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To whom it may concern,

Please view attached my comments in objection to the Merino Solar proposal (SSD-59155459)

Rural Lifestyle Area and Scenic Quality

My objection is primarily based on non-compliance of the State Environment Planning Policy (Transport and Infrastructure 2021) clause 2.42. As Goulburn is classified as a regional city and the majority of the Merino footprint is within the 10km of the regional city mapped land, there will be a devastating impact on the scenic quality and landscape character. As Goulburn is also a growing city (particularly with the proximity to Sydney and Canberra) there will be an immediate impact on limiting expansion of the city for housing, particularly the highly popular rural-residential blocks which are sought-out within the region. The footprint of Merino is surrounded by these small lifestyle blocks, particularly in an area zoned as RU-6 (transition from rural to residential) located immediately adjacent to the North-Western boundary of the development accessible by Elm Grove and Gretta Roads.

My family property is located adjacent to this proposal on Windellama Road (R30 on EDPR maps) and has been in our family for 80 years. I am the 4th generation to live here and intend on building a family home (as we have another building entitlement) to raise a 5th generation on the land. To clarify, we are not full-time primary producers, we are lifestyle farmers that rely on off-farm income. We choose to dabble in farming because we love it. It has been an inspiration for an extremely rewarding and fulfilling career (I am an Agronomy Consultant by profession), and I want my children to experience the same upbringing on a lifestyle farm.

As we will be grossly affected by this proposal, we will see this development from every spot on our 350 acre property and will share approximately a 2km boundary with the project. The risks associated with the development (fire, contamination, traffic, noise dust etc) are simply too great for me to build if this proposal is approved, and I will be relocating elsewhere to build. Some of the best locations on our property for building are only located approximately within 100m of the proposed panels. An industrial development in the middle of an idyllic rural-residential area will completely erode any scenic quality, greatly diminishing my sense of place that I have enjoyed my entire life. Hence, on this alone there is significant conflict with adjacent land use, and the project cannot be approved due to the aforementioned SEPP legislation.

Lack of Genuine Consultation

The consultation process conducted by ITP/EDPR has been nothing short of an absolute farce. The mental health strain this has placed on my parents in particular is extremely distressing for my family, and I have had to leave full-time employment to be more present due to concerns for their wellbeing and to alleviate the stress levels that they have endured. Only last week I had to provide support to my mother due to her having a mental health breakdown, and this has occurred several times over the last 12 months due to the stress she is enduring over the proposal. Providing generic mental health phonelines in the EIS by the proponent is nothing short of dismissive of the extreme mental health impacts we are facing, and not a genuine attempt to address this matter.

EDPR never formally notified my parents or any other affected landholders of additional lots added to the project area. The original design in the scoping report had panels placed approximately 500m from our family home. However, due to the addition of a lot adjacent to our home panels are now within 150m of our residences, and we will see panels in every room of our existing two dwellings as a result. This was never raised formally in any consultation, only in a generic A4 map we received in the mail with a letter (dated 29/01/25) addressed "To the Resident" with no detail of previous area compared to the increased area, or any acknowledgement of increase in footprint of panel arrays. The letter stated:

"Additionally, there have been very minor changes in the land associated with the project, which have resulted from the roads required to access the site."

However, the published Addendum Scoping Report states:

"Additional areas now included in the Project Area, for array expansion..."

My interpretation of this breaches the issued SEAR's as this cannot be described as detailed or genuine consultation, as the proponent has purposely attempted to downplay the increase in the project area to residents, blatantly avoiding any transparency with those most affected by these additional lots.

My own experience with EDPR has been extremely disappointing. I sent an email in May 2025 highlighting my concerns with the project, along with some questions and queries. To date, I have not yet had a response to any of these, even though EDPR acknowledged they had received the email.

In the mentioned email to EDPR I stated I have a long-term cropping plan for our property, which included cropping all paddocks along the shared boundary with the project. According to NSW guidelines a 30m buffer must be applied to mitigate heat-bank effects of panels for adjacent cropping land. This has not been applied to our whole boundary as it should have been in accordance with the NSW guidelines, with approximately 1/3 of our shared boundary having panels proposed only 10m from the boundary despite my plans to also crop this area. Hence my attempt to raise this has not even been acknowledged, and further demonstrates the absolute lack of care and disrespect this developer has for adjacent landowners.

In my opinion, the proponent has failed to comply with the Regional Communities (Consultation Standards) Act 2024.

Grass fire risk and lack of fire plan: Failure to comply with SEARs

Grass fire management has not been adequately addressed. To my understanding, the only mentioned fire water supply consists of only two 20,000L tanks located adjoining the BESS site. There are no other water sites proposed for the remaining project area of panels, which is grossly inappropriate considering the size of the site. The suggestion fire control relies on the Gundry Rural Fire Brigade is comical, considering it is a small volunteer organisation. As a volunteer on the brigade, I will not be risking entrapment within a maze of panels or exposing myself to the dangers associated with BESS fires. I doubt I am the only one who has this sentiment.

