

## SUPPLEMENTARY / INTEGRATED PLANNING SUBMISSION

Proposed Gundry Solar Farm – SSD Proposal

Prepared under SEPP (Transport and Infrastructure) 2021 – Clause 2.42

In accordance with NSW Large-Scale Solar Energy Guideline (March 2023)

As a resident of Gundry Lane, with family ties to the Gundry region for over 100 years, I strongly object to this project.

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### 1. Purpose of Submission

This submission formally objects to the proposed Gundry Solar Farm. It addresses the project's cumulative impacts on:

- Existing rural-residential and agricultural land uses
- Farming viability and livelihoods
- Community wellbeing and rural men's mental health
- Traffic safety for rural roads and school students
- Construction risks and overseas-manufactured component hazards

The objection is made under SEPP Clause 2.42 regarding State Significant Solar Developments near regional cities, and guided by the NSW Large-Scale Solar Energy Guideline.

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### 2. Legislative and Guideline Context

- SEPP (Transport and Infrastructure) 2021 – Clause 2.42 requires consent authorities to ensure that solar farm developments:
  - Avoid significant conflict with existing residential or commercial land use
  - Consider environmental, social, and human health impacts
  - Ensure compatibility with rural and regional city growth and landscape character
- NSW Large-Scale Solar Energy Guideline (March 2023) requires:
  - Protection of agricultural land, water resources, and soil quality
  - Minimisation of noise, visual, and light impacts

- Community engagement and social licence to operate
- Assessment of operational, construction, and decommissioning risks

The Gundry Solar Farm proposal fails to satisfy these obligations.

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### 3. Incompatibility with Residential and Rural Land Uses

- The project conflicts with surrounding residential and rural-residential properties, including my family's property on Gundry Lane.
  - The scale and industrial character of the proposal is incompatible with the established rural lifestyle that residents have invested in.
  - Security fencing, solar panels (~3m height), substations, and battery storage facilities create visual intrusion and light pollution.
  - The proposal fails to avoid or mitigate cumulative lifestyle impacts, contrary to SEPP Clause 2.42(1)(a) regarding land-use conflict.
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### 4. Impact on Scenic Quality and Landscape Character

- The project footprint (~1850 acres) significantly alters the pastoral landscape and scenic values of the Goulburn region.
  - Individual landowners and the broader community will experience direct and indirect views of industrial infrastructure.
  - Battery storage (BESS) and substations will introduce permanent lighting into areas known for clear night skies, affecting amenity and quality of life.
  - These impacts are not offset by purported economic benefits, which are limited and accrue minimally to the wider community.
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### 5. Agricultural and Farming Viability Impacts

*(SEPP Clause 2.42(1); Solar Guideline – Agricultural Land and Soil Protection)*

- Our property is actively farmed, producing hundreds of round bales of hay annually and grazing ~30 head of cattle.
- The EIS fails to adequately address contamination risk from panel degradation, hail, fire, or heavy metals leaching.

- Livestock accreditation, soil fertility, and waterway quality could be compromised, directly threatening farm income and long-term land value.
  - Farming is not just an economic activity; it is a rural family's livelihood, heritage, and identity.
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## 6. Construction Risks

*(Solar Guideline – Construction and Operational Impacts)*

Construction introduces multiple risks:

- Heavy vehicle movements, dust, vibration, and noise disrupt farming operations and livestock welfare.
- Use of rural laneways for OHOM vehicles presents safety hazards (see Section 16).
- Extended construction periods create prolonged disruption, stress, and financial risk for adjacent landholders.

The EIS does not demonstrate that construction impacts can be adequately mitigated.

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## 7. Overseas-Manufactured Product Risks

*(Solar Guideline – Lifecycle Risk Management)*

- Solar panels, inverters, and batteries are overseas-produced, with variable quality control and limited traceability.
- Degradation, cracking, or failure increases the risk of:
  - Toxic leaching into soil and waterways
  - Fire hazards, particularly with lithium-ion BESS
  - Early component replacement and supply chain disruption

These long-term uncertainties are inconsistent with SEPP Clause 2.42 obligations to safeguard human health and agricultural land.

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## 8. Noise, Light, and Heat Impacts

*(SEPP Clause 2.42; Solar Guideline – Amenity)*

- Operational noise from inverters, transformers, and cooling fans creates continuous low-frequency hum, which is highly intrusive in rural quiet zones.
  - Noise is linked to sleep disturbance, stress, anxiety, and depression, particularly for rural men and farming families.
  - Localized heat retention from panel arrays may increase night-time ambient temperatures by 3–4°C, contributing to heat stress and reduced sleep quality.
  - Light pollution from battery storage and substations disrupts the rural night environment and resident wellbeing.
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## 9. Mental Health Impacts for Rural Men

*(SEPP Clause 2.42 – Human Health and Community Wellbeing)*

- Rural men are at higher risk of mental health issues and suicide due to isolation, financial stress, and stigma.
  - Threats to farming income, land use, and lifestyle exacerbate anxiety, chronic stress, and depression.
  - The proposal’s social division and lack of consultation amplify psychosocial strain.
  - Ongoing uncertainty over construction, contamination, and operational impacts has direct implications for rural men’s wellbeing.
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## 10. Traffic and Road Safety Risks

*(SEPP Clause 2.42; Solar Guideline – Traffic Safety and Access)*

- Rural laneways and Windellama/Braidwood Roads are not designed for OHOM vehicles transporting transformers, substations, or battery units.
- Safety hazards include:
  - Narrow lanes, limited sight distances, tight curves, and tree-lined roads
  - School bus turning and student access points
  - Interaction with farm vehicles and livestock transport
- OHOM vehicles pose direct risk to children, school buses, and residents.
- Safer alternative access exists but is not utilised, demonstrating poor planning and avoidable risk.

- The EIS fails to provide swept-path analysis, vehicle dimensions, or emergency contingencies.
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## 11. Cumulative Community and Social Impacts

- The combination of visual intrusion, noise, traffic risk, lifestyle disruption, farming threat, and social division creates a highly adverse cumulative impact.
  - Children have already experienced restrictions on discussing the project at school, creating anxiety and distress.
  - Community division has eroded trust, and the proponent has failed to obtain a social licence.
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## 12. Conclusion

The Gundry Solar Farm proposal fails to comply with SEPP Clause 2.42 and NSW Large-Scale Solar Energy Guideline requirements due to:

1. Threats to agricultural viability and livelihoods, including soil, water, and livestock risks.
2. Elevated mental health risk for rural men due to financial, lifestyle, and psychosocial stress.
3. Construction impacts that disrupt farming operations, traffic, and rural amenity.
4. Use of overseas-manufactured components, creating long-term uncertainty, fire, and contamination risk.
5. Traffic hazards from OHOM vehicles on narrow rural roads, including school bus and student safety concerns.
6. Cumulative adverse impacts on visual amenity, noise, heat, light, and community cohesion.

The precautionary principle requires that risks to human health, agricultural land, and community wellbeing be avoided or demonstrably mitigated. The Gundry Solar Farm does not meet this standard.

Consent should be refused.