

To Whom It May Concern,

I write to formally lodge a strong and unequivocal objection to the proposed Merino Solar Factory development.

The proposal is ill-conceived, irresponsible, procedurally flawed, and profoundly damaging to established rural residential communities, public safety, environmental integrity, planning governance, and long-term regional sustainability.

This objection is based on lived experience, direct impact, documented failures in consultation, flawed assessment processes, and serious regulatory, safety, environmental and social risks.

The basis of my objection is set out below and expanded in the following pages.

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1. Social Licence Failure, Bullying and Misrepresentation

The developer has no social licence.

Throughout this process, EDPR and associated consultants have consistently provided conflicting information to neighbours and landowners. What developers say does not align with what landholders report. This pattern demonstrates coercive behaviour, misinformation, and pressure tactics designed to secure agreements rather than informed consent.

This is developer-led engagement, not community consultation.

Examples include:

- No authentic consultation process — communities are informed of decisions, not involved in them.
- Letters containing false claims of “previous correspondence” when none had occurred.
- Most affected neighbours receiving no correspondence at all until late September 2025
- Addendum report issued without consultation with affected residents before changes to layout, scale and proximity to homes.
- Visual Impact Assessment processes conducted without transparency, proper methodology or community trust.
- Neighbours refusing Visual assessments due to lack of trust in EDPR’s processes.

In my opinion, these assessments were developer-led, not independent.

EDPR past behaviour

EDPR’s history in other projects (including the failed Mudgee project which was overturned in court due to SEPP conflict, and controversy over two projects near Orange) demonstrates a pattern of regulatory overreach and community disregard.

I have expanded on the NSW T&I SEPP later in my objection.

ITP, now EDPR, used bullying and intimidation tactics when they first approached landowners to host the solar farm. We have personal and anecdotal evidence of this. They told prospective host landholders that ‘everyone around you has signed up and you’ll be surrounded so you don’t want to miss out’.

Neighbour Agreement

In June 2025, EDPR offered a select group of neighbours (10 or 11), a "Neighbour Agreement". They proposed that the funds offered come from the 'Community Benefit Scheme', subject to Council approval. Neighbours were offered varying amounts with no explanation of how they justified the different amounts offered. We were told that if we did not sign the 'Agreement', within their timeframe, they would redirect the funds to Goulburn Mulwaree Council. It should be noted EDPR requested we sign prior to the release of the EIS. EDPR told us via email: *"We have discussed our Community Benefit Sharing with the NSW Department of Planning, Housing & Infrastructure. They are supportive to sharing the*

benefits with those most impacted by the Project." EDPR also confirmed as at 7 August 2025 they had **not** shared with GMC any details of the offer. EDPR say: *'we believe our approach to neighbourhood benefit sharing is so far untested.'*

Asking our Solicitor to review the agreement, he advised the agreement contained:

- No guarantee of payment
- A 'No Objection clause'
- A non-disclosure agreement
- No right to seek compensation at a later date; essentially signing away our rights before the EIS was released.
- Time limited offer
- Sign-on payment, only when we signed on. NSW Guidelines state they must cover our legal costs regardless of whether we sign an agreement or not.

EDPR later withdrew the offer as we had not signed within their time frame: *'It is unfortunate that we were not able to progress these offers within our desired timeframe to meet planning submission milestones. Rest assured that the community will derive benefit from the project through a voluntary planning agreement with the Goulburn Mulwaree Council instead.'*

EDPR later changed their mind and came back to us to negotiate. Mrs Wendy Tuckerman MP had mentioned this in parliament and wrote to EDPR. Mrs Tuckerman also contacted the Minister for Planning who advised that the Planning Department had already raised concerns with the applicant in regard to this.

EDPR have tried to bully and coerce neighbours into signing an inappropriate agreement prior to the EIS being lodged. As of September 2025, EDPR lifted restrictions regarding timing and not lodging an objection to the project (EIS 2.5.1 page 31). This was clearly due to the fact that the Parliamentary Secretary for Planning & Public Spaces, Stephen Bali MP, responded to Mrs Tuckerman MP:

'Benefit sharing is intended to deliver transparent, equitable, and lasting benefits to communities hosting renewable energy projects. It is not designed to restrict residents' statutory rights, limit their ability to speak openly, or remove their ability to participate in the planning system. While benefit sharing arrangements may be outlined in an Environmental Impact Statement, they are not required to be finalised before exhibition.'

