

Objections to Merino Solar Farm Project

Key objections to the Merino Solar Farm Project

- Inconsistent with the State Environmental Planning Policy (Transport and Infrastructure) 2021 and the NSW Large-Scale Solar Energy Guideline (August 2022) as they apply to mapped regional city land, in this case Goulburn.
- SEPP 2021 highlights a development consent will not be granted if it has adverse impact on a regional city's scenic quality and landscape character. This proposed development will have an adverse effect on the scenic quality and landscape character of Goulburn.
- Fire Risk: uncontrolled grassland creating a fuel load underneath the solar panels is a significant cause for concern regarding fire safety and risk. Easily resulting in a fast-moving high risk grass fire that would be extremely difficult to control.

State Environmental Planning Policy (Transport and Infrastructure) 2021 and the NSW Large-Scale Solar Energy Guideline (August 2022)

The proposal is inconsistent with the intent and principles of the State Environmental Planning Policy (Transport and Infrastructure) 2021 and the NSW Large-Scale Solar Energy Guideline (August 2022) as they relate to development on mapped regional city land. These planning instruments are designed to safeguard the integrity and future character of areas like Goulburn by ensuring that new infrastructure is appropriately sited, contextually sensitive, and aligned with long-term strategic planning objectives. The current proposal does not demonstrate such alignment.

The State Environmental Planning Policy (Transport and Infrastructure) 2021 clearly states.

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.*

This proposed development will have an adverse effect on the scenic quality and landscape character of Goulburn. I lived in the Goulburn region for majority of my early life, having a direct connection with one of the hobby farms on the boarder of the development site, and I hail from a hobby farm myself, so I know the benefit of living in a rural setting for lifestyle and quality of life. This has provided me with a wonderful perspective on the region, and I hold deep regard for the region's rural character, open landscapes, and the distinctive country identity that has long defined this community. These qualities are not just aesthetic, they form the foundation of the appeal to live in Goulburn and are part of region's culture.

Significant Fire Risk

Fire risk, the adequacy of water for firefighting, and the capacity to control a fire in an appropriate timeframe represent critical concerns for the proposed development. The presence of unmanaged grassland beneath the solar arrays would create a substantial fuel load, significantly elevating the likelihood of a fast-moving and high-intensity grass fire that would be extremely difficult to suppress. I also hold serious concerns regarding the potential for heat-bank or heat-island effects generated by extensive solar panel installations. During summer periods, such effects could exacerbate already extreme heat conditions, further heightening the fire risk to nearby residents, vegetation, and wildlife.

Documented incidents reinforce these concerns. Vegetation accumulation has directly contributed to solar-related fires in Victoria, including the Raywood Solar Farm incident, where an electrical fault ignited surrounding vegetation and demonstrated the ease that in the right conditions this could have easily spread fast and far throughout the neighbouring farms. Additionally, fires originating within solar farms pose secondary hazards, including the release of dense, toxic black smoke capable of drifting across neighbouring residents and potentially into the city, presenting health, safety, and environmental risks to the broader community.

Other Areas for Concern

- Mental health of the community residents, particularly those on the adjacent properties. The attitude of the developers towards the community has been appalling at best. With limited consultation, no regard for the livelihood of the residents, and attempting to pull the wool over their eyes through project scope changes has all had a significant impact on the mental health load of those neighbouring residents.

- Waterways contamination: The proposed development site resides near waterways which are directly linked to the Sydney Water Catchment
- Goulburn has very bleak cloudy winters with limited sunlight, the region does not seem a good fit for purpose with Goulburn BOM data stating only 89 suitable days of the year, at 8 hours a day of sunlight that equates to 8% of usable sunlight.
- Future risk of livestock, grain, and producer withholding periods due to the growing of our food in close proximity to solar farms. With producers now encouraged to assess risk of livestock accessing degrading solar equipment, something that is inevitable with time.

Summary

In summary, the Merino Solar Farm poses a significant threat to the landscape, amenity, and identity of this region. Its approval would undermine the qualities that make Goulburn unique and valued, and would set a concerning precedent for the treatment of regional city lands intended to be protected under existing planning frameworks. There is significant fire risk due to uncontrolled grassland creating a fuel load underneath the solar panels, which is a significant cause for concern regarding ability to control a fire. All whilst significantly impacting the livelihood of the neighbouring hobby farms through mental health load because of how the developer has treated and consulted with community, and always needing to stay vigilant with the constant reminder of a fire risk and potential waterway, land, produce, and livestock contamination.