



9 December 2024

Department of Planning, Housing & Infrastructure
Attention: Cameron Ashe

Delivered online via planning portal

Gundry Solar Farm project (SSD-48225958)

I refer to the Exhibition of the application for the Gundry Solar Farm project (SSD-48225958). In my capacity as a Director of Wicklow Properties Pty Limited which owns Rosslyn Farm at Roslyn, I strongly object to the proposed development of Gundry Solar Project.

The owners of Rosslyn firmly believe that this proposal must be challenged. If approved, it would set a troubling precedent for future developments in our region. We submit this objection for all the valid reasons outlined, and we emphasise that this stance represents a collective defence for any property owner near a regional centre with access to current or future tower and wire infrastructure. This proposal is entirely unacceptable and must be rejected.

The proposed solar project at Gundry Plains highlight significant issues regarding environmental, social, and economic impacts. The size and scale of the project, potential fire risks, property devaluation and inadequate job creation are critical points. Additionally, the lack of financial commitment for decommissioning raises concerns about long-term sustainability.

The basis for my objection is outlined in detail below:

1. **Size and scale of the project is inappropriate.** This proposed solar project consumes an excessive 1,650 acres of land, and with a capacity of 400MW would make it the equal largest solar farm in Australia alongside Western Downs Solar Farm in Queensland¹. The equipment proposed is going to destroy the natural landscape with 740,740 industrial solar panels, 154 battery stations and 167 Inverters (each larger than a 40-foot shipping container), 7.4-acre high voltage substation and extra transmission towers and a 400 or 800MW grid scale lithium battery.

¹ <https://www.synergy.net.au/Blog/2023/08/Solar-farm-facts>



2. **The location of the project is too close to Goulburn, a major regional city.** The site proposed for the Solar Farm project is less than 10 kilometres from the City of Goulburn (population 23,963)² and is on land that is mapped for Goulburn's future population growth. By contrast, the Western Downs Solar Farm is appropriately located over 22km from the nearest population centre of Chinchilla (population 7,068)³. It will also severely impact the current residents as it sits in the middle of over 100 rural lifestyle blocks.
3. **The considerable fire risk on the local area and its residents.** Solar farm projects constructed in Australia have historically presented a higher fire risk to the local area and its residents. For example, an inverter caught on fire at the Mannum Solar farm in January 2024⁴. Fortunately, there was a contractor on site and emergency services were called and were able to extinguish the fire before it spread. Solar fires that break out on an operating solar farm will not always be identified early and reported before spreading to neighbouring properties. It is negligent to ignore this risk given the proximity of the proposed solar farm to forty (40) residences on Kooringaroo Road, a dead-end road, that have a likelihood of being trapped by fire. In addition, the proximity of the solar farm to Goulburn, a major population centre should be considered.
4. **The proposed large scale solar farm will result in permanent devaluation of properties.** There is limited research in Australia to support this however anecdotal evidence suggests that devaluation of 20-30% is possible if the land is near large scale solar or wind farms. There has been a study published in the USA by the Lawrence Berkeley National Laboratory which analysed 1.8m homes across 6 States and found declines of up to 6% in home values near solar farms⁵. It should be noted that these States contained solar farms producing as little as 1MW. The larger scale of the proposed 400MW project will most likely devalue properties by a greater percentage.
5. **Lack of job creation for local area.** The Scoping Document claims an additional 400 jobs during the construction phase and two to four permanent staff during the operational phase. Very few of these jobs will come from the local Goulburn Mulwaree area. The EIS estimates only 12.5 jobs will be filled from the local area.

² <https://www.abs.gov.au/census/find-census-data/quickstats/2021/UCL112009>

³ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL30602>

⁴ <https://reneweconomy.com.au/inverter-burst-into-flames-investigations-underway-into-fire-at-south-australia-solar-farm/>

⁵ https://eta-publications.lbl.gov/sites/default/files/lspvp_journal_article.pdf



- 6. Lack of financial commitment by the developer to decommission and remediate the proposed site.** The developer is a shelf company Lightsource Development Services Pty Ltd and the scoping document notes only the following relating to decommissioning. This is at best a motherhood statement rather than a financial commitment to decommissioning and remediation of the proposed site for the solar farm:
'Decommissioning of the Project will occur at the end of its operational life. A decommissioning plan for the Project and associated infrastructure will be prepared in advance of decommissioning in consultation with the relevant regulatory authorities and landholders. The basis of the plan will be that the Project and associated infrastructure are to be decommissioned in line with the applicable legislative requirements and best practice guidelines existing at that time. Should the Project be approved, the development consent for the Project will include standard conditions regarding the cessation of operations, decommissioning and rehabilitation of the Project Area.'
- 7. Significant environmental impact on the local flora and fauna.** The Scoping document noting that Desktop database searches identified several potential threatened species that could occur within the Project Area, including 15 flora and 28 fauna species. The scoping document outlined that
"Construction activities will result in direct impacts to fauna and flora species and ecological communities through vegetation clearing, earth moving, cut and fill excavation and associated habitat loss. Indirect impacts to ecological communities may occur through temporary changes to noise, dust, and hydrology features during the construction phase. Once the proposed action is operational, no further biodiversity related impacts are expected."

I can declare that no reportable political donations have been made by Wicklow Properties or me personally in the past two years. I acknowledge acceptance of the Department's disclaimer and declaration.

Yours sincerely,

Michael Hannan
Director