As fighting grass fire will be extremely difficult and dangerous within the site, it is likely we will bear the brunt of a fire-front once it moves out of the site onto adjacent land. With safety issues to enter the site due to entrapment dangers, this allows time for a potential fire to grow significantly in size and intensity, hence we will be facing a much more dangerous grass fire to control. With only 150m from our family home to the panels, this is a significant risk to our home and lives.

The issued SEARs required the proponent to provide a detailed Fire Management Plan, I could not locate this. It is stated that a bush fire emergency management and operations plan will be prepared after approval. This is one of many failures to address the SEARs, as it needs to be included for assessment prior to project determination.

Visual Impact Assessments: Flaws in methodology and failure to comply with SEAR's

The visual impact assessments have not been completed correctly. The assessments provided for R30 for example, have the panels placed 80-100m from the boundary (which you can note clearly once you have zoomed into the provided photomontages), whereas the proponent has advised in the EIS there will only be a 10m buffer between the boundary and the panels.

There are also cloudy conditions in the photomontages, which is in direct contradiction to the relevant NSW guidelines for visual impact assessments. Guidelines state assessments must be conducted on clear sunny days, or sunlight superimposed on the images to gauge glint and glare. This has not occurred.

On these two points alone, the methodology is flawed and does not comply with the relevant NSW guidelines.

Furthermore, the public viewing points are also taken from areas which will not have significant visual impact. Panels will be extremely visible from the intersection of Windellama Road and Airport Lane, yet this has not been included.

Additionally, the assessment has also failed to conduct worst-case visual impact assessments for building entitlements, which was a direct requirement of the issued SEAR's. At no point did the proponent or contractor responsible state this was necessary, and I was unaware it was a SEARs requirement until I investigated this further.

There is also no visual impact assessment conducted at the Goulburn Airport, which was also a SEARs requirement.

Agricultural Impact, Invasive Weed Infestations and lack of clarity on continued Agricultural Practices

I could not ascertain any conclusive statement that suggested that the land will be continued to be used for agricultural use, only statements such as “if agrivoltaics are adopted.” Hence, it cannot be claimed the land will certainly be used for continued agricultural production.

I would also like to draw your attention to some relevant facts about the main proposed host property. The farm in question has grown crops consistently in the last 20-25 years, particularly high intensity dual-purpose crops in the last 15 years. In 2025 on our shared boundary there was Wheat crop on the proposed site, and further to the south-west a Canola crop, also located on the proposed site.

A picture for reference included below, taken from our shared boundary on the 16/05/25, a very healthy Wheat crop in the foreground, along with the Canola crop in the background.



I would also like to highlight the current online advertisement for the sale of the host property in question, I have attached the link for viewing below:

(<https://www.realestate.com.au/property-other-nsw-goulburn-700303600>).

Please also note the photos included in the advertisement, of the “unique” and “natural” landscape, along with the images of highly productive crops.

I quote directly from the add:

“...located just 10 minutes south of the CBD, this expansive property sprawls across 717 hectares of prime Gundary Plains land, renowned for its fertile soil and

productive farmland. Embracing a diverse enterprise, Pelican Sheep Station encompasses a thriving mix of sheep, cattle, and mixed crops... ”.

The advertisement further states:

“This 6th generation landholding features a unique natural landscape, with a dry creek bed traversing its rear paddocks, fed by underground springs that replenish several dams scattered across the land, equipped with two operational bores. Presently, the property cultivates 84 hectares of canola, 80 hectares of wheat, and 50 hectares of barley, providing ample grazing and harvest options. Pelican Sheep Station maintains an impressive self-replacing flock of approximately 4,000 sheep, comprising Merino, First Cross, and Second Cross breeds, yielding 1,500 prime lambs annually. Additionally, the property accommodates apx 120 head of cattle, further diversifying its agricultural portfolio.”

The advertisement additionally mentions:

“Pelican Sheep Station stands as a testament to agricultural excellence, offering a harmonious blend of heritage, productivity, and potential.”

Hence, the EIS has listed the host area as Class 4, with some Class 5, the advertisement of the property clearly contradicts the classification of rural land use. To sustain intensive farming practices incorporating mixed cropping and livestock production, which the host property has achieved for as long as I can recall, the outlined classification in the EIS does not align with the history of sustained intensive agriculture on the property.

Continuous grazing under solar panels without the ability for appropriate agricultural management will significantly reduce the productive output of the farm. With an informed assumption due to my profession and farming experience, crops in our region should comfortably sustain 30-40 DSE/ha (Dry Sheep Equivalent), and improved pastures should sustain 10-12 DSE/ha. If the project commences, realistically with the reduced ability to maintain agricultural fertility (for example, the inability to sow crops and pastures, spread fertiliser, incorporate lime) I expect production will dramatically decline to 1-3 DSE/ha, and this will occur within the first 10-20 years of the development. Lack of crop and pasture competition also raises serious concerns with noxious weed infestations in the proposed development, such as Serrated Tussock and African Love Grass, which are synonymous for establishing profusely in areas of low nutrition availability with reduced plant competition. The most effective way to combat these infestations is to maintain strong fertility with a crop and pasture rotation.