Additional Area Close to our Home – R30 on NGH/EDPR Mapping

In 2023, EDPR released their Scoping Report and in that report, the closest panels to our home were approximately 550m. In November 2024 we received a generic letter from EDPR, (the first contact since ITP in late 2022) with no reference to new areas added to the project, other than an attached map with a different outline to what we had seen previously. It was left to us to discover that the project had expanded. A google search showed the major host landowner had purchased the 36.4ha adjoining our southern boundary in August 2024. Without any consultation whatsoever, the panels are suddenly 150m from our home, and 130m from our cottage. In fact, EDPR did not discuss this directly with us until we brought it up with them. After discovering there was an Addendum Scoping Report done in January 2025, we found that EDPR had not advised the NSW DPIE of the new proximity to our homes, which we are to understand are the closest homes in the Northern Project area. When we queried EDPR on this the response was: *'This was done so that additional areas could be considered for panels and access to the site. Our assessment team are working on the detailed assessment of impacts and our aim is to ensure that no receivers experience*

unacceptable impacts of any type.’ We also asked why the extra acres of panels could not be located in the clear areas around the Major host landholder’s residence? EDPR chose not to respond to this question.

With no authentic consultation, EDPR have placed panels 130m from our closest home, and they still insist our impact is low. We will see panels from every room in our home. They still have not acknowledged the second home in their mapping despite us informing them in March 2025. EDPR do not engage in meaningful consultation, they have never been transparent, and they show absolutely no regard for affected neighbours. EDPR have no social licence whatsoever.

Belittling

EIS page 83, Table 5-1 Project stakeholder breakdown and engagement approach: EDPR have listed the two groups, ‘Stop Gundry Solar Farm’, and ‘Stop Merino Solar Farm’ as ‘*Groups of renewable objectors*’. This comment is insulting and misleading. Our Groups were formed to object to inappropriate projects in the wrong locations. We have stated time and time again, that we are not anti-renewable and that most of us have our own solar panels. Yet another example of bullying and intimidation.

Property Values

EIS Page 192 Table 6-14 Summary of LUCRA says:

*Landholders (non-involved) concerned with the perception that **market value of their land will be adversely impacted** due to the construction and operation of the Project.*

Along with the communication sent late September 2025, that says ‘*there is limited direct evidence about their (solar farms) impact on Property values. However, research by the Clean Energy Council found the opposite trend in some regions.*’ This is patronising and wrong. There have been neighbours that have had their property on the market for over 3 years, unable to sell at proper market value due directly due to the proposed solar developments. Others who have had to sell for family reasons have sold at a significant loss. We have been told of property devaluations of up to 30%. This is not a **perception** for us, this is real life. Most residents have invested their life savings into their properties. Many plan to use it as part of their retirement plan by subdividing to help fund their retirement. This is yet another example of EDPR not listening to the residents’ concerns and ploughing on regardless.

2. Communication Failures and Procedural Disrespect

Most residents received **no contact from EDPR until late September 2025**.

ITP had resident contact details since December 2022 and failed to engage.

Despite multiple contact points:

- Emails took over a month to receive responses, often with lengthy wording and minimal substance.
- Questions were not directly answered.
- Requests for valuations were refused.
- Compensation was explicitly rejected.

Generic letters addressed to “The Resident” after months of correspondence (initiated by us) are insulting and demonstrate institutional disregard for residents as individuals, families, and stakeholders.

Sending an “update” email at 4:01pm on a Friday before a long weekend, immediately prior to EIS lodgement, reflects procedural manipulation, not good faith engagement.

Lack of authentic consultation

Most of the neighbours received no correspondence from EDPR until late September 2025, just before the EIS was due to be lodged. For some neighbours, the NSW Department of Planning Housing & Infrastructure letter dated 24 December 2025 was the first communication they received about the project. They only knew about the project by word of mouth from neighbours. These residents were unaware of the EDPR Survey, unaware of the Community Information Session held at the Goulbur Solders Club on 18th February 2025, and largely unaware of the location and size of the proposal. In an email to EDPR in May 2025, I told EDPR of neighbours that have received no correspondence and their response, over a month later on 23 June 25, was *‘we can confirm that there are 194 non-associated receivers (not including the host landowners) within a 4km radius, and letters were sent out to all these receivers.’* This is simply untrue; the majority of residents received no communication until late September 2025. It should be a mandatory requirement of these proposals that mail be sent via Registered Post as proof of their claims that letters were sent to all receivers.

Community Consultation

A Group of representatives from the Merino Solar Farm Objection Group, and the Stop the Gundry Solar Factory have manned a stall at the monthly Rotary Markets almost every month for over 3 years. This past year we have focused on the Merino Solar Farm as the EIS has closed for the Gundry Solar Factory. The overwhelming majority of people who came to talk to us had no idea that there were 2 Solar Farms proposed. If EDPR had done the Community Consultation as thoroughly as they suggest, why then are most of the Goulburn Community unaware of the 2 proposals? I would presume that most of the ‘consultation with the community’ that EDPR have done was only with a local Renewable Group that now stand to receive \$20,000-00 pa for the life of the project (*EIS page 31 & 32*). There is no issue with

this group receiving funds, however, they seem to be the only ‘community’ that have had consultation.

