around the entire perimeter. In the event of an internal fire (from any cause: arcing, inverter failure, lightning strike igniting dry grass under panels, etc.), the Rural Fire Service (RFS) and Fire & Rescue NSW would have to breach fences and navigate tight rows of panels – significantly slowing response.

FRNSW's submission on the SEARs explicitly noted "insufficient information" on fire safety and pointed out that battery installations pose special firefighting problems. They know that a 300 MW/1800 MWh lithium battery (as proposed here) can, in worst cases, enter thermal runaway and burn for days, releasing toxic fumes. The proponent has not provided a detailed emergency management plan to alleviate these worries.

FRNSW essentially said: we don't yet know how we'd handle this. That is deeply unsettling for a project so close to a city and homes.

Grass Fire Conduit

If a grass fire starts either on-site (e.g., from a fault or a spark during hot, dry conditions) or off-site (natural bushfire moving in), the solar farm could act as a fuel-rich conduit. The site will have vast numbers of plastic panel components, cables, and perhaps vegetation between rows if not perfectly maintained. A fire running through 760 ha of this cannot be easily stopped – you cannot perform back-burning inside an array, nor can aerial water drops reach under panels effectively.

The proponent's documents admit that fire spread can't be fully mitigated on a solar farm of this size. If a blaze tore through the site, it could spread unimpeded to surrounding properties (like mine).

It could also loft embers directly toward Goulburn (some of the devastating 2020 fires in this region showed how grassfires can carry embers many kilometres). The consequences

could be **catastrophic** – mass loss of property, livestock, wildlife, and potentially human life. I say this not to be alarmist, but to point out that no conventional mitigation (fire breaks, a few on-site water tanks) can guarantee safety in such a scenario. Even the proponent’s own admission is that “no mitigation can fully contend with a fire of this scale without residual catastrophic consequences.”

Toxic Smoke and Residue

A unique aspect of solar farm fires is the *toxicity*. Burning or smouldering solar panels release harmful fumes (from plastics, metals, etc.). A battery fire (BESS) is even worse – as seen in the 2019 Tesla Megapack fire in Victoria and the 2023 BESS fire in Queensland, authorities often decide to let them burn out because traditional firefighting doesn’t work, and they warn residents to stay indoors to avoid inhaling smoke. If Merino’s 360 battery containers ignited, Goulburn City could be blanketed in toxic smoke for days.

This isn’t theoretical – I provided references of a New York state solar battery fire that burned four days and triggered air quality alerts 10+ km away. Merino’s battery installation would be many times larger. I am essentially talking about situating a potential “chemical fire” disaster on the edge of a city. The local emergency services have no precedent for handling such an event, and the proponent’s EIS provides little reassurance beyond noting FRNSW’s concerns.

Insurance and Liability Nightmare.

I have elaborated in a separate section about insurance, but to reiterate:

if a fire originating on the solar farm destroys neighbouring properties (or vice versa, if a bushfire from a neighbour destroys the solar farm), the liability and insurance issues are extraordinarily murky. My regular farm insurance will not cover millions in damages to the solar farm, and the proponent has not offered blanket indemnity. This means, in practical terms, if a tragedy happens, I might be **financially ruined on top of everything else**. This prospect weighs heavily on residents' minds each fire season now.

All of the above points to one conclusion: the project dramatically increases fire and emergency risks in a way that cannot be confidently managed or mitigated.

The NSW Rural Fire Service and FRNSW have both signalled red flags, and the proponent's answers have been superficial. Approving this development under these conditions would be irresponsible. If a catastrophe occurred, saying "sorry" afterward (as is too often the case) would be of little comfort – it's far better to prevent a known high risk than to regret it later. In my own dark humour, I've noted I changed my will to prefer incineration on-site if trapped by a grassfire here, because I feel that vulnerable. It is only half a joke – the fear is real.

