

8TH February 2026

Department of NSW Planning,

Dear Sir/Madam,

Objection to the Merino Solar Farm SSD-59155459

I am writing to formally lodge an objection to the proposed Merino Solar Farm development currently under assessment.

I am concerned that the project, in its current form, will result in significant and unacceptable impacts on the local community and surrounding environment. In particular, I wish to raise the following concerns:

1. **Visual and Landscape Impact** – The scale and industrial nature of the proposed solar facility will permanently alter the rural character of the Merino area. The development is inconsistent with the existing landscape values and may negatively affect nearby residents and landholders. This has been continually referenced in community engagement.

The document Landscape Character and Visual Impact Assessment on page 8 notes:

- Minor cut and filling would be undertaken to create suitable platforms for the panel arrays and other equipment (e.g. inverters).
- All trees within the disturbance footprint would be removed

How can the visual and landscape impact be defined by placing 2 round bales with witches hats? There will be 870,000 solar panels on the site and to state “Minor cut and filling would be undertaken”. This assumption downplays the reality of what a large solar project earthworks disturbance looks like and then the scale of the number of solar panels highly visible across the rural landscape. In the study, no trees were physically marked to highlight the impact on the landscape once they were removed.

2. **Glare Risk**

The document Landscape Character and Visual Impact Assessment has an overreliance on vegetation screening to resolve identified issues of glare. Relying on mature trees and shrubs to continue to provide screening fails to acknowledge the long term variability, seasonal, natural decline and weather damage to the existing vegetation. Points that were not considered are:

- Seasonal Leaf Loss
 - Deciduous species lose leaves in fall/winter.
 - During those months, screening effectiveness drops significantly.
 - Solar glare issues often occur during low winter sun angles—precisely when screening is weakest.
- Natural Decline
 - Trees can die from disease, drought, pests, or storm damage.
 - Replanting takes years to restore screening effectiveness.

Vegetation screening is useful as a supplementary visual barrier; however, it is not a primary reliable long-term mitigation strategy. This can be seen by the consultant's analysis of Painters Lane.

“From Painters Lane there is a risk of glare during sunrise and sunset as this unsealed road passes between two areas of the solar farm. The SGHAT analysis identifies 134 hours (8055 minutes) per year of glare, most generated from Panel Array 1 and 2 (refer to Figure 6-15, Figure 6-16, Figure 6-17 and Figure 6-18). This glare would mostly occur in the section of the lane between these two panel arrays, with the areas of the solar farm PV array directly adjacent to the road mostly having the potential to cause glare effect. Some existing semi-mature screening vegetation along the northern side of Painters Lane, adjacent to Panel Array 1, would provide screening of a substantial area of the glare reflecting area of Panel Array 1 (Refer to Figure 6-19).”

Solar glare on an unsealed (gravel/dirt) road presents safety risks, and relying on semi-mature vegetation screening as mitigation introduces significant uncertainty and long-term risk. Unsealed roads already have reduced safety margins compared to sealed roads. There is no acknowledgment of the dust factor on the impact of the glare from the solar panels.

Road safety mitigation should be:

- Predictable
- Quantifiable
- Permanent
- Not dependent on biological growth

Vegetation screening:

- Cannot be precisely modelled long-term
- Cannot guarantee zero glare exposure
- Cannot ensure consistent performance

Reliance on semi-mature vegetation introduces:

- Time delay
- Biological uncertainty
- Seasonal weakness

- Maintenance dependency

For a long-life solar project, this is generally considered an insufficient standalone mitigation strategy. This report has not been independently peer reviewed and has been prepared by a consultant for the Merino Solar Farm proponent. Reliance on vegetation screening within the Merino Solar Farm and the surrounding area should not be a mitigation strategy and I would suggest that an independent third-party study be undertaken.

I object to the Glint and Glare Assessment for the proposed Merino Solar Farm on the basis that it relies heavily on theoretical modelling and optimistic assumptions regarding panel orientation and vegetation screening. The study does not adequately assess worst-case seasonal sun angles, cumulative impacts, or the potential impact on road safety and residential amenity. There is no enforceable monitoring or remediation framework should glare exceed predicted levels. Accordingly, I request that the assessment be independently reviewed and revised before any approval is granted.

3. Bush Fire Risk

I object to the Merino Solar Farm Bushfire Risk Study on the basis that the methodology used to assess bushfire risk is inadequate and does not provide a reliable representation of actual fire behaviour risk at the site and the potential impact on residents.

My primary concern is that the site inspection was undertaken on the 9th July 2025 during winter conditions. A winter site visit does not accurately reflect peak fuel loads, grass curing levels, prevailing summer wind patterns, or extreme fire weather conditions. Assessing bushfire risk outside of the fire season significantly limits the ability to properly evaluate fuel continuity, ember pathways, radiant heat exposure, and likely fire spread behaviour.