False claims of ‘previous correspondence’

In November 2024, we received a generic letter that began with ‘*As you may recall from our correspondence in 2022 and 2023...*’ The next letter received 4 February 2025 began with ‘*As you may recall from our correspondence in 2022, 2023 and 2024...*’ In 2022 we had a ‘Sorry I missed you’ card in our mailbox and a glossy but extremely vague brochure in our mailbox. In 2023 we received no correspondence at all, and it wasn’t until November 2024 that we received our first letter from EDPR. This is evidenced by Appendix E – Community and Stakeholder Engagement, with their first letter being dated November 2024. EDPR cannot counter this by saying ‘*That was ITP, we’re EDPR*’ as ITP staff that were present at the first encounter where they took our email addresses, still work for EDPR. To refer to ‘previous correspondence’ is misleading – just because EDPR say this, it doesn’t make it true.

Additional Area Close to our Home

As mentioned in the previous section, an additional block was purchased and the new section was added to the project area which reduced the panels proximity from approximately 550m to 150m from our home, and 130m from our cottage. **At no time were** we consulted about this additional area. (The very first reference I can find in any document to the new proximity to our home is on page 220 of the EIS.) We received a generic letter in November 2024 with no explicit reference to this new section, in fact no reference to additional area at all. The letter contained a map with a different outline to what we had seen before, and it was left to us to discover for ourselves that the project area was so much closer than it was previously. The map on page 133 of the EIS says, ‘*Original development footprint at July 2023*’. The map clearly shows the new additional area behind our homes, how long had this been part of the proposal before we found out about it? This is a severe lack of transparency and respect to neighbours. For Simon Franklin of EDPR to say on ABC Canberra Radio ‘*EDPR have regularly met with neighbours, listened to their concerns and redesigned as much as possible to address concerns*’ 15 January 2025 (see Section 5 for more information), was totally and utterly insincere. Rather than move panels away from our homes, they have done the exact opposite and brought them so much closer – with no communication.

Missing Homes

As touched on in Section 1, I advised EDPR by email in March 2025 that there two homes on our property, not one as they have indicated on their maps. I also advised EDPR that there were at least 4 other homes, that I was aware of, that were not indicated either. EDPR’s response was that they ‘*are currently working on identifying this.*’ I note that these homes are still missing from their EIS maps. It seems that EDPR do not communicate with their own departments any better than with the community.

Ongoing Airport Consultation

Page 186 of the EIS says, '*Consultation with the airport owner has been ongoing since the Scoping Stage.*' I have spoken with the airport owner, and he told me he spoke with EDPR 12 to 18 months ago. Describing the process as '**ongoing** since the Scoping Stage' does not accurately reflect the situation.

3. BESS Risk Non-Disclosure and Informed Consent Failure

There is no evidence that landowners or neighbours were provided with **independent, unbiased risk assessments** of Battery Energy Storage Systems (BESS), including:

- Fire risk
- Thermal runaway
- Toxic fume release
- Shrapnel blast risk
- Chemical contamination
- Oil spill risk
- Firefighter exclusion zones

There is no evidence of informed consent. This constitutes a serious ethical and procedural failure.

4. Rate Classification and Industrial Reality

These facilities function as industrial infrastructure yet continue to be classified and rated as primary production. This misclassification shifts cost burdens to communities and ratepayers while granting developer's financial advantage.

5. Sense of Place and Psychological Harm

Sense of place is defined as the emotional bonds and attachments people develop with specific locations. These bonds form identity, wellbeing, stability, and belonging.

We did not build our home to look out over dead glass and steel.
We did not choose the countryside to listen to inverters humming all day.
We did not sacrifice, save, and build, to live beside industrial infrastructure.

Our home is our sanctuary — through COVID, through cancer treatment, through family hardship. It is our forever home, built slowly over years of saving, sacrifice, and work.

No one chooses a home because they love the view of solar factories.

We built our home here almost 30 years ago. We were fortunate enough to choose a site that we loved, on the property that has been in my husband's family for around 80 years. His Grandfather bought the property as a retirement dream. His father ran sheep as well as having off-farm employment and his mother ran a successful business in her own right. My husband and his sisters were born here and grew up here. Our own children are the second generation to grow up here, and the fourth to live here. Our grandchild loves to come and help on the farm. Our son would someday like to build his own home here and give his future children the same rural upbringing he and his siblings had. Our children all enjoy coming home to visit and appreciate even more their rural upbringing now that they live in cities. They especially treasure the time they spent with their Grandparents helping on the farm. When the original family home became too much work for my mother-in-law, we built a cottage just 20m from our own home so she could live independently but close by for help when needed. She had lived on the property since the 1950's and did not want to move into town.

Our property is a Lifestyle not a Livelihood We run a small herd of Angus cattle. If our block was big enough, my husband would not have to have employment in town. We can't make a living from our lifestyle farm, it is a hobby that we have chosen because we love breeding cattle, and love the space, freedom and privacy of rural living. All our neighbours are either employed or retired. None of us make a living from our rural residential blocks.