This region endures some of the harshest fire climates; layering an untested industrial battery/solar complex into it is, frankly, courting disaster. For this reason alone, the development should not proceed unless the consent authority is absolutely satisfied (in a way I am currently not) that every fire risk scenario is fully resolved – and even then, the residual risk to life and environment may simply be too great.

Visual Impacts

My property is impacted by the proximity, size, glare, elevations, topography of the adjacent Stage 2 of Merion Solar farm. **See my earlier comments** as to why their rating is heavily flawed

I agreed to an on-site detailed assessment after seeing that from a desk top assessment, my property was identified as visual impact of moderate or above, requiring a detailed assessment.

The on-site detailed assessment according to Guidelines has resulted in a rating of Low.

The Developer themselves were astounded when I showed them the building site and panorama and what looking at 360 hectares of panels over gently rising topography up to 40 meters and viewed from a site with an elevation of 20 meters, and stating some 300-400 metres away looked like .

From a **TOPOGRAPHY** guideline issue, the Dominant hill bounding Painters Lane should be immediately excluded from having panels as per DPHI guidelines for effect of **Topography** .

From a Goulburn Mulwaree Council Development Control plan issue, setbacks should be substantial from boundary fence and have screening ,allowing distance from the Solar panel to THEIR ASSET PROTECTION ZONE - too bad for my assets as a consideration !!!!

Visual and Landscape

I disagree with this rating on several grounds – *see my earlier comments*

Some houses will be within 150 metres of this development – with direct views to an industrial perimeter fence surrounding the entire 1850 acres with up to 1.2 million solar panels visible above the fence line. Both of these are completely out of character in this grassland rural environment. Gorgeous big sky sunsets and clear night skies will also be visually destroyed with both the 80-acre BESS and substation areas and the perimeter fence likely to be illuminated at night

Environmental Impacts – contamination, heat, flora and fauna

This is a small sample of the types of environmental impacts we can expect. The complexities of environmental impacts from industrial developments are often unforeseen or little understood in the initial rollout of new technologies.

For instance, NSW Planning (on advice from the EPA based on short term studies) states in the Large-Scale Solar Energy Guideline FAQ that: “The metals in solar panels (including lead, cadmium, copper, indium, gallium, and nickel) cannot be easily released into the environment.

This is because metals such as cadmium telluride (CdTe) or cadmium sulphide (CdS) are enclosed in thin layers between sheets of glass or plastic within the solar panel. Because of this, the use of metals in solar panels has not been found to pose a risk to the environment. To readily release contaminants into the environment, solar panels need to be ground to a fine dust.”

<https://www.planning.nsw.gov.au/sites/default/files/2023-03/large-scale-solar-energy-guideline-faq.pdf> . this is simply untrue.

A paper by researchers at the University of Stuttgart published in 2021 titled Leaching via Weak Spots in Photovoltaic Modules refutes this with a long-term study of photovoltaic

leaching, finding: “Our long-term experiments clearly demonstrate that it is possible to leach out all, or at least a large amount, of the (toxic) elements from the photovoltaic modules.”

Their conclusion states: “Compared to other, earlier studies, our experiments were carried out over more than a year. As one of the key results, we found huge differences between the amount of elements found in the solutions after one day and more than a year. In our opinion, tests for just one day are inappropriate to judge module technologies, in particular if conclusions and political decisions on the toxicity and environmental issues of photovoltaic module technologies are based on such short-term measurements.”

<https://www.mdpi.com/1996-1073/14/3/692>

This issue alone has the potential to impact the neighbouring land via water run-off and/or contamination of soil and water tables.

Accredited livestock producers must ensure their stock do not graze contaminated land, nor drink any water that has flowed from a solar farm site. There are numerous primary producers, mostly cattle but also sheep and horses, that surround this development.

A hailstorm would hasten this disaster.

Studies around the world show that large solar farms create a heat bank extending several hundred metres from the perimeter of the panels. It is naturally worse in the summer months.

