

SAVE Gundry Plains

Objection to the EDP proposal

Merino Solar Photovoltaic Energy Generation Facility

and Large Batteries

SSD 59155459

SAVE Gundry Plains is a community group made up of impacted residents of the localities of Gundry, Tirrannaville and Quialigo and supporters who are **OPPOSED** to the Merino Solar Photovoltaic Energy Generation Facility and large Battery (BESS) proposed by EDP.

EDP site selection

The Gundry Plains is just south of the city of Goulburn in the city's hinterland where subdivisions of rural lifestyle blocks have been approved and most of the blocks have been inhabited.

The NSW Premier and the Minister for Regional NSW launched the government's initiative of **"Make the move"** which is to encourage people from the Sydney area to **move to the country because of the lifestyle benefits**. The site of the launch of *Make the move* was accessed off Windellama Road, was on a rural lifestyle property and the view to the south would be destroyed by the industrial development proposed by EDP.

The mental health of many residents of Gundry Plains has suffered because of the proposal by EDP. The stress of not knowing what the future holds, the actual devaluation of rural lifestyle properties, the impossibility of selling a rural lifestyle block and being forced to put life choices on hold is totally unacceptable.

The residents of Gundry Plains had no option or choice in the EDP selection of the site for their proposal.

EDP does not meet the mandatory requirements of the State Environmental Planning Policy (Infrastructure) 2007 (SEPP). They have failed to consult and get agreement from neighbours and the local community regarding the site selection. EDP has not addressed the significant conflict with existing uses - cl.2.42(a) of the SEPP.

The EDP industrial development proposal is mainly located on SEPP Subject Land – Pelican Station, the largest individual contributor of land for development, is all on SEPP Subject Land.

Additionally, the proposed development centred on Painters Lane, while not covered by the SEPP Map of Goulburn, is an area of rural lifestyle properties, and therefore the proposed placement of an industrial facility beside rural lifestyle properties is unconscionable.

The EDP Merino EIS under heading **1.4 Site selection background** (pages 5 & 6) does not address the avoidance of significant conflict with existing uses (especially rural lifestyle) and seeks to deceive planners under dot point commencing with “*Proximity to Goulburn*” – page 6 – and fails to address the SEPP Regional Cities Map for Goulburn and the broader issue of conflict with existing land use.

Scenic quality and landscape character according to the **Land and Environment Court NSW**

IT Power (Australia) Pty Ltd v Mid-Western Regional Council [2023] NSWLEC 1800

Note, IT Power was the original proponent of the Merino Solar Facility and has been reincarnated as EDPR (EDP).

Para 62 of the above judgement – The terms “**scenic quality**” (includes the requirement to take into consideration community values) and “**landscape character**” are not defined in the T&I SEPP yet, being specifically identified in the clause they clearly have separate and distinct meanings.

Para 63 of the above judgement – The Council submits that “scenic quality” can be assessed by reference to an area’s visual characteristics, as similar (but not identical) to the assessment of the development’s visual impact on the area. **Whereas “landscape character” is more than a visual exercise (this includes “a sense of place”).**

Cumulative impacts across Gundry Plains (Gundry/Tirrannaville/Quialigo)

Gundry Solar Facility proposal is only 1.5km east of the Merino Solar Facility with many residents impacted by both. If both proposals were to be approved there would be some 14.7 square kilometres of solar panels plus inverters and 2 large BESS and 2 large (330Kv) transformers and switches.

Property devaluation and difficulty selling properties on Gundry Plains. EDP use the term “perceived” many times in their EIS report. Whereas there is actual loss of value of properties because of their proposal and additionally, properties are difficult to sell as potential buyers do not want to live next to an industrial solar facility.

Conformation of a major conflict with current land use is evidenced in EPD's EIS

EIS Appendix F11 Social Impact Assessment page 50, Table 4-17 Respondents levels of concerns on some aspects of surrounding

TABLE Extract

<i>Perceived impacts</i>	<i>Percentage of respondents Very concerned and Concerned</i>
<i>Potential for visual impacts for near neighbours</i>	<i>94.4</i>
<i>Temporary construction impacts (noise, traffic, dust)</i>	<i>97.2</i>
<i>Effects on natural areas or habitats</i>	<i>91.7</i>
<i>Perceived effects on insurance rates</i>	<i>91.7</i>
<i>Fire management practices</i>	<i>94.5</i>
<i>Potential for impacts to waterways</i>	<i>91.7</i>
<i>Waste</i>	<i>91.7</i>
<i>Effects on agricultural land use within the region</i>	<i>91.7</i>

The change in landscape character and visual amenity was one of the more common concerns raised during consultation. Overall, visual impacts were one of the most frequently raised impacts by near neighbours who participated in interviews and consultation.

This list of impacts highlights that there is a major conflict with current land use and the proposed industrial facility proposed by EDP.

THIS PROPOSAL SHOULD NOT BE APPROVED.

SAVE Gundry Plains submission 9 February 2026