This is not just our home; it is our life. It is our history and hopefully our future. We feel a deep connection to this land.

Mental Health, Stress & Anxiety

The stress and anxiety this has placed on us, at no fault of our own, is overwhelming. It is all I think about. I dream about it and wake in the middle of the night and struggle to get back to sleep. Every conversation I have seems to come back to Solar. It is relentless. My Oncologists have told me not to get stressed – impossible with this hanging over our heads.

We have asked EDPR what they are doing about the **Mental Health** of the affected neighbours. The first two times I asked about this, the vague unhelpful response was “*Yes, other people have mentioned this*”. The next time we asked, the response was: “*EDPR have been in contact with two Mental Health providers, and they will be made available to neighbours at the cost of EDPR*” (June 2025). I couldn't help but feel this was for the benefit

of our solicitor who was present at this meeting. By this stage I had sought my own Mental Health Provider. Our trust of EDPR at this stage was negligible and therefore I had no faith or trust in any provider offered by EDPR. This offer never eventuated in any written form and to the best of my knowledge was not communicated to any other affected residents. In the 'Update Brochure' received late September 2025, the first correspondence most people have ever received from EDPR, they offered the very generic 'Ring Lifeline or Beyond Blue'. This is patronising and insincere. The lack of empathy from EDPR staff is astounding.

The interview done by Simon Franklin, Australian Market Director EDPR, on ABC Canberra 15 January 2026, was insincere and misleading. He stated:

- EPDR spent 100's of hours talking to neighbours and community
- Some neighbours may have a view of panels from parts of their land
- EDPR are working with neighbours to try and minimise impacts on their view
- EDPR have been working closely with the Goulburn Mulwaree Council
- EDPR have done whatever they can to make the community aware of the project
- EDPR have regularly met with neighbours, listened to their concerns and redesigned as much as possible to address concerns
- A number of the Councillors are quite supportive of the project
- EDPR are committed to benefit the community while EDPR minimising any impacts on neighbours
- EDPR are trying to make people understand and show them there won't really be a major impact going forward

This is all disingenuous. This misinformation broadcast to a wide radio audience adds to our anxiety. We are immediately branded 'anti-renewable', 'climate deniers', 'NIMBY's'. Incidentally, Simon Franklin has never spoken to us and has never been to our property and seen the impacts for himself. How are we meant to have any trust in EDPR when they continually behave in this manner. For example, with no consultation whatsoever, the panels were moved from the original 550m to within 150m of our home. A Google search shows, the major host landowner purchased the 36ha block behind us in August 2024 and it was added to the 'project footprint'. EDPR have done nothing to 'address our concerns' and 'minimise our impacts'.

Unfair response Timeframe

EPDR have had over 2 years to produce their EIS. The expectation that we can read, digest, and respond to, 1790 pages of the EIS within 28 days, while attending to our normal daily responsibilities and routines at the same time, is unrealistic and unfair. This is yet another layer of anxiety and stress placed on us.

6. Visual Impact Manipulation and Misrepresentation

Claims of “low visual impact” are demonstrably false.

Panels will be 2.9 metres high, placed on undulating terrain, visible from every room in our home. Substation and BESS infrastructure (32 hectares) will be permanently lit and located off a lifestyle residential cul-de-sac type lane.

Visual assessments:

- Were only offered to approximately 10 neighbours
- Poorly taken up due to distrust
- Conducted under unsuitable conditions
- Do not comply with NSW DPHI Guidelines
- Omitted key public viewpoints
- Selected biased vantage points
- Misrepresented road geometry and visual context
- Failed to assess lighting impacts adequately (EIS p.146 lacks clarity)

Flawed Visual Assessment

In February 2025 we received the first letter directly addressed to us, not generic, advising that our property has been identified as requiring further detailed assessment. The FAQ says: ***Will photographs be taken from other locations on my property? Answer: No, the guidance for visual impact assessment prioritises view from dwellings on private property.*** This contradicts the SEARS, Landscape & Visual, that state: *a detailed assessment of the likely visual impacts of all components of the project on surrounding residences (including approved developments, lodged development applications and dwelling entitlements).* This was not communicated to us by EDPR or Iris Visual.

On 20 March 2025, Iris Visual attended to conduct visual impact photography on a cloudy day, contrary to visual assessment guidelines. Height referencing was inaccurate (bale of hay on the back of a ute used to represent 2.9m panel height), with no visible height reference markers upslope. An unidentified individual accompanied the consultant without disclosure of affiliation, which is inappropriate in any assessment process. Iris Visual also did not ask us about Primary and Secondary views from our home which we later discovered ourselves in the NSW DPHI *Large-scale Solar Energy Guideline Technical Supplement for Landscape Character and Visual Assessment*. As a result, pages 48 & 49 of Appendix F5 VIA incorrectly states that the view towards PV array 2 (150m away) is a *Secondary View*. **This is totally incorrect** as this is the view from our kitchen, dining and living room. When I sit at my table every morning for breakfast, at lunch time, at dinner time, and for every family celebration, I will see panels out my back window, and panels out my front window. There will be no escaping the view of black glass and steel.



