There is so much wrong with the Jupiter EIS. Rather than saving it all for a book sized submission at the end, I will deliver it a chapter at a time.

Chapter 1
Where Mr Clouston publishes the worst set of photomontages in modern times.

They are the most misleading set of photomontages I have ever seen, both from a size and realism viewpoint. The wireframes are more realistic. At least you can clearly see the turbines.
EPYC was asked in the watered down 2015 replacement SEARs:

> "Utilise recognised tools (such as photomontages and wireframes) at representative locations to adequately assess the visual impacts of the Project, particularly for non-associated residences within 3 km of a proposed turbine."[1]

I draw your attention to the terms "representative locations", "adequately" and "particularly"
Cloustons have made no attempt to assess, adequately or otherwise, the visual impacts of the project on any non associated property outside 3kms. All private photomontages and wireframes have been taken from within the 3km boundary.[2]
Cloustons advises that there are approximately 140 non-associated residences/DAs within the 3 km boundary (63 of which are within 2 kms of one or more turbines) which they maintain can be represented by 39 photomontages and wireframes.
Which is the representative photomontage/wireframe for residence J10? It can't be WF 3 (J272) as J10 is 25 metres higher up the Roseview escarpment than J272.

Accuracy

Cloustons advise:

> **B.1.4 Accuracy**
> "Whilst a photomontage can provide an image that illustrates a photo realistic representation of a wind farm in relation to its proposed location and scale relative to the surrounding landscape, it is acknowledged that a photomontage cannot fully represent a human view. Flat image do not allow the viewer to perceive any information relating to depth or distance. To gain the most perceptually accurate view of the photomontages, they will need to be printed and viewed at A1/A0 sized sheets and held at arms length."

The key issue is with the last sentence.
So, which is it Mr Clouston A0 or A1. A0 is twice the size of A1. Or is Mr Clouston saying that A1 is for those of us with short arms?

Cloustons is saying that to get a perceptually accurate photomontage, you have to view it on a 55 inch TV. (except the TV doesn't have the required resolution)

The Department knows what I'm going to say, seeing I've said it four times before. The EIS is designed to be read at A4 size either on paper or a laptop screen. So:

Take an A4 section of an A0 photomontage and publish that. It doesn't matter if you only have a few turbines in the picture. At least the representation will be honest and not misleading.

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[1] ERM recognized this by quoting it back in confirmation. EIS Main Report Page 11.4

> "The LCVIA utilised recognised tools (such as photomontages and wireframes) at representative locations to comprehensively assess the visual impacts of the Project, particularly for nonassociated residences within 3 km of a proposed WTG"

[2] LVIA Fig B2, Page 143. Fig 7.3, Page 197.

We were getting close with the Bango photomontages. Less than 50% out.
We, of course, cannot produce or print A0 images or sheets. The photomontages and wireframes as published are of such low resolution as to preclude that. I have a request into the Department for high resolution images. Then, we may be able to create some realistic photomontages. High resolution images will also enable us to assess whether the colour, contrast and clarity of the turbines is accurate. From the published photomontages, this would appear to be questionable.

The only photomontages/wireframes approaching realism are the introductory photographs for each of the LVIA chapters. On page 196 of the LVIA, for example, is an enlarged version of WF 3. It would appear to show a small section of an approximate A0 image. Its Visual Impact is telling, isn't it? Cloustons could have done the same for each photomontages/wireframe, but they didn't.
Even then, they didn't enlarge and crop the most telling portion of WF 3.

In deciding whether the EIS was adequate for public review, surely the Department reviewed the photomontages at A0. If not, why not? We know they have the equipment; a previous PAC determination told us.

The other EPYC supplied photomontages for the Jupiter wind farm that showed some semblance of reality were the three on display at the Jupiter Community Meeting at Tarago on December 11, 2014.[3]
Compare them to the ones in the LVIA.

Cloustons set out to:

> "Prepare photomontages and wireframes indicating the Project within the landscape setting" [4]

and that's about all they achieved.

Cloustons further advise:

> "Photomontages developed for this assessment have been created by Fulcrum3D 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 Wind farms (2014)."

Firstly, as advised previously in a Biala submission, there are no references to or guidelines for photomontages in the Clean Energy Council Best Practice Guidelines (2013) and if there was why would you take any notice of documents from the wind farm union.
Clouston Associates would, once again, appear to endorse the excellent publications put out by the Scottish Natural Heritage (SNH).
Time of Day was recorded for each photograph but not published (SNH requirement)[5]
Also, the following SNH comments are relevant:

1. "The siting of viewpoints needs to balance two key factors: the likely significance of impacts; and how typical or representative the view is."[6]
2. "Viewpoints should be free from any avoidable foreground objects and other obstructions…"[7]
3. "The effect of light and shade on wind turbines is an important aspect of their visual character and should be represented well."[8]

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[3] http://www.epyc.com.au/wp-content/uploads/2015/11/Proposed-Jupiter-Wind-Farm_Community-Information-Session-2_Posters_11Dec20141.pdf
[4] LVIA Page 17
[5] Page 22. Scottish Natural Heritage, Visual Representation of Wind Farms
[6] Page 21. Scottish Natural Heritage, Visual Representation of Wind Farms
[7] Page 21. Scottish Natural Heritage, Visual Representation of Wind Farms
[8] Page 37. Scottish Natural Heritage, Visual Representation of Wind Farms

Cloustons have given scant respect to the first one, none to the second one and the jury is still out on the third until we obtain high resolution images (JPEGs or similar).