However, to date the Australian government has not commissioned research to explore the extent of the heat bank and the impact on people living close by. And so, we rely on international examples - an often-cited empirical study published by Nature in 2016 found: “...temperatures over a PV plant (Solar Farm) were regularly 3–4 °C warmer than wildlands at night, which is in direct contrast to other studies based on models that suggested that PV systems should decrease ambient temperatures.”

<https://www.nature.com/articles/srep35070>

Solar Farm proponents routinely describe environmental activities and impacts along the lines of: “Construction activities will result in direct impacts to fauna and flora species and ecological communities through vegetation clearing, earth moving, cut and fill excavation and associated habitat loss. Indirect impacts to ecological communities may occur through temporary changes to noise, dust and hydrology features during the construction phase. Once the proposed action is operational, no further biodiversity related impacts are expected.” It’s almost as if – there is nothing to see here. Again, this is simply not the case.

The proposed construction as outlined above results in a sterile environment in which a significant proportion of the reptiles and birds that rely on fallen timber, undisturbed rocks and undisturbed ground in order to survive will no longer be able to live on these sites. Thus, no further biodiversity related impacts would occur as there will be few native creatures to re-colonise the land other than feral rats, rabbits and foxes that will be protected within the perimeter fence.

The native creatures will have no protection in the form of standing trees or fallen timber and will therefore have no incentive to re-colonise the area. The machinery drivers will not be stopping to rescue the lizards, snakes, lady birds, wombats, echidnas etc that they drive over when they strip the pasture cover, bulldoze what trees have been planted in the area, and disturb other animals that will not be able to escape because of the industrial perimeter fencing.

4. SOCIAL Impacts

Health Impacts – Mental health and property valuations

I bought my property in December 2022 without knowledge of the proposed solar farm development. If there were adequate community and individual consultation and awareness, I would not have made this purchase, but here I am.

I participated in the detailed assessments and social impact 1-1 interviews as part of the EIS process. Both are FAILS .

The mental health impacts of living so close to the Merino Solar Farm development proposal is hard to articulate. For all of the reasons listed above, and more, residents are subject to ongoing mental anguish as the decision-making process unfolds. In the Merino case, some residents are exposed to both the Merino and the Gundry project – many visually exposed to both, with some not only visually impacted but also sharing a boundary with one or the other. One resident purchased their property in 2024 only to discover the proposal is located directly across the road from the property after moving in. Some have listed their properties for sale, but are yet to sell despite a healthy market in this area. Many have heavily invested in their properties as a way of supporting their retirement.

Most of us bought into this area for its visual beauty and are saddened at the thought of the visual and environmental destruction of this unique area. Added to this is the impact of engaging for years with a complex and drawn-out process whilst maintaining full time jobs, businesses and lives. Identifying, locating, filing and digesting dense reports; drafting emails and letters, liaising with government bodies and neighbours – all of these actions by neighbouring property owners places enormous pressure on individuals and families.

Additionally, for residents who have engaged with the proponents, either EDP or NGH the outcome is obscure – specific questions are often met with “we are working to prepare a comprehensive reply” or “this will inevitably take some time to reply” although no forthcoming reply is delivered. And it doesn’t have to be like this - in a recent case about an hour away, just outside the city of Yass, a very different process took place. A development proposal by Engie was halted at the Scoping stage by the proponent after a thorough public consultation process that found local residents and the wider community were opposed to the project.

<https://engie.com.au/about-us/our-generation-activities/solar-farms/yass>

In terms of property values – it is not even considered by the State or Federal governments, or by the proponents, or by their consultants. For instance, NSW Planning states in its Large-

scale Solar Energy Guideline FAQ: “Do large-scale solar energy developments affect the land value of neighbouring properties? There is no evidence to suggest that large-scale solar developments affect the land value of neighbouring properties.

While the department acknowledges that effects on land value (positive or negative) are of great concern to the community and landholders, this is not a planning issue and is outside the scope of what the consent authority can consider in making a determination on a DA

<https://www.planning.nsw.gov.au/sites/default/files/2023-03/large-scale-solar-energyguideline-faq.pdf>

It’s as if it is not an issue at all. We wish.