View from our home of canola and wheat on host property.
Above red line is host property and will be PV array 2

Bale height representing Solar panel height of 2.9m

At no time have we been offered a Visual Impact Assessment from the second home on our property. The second home is 130m from the proposed panels. The second home still does not appear in the EIS maps or information, despite us informing EDPR by email 12 March 2025 that it has not been accounted for. We also advised EDPR at the same time of at least 4 other homes that have not been recorded. These homes still do not appear on the Maps in the EIS either.

Upon receiving the Visual Assessment, in the presence of our solicitor, EDPR advised that our 'Scenic Quality is Low' and our 'Impact Rating is Low'. We were understandably shocked by this assessment as the solar panels will **be visible from every room** in our home, with the closest panels 150m from our home. Scenic quality is subjective, of course EDPR will rate it as low because EDPR want this development to happen. EDPR also advised that if we declined to have our images published in their Visual Assessment document, it would be recorded that we 'refused to have assessment done'. Our Solicitor pointed out to EDPR that would be false/misleading information.

The images were not taken on a day with no minimal cloud cover and when the sun is high in the sky. The images we were provided with have overcast skies and have not had clear skies superimposed over them as stated on page 64 of the NSW DPHI *Large-scale Solar Energy Guideline Technical Supplement for Landscape Character and Visual Assessment*.

Upon closer inspection of the images provided, when zoomed in, the panels are approximately 100m from the boundary and not 10m as shown in in the EIS maps. This is a misrepresentation.

The Public Viewpoints are also inadequate. There have been no photos taken from Braidwood Road beside the Southern area of the project. There have been no photos taken from Corrinyah Road. There are no photos taken anywhere along Windellama Road from the

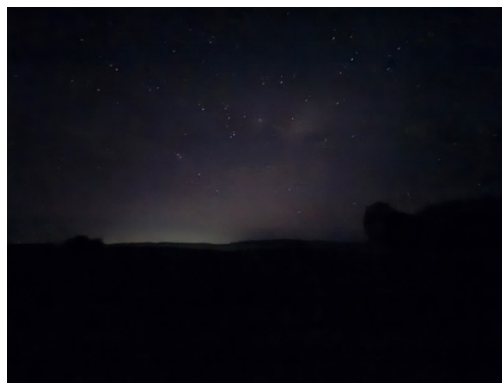
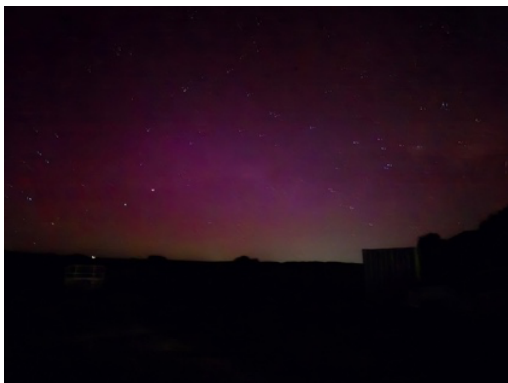
Hume highway overpass as you drive towards the solar panels. There are numerous places in town that while they are over 4km from the project, they still provide scenic vistas towards the project. The Rocky Hill War Memorial and Museum is a key tourist location in Goulburn with panoramic views North, South, East and West of Goulburn and therefore will have a view of this industrial monstrosity.

The image of viewpoint 2 on Windellama Road is deceiving as it appears to be on a bend in the road whilst it is in reality a straight stretch of road. (Appendix F5 Landscape Character and Visual Impact Assessment)

There are no photos of Visual Impact Assessment at the Airport as requested in the SEARS.

Security Camera's and Night Lighting

There is no clear information in the EIS regarding the location of the night lighting and security cameras (*EIS pages xxii & 5 & 36 & 215*). Is it the BESS & Substation, or the entire project? Will the entire perimeter of the Solar Farm be subject to night lighting? If so, how is this in keeping with rural living? We enjoy our night sky, the view of the Milky Way is breathtaking on a clear night and we often sit outside to enjoy it. We have been very fortunate to observe the stunning Aurora Australis in our dark southern sky.



Aurora Australis in our Southern Sky

Will the entire perimeter be subject to security cameras? If so, isn't this a breach of privacy as the lights and cameras will be mounted on each directional change which would inevitably cover neighbours' land as well? *EIS Page 47* says:

'The Applicant would procure a closed-circuit television (CCTV) system that would deliver both high quality video surveillance as well as early detection of unauthorized entry to the solar farm-associated compound area. Cameras would be installed alongside the perimeter monitoring the area between the fence line and the solar panels. If movement is detected, a relay would be activated, communicating to the 24-hour offsite security control room.'