African Lovegrass is also extremely flammable, with documented grass fires occurring even in winter months. An out of control grass fire occurred due to a dense African Lovegrass population at a property located west of the proposed northern site (<https://www.goulburnpost.com.au/story/9041341/crews-battle-escaped-fire-off-braidwood-road-near-tirrannaville/>)

Hence, with no description of how agricultural productivity will be maintained, or if agricultural practices will confidently continue on the site, there is significantly increased risk of African Lovegrass infestation on-site, which dramatically increases the risk of grass fire incidence.

The EIS also states “groundcover will be maintained at 70% where possible.” However, there is no description of how groundcover will be maintained at all. This also heightens my concerns regarding soil erosion.

Decommissioning

Decommissioning is covered briefly in the EIS.

There is no description provided regarding how the cost of remediation will be covered, and I am extremely concerned that the developer will abandon the site at end of life, and the community will be faced with a derelict site.

Issued SEARs Expiry Date

The issued SEARs for the Merino EIS expired on the 14th of October, 2025. Yet, the final version of the EIS for public viewing is dated 7th of November 2025. Since the EIS was lodged after the SEARs expiry, I would assume this is non-compliant with the issued SEARs.

Non-Compliance with SEARs on Soil Characteristics and Land Constraint Assessments

The EIS does not contain a consolidated assessment of soils and soil constraints.

There is no constraint-base soil mapping or any quantified erosion or soil loss analysis. Specifically, there is not constraint mapping for sodicity, dispersibility or erosion class.

There is no detailed mapping of sodic soils on-site, and I can confirm from our own soil testing and local knowledge there is widespread sodic soils across our property. This has not been identified in detail in the EIS assessments, and only assumed sodic soils are present along waterways. That is an incredibly poor assumption, as sodic soils are common across all areas of the Gunday Plains.

The EIS also states there is potential for tunnel erosion, yet no management strategies have been applied to mitigate this.

There is also no Neutral or Beneficial Effect (NorBE) on water quality included in the EIS, which is essential as the project falls within the Sydney Drinking Water Catchment.

Contamination to waterways via run-off

The EIS fails to acknowledge the risk of contamination of chemicals contained within solar and BESS infrastructure, with minimal discussion on prevention and testing.

This is extremely risky for our cattle operation, as it is a requirement under the Livestock Production Assurance Scheme (LPA) that livestock must have limited contact with electrical generating infrastructure. Without an LPA accreditation, you cannot sell livestock. We are

downstream of two watercourses that direct water run-off from the project area which fill many of our dams for stock water, and eventually supply the Gundary Creek which flows into the Mulwaree River. We are at a high risk of waterway contamination from this infrastructure, along with others downstream.

Damage to electrical generation and storage components which contain heavy metals (for example which can occur with hail, damage during construction and overall degradation over lifetime of the project) can easily leach into waterways, carrying downstream to neighbouring properties and would also be captured in the Sydney Water Catchment area.

The proponent has indicated they will not be conducting water testing, hence we are extremely concerned we will be responsible for any cost in water testing and we could also be at risk of losing our LPA accreditation if any contamination occurs.

In regards to contamination, furthermore no Preliminary Site Investigation (PSI) in accordance with the Hazards SEPP has been completed, hence the EIS does not comply with the SEARs as a PSI is required.

In the current form, the EIS is also non-compliant with the SEARs due to no inclusion of a Water Cycle Management Study, a listed SEARs requirement.

Noise Testing Methodology

Noise testing methodology is questionable, as site-specific background logging was not used. A virtual study was adopted instead, which brings into question the validity of the results and the potential confidence in the construction noise management. No survey details were included as required by the SEARs.

No Detailed Maps of Site Layout

I could not locate any detailed maps of the site design and layout. This was also a SEARs requirement, hence the EIS is non-compliant with the SEARs yet again.

Traffic Impact Assessment

The traffic impact assessment is invalid as the assessment was conducted on Currawang Road, not Windellama Road. Currawang Road does not join Windellama Road at any point.

An expected vehicle movement of over 700 per day is placing extreme pressure on an already busy road, as Windellama Road is utilised as a main route to access Nowra and coastal locations.

Community Benefit Scheme: Not Compliant with NSW Benefit Sharing Guidelines

Conclusion

The EIS is inappropriate for consideration due to the failure to include many SEARs requirements.

Furthermore, the proposal is in direct contradiction with the Transport and Infrastructure SEPP, due to the significant impact on the scenic quality of the region along with the erosion of the communities' sense of place.

EDPR has failed to consult with affected landholders appropriately and has failed to address mental health impacts of the local community.

I urge the relevant authorities to deny any approval for this development on these grounds, along with the other considerations I have raised.

Regards,

Peter John Coles.