

To: Department of Planning, Housing and Infrastructure (NSW)

Re: Objection to the Merino Solar Farm Proposal – SSD 5915545

Location: Tirrannaville (Goulburn) NSW

Date: 11 February 2026

Please note – to aid in understanding this submission, direct quotes from the Merino Solar Farm EIS and the Goulburn Regional City SEPP are in *blue text* – my own words are in black text. Where included, direct quotes from the Goulburn Mulwaree LEP (2009) are in *italics*.

Dear Sir/Madam

Please accept our formal objection to the Merino Solar Farm proposal.

We support the transition to renewable energies, including solar – however, we strongly believe that this proposed development is situated in the wrong location for such a substantial industrial project. Primarily, it is within the Goulburn Regional City SEPP (2021) - the EIS does not adequately address the issues raised by this. Furthermore, the applicant, and their representatives, have failed to adequately engage in consultation with us as neighbouring/receiver property owners.

This development quite clearly favours the applicant in terms of access to the power grid, suitable land form and transport links – but detrimentally and significantly impacts a largely rural residential population given its footprint of 986 hectares lies across 8 separate properties. Placing this industrial development across 8 properties directly impacts at least 192 neighbouring rural residential properties within a 4 km radius of the project.

We believe such large-scale industrial projects should be contained on a single property of at least double the size of the project in order to minimise the impact on neighbouring residential property owners. This project has no social licence among its neighbouring property owners – it is hoped that future policy developments acknowledge the increasing opposition to these developments and thus address this issue by isolating these projects as outlined above.

This submission identifies fundamental and pervasive deficiencies in the Environmental Impact Statement (EIS) for the proposed solar farm and Battery Energy Storage System (BESS) development comprising approximately 986 hectares, 870,000 solar panels, and a 450 MW / 1800 MWh BESS and substation across 32 hectares of the site.

The focus is on 2 key issues:

- Part 1. Lack of consideration of the SEPP
- Part 2. Noise impacts during construction

- Part 3. Failure to adequately consult with neighbouring/receiver property owners

Part 1. Lack of meaningful consideration of the SEPP

The State Environmental Planning Policy (Transport and Infrastructure)
2021 (SEPP) for Goulburn Regional City:

2.42 Determination of development applications for solar or wind electricity generating works on certain land

(1) This section applies to development in a regional city for the purposes of electricity generating works using a solar or wind energy source that is—

- (a) State significant development, or
- (b) regionally significant development.

(2) 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.**

(3) In determining whether to grant development consent, the consent authority must consider measures proposed to be included in the development to avoid or mitigate conflicts referred to in subsection (2)(a) or adverse impacts referred to in subsection (2)(b).

Despite the EIS referring to the SEPP on 12 pages of the document - it does **NOT** address the issue of the project's significant conflict with existing or approved residential uses of land surrounding the development - including the following objectives and allowed uses under the Goulburn Mulwaree Council Local Environment Plan 2009 which states:

Zone RU1 Primary Production

1 Objectives of zone

- *To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.*
- *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
- *To minimise the fragmentation and alienation of resource lands.*
- *To minimise conflict between land uses within this zone and with adjoining zones.*
- *To promote the use of agricultural land for efficient and effective agricultural production.*

- *To avoid or minimise impacts on the natural environment and protect environmentally sensitive land.*
- *To allow the development of non-agricultural land uses which are compatible with the character of the zone.*
- *To allow the development of processing, service and value-adding industries related to agriculture and primary industry production.*
- *To protect and enhance the water quality of receiving watercourses and groundwater systems to reduce land degradation.*
- **To minimise the visual impact of development on the rural landscape.**

2 Permitted without consent

Environmental facilities; Environmental protection works; Extensive agriculture; Farm buildings; Home occupations; Roads

3 Permitted with consent

Aquaculture; Cellar door premises; Dwelling houses; Extractive industries; Hardware and building supplies; Intensive livestock agriculture; Intensive plant agriculture; Kiosks; Landscaping material supplies; Light industries; Markets; Open cut mining; Plant nurseries; Roadside stalls; Rural supplies; Timber yards; Any other development not specified in item 2 or 4

In particular, the EIS effectively ignores section 2.42 - (2) - (a) of the SEPP and merely comments that it does not conflict without providing evidence of this other than visual impact statements and images that do not accurately represent the lived experience of those surrounding this project. For example, in the many references to the visual impact of this project and its cumulative impact alongside the Gundry project, a mere 1 m away, the EIS states:

The Merino Solar Farm and Gundry Solar Farm projects are unlikely to both be visible from any dwelling within the study area.

This is NOT true - both developments will be visible from directly outside our home and from most areas of our house yard, Merino to the West and Gundry to the East.

This significantly limits our capacity to engage in permitted uses of our property under the LEP due to the visual impact of this development, including, but not limited to:

- *Cellar door premises*
- *Dwelling houses*
- *Intensive livestock agriculture – horses in particular given their sensitivity to noise and vibration*
- *Kiosks*
- *Markets*
- *Roadside stalls*
- *Any other development not specified in item 2 or 4*

In another example, on Page 110 in relation to community concerns in regards to the SEPP section 2.42 - (2) - (a) the EIS states:

The applicant, ...explained that the detailed environmental investigations are considering the potential for the Project to impact residential and commercial uses, scenic quality and growth plans, addressing these considerations. The Applicant also explained that through consultation with the Council, it has been indicated that the growth area for Goulburn is being focused on the north of the city.