Does this mean that every animal movement will trigger a security alert?

7. Fire Risk and Emergency Management Failure

These proposals create catastrophic fire risk.

The presence of:

- Solar arrays
- BESS infrastructure
- boundary fencing
- substations
- electrical systems

creates a landscape that is **undefendable in bushfire conditions**.

We have been told that the Rural Fire Service will not fight fires on a Solar Factory because of the added dangers. A fire that has a huge open area of grassland inaccessible because of Solar Panels is going to be unstoppable and will become massive in a very short time, particularly with the presence of African Love Grass. The fire plan of EDPR is to have a 20,000L water tank, and to offer the local RFS orientation and the facilitation of training in Li-ion battery fires is NOT a fire plan, it does not constitute a fire response strategy. This transfers fire risk from developers to residents and volunteers. The local RFS volunteers are not an asset owned by EDPR or the Solar Factory. The solar factory should have their own firefighting service and not expect local neighbours and volunteers to do the job for them and put their lives at risk entering a fire and electrocution trap. The solar panels and boundary fencing mean that people and animals would easily become trapped on one side or the other. The solar panels would be 150m from our home, and 130m from our cottage. There is no way a rapidly advancing huge bushfire could be stopped within 130m. Add to this the toxic fumes from Solar panels and the BESS, and who knows what this will do to local residents and the wider Goulburn Community.

The Moss Landing BESS fire in California demonstrates real-world consequences of lithium battery infrastructure failure.

Bush Fire Emergency Management and Evacuation Plan

Appendix F10 – Bushfire Assessment Report, page 23, says a BFEMEP should be developed prior to construction. Therefore, there is currently no Bushfire Management Plan. The entirety of the project is mapped as Category 3, which has been introduced to reflect the significant but often overlooked fire risk posed by grassland. Category 3 areas support faster moving bushfires in high winds than other categories. EDPR imply that Category 3 fires are lower risk than category 1, however, if you have ever lived through a bushfire, as I have, you know just how fast and terrifying a ‘grassland fire’ really is. In March 1985 a fire started on Braidwood Road at Tirranna and burnt almost to the coast. This is a memory that haunts you forever, and placing a 760ha solar farm on our doorstep, with as yet no Bushfire plan is an extremely frightening prospect. Clearly EDPR have thought about protecting the Solar Farm assets (BESS, Substation etc), but there is no plan to protect our assets. This has a huge impact on our anxiety and stress levels.

Insurance

We have been told that we will not be able to get Public Liability Insurance in Australia to cover us if a fire were to start on our property and enter the Solar Farm. Offshore Insurance costs are unaffordable. We also will face an increase in all our farm insurance premiums as there are more and more solar farm fire incidents. Insurers will naturally want to cover their costs. Insurance is already extremely expensive; how can we afford inevitable premium price rises? The assurance from EDPR that the Clean Energy Council links premium increases to inflation and not proximity of Renewable Projects is hardly reassuring.

8. Contamination and Cumulative Risk

Floodwaters from both Merino and Gunday developments converge on our property and flow into the Sydney Water catchment.

This creates **cumulative contamination risk**, not isolated impact.

The EIS itself acknowledges further work is required to demonstrate a Neutral or Beneficial Effect (NORBE) — a threshold requirement — which has not been met.

Damaged panels are not repairable — they must be removed and disposed of. Our own solar panels were totally destroyed in a hailstorm, the day after the EIS was released, and were disconnected from our drinking water system due to contamination risk.

Replacing 700+ hectares of damaged panels is neither financially nor environmentally viable.

Electrical fire risk, chemical leaching, runoff contamination, and hazardous material dispersion remain unaddressed at a cumulative scale.

Please see attached articles by Emeritus Professor Ivan Kennedy & also Stuttgart University in regard to leaching and contamination.

9. Water Risk

Creeks flowing through both Merino and Gundry proposed developments converge on our property. Flooding has increased in this area since the bypass construction. Minor and major flooding events are regular.

This creates compounded contamination, sedimentation, chemical transport and water quality risk for downstream users and Sydney Water.

By their own admission, EDPR acknowledge that further work is required to demonstrate a Neutral or Beneficial Effect (NorBE) on water quality. Under NSW Policy, this is a threshold requirement.

The Project area is located within the Sydney Drinking Water Catchment; further hydrological modelling is progressing in tandem with Project design to inform the specific requirements to achieve a neutral or beneficial impact on water quality. (EIS XIX)



Airport Lane Closed due to flooding. Cumulative effect from both Merino & Gundry Solar Farm catchment areas



Flood waters from proposed Merino Solar Farm and Gundry Solar Farm converging on our property near Goulburn Airport

10. Agriculture Impacts

Impacts include:

- biosecurity risk
- contamination
- heat island effects
- loss of productive land
- land sterilisation
- long-term soil degradation
- land use conflict

This is not compatible land use.

