

## **Visual Impact Assessment – Crudine Ridge Wind Farm, Modification 1**

The need to change one instance of the number 77 in the Conditions of Consent to 37 could have been done by a one sentence Modification Application leading to an Administrative Update, or some even simpler administrative method. No Visual Impact Assessment was required, but seeing one has been offered, it requires comment to assist the Department with its merit assessment.

The Visual Impact Assessment “updated” June, 2018 (VIA) produced by Moir Landscape Architecture can only be described as highly implausible.

We have a wind farm with 37 turbines, each 160 metres tall surrounded by a large number of non-associated residences.

**This VI expert has judged that not one, NOT ONE, of these residences will suffer a HIGH Visual Impact**

**This VI expert has judged that not one, NOT ONE, of these residences will suffer a HIGH/Moderate Visual Impact.**

Every VI rating is Moderate or below. As we’ve described it previously; ordinary, modest or ho-hum.

Additionally,

this Modification must be assessed under the 2016 Wind Energy Guidelines. No mention is made in the VIA of the 2016 Guidelines or the 2016 Visual Assessment Bulletin.

The 2016 Guidelines state on Page 14 that the proponent needs to:

“have: considered existing dwelling entitlements on land within the vicinity of the wind energy project.”

DPE Secretary McNally confirmed to me that it is important for proponents to identify all **land** that may be affected by a proposal. (my emphasis)

Whether the property has an existing residence is irrelevant.

As this VIA must be assessed under the 2016 Guidelines, and as this entitlements issue has never been addressed before for this wind farm, any merit assessment that includes visual impact is invalid without such a review.

A VIA containing no non-associated properties **without a dwelling** potentially impacted by one or more of the 37 wind turbines confirms its invalidity.

Having chosen to ignore the totally flawed 2016 Visual Assessment Bulletin, the detail of which is unique to the NSW Department of Planning and therefore neither shared nor adopted by any of the world experts, Moir Landcape Architecture or someone else is obliged to assess the real VI by accepted international methods.

The assessment methodology Moir describes indicates that the original July 2017 version and this update were done without a site visit. Surely that can’t be correct, especially as the VI from many of the residences was not previously determined. A lot has happened since Moir (2012).

DPE doesn't give us much time to analyse the VIA but what is there has some inexplicable VI assessments. Take for instance the details from the table for residence CR34. Under the DPE approved wind farm of 77 turbines, the closest turbine was at a distance of 1.99 km. Under the overriding DOE approved 37 turbine layout, it is 2.00 km. The original VI assessment was HIGH, now it is LOW. To explain this, the Moir assessor writes:

“Majority of visible WTGs immediately west of the residence are likely to be reduced. Slightly lower visual impact rating as a result.”

I share something in common with the VI assessor from Moir Landscape Architecture. I haven't been there either. I'm not sure, however, that I would have written the above explanation. The ratings might be valid but the explanation is not. (or vice versa)

Whilst this VIA is described as a June 2018 updated version, the original version was done in July 2017 and before. (Appendix B, last sentence)

The first sentence of the VIA implies that it was written before the Federal Department of the Environment and Energy published its overriding determination for 37 turbines dated April 4, 2017:

“Moir Landscape Architecture have been engaged by CWP Renewables to undertake a comparative assessment of the **potential alteration** to the approved layout for Crudine Ridge Wind Farm from 77 WTGs to 37 WTGs.” (my emphasis)

So this VIA was not produced for this Modification

Perhaps the department could find out the facts and let us know its ancestry.

If the department intends to place any importance or relevance on this VIA, it must be peer reviewed by someone independent of both CWP and the Department and any deficiencies in the current VIA rectified, particularly the inclusion of all land with dwelling entitlements.