This does NOT address the meaning of section 2.42 - (2) - (a) in relation to residential uses of the land surrounding the development, RU1 zoned land, as outlined in the LEP above. In referring to the 'growth area for Goulburn' the proponent is in this case referring to urban small block residential and completing ignoring the impact on large block rural residential areas in the Turrannaville area – both existing and as part of the potential residential growth within the SEPP.

This issue is compounded by the lack of consultation in which residential use of surrounding land may have been identified - but due to the inadequate consultation in our case - it was not. (See below for more detail of the absence of consultation in our case).

The following example details how the development **DOES** conflict with section 2.42 - (2) - (a) of the SEPP in our case.

Part 2. Noise impacts during construction

Construction noise is acknowledged by the Applicant as one of the most significant concerns raised by the community. However, the Noise Impact Assessment is based on unrealistic assumptions and fails to model worst-case scenarios.

For example, Page 223 of the EIS - 6.6.3 Potential Impacts (Noise)

Table 6.22 lists Typical Civil construction works equipment including No. 11 Small pile driving rig. The Sound Power Levels of a single pile driver is 114 dB(A) - there will be 8 pile drivers in total onsite, presumably all operating at the same time given there are hundreds of thousands of piles to be driven 1.5 to 3 metres into the ground. There is no modelling for 8 pile drivers working concurrently. This short clip is typical of a single pile driver - there will be 8 on this project, working concurrently:

<https://www.youtube.com/watch?v=2XDYa4UaPrk&t=54s>

And yet, Page 224 claims, All receivers (ie, neighbouring properties) are **predicted** to be below the highly noise affected level of 75 dB(A).

I do not believe this to be the case. I can hear a small dog barking on a neighbouring farm around 2 kms from me - so I'm pretty confident I will hear 8 pile driving machines operating 6 days a week at 114 dB(A) across this treeless, open landscape - above levels '**predicted**' in the EIS.

It will be a constant background noise affecting our quality of life for a significant period of time. As a comparison, cars lapping One Raceway which is around 6 kms from our property are restricted to 95dB(A), and only on select days of the year - most race days are well below this level.

The most concerning issue for us is disclosed on Page 180 of the EIS, Table 6.14 Summary of LUCRA states:

[Landholders \(both involved and non-involved\) concerned with disturbance of livestock from construction noise and machinery movements.](#)

[The Highest risk is with horses...](#)

The proposed mitigation for this risk?

[Communication with landholders to enable livestock to be moved if operations could possibly disturb livestock.](#)

This is not at all acceptable and is a direct and significant inconsistency with the way in which we have used our land for the past 7 years. I have 8 horses of my own, and 2 horses on agistment. - I cannot simply 'move' my livestock and nor should I have to do so in order to mitigate a risk imposed on me by the applicant. This is a direct and unavoidable conflict of land use.

Part 3. Failure to adequately consult with neighbouring/affected property owners

The EIS repeatedly claims that consultation focused on residents within a 4km radius and included a wide range of activities including door knocking, letterbox drops and so on. These claims were repeated by EDPR representative, Mishka Talent, at a Public Forum held by Goulburn Mulwaree Council on 10 February 2026.

These statements are demonstrably false in our case.

Despite residing within the 4 km engagement zone since 2019 - and despite our residence being clearly visible from our road frontage:

- We were not assigned a resident number in the NGH Scoping Report
- We were never contacted in any direct way by EDPR, NGH, ITP or their representatives
- We only became aware of the Project in early 2025 via a neighbour
- We emailed EDPR on 26 August 2025 regarding lack of engagement and

misleading public statements in the Goulburn Post - we did not receive a response

The only correspondence we have received about the project was a generic, unaddressed "Project Update" newsletter delivered into our letterbox in September 2025.

This cannot reasonably be described as consultation.

Moreover, the following claim is repeated throughout the EIS, [The Merino Solar Farm and Gundry Solar Farm projects are unlikely to both be visible from any dwelling within the study area.](#)

This IS Not True - both developments will be visible from our house yard, Merino to the West and Gundry to the East.

Further inconsistencies re engagement within the EIS include:

- Page 24: our property is not identified with an R number on this map
- Pages 38 and 57: we are retrospectively assigned R191 on these maps despite no prior engagement or notification
- Page 87: conflicting statements regarding the number and reach of postal notifications
- Page 88: claims that no consultation was required for the Noise Impact Assessment, despite noise being a major concern raised by stakeholders – as noted above.

The Applicant's own admission on Page 114 that 44 stakeholders raised concerns regarding inadequate consultation and lack of transparency confirms that the engagement process has not met acceptable standards. There is no social licence for this project based on this issue alone.

Thank you for considering our submission. There are many other issues raised by the EIS but it is 1790 pages in length and we can only respond to these few issues that we feel impact us most significantly and trust that others are doing the same.

Together with the Gundry Solar Farm proposal, I believe these are the first large-scale solar farm application to NSW Planning that are within a regional city SEPP. We ask that you please refuse these applications – they represent a completely unacceptable and unnecessary imposition on regional populations given the identification of REZ's and the abundance of larger rural properties away from regional cities. This application is not the way forward.