EDPR were informed of neighbouring cropping, yet they have not included the necessary 30m setback along the entirety of our farming area.

EDPR are ‘Sheepwashing’ with their glossy pictures of a few sheep grazing near solar panels on a lovely sunny day. EIS Table 6-15, page 198 LC 2 & LC 4 says ‘*Agrivoltaics if adopted*’. Therefore, there is no confirmation that sheep grazing will continue on the property as implied by EDPR.



Foreground – our property. To the left of and above the red line, host property. The land is undulating and photo clearly shows run-off from host property from the south and the west through our property. This runoff meets Gundry Creek near the Goulburn Airport and flows into the Sydney Drinking Water catchment.

11. Noise Impacts

Noise modelling is not credible. Construction and operational noise constitutes chronic environmental stress, not amenity impact.

How is it possible that ramming I beam 1.5m to 3m into the ground (page 50 EIS), 150m away from our home will not exceed acceptable noise limits? What will this constant daily hammering do to our mental health? EIS, page 224 says '*Noise emissions were predicted by modelling the noise sources*' and '*All receivers are **predicted** to be below the highly noise affected level of 75dB(A)*'. This is real life for my family and myself, not modelling, and given the amount of trust we have in EDPR, we find it very hard to believe these 'findings'.

Modelling has also been done and 'predicted' for operational noise (EIS page 228 & 229). Given that EDPR has not supplied any mapping of where the 282 Inverters & Transformers will be placed around the project, and that transformers emit a constant hum, how can we have faith that the Noise levels comply (EIS table 6-29)? As a rural area, we are accustomed to ambient animal noises, occasional farm machinery, rural traffic noise, intermittent aircraft noise, and infrequent track noise from One Raceway (formerly Wakefield Park), these were all known factors when we built here. We did not build here to listen to industrial humming.

12. NSW Transport & Infrastructure SEPP contradiction

State Environmental Planning Policy (Transport and Infrastructure) 2021

2.42 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).*

From the Large-Scale Solar Energy Guideline August 2022 – page 14:

2.2.2 Regional cities

The NSW Government's regional plans identify cities that are strategically important to the ongoing growth and development of regional NSW.

We expect significant growth in regional cities over the next few decades. Investment in these cities is important. They represent major centres for housing, employment, commerce, tourism, education, health and other regional infrastructure and services.

To approve large-scale solar energy development near certain regional cities, the consent authority must be satisfied that any urban land conflicts, impacts on urban growth potential and important scenic values are not significant. This applies to State significant solar energy generation projects located on mapped land for the regional cities of Albury, Armidale, Bathurst, Dubbo, Goulburn, Griffith, Goulburn, Mudgee, Orange, Tamworth and Wagga Wagga.

While these provisions do not prohibit solar development in these areas, a consent authority must not grant development consent unless it is satisfied that the development:

- is located to avoid significant conflict with existing or approved residential or commercial uses of land surrounding the development*
- is unlikely to have a significant adverse impact on the regional city's capacity for growth, scenic quality or landscape character.*

The consent authority must factor in any proposed measures to avoid or mitigate those conflicts and adverse impacts.

The proposed Merino Solar Farm is in direct contradiction with the NSW Transport & Infrastructure SEPP, and the Large-Scale Solar Energy Guideline. EDPR **have not** justified the suitability of the site in respect to land use conflicts with existing and future surrounding land uses. The proposed site is in the middle of a predominately rural residential area, with over 194 family homes within 4 km, and over 300 family homes within the cumulative 4km radius of the proposed Merino and Gundry Solar farm sites. This is totally unacceptable.

Residents have built or bought their homes here in good faith that it is a rural area, not an industrial monolith.

13. EIS and SEARS Integrity Failures

The EIS is procedurally and substantively deficient, including:

- flawed engagement processes
- inaccurate and incomplete mapping
- incomplete receiver identification
- SEARS non-compliance
- inadequate cumulative impact assessment
- inadequate water modelling
- inadequate fire risk modelling
- insufficient contamination risk analysis
- missing high-quality mapping files
- lack of lighting detail
- failure to assess land use conflict
- failure to address Bush Fire Emergency Management
- failure to assess long-term remediation
- failure to demonstrate NORBE
- flawed visual modelling methodology
- inadequate airport stakeholder engagement

These are not minor omissions — they are **structural assessment failures**.

