

Submission to the Woodlawn Advanced Energy Recovery Centre proposal.

Thank you for the opportunity to comment on the Landscape and Visual Impact EIS components (mostly Appendix BB), authored by Green Bean Design (GBD) Principal, Mr Andrew Homewood and others.

I have followed the professional career of Mr Homewood for some years, making one or more submissions on NSW wind farms that he has been involved with, in his capacity as an “independent” expert or a peer reviewer for the Department. I’ve had some small wins.

In recent times the challenge has faded as DP(I)E commissioned and published a guidance document on wind farm VI. Mr Homewood’s recent LVIA’s for both new wind farms and modifications to approved wind farms, religiously follow that guidance whether he agrees professionally with it or not.

How delighted I was to find that he was undertaking the LVIA for my local incinerator. I won’t see the ARC, but going by the various windroses, I’ll be occasionally under the plume and what’s in it.

Some of the characteristics of the LVIA and elsewhere, or those missing, that caught my attention were:

- The suitability of the methodology used
- Landscape
- Selective Viewpoints
- Community Consultation
- Photomontages
- Skewed Matrices
- The community was visually misled

In more detail:

Methodology suitability

There being no DPE guidance on VI assessment for incinerators, GBD introduced two new (to me) reference sources, although there was something familiar about the latter.

To quote:

“This Visual Impact Assessment has adopted (and) the following definitions from *Guidelines for Landscape and Visual Impact Assessment* (2013) and the Transport for NSW (TfNSW) *Guideline for Landscape Character and Visual Impact Assessment, Environmental Impact Assessment Practice Note EIA-N04* (July 2020).”

The first document, under the auspices of the UK’s Landscape Institute is in book form and only available at a cost:

“Copies of the book can be ordered direct from the publisher. Although PDF versions are not available, other digital versions are, in the form of: ebook | Kindle.”

and:

- Buy a copy of GLVIA3 from the LI website @ discounted £44.99

Makes it a bit hard to check what is quoted and what is not.

So we are left with Practice Note EIA – N04, upon which the LVIA heavily relies. This document was:

“Prepared by Centre for Urban Design Transport for NSW”:

Let me emphasize:

URBAN DESIGN speaks for itself. What makes us believe that their methodology transfers to massive offensive rural industrial structures.

The Centre for Urban Design is part of Transport for NSW and has expertise in LVIA's for Freeways, Interchanges, Bridges, Culverts and Embankments, for example, mostly in the Sydney basin. They haven't been down our way for a few decades.

Read the whole Practice Note from the Centre for Urban Design and ask yourself whether their methodology relates in any way to the visual impacts of a massive incinerator in our rural landscape. More research brings to light that the NSW RTA published, in March 2009, the first version of this practice note. From memory, someone used it to do an LVIA for a NSW wind farm and received some predictable submissions. It was as unsuitable for wind farms as it is for this project.

Landscape

I guess I'm a little bit biased about the richness of my landscape, as are most lifestyle property owners. Having read over 50 LVIA's, I was very surprised to read that Mr Homewood lumped our landscape all together as one "relatively limited" landscape unit:

"The landscape character surrounding the Eco Precinct has been determined as a singular landscape unit which generally occurs within 10km of the Eco Precinct.

The landscape unit represents an area that is relatively consistent and recognisable in terms of its key landscape elements and physical attributes which include a relatively limited combination of topography/landform, vegetation/landcover, land use and built structures."

At some stage and at some prompting, I would assume, the following was added:

"Whilst the landscape character surrounding the Eco Precinct has been defined as a single landscape unit, this LVIA recognises that localised and specific characteristics can occur within the landscape unit, including:

- Landscape associated with the Great Dividing Range (timbered slopes and ridgelines) •
- Grassland and pasture •
- Lake George •
- Collector Road corridor and •
- Industrial landscapes (Eco Precinct, including waste management operations, mining operations and the Woodlawn and Capital wind farm infrastructure)•"

That's not all. Mr Homewood describes above the area of landscape that he is assessing as generally within 10 kms of the **eco precinct**.

That takes in the village of Tarago, the settlements of Mt Fairy and Lake Bathurst and the lake itself, a significant section of the Goulburn Rd and its rural residential focus, including the Roseview subdivision and much more.

Mr Homewood would be hard-pressed to find another small area of landscape with so many defineable LCAs.