Neighbours that share a boundary fence with the Merino or Gundary proposals have been advised by local real estate agents that their property values will drop by 30% to 60% if the development goes ahead. As noted above, other residents have been unable to sell their properties with buyers citing the solar farm proposals as their reason for walking away. This is despite a generally healthy rural property market in the Goulburn region with rural property in close proximity to the city highly sought after.

Insurance - unknown risks, costs & cover for neighbouring residents

(FAIL without a blanket indemnity of liability for neighbouring properties)

This development will impact insurance costs for surrounding residents. What is clear is that regular house and contents insurance, farm insurance, or Public Liability insurance will not cover the costs of a fire spreading from a neighbouring property to engulf a multi-million-dollar large scale solar farm. In the past few years farmers in NSW and Victoria have expressed concern that their properties may be uninsurable due to the high risk and impact of a solar farm fire

<https://www.abc.net.au/news/2024-06-12/farmer-stephen-pumpa-insurance-concerns-neoen-solar-farm/103855680>

<https://www.insurancebusinessmag.com/au/news/breaking-news/farmers-say-plans-for-multimillion-solar-plantwill-make-them-uninsurable-485019.aspx>

The Insurance Council of Australia (ICA) suggests it is appropriate that a ‘neighbour agreement’ between neighbouring residents and solar farm owner/ operators clearly set out who is responsible in the instance of accidental damage by the landholder to the energy infrastructure. The Australian Energy Infrastructure Commissioner has highlighted that before a wind or solar farm is built, some project operators have negotiated a ‘neighbour agreement’ with neighbouring landholders, setting out the terms and responsibilities of each party

https://insurancecouncil.com.au/wp-content/uploads/2024/05/UpdatedICA_Briefing_Farm-Insurance-and-Energy-Infrastructure_May-2024.pdf

However, it is simply not good enough to expect neighbouring landowners to individually negotiate these insurance issues with the proponent. To date, it is not clear whether the proponents of the Merino Solar Farm will engage in such an agreement in any case, let alone what the agreement might entail.

The **Scoping Report** for the Merino proposal has a single paragraph in relation to Insurance (**6.7 Economic, page 65**) that contradicts the above ICA guidelines.

The Scoping Report states “Engagement with the Insurance Council of Australia is proposed to ensure no offsite impacts to insurance policies of nearby non-associated landowners.” Such vague statements do nothing to allay the concerns of nearby landowners that are not associated with the project, but it does suggest that those landowners who are associated with the project already have an agreement in place (that is, the landowners who will be reaping financial gain by hosting the solar farm on their property via a lease agreement). NSW Planning completely shuns this issue in its Large-scale Solar Energy Guideline FAQ stating: “Does large-scale solar energy development affect the insurance premiums of neighbouring landholders? The department has heard anecdotal evidence that solar energy development can affect premiums for public liability insurance. Insurance issues are not governed by the planning system under the Environmental Planning and Assessment Act 1979 (EP&A Act), so the guideline does not address these concerns.”

<https://www.planning.nsw.gov.au/sites/default/files/2023-03/large-scale-solar-energy-guideline-faq.pdf>

This lack of support by all stakeholders in relation to insurance risks and costs is unacceptable, particularly given the extreme weather conditions that plague the Goulburn area; including hot dry conditions, parched grasslands and severe winds.

Social licence

Failure to Achieve Social Licence & lack of Procedural Fairness

Finally, I object on the grounds that the proponent has failed to obtain a social licence or engage in fair, competent consultation with the community – a key requirement for any State Significant Development.

Disproportionate Benefits vs Burdens – placate with money

The proponent has signed lucrative lease agreements with a handful of host landowners (most of whom do not reside on the properties in question). These few will benefit financially, while hundreds of neighbouring landowners and the broader Goulburn community bear the burdens (visual amenity loss, land value loss, risk exposure, etc.). This imbalance has fostered intense community resentment.