The EIS contains many errors, following are some that I have noted:

- page 20 -Distance of project to Braidwood 50km, and Tarago 70km
- page 24 – Homes still not recorded on map
- pages 41 & 42 – Transformers with a maximum height of 3.5m – this does not account for the bushings etc on top of the transformer
- pages 57 & 268 – miss-spelling of Lansdowne Bridge
- page 66 – Reference to Appendix E-8 poster outside a café is of no relevance to Sydney Drinking Water
- page 72 – Cumulative view of Gundry & Merino Solar farms unlikely from any dwellings - untrue
- page 205 – It has mostly been cleared for agricultural use (See Jennifer Lamb Goulburn Historical Society reports from First Explorers)
- page 234 – Gundry Lane sign posted speed limit of 100km/h
- page 243 – Cumulative Impact of Traffic with Gundry Solar Farm (Gundry SF EIS states a different traffic movement figure)
- page 327 – Cumulative impacts Map SSD, Crookwell 3 is omitted

Appendix Errors:

- Appendix F5 VIA:
 - Pages 21, 22, 27 - references to ‘Cleared Land’
 - Page 36 – Results of assessments shown in table 5-1
 - Page 49 Figure 6.6 – Secondary View from the grounds of Dwelling R030 – this is not a secondary view

- Appendix D of Appendix F5 VIA – Viewpoint 2 Windellama Road – not a curved road
- Appendix F7 Traffic Impact Assessment:
 - Page 18 – Windellama Road Survey was undertaken at 878-782 Currawang Road
 - Page 17 – Table 5 Unsealed basic right turn treatment provided
 - Page 36 – Gundry Solar Farm morning peak traffic 63 light, 38 heavy. – This differs to the Gundry Solar EIS, page 26, 450 movements in peak construction

SEARS Noncompliance

General Requirements

- A high-quality site plan at an adequate scale showing all infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process)

I am unable to find a high-quality site plan that shows solar panel layout, and positioning of transformers and inverters around the solar array, or security lighting and cameras. As there are still homes missing from the EDPR maps, despite EDPR being informed by myself and others, the lack of a high-quality site plan is not surprising.

Land and Visual

- A detailed assessment of the likely impacts (including night lighting) of all components of the project on surrounding residences (including approved developments, lodged development applications and ***dwelling entitlements***), Goulburn Airport, and key locations, scenic or significant vistas and road corridors in the public domain; and
- Details of measures to mitigate and/or manage potential impacts (including a draft landscaping plan for on-site perimeter planting, ***with evidence it has been developed in consultation with affected landowners***)

EDPR only approached a select few neighbours for visual assessments, and we were specifically told in the letter dated 6 Feb 25, *FAQ: Question-Will photographs be taken from other locations on my property? Answer – No, the guidance for visual impact assessment prioritises views from dwellings on a private property.* At no time did Iris Visual or EDPR advise us that a detailed assessment should be done on a dwelling entitlement.

I can find no evidence of Visual Assessment photos taken at the Goulburn Airport. I can find no evidence of Visual Assessment Photos taken from key locations, scenic or significant vistas, for example Rocky Hill War Memorial.

Details of measures to mitigate... (with evidence it has been developed in consultation with affected landowners). EDPR provided no consultation regarding mitigation, even though panels are 150m from a primary view of our home. They merely rated the impact as low, so they don't have to mitigate. There is also a primary view from our cottage that EDPR have failed to acknowledge in their mapping.

The SEARS of 14 July 2023 also requires an assessment of potential impacts on the Sydney drinking water catchment including WCM, MUSIC, and NorBE. By their own admission, EDPR have not completed these assessments, it '*is progressing in tandem with Project design.*' (EIS pg. 268). EDPR have had 2 years, plus an extension to complete the work required. Why hasn't this been completed?

Conclusion

This proposal represents:

- Social licence collapse
- Mental Health issues
- Procedural failure
- Regulatory risk
- Community harm
- Public safety threat
- Environmental risk transfer
- Long-term taxpayer liability
- Planning integrity erosion
- Industrialisation of rural communities
- Misinformation

The EIS does not demonstrate community confidence and therefore cannot proceed ahead of projects within designated REZ's. This proposal does not conform with the NSW Government's primary fulfillment method of new renewable generation and storage projects.

This proposal is in direct contradiction with the Transport & Infrastructure SEPP 2.42. (2) (a) as it is **not** located to avoid significant conflict with existing or approved residential or commercial uses of the land surrounding the development, and (b) it **is likely to** have a significant adverse impact on the regional city's – (i) capacity for growth, or (ii) scenic quality and landscape character.

We did not choose this. We did nothing wrong. We built our lives here in good faith.

We are now living in limbo under an imposed industrial future we did not consent to, with no protection, no genuine consultation, and no accountability.

For all these reasons, I formally and unequivocally object to the approval of the Merino Solar Factory development and request that the proposal be refused.

This submission is made in good faith, based on lived experience, documented evidence, procedural failures, and serious long-term risks to safety, environment, community wellbeing, and land sustainability.

Yours sincerely,
Michelle Coles
Windellama Road
Gundry NSW

Attached:

- Emeritus Professor Ivan Kennedy University of Sydney Agricultural and Environmental Chemistry
- Leaching Via Weak Spots in Photovoltaic Modules – University of Stuttgart, Germany