In addition, the assessment appears to rely heavily on desktop modelling rather than comprehensive seasonal field assessment and empirical site-based analysis. Desktop modelling alone cannot adequately account for micro-topography, local wind channeling effects, vegetation variability, and cumulative landscape-scale fuel conditions. These factors are critical in accurately modelling fire behaviour, particularly in high grass-fire risk environments.

Given the increasing frequency of extreme fire weather events, it is essential that bushfire risk assessments are undertaken using conservative, worst-case summer fire conditions and supported by field observations conducted during peak risk periods.

therefore request that:

- A revised site assessment be undertaken during peak fire season conditions;

- The modelling be independently peer-reviewed;
- The assessment incorporate worst-case fire weather scenarios
- Approval not be granted until a seasonally appropriate and methodologically robust bushfire assessment is completed.

Community safety must be based on realistic and precautionary assessment standards.

4. Loss of agricultural land – Agriculture Impact Assessment

Renewable projects continue to push that solar energy generation and agriculture can be simultaneously run on the renewable energy projects. The Merino Solar Farm's Agriculture Impact Assessment as quoted below is unclear on the project operating as agri-solar.

Operation of the Project would result in the change in some land use from agriculture to electrical generation infrastructure where infrastructure would be established for the life of the Project (eg solar panels, BESS, transmission line structures, permanent access tracks, substations, operations and maintenance compound and solar resource monitoring station).

Some lands in the Development footprint would be removed from all agricultural production during the operation phase of the Project. However, grazing could continue on other parts of the Development footprint, such as under the solar panels and transmission line structures. If accommodated in the final Project design, co-existence with sheep grazing enterprises would allow grazing to continue in the solar panel area. It is not expected that cattle grazing would be possible due to the required height of panels and other fragile Project infrastructure to facilitate this use.

It is unclear if the Project will incorporate grazing under the solar panels. It is recommended that a planned approach to incorporating grazing of sheep under the solar panels (aka 'solar grazing') is taken by the Applicant. This will allow an integrated approach to vegetation management and weed control in the Project area.

I formally object to the Merino Solar Farm proposal on the grounds that the project documentation does not provide clear, enforceable commitments regarding the incorporation of agri-solar practices, specifically the continuation and management of sheep grazing beneath and between solar panels.

While project materials indicate that sheep grazing is "anticipated" to continue once the solar farm becomes operational, there is insufficient detail to demonstrate how this will be implemented in practice. There is no clearly defined agri-solar management plan outlining matters such as stocking rates, grazing zones, infrastructure arrangements, biosecurity measures, long-term land management responsibilities, or mechanisms to ensure agricultural productivity is genuinely maintained throughout the life of the project.

Given that this proposal involves the long-term use of productive agricultural land, it is critical that any claim of continued agricultural use be supported by binding

commitments rather than general statements of intent. Without detailed conditions of consent requiring active and ongoing grazing operations, there is a real risk that the land could effectively transition from productive agriculture to primarily industrial energy use.

Agri-solar practices are increasingly recognised across Australia as a viable way to maintain agricultural output alongside renewable energy generation. Best-practice projects demonstrate clear integration of grazing into site design, operational planning, and long-term management. If the Merino Solar Farm is to proceed, it should be required to meet similar standards.

Accordingly, I request that the consent authority:

1. Require the preparation and implementation of a detailed Agri-solar Management Plan prior to construction.
2. Impose enforceable conditions ensuring that grazing continues for the operational life of the project, unless otherwise approved through a formal variation process.
3. Require regular reporting to demonstrate that agricultural productivity is being maintained.
4. Ensure that site layout and infrastructure design facilitate safe and practical livestock grazing.

Absent these clear and enforceable commitments, I submit that the proposal does not adequately protect the agricultural value of the land or the long-term interests of the local farming community.

In conclusion, the proposed Merino Solar Farm should be rejected due to its significant environmental, agricultural, and community impacts. While renewable energy development is essential for reducing carbon emissions, it must not come at the expense of productive farmland, local ecosystems, and the wellbeing of rural communities.

Additionally, the scale of the development would alter the rural character of the area, impacting visual amenity, property values, and the lifestyle of nearby residents. Concerns regarding glare, construction disruption, increased traffic, and potential environmental degradation have not been adequately resolved. Community opposition demonstrates that the social license for this project is lacking.

For these reasons, the Merino Solar Farm proposal does not represent a balanced or responsible approach to renewable energy development and should therefore be rejected.

Thank you for considering this submission.