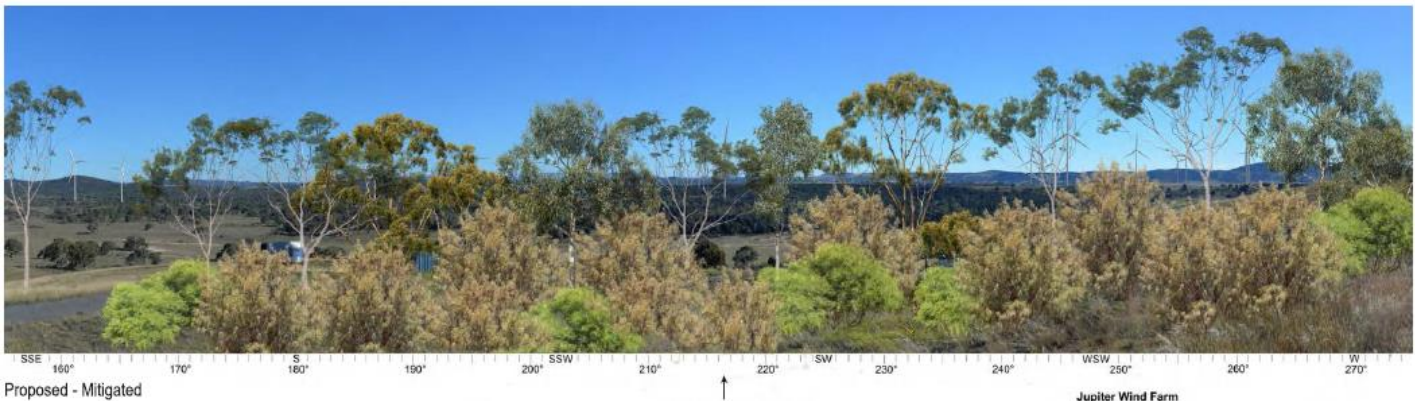
Proposed Mitigation

Faced with a level of Visual Impact unparalleled in NSW Wind farm history and faced with the prospect of DA rejection or at the minimum, the acquisition of 50 properties, the team had to come up with a strategy. On the surface it is laughable, but it just may be part of some future desperate legal tactic, possibly also involving the new draft, pro-developer, Framework and its emphasis on screening. We'll take some advice.

The mitigation strategy deserves a chapter on its own, so we will only give you a taste of what is to come. Property J3 on Lakeview Rd has views only rivaled by its equivalent on the other side of the valley in Roseview Rd (J10)
Here is what our landscape professionals, Cloustons, offer. They are obviously supported by ERM, who also have significant wind farm LVIA experience.
The photomontages below are smaller than published. If Cloustons can publish photomontages 1/16th of the true size, I can be allowed a small additional leeway.
By the way, the view is far better than this. Naturally, as you diminish the impact of the turbines, you likewise diminish the original view of the landscape.

SCREEN PLANTING EXAMPLE B
Lower Effectiveness
Location: J3, Lakeview Road

Proposed - Unmitigated



Proposed - Mitigated

This mitigation nonsence enabled Cloustons to lower the Visual Impact for residence J3 from High to Moderate/High

ERM concluded:

> "The mitigation measures generally involve the planting of screening vegetation and the further assessment found that the impact ratings for individual dwellings were able to be reduced however, Moderate to High ratings were still recorded for 14 dwellings. This results in 45 dwellings less than the original 59 dwellings identified as having an unmitigated impact rating of Moderate/High and High."

If any of this ends up in the Departmental Recommendation, we'll know we are in for a long battle.

Photomontage/Wireframe Locations

You would expect commonality between viewpoints and photomontage locations. You would be wrong. There is little similarity between the map of public and private viewpoints on Page 58 of the LVIA and the photomontage location maps (Public on page 142 and Private on page 143) and wireframes on page 197. They differ in numbers and numbering. Viewpoints don't have photomontages and photomontages don't have viewpoints. Private viewpoints beget public photomontages. Public viewpoints pointing North become public photomontages pointing South.

The consultants have served up a complete dog's breakfast.

Comments on individual photomontages and wireframes

Please remember these extracts from one of Cloustons key expert references, The Scottish National Heritage.

- "The siting of viewpoints needs to balance two key factors: the likely significance of impacts; and how typical or representative the view is." and,
- "Viewpoints should be free from any avoidable foreground objects and other obstructions…"

Public Viewpoints

Pub 1

Worth inserting the photomontage. For those who aren't sure, this is the one with the turbines in it.

The photographer could at least moved to the other side of the road so the power pole was not so intrusive. After all, that lane carries the south-bound traffic towards the wind farm.

Pub 3 Also worth inserting.