The proponent states in EIS they have NO impact agreements based on visual and landscape assessments. R82 had some adjacent panels removed from view .

The proponent has made limited offers of Neighbour Benefit Sharing Agreements in accordance with the Guidelines to gain social licence to operate. While the Benefit \$\$ are better than nothing, these Agreements do not compensate for a loss of sense of place, and reason why land owners chose to buy and live and enjoy the properties now affected by this development . A few thousand dollars a year does not compensate for a 30–60% property devaluation, loss of enjoyment, and mental anguish.

Many neighbours (myself included) found the notion of taking a payoff for silence offensive – our rural lifestyle is not for sale. The mere existence of these token offers underscores that the proponent knows there are significant negative impacts, but prefers to “buy off” individuals rather than genuinely mitigate or avoid problems for all.

Inadequate Consultation and Transparency

The consultation process has been sorely lacking. The original proponent (ITP) lodged the Scoping Report quietly in 2023 with minimal community knowledge. When EDP Renewables took over, they mailed a generic newsletter addressed to “The Resident” (which in my case sat unread in a shared mailbox).

The Scoping Report claimed that all landowners within 4 km were contacted via phone, email, door-knock, etc. – this is patently false. Many of us (including me) **had no contact** until well after.

In fact, it emerged that the consultants' database of neighbours was missing over 100 properties (out of ~190) due to a data error during the handover from ITP to EDPR. This is an astonishing oversight: literally half the neighbours were not initially identified or contacted. Some people only found out when the EIS was publicly exhibited in 2025. Others might still not realize, if they live away.

This failure defeated the purpose of early consultation – which is to surface issues early so the project can adapt. By the time many of us were aware, the design was basically fixed.

The face-to-face consultation has also been token. As far as I know, NGH (the proponent's consultant) only met in person with about 6 neighbours during scoping. Six, out of nearly two hundred. That's 3%. This is not genuine consultation – it's checking a minimal box.

The Social Impact Assessment (SIA) in the EIS reflects this poor engagement. I participated in a one-on-one SIA interview, voicing all my concerns (mental health stress, financial worry, etc.). None of my issues appeared in the SIA report. The SIA reads like a copy-paste from a generic project, claiming social impacts are manageable or minor, which is completely at odds with what people here are actually experiencing. It even states community sentiment as mixed or neutral, which is blatantly incorrect – the vast majority are opposed, evidenced by the flood of objection submissions.

This leads me to conclude the SIA and consultation record are not credible. The proponent did not incorporate real feedback (like excluding the hill, which I begged for, or adjusting layouts). They have treated this as a PR exercise rather than a genuine dialogue.

Example of Best Practice (Missed).

By contrast, a similar large solar farm proposal near Yass (about an hour from here) was halted at Scoping by its proponent (Engie) precisely because strong community opposition was identified early through proper consultation. They recognized they lacked a social licence and chose not to push ahead. This is how responsible developers behave. EDP Renewables, instead, appears to be pushing forward despite overwhelming local opposition and trying to paper over it with belated minor concessions or payouts. This is a recipe for long-term conflict and resentment.

Ongoing Social Impacts

As detailed, this ordeal has taken a heavy toll on residents. We have suffered sleepless nights, constant anxiety, and distraction from our work and family life by the need to organize, research, and fight this proposal. Many are elderly or have health issues that are exacerbated by stress. People have put their retirement plans on hold, unable to sell or peacefully enjoy their "last home" as intended. This social impact is real – even if intangible – and it counts. The Environmental Planning & Assessment Act (sec 4.15) requires consent authorities to consider the public interest and social effects of a project.

I submit that the public interest is not served by approving a development that has caused this level of distress and division, and promises to do so for decades to come.

In summary, the proponent has forfeited any social licence. The project has sown division, fear, and anger from day one. Consultation was perfunctory and, in many cases, non-existent. Reasonable community feedback was ignored. As a result, instead of winning hearts and minds, the proponent has galvanized an entire community against it. The Department and decision-makers should take this social risk into account: a project without social licence is likely to face ongoing disputes, compliance issues, and eroded public trust in planning processes.

