

Re: Project title - Merino Solar Farm

I object to the Merino Solar Farm proposal because its location, along with that of the Gundry Solar Farm, impacts negatively on the lifestyle of too many residents. Many of these residents share with me an appreciation of a rural landscape and open natural spaces, and at the same time enjoy the proximity to town and community interests.

I live on a property that is categorised by the Applicant as a non-associated receiver. The proposed site is 500 metres from my house and 300m from my closest boundary. The preliminary visual assessment listed my potential visual impact as High (Appendix F5). The Intermediate Assessment has downgraded this to Moderate with a Magnitude of Low due to a significant reduction in the number of squares highlighted on a 2D montage. This downgrade means that no mitigation is required for my loss of scenic quality, but that skinny line on the Appendix F5 montage does not look like my view of the surrounding landscape. Even if the measurement methodology is valid, it is not representative of the visual and sensory experience that I will have when out-and-about on my property. And the skinny line does not look much different in montages for residents much closer than me to the project.

It seems I missed my opportunity for EDP consultation. I did receive a letterbox brochure from ITP during the scoping phase, and I attended two on-property meetings that were also attended by ITP. I did not know that EDP were involved until mid-to-late 2025, and only then because a neighbour mentioned it. I was unaware of EDP's engagements with the community in town and I have received no correspondence from them.

Contamination is my biggest concern with both the Merino and Gundry PV solar arrays and batteries. I understand that the panels should not be an issue as long as they remain in good condition and sealed. Fire and hail threaten this condition. We are in a bushfire prone area, and we are currently waiting on our insurer to assess our rooftop solar panels after the most recent hail storm that damaged all roofs on our property. Future damaging hail in the district must also be of concern for this massive array of 870,000 panels.

Wind also seems to be a consideration for the ongoing good condition of the panels. A study of damage to solar panel arrays in Spain (1) found the cause to be 60km/hr winds. Of note, the panels in the Spain study are the one-axis east-west tracker - described as the simpler and cheaper option when compared to the two-axis tracker. The EIS, however, compares a single axis tracker favourably to a fixed panel (p.29), but does not mention the two-axis tracker.

Bushfire is a hazard for all residents, and the proposed development increases this risk (2), and almost certainly more than the EIS indicates (pp.26, 277) with the omission of the statement from the Bushfire Appendix F10 (p.10) that Vegetation Category 3, the predominant classification found in the study area, "can support faster moving bushfires than other categories in high winds". Weather is unpredictable, but I am certain there will be plenty of days coming with wind speeds higher than the 60km/hr winds that damaged the Spain tracker array. The Bureau of Meteorology recorded three days in January 2026 in excess of 60km/hr at the Goulburn Airport (3). The highest was 93km/hr on January 5th. December had more days of wind speeds exceeding 60km/hr, but the top speed recorded was only 78km/hr. November had a top of 94km/hr, and so on.

Reading the Preliminary Hazards Assessment at Appendix F9 feels like work at an Industrial site, which of course it is for the Applicant and construction and operating personnel. Determining what I need to do at home to prepare for any of the potential hazards is disturbing,

disruptive and burdensome. Not only do I lose my sense of home with this large scale industrial construction taking up much of my surrounding environment, but I will worry what the winds, dust and rain bring in from the arrays and the Merino and Gundry BESS's. And even if a fire is controlled before breaching the Asset Protection Zone - (who will get to that 10 metre wide strip in time on a total fire ban day with hot winds at the speeds mentioned above?) - will I still be able to drink my rooftop-caught rainwater? Will there be any impact on my chooks and their eggs? Or on what my horses graze and drink? What about the orchard and vegie patch? Perhaps I would have been better off staying in the city and working rather than buying into a planned simpler, healthier lifestyle. I anticipate that I will need to seek a sense of home and a more natural environment elsewhere once the construction begins, and eventually move away bearing the loss - both financial and emotional.

I strongly support the development and implementation of renewable energy, but expect that renewable energy to be harnessed in a sustainable manner. Toxic and hazardous metals and chemicals are released during the manufacturing and decommissioning phase of panels threatening workers (4). Disposal to landfill or incineration causes more dangerous emissions (5). Even when recycling of panels is possible, a life of 30 or 35 years is considered too short to justify both the hazardous emissions and the use of the finite raw materials in manufacture. A lifespan of 50 or 100 years is considered more likely to reap resource, ecosystem and human health benefits (5). Sustainability is broader than the generation of a renewable energy source. If we, as residents, must bear the loss of our lifestyle and landscape, the Merino Solar Farm can do more to generate a renewable energy source in a sustainable way.

References

1. David Valentín, Carme Valero, Mònica Egusquiza, Alexandre Presas. Failure investigation of a solar tracker due to wind-induced torsional galloping, *Engineering Failure Analysis*, Vol 135, 2022, 106137, ISSN 1350-6307, <https://doi.org/10.1016/j.engfailanal.2022.106137>, <https://www.sciencedirect.com/science/article/pii/S135063072200111X>
2. Z. Wu, Y. Hu, J. X. Wen, F. Zhou and X. Ye, "A Review for Solar Panel Fire Accident Prevention in Large-Scale PV Applications," in *IEEE Access*, vol. 8, pp. 132466-132480, 2020, doi: 10.1109/ACCESS.2020.3010212. <https://ieeexplore.ieee.org/abstract/document/9143083>
3. Bureau of Meteorology, Australian Government, Goulburn, New South Wales, January 2026 Daily Weather Observations, <https://www.bom.gov.au/climate/dwo/202601/html/IDCJDW2049.202601.shtml>
4. Yu, M., & Halog, A. (2015). Solar Photovoltaic Development in Australia—A Life Cycle Sustainability Assessment Study. *Sustainability*, 7(2), 1213-1247. <https://doi.org/10.3390/su7021213>, <https://www.mdpi.com/2071-1050/7/2/1213>
5. Daljit Singh, J. K., Molinari, G., Bui, J., Soltani, B., Rajarathnam, G. P., & Abbas, A. (2021). Life Cycle Assessment of Disposed and Recycled End-of-Life Photovoltaic Panels in Australia. *Sustainability*, 13(19), 11025. <https://doi.org/10.3390/su131911025>, <https://www.mdpi.com/2071-1050/13/19/11025>