

## **Photomontages that Appear to be Grossly Misleading**

Photomontages for the project have been produced in a manner clearly contrary to best practice and so as to provide what appears to be grossly misleading information.

The proponent should be required to redo all photomontages that do not fully comply with best practice, prove to the Department that each photomontage does then comply with best practice, and make the revised photomontages available for public comment before the Department considers them for its assessment.

### **Anatomy of a Biala photomontage.**

Let us examine a random photomontage, specifically:

Photomontage 7 taken from Private residence H07

Clouston Associates advise us:

Photomontages developed for this assessment have been created within the guidelines of the Draft NSW Planning Guidelines for Wind Farms (December 2011) and the Clean Energy Council Best Practice Guidelines (2013), as well as the Scottish Natural Heritage Visual Representation of Windfarms (2006).

The process of creating a realistic photomontage of a wind farm begins with taking clear accurate photos. For the BWF Fulcrum3D travelled to site and took panoramic photos using a Nikon 610 full frame DSLR camera and tripod. Weather conditions ideally need to be clear, and bearing and GPS co-ordinates are recorded.

Clouston Associates LVIA, Page 89

Firstly, there are no references to or guidelines for photomontages in the Clean Energy Council Best Practice Guidelines (2013)

Clouston Associates would appear to endorse the excellent publications put out by the Scottish Natural Heritage, particularly, we would hope:

Visual representation of wind farms - version 2.1 - December 2014 (8 years on from the version they reference above). Various references to this publication follow (indicated by SNH).

Whilst GPS coordinates were recorded (as above), they were not published in the LVIA (SNH requirement) No doubt Time of Day was recorded for each photograph but not published (SNH requirement)

The location from which photograph number 7 was taken is approximately:



Source: Biala LVIA. Page 90.

The photomontage prepared from the photograph was:



Source: Biala LVIA. (No page number)

Note: photomontage was published in landscape format, so this image is reduced.

The turbine configuration is difficult to verify. Which are the three closest turbines, T1, T2 and T3?

Let us leave aside the fact that the photomontage, as published, gives a totally misleading assessment of the Visual Impact of the wind farm on this property. (If you find the turbines, the closest of which is 2.08 kms away, difficult to see, they are not much clearer as published)

Whilst there is confusion in the LVIA with respect to viewpoint locations (from which photomontages were not produced) and photomontage locations, the following SNH comments are relevant.

- "The siting of viewpoints needs to balance two key factors: the likely significance of impacts; and how typical or representative the view is."
- "Viewpoints should be free from any avoidable foreground objects and other obstructions..."
- "The effect of light and shade on wind turbines is an important aspect of their visual character and should be represented well."

We draw your attention particularly to the flood light towers of the tennis court with the turbines just behind them. No doubt the choice of photograph location was coincidental.

Without a GPS location, it is difficult to define that view, but:



Source: Google Maps.

A= approximate location from which the photograph was taken

B= building demolished before the photograph was taken.

C= tennis court

D= the two tanks visible in the photomontage

E= the row of screening trees behind the tennis court visible in the photomontage.

F= the current residence?

Obviously, Fulcrum 3D had access to the whole property.

One must ask these questions:

Why did Fulcrum 3D choose the location it did?

Were there not more “representative” locations within the living and working areas of the property?

Why did they choose to shoot through the tennis court and the wind break?

Why did Clouston Associates, ERM and Newtricity approve and publish a photomontage from this location?

Could this photomontage be classed as misleading?

If so, was it deliberate?

Recommended actions:

- that Newtricity provide GPS coordinates for each photomontage location.
- that Newtricity redo this photomontage with reference to the current or prospective residence.
- that Newtricity redo any photomontage that is misleading in accordance with the Scottish National Heritage Visual representation of wind farms - version 2.1 - December 2014.
- that Newtricity advise the dates and times on which all photomontage base photographs were taken.

I reserve the right to examine all photomontages in detail and provide further submissions even if outside the submission period as vital information has been withheld from the public.