5. Conclusion:

For all the reasons above – especially **land-use conflicts, harm to Goulburn’s community and growth, destruction of landscape character, unmanageable environmental and fire risks and traffic technical requirements, and the failure to earn community acceptance** – I respectfully urge the consent authority to **refuse** the Merino Solar Farm application.

This is a **case of the wrong place** for this project.

The costs and burdens on the local community far outweigh any broader benefits. Indeed, approving it under these circumstances would **violate basic principles of good planning and equity**.

I appreciate the opportunity to make this submission. I have provided references and evidence (attached separately) to substantiate the points raised.

I am also willing to host site visits for decision-makers to see first-hand what paper reports cannot fully capture.

Ultimately, I ask that you stand with our community – not against it – and do not grant consent to this development.

6. References:

I have structured my objection submission against The State Environmental Planning Policy (Transport and Infrastructure) 2021 (SEPP) legislation:

The relevant section on solar farm proposals is 2.42 as re-produced below

<https://legislation.nsw.gov.au/view/html/inforce/current/epi-2021-0732#sec.2.422.42>

Determination of development applications for **solar** or wind electricity generating works on certain land

(1) This section applies to development in a **regional city** for the purposes of electricity generating works using a solar or wind energy source that is

(a) **State significant development**, or

(b) regionally significant development.

(2) Development consent **must not be granted** unless the consent authority is satisfied that the development

(a) is located to avoid significant conflict with existing or approved residential or commercial uses of land surrounding the development, and

(b) is unlikely to have a significant adverse impact on the regional city's

(i) capacity for growth, or

(ii) scenic quality and landscape character.

(3) In determining whether to grant development consent, the consent authority must consider measures proposed to be included in the development to avoid or mitigate conflicts referred to in subsection (2)(a) or adverse impacts referred to in subsection (2)(b).

In researching and identifying the salient impacts , issues, possible mitigations, the respective objection groups have established a library of references .

In the main, the collection of issues and impacts are a similar theme for each land owner , precinct and objector.

I reference these at the end of my objection and have concentrated in the body of my objection on how the development unreasonably impacts my sense of place.

The issues for myself in this objection may vary in significance per land owner, and some impacts may be mitigated differently across each land owner.

However, as a whole there are sufficient impacts, of sufficient scale and significance where any mitigation strategies will leave a residual impact that is still unreasonable to allow the Merino Solar Farm development to be granted consent.

References and Supporting Documents:

(Provided in attachment or upon request)

- NSW Department of Planning – Large-Scale Solar Energy Guideline & FAQ (2023)
- Goulburn Mulwaree Council – Submission on Merino Solar Farm Scoping Report (excerpt on zoning/lifestyle blocks)
- FRNSW – Submission on Merino Solar Farm SEARs (2023)
- University of Stuttgart Study – “Leaching via Weak Spots in Photovoltaic Modules,” *Energies* journal (2021)
- Scientific Reports (Nature) – Barron-Gafford et al., study on Solar Farm Heat Island effect (2016)
- Case Studies:
 - NY State battery fire at solar farm (Jan 2023, Lake Ontario) – CTIF report/news article
 - Bouldercombe, QLD battery fire (Sept 2023) – Guardian news report
 - Victorian Big Battery fire (Jul 2021) – ABC News report
- Insurance Council of Australia – Briefing: “Farm Insurance and Energy Infrastructure” (May 2024)
- ABC News (12 June 2024) – “Farmer fears being uninsurable due to solar farm” (Stephen Pumpa, NSW)
- Insurance Business Magazine (2023) – “Farmers say plans for solar plant will make them uninsurable”
- Engie – Media release on withdrawal of Yass solar farm proposal (2023)
- Greyhound Welfare & Integrity Commission – Investigation report on cobalt contamination case (provided via NSW GBOTA)
- [Additional photographs of current landscape, wildlife on my property, and simulated views of solar farm]*