Once again, why take the photo from the wrong side of the road if the aim wasn't to include more screening vegetation.

Pub 5. Love the strategically placed power pole.

Pub 6. The Department has a copy of a presentation given by a CCC member to a CCC meeting .The presenter made a number of comments on viewpoint locations that are just as relevant today.
Why pick this location which is behind the only line of trees in the immediate surrounds. The photographer's 2-way trip would probably have doubled the traffic movements at that spot on that day. In fact why pick it at all.
Who picked the public locations?
Another comment in that CCC presentation was the distance between photomontages 5 and 9 on the key public viewpoint carriageway, the Braidwood/Goulburn Rd. In the 10 km gap, you pass most of the Jupiter turbines.
Yet the consultants pick Pub 6 as being representative of the area.

Pub 9. In the 10 kms since Pub 5, there are many panoramic public viewpoints on the Braidwood/Goulburn Rd, but the cameraman had to hide his tripod behind dense roadside vegetation.

Pub 10. The cameraman parks his car on the verge and takes the picture from behind it. As previously asked of EPYC, is one photomontage taken from the Kings Highway representative? Traffic travels both ways for starters and this very busy thoroughfare bisects the wind farm.

Pub 11. Love the Power pole as I do in Pub 13

Pub 16. As the Scottish National Heritage says "how typical or representative the view is"

<u>Private Viewpoints</u>

Priv 17. (J255) Why didn't you swivel the camera and capture all the other turbines in the southern cluster (and closer to the residence). Without that additional photomontage, the visual impact on this residence is false and misleading.
This same comment can be leveled at photomontages 21, 42, 24, 25, 33, 32 and more. (Two photomontage positions numbered 42 appear in Fig B2, page 143 - confusing)

Priv 19. (J5). This photomontage is NOT representative. For a start, the nearest turbine would not be behind the tall conifer.

Priv 22 (J194), Priv 23 (J115), Priv 24 (J142), Priv 25 (J148), Priv 27 (J 197), Priv 29 (J216), Priv 30 (J217), Priv 32 (J234A), Priv 39 (J373).
Do all these have a representative view from the residence and its curtilage? Loved the tree in Priv 24 and the Hills hoist in Priv 29.

Priv 31 (J218A). Seems to have been taken approximately 75 metres North of the residence. A shorter distance to the South along the driveway would give an uninterrupted view of the other 6 turbines in the southern cluster and collectively give a much more accurate assessment of Visual Impact.

Priv 38 (J257). I suspect under SNH guidelines that sheep and alpacas would count as foreground distractions.

Priv 41 (J58B) A key architectural feature of this residence is the elevated terrace. Why was the photomontage taken from the ground level below if not to mislead?

WF 3 (J272) Why the rusty trailer in the foreground? Was that the most unobstructed view from the residence and its curtilage?

WF 4 (J423) Why did the photographer leave his car in the foreground?

WF 6 (J70) Was that the most unobstructed view from the residence and its curtilage?

WF 7 (J154-DA) A nice touch to have the mounds and the wheelbarrow in the foreground. The photographer could have walked another 5 metres closer to the turbines.

WF 8 (J239) Obviously not the most unobstructed view from the residence and its curtilage

WF 9 (J83A) Cute set of harrows in the foreground

WF 10 (J158) WOW, couldn't you have walked to the left a tad?

WF 11 (J91) WOW, couldn't you have walked to the fence?

In summary, all photomontages and wireframes do not give a true and representative depiction of the visual impact on the landscape of the Jupiter wind farm. They do not come close. Everyone remotely familiar with wind farm Visual Impact knows that; the local community, the developer and their consultants and the Department. Why was it allowed?

There are no photomontages relating to the substation. There were no photomontages from Roseview or Lakeview where residents would be looking down on a scarred landscape of turbine pads and connecting roads. There are no photomontages which show the new transmission line. EPYC has had three years to come to an agreement whether it will be above or below ground, so we must assume it will be the former. The Goulburn Mulwaree Development Control Plan DCP (2009) says: "Similarly, the visual impact of new transmission lines must be evaluated" [9] Surely the Department would agree.

Who is going to take responsibility for this photomontage deception? Fulcrum 3D who created the photomontages, DNVGL whose software was used to model them, Cloustons who embraced and published them, ERM who signed off that they were "neither false nor misleading", Epyc who probably loved them or the Department who decided that they were acceptable for community review knowing their faults.

[9] LVIA Page 14

Of all the reasons the Department could have chosen to reject the original Jupiter EIS, deceptive photomontages didn't make the top five.

Stay tuned for future chapters, one of which will show you how Mr Clouston magically proposes, through the power of vegetation mitigation, that NO residence in the Jupiter viewshed will suffer a HIGH Visual Impact. Not even Green Bean Design would attempt that.
Another chapter will describe how Mr Planning, by severely watered down the Jupiter SEARs, produced the inevitable result.

One final question for the Department management and planners who have visited the area:
Are you satisfied that the photomontages, as presented to the public, give a true and non-misleading representation of the Visual Impact on non-associated residences and their curtilage?

I will offer no recommendations, but will study with interest the departmental reaction.