One LCA enabled him to come up with a combined value for Landscape Character of 13/30, lower even than the scores for the 5 LCAs in Mr Homewood's LVIA for the Collector wind farm over the Range. (15,16,18,16,16)

Selective viewpoints.

There being no DPE guidance on VI assessment for incinerators, I think GBD needed to adapt some of the latest relevant planning policy statements. For example:

From the Wind Energy Guideline:

"As often occurs for other SSD projects, the Department and the consent authority will consider the following in the assessment and determination of wind energy projects:

-

- **existing dwelling entitlements on land within the vicinity of the wind energy project.**"
(bolding added)

Viewpoints don't need a residence.

The then Planning Secretary McNally confirmed it to me when she wrote in response to my letter on the subject:

"There are no legal limitations on the Department's ability to consider these impacts, and so it is important for proponents to identify all land that may be affected by a proposal.

This has been confirmed in the new Wind Energy Guidelines and Assessment Bulletins published by the NSW Government in 2016, and in the assessment requirements issued by the Department."

The SEARs talk about receivers, not residents or residences.

Visually, that includes any land with a dwelling **entitlement** in the viewshed.

GBD defines the viewshed as:

"For the purpose of this LVIA the viewshed is defined as the area of land surrounding the project which could be affected by project related infrastructure, including the proposed ARC building, the IBA area and the encapsulation cell."

Who restricted the viewshed to a 5 km radius?

The viewshed definition must be modified to "the proposed ARC building **and its plume**". To many of us, there is nothing more industrial than the sight of a chimney and its plume.

You are in rural residential country. You will find many land owners yet to build. Some will be on the surrounding hills and ridgelines. **There are plenty of new photomontage subjects and unassessed visual impacts.**

It's also time to get rid of the concept of CURTILAGE. My landscape is what I view from anywhere on my land, a modest 100 acres.

Community consultation.

The Wind Energy Visual Assessment Bulletin (DPIE 2016) is strongly focused on the need to consult with impacted landowners, at Scoping, Design and at EIS preparation stages, particularly on the importance of their landscape.

I can find no reference to any, relevant or otherwise, community consultation in the LVIA.

Had such consultation taken place, it may have influenced Mr Homewood's professional judgement.

Mr Homewood concedes that community consultation on Landscape may have been useful (LVIA Page 33) but DPE recommends that it be done before the LVIA is submitted:

"Whilst landscape character assessment is largely based on a systematic description and analysis of landscape characteristics, this LVIA acknowledges that some individuals and other members of the local community may place higher values on the local landscape. These values may transcend preferences (likes and dislikes) and include personal, cultural as well as other parameters that may be explored in more depth through consultation with the local community."

In Chapter 7, Engagement (Page 122) of the main EIS, consultation on the question of visual impact is mentioned:

The following topics were raised during conversations with neighbours about the ARC:

- visual impact – how the existing cultural, vegetation and terrain considerations will be reflected in the design of the facility and the landscaping;

That's all there is. The only visual issue raised by the neighbours was the appearance of the development. It raises the issue of what were the questions. As for being designed to blend in, I predict it will become known as the Tarago Opera House, should it be built.

Photomontages.

For the ARC building there is only one relevant photomontage – PM1.

Ignore all the riders Mr Homewood places on the accuracy of the photomontages. If they were significant (and they are not), he could have had the image adjusted. It would appear that PM1 was a joint effort from EMM and GBD, but it was in GBD's LVIA, so Mr Homewood must take ultimate responsibility for any faults.

To have a photomontage without a plume is misleading, a bit like a wind turbine with no blades.

We were not told the GPS coordinates of the camera location or the ARC stack, so we had to take an educated guess.

We were not told how to get the correct visual impression. eg: print the photomontage at A0 and hold at arms length, so we assumed that we either view on the laptop or print the photomontage at A4 and view at a readable distance, say 40 cm.

Unfortunately, the photomontage shows the smallest profile, end on, but that is because of GBD's choice of camera location.

The most easterly turbine of the Woodlawn wind farm is turbine number 12. I have assumed that the LVIA is referring to turbine number 1, the most northerly turbine. We know the coordinates of turbine 1 from Google Earth Pro.

So by guess and factually we know the locations of the key components, where the photo was taken from, the ARC and turbine number 1. We also know the turbine and ARC height.

The community can expect that what they see in Photomontage PM1 in the LVIA is a reasonable interpretation of what they will see from Collector Rd.

When we do the maths we find that:

The ARC and Turbine 1 are reasonably to scale with each other. Good.

The ARC and Turbine 1 are both less than half of their true dimensions. To put it mildly, Not so good! (then add on the plume)

I haven't checked the other photomontages but I suspect I would find similar.

(Fig 6 – photo locations. The most important one, P4, is not shown. P3 is supposedly 1.9 kms from the ARC which it obviously isn't.)

Skewed matrices

We've raised this issue many times before, including with GBD.

Table 8, Page 41 of GBD's LVIA is skewed, having one rating above moderate and two below. The fact that the one in the urban road builder's Practice Note 4 is similarly skewed doesn't excuse its use by GBD. Similar faults exist with the landscape sensitivity "table" on Page 35 of the LVIA.

High (Scale of 23 to 30) – key characteristics of the landscape character area would be impacted by the ARC and would result in major and visually dominant alterations to perceived characteristics of the landscape character area which may not be fully mitigated by existing landscape elements and features. The degree to which the landscape may accommodate the ARC would result in several perceived uncharacteristic and significant changes.

Medium (Scale 15 to 22) – distinguishable characteristics of the landscape character area may be altered by the ARC, although the landscape character area may have the capability to absorb some change. The degree to which the landscape character area may accommodate the ARC would potentially result in the introduction of prominent elements to the landscape character area but may be accommodated to some degree.

Low Rating (Scale of 7 to 14) – most of the landscape character area characteristics are generally robust and would be less affected by the ARC. The degree to which the landscape may accommodate the ARC would not significantly alter existing landscape character.

Negligible Rating (Up to 6) the characteristics of the landscape character area would not be impacted or visibly altered by the ARC.

It is interesting to compare the above “table” with the one in GBD’s LVIA for the Collector wind farm. (Part 3, Page 35)

High (Rating of 25 to 30) – Key characteristics of the LCA will be impacted by the proposed Project, and will result in major and visually dominant alterations to perceived characteristics of the LCA which may not be fully mitigated by existing landscape elements and features. The degree to which the landscape may accommodate the proposed Project will result in a number of perceived uncharacteristic and significant changes.

Medium to High (Rating of 17 to 24) – Recognisable characteristics of the LCA will be altered by the proposed Project, and result in the introduction of visually prominent elements that will alter some perceived characteristics of the LCA but may be partially mitigated by existing landscape elements and features within the LCA. The main characteristics of the LCA, patterns and combinations of landform and landcover will still be evident.

Medium (Rating 12 to 16) – Distinguishable characteristics of the LCA may be altered by the proposed Project, although the LCA may have the capability to absorb some change. The degree to which the LCA may accommodate the proposed Project would potentially result in the introduction of prominent elements to the LCA, but may be accommodated to some degree.

Low Rating (7 to 11) – The majority of the LCA characteristics are generally robust, and would be less affected by the proposed Project. The degree to which the landscape may accommodate the wind farm would not significantly alter existing landscape character.

Very Low or Negligible Rating (up to 6) – The characteristics of the LCA would be unlikely to be impacted or visibly altered by the proposed Project.

A score of 13 on this Collector “table” would attract a rating of MEDIUM, not LOW. Perhaps Mr Homewood could explain why and when this changed.

The community was visually misled.

The community has been visually misled from the start, with the publication of the Scoping Report. I'm assuming that GBD was not involved in the preparation of the Scoping Report (SR).

I and most others were seriously misled by the “photomontage” on the SR cover page. Earlier in this submission I complemented the producers of Photomontage PM1 in that the relative sizes of Woodlawn turbine 1 and the ARC building were to scale with each other. Now compare PM1 to the SR cover variant. Any community member would conclude back then that the ARC building compared to the Woodlawn turbines they see every day would be much smaller than it will turn out to be.

The SR cover “photomontage” was shown again on Page 48 of the SR (Fig 6.2)

Displaying it in A4 Portrait makes the deception even worse.

The most recent document with a “photomontage” is ERM’s Appendix K, October 11, 2022. On Page 9, Fig 5, also displayed in Portrait - massively misleading. The photomontage author is unknown.

I’ll leave it up to DPE to decide the next step. I don’t think the LVIA and other relevant VI parts of the EIS should have been published.

I object to this proposal
Anthony Gardner