

The purpose of this submission is to identify a number of failures of the VI assessment component of the Jupiter EIS, and as a result its' failure to adequately assess the VI upon my property, 24 Duralla Place (J58). Specifically:

- The qualifications and relevant experience of Clouston and Associates Consultant, Matt Knight;
- The lack of an "extreme" rating of Visual effect;
- The deliberate use of deceptive photography techniques to understate Visual Impact;
- The photomontage from my property not depicting the actual view from my residence;
- The inappropriate use of vegetative screening as the sole VI mitigation strategy;
- The deliberate omission of consultation by Clouston and Associates Matt Knight as a part of the assessment;
- The failure of the EIS as exhibited and made available by the Department to reasonably assess the photo montages and wireframes

### **Qualifications and relevant experience of Clouston and Associates agent, Matt Knight**

Clouston and Associates offer Matt Knight's CV on their web site. Within this CV, Matt's experience has been listed as follows:

- Northern Road Stage 4 - RMS Strategic urban design study and report
- Scone Bypass - RMS Urban and landscape concept design
- Mona Vale Road Strategic Urban design Study - RMS Strategic urban design study and report
- North West Growth Centre - RMS Strategic urban design study and report
- Schofields Road Stage 2 Detailed Design - Mott Macdonald Urban and landscape detailed design and documentation
- Schofields Road Stage 2 Concept Design - Parsons Brinckerhoff Urban and landscape concept design
- Maitland Roundabout Overpass - Parsons Brinckerhoff Urban and landscape concept design, detailed design and documentation
- Lisarow to Ourimbah Upgrade - Parsons Brinckerhoff Urban and landscape concept design, detailed design and documentation
- Boundary Street, Roseville - RMS Concept urban and landscape design
- Orange Drought Relief Pipeline - GHD Landscape character and visual impact assessment
- Moorebank Intermodal Freight Terminal - Parsons Brinckerhoff Landscape character and visual impact assessment
- Terelba Quarry Extensions - Corkery Consulting Landscape character and visual impact assessment
- Camden Link Road Intersections - JWP Landscape character and visual impact assessment

Whilst Matt's experience appears at first glance to be extensive, on closer inspection, none of these previous roles have involved the VI assessment of a windfarm in a rural setting. What possible relevance can the VI assessment of a number of public road projects in Sydney have to this rural

project? What correlation is there between the assessment of the VI of a road at ground level, and doing the same assessment for multiple structures the size of Centre Point Tower?

Despite of this lack of experience, it is arrogantly assumed by Clouston and Associates that there is no requirement for consultation with non-hosting landowners as a supporting activity for this EIS component (appendix F, para 1.7). What is the basis for this rationale? Who knows or appreciates their view more than the land holder themselves? Conversely, who will feel most affected by a loss of visual amenity other than the landholder themselves? Thirdly, who will feel most offended by someone with no connection to their land making seemingly biased subjective judgements on their behalf?

Further into the document, (para 4.2.1) the following statement is made:

*“Human perception is important in consideration of wind turbine visibility. People perceive size, shape, depth and distance using many cues, so the context of that view is critically important.”*

How is this context obtained by Clouston and Associates without the use of any consultation? This statement alone suggests that without this consultation their own assessment is **critically flawed**. Clearly, the role of Clouston and Associates is to understate the VI effects as much as possible to the proponent’s favour (he who pays the piper calls the tune). At what point does the subjectivity of this assessment without consultation render it invalid? I can assure you that the effect upon me and my family as described in the VI assessment is far divorced from the effect I and my family perceive.

## **The lack of an extreme rating of visual effect**

The matrix contained in Appendix F, Tale 3.2 uses the following ratings:

Negligible, Low, Moderate/Low, Moderate, Moderate/High, and High

Why is there no extreme rating available within this matrix? If there exists a negligible rating, then that should be offset by the addition of extreme since both ends of the impact spectrum need to be considered. For the previous work conducted in the Biala proposal, where there were no residences within 2Km of a turbine, and the total number of turbines is 31. In this proposal there are 88 turbines, many of which are within 2Km of numerous non hosting residences. There is a compelling case for the addition of an extreme rating where properties are within 3km (or more) of multiple turbines.

Figure 4.5 suggests that my property will have the oversight of the nacelle of **at least** 79 of the 88 turbines associated with this proposal. The closest of these is within 3Km of my residence. In spite of this, the unmitigated Visual Impact upon my property has been assessed (by a consultant with extremely limited prior experience in windfarm VI and devoid of consultation) as Moderate/High (Appendix A). Am I expected to believe and accept this? Honestly? 79+ turbines the size of Centre-Point tower, some within 3Km of my residence and the conveniently dumbed down VI assessment is “Moderate/High”? I will effectively be subjected to witnessing **two** Biala wind farms from my property, some from within 3Km. How is an extreme classification not justified in my case?

Even though no formal consultation was made by Clouston and Associates, I was in attendance when EPYC and Matt Knight took some preliminary photographs from my property. I made no secret at

that time that I was of the opinion that this proposal would desecrate my views that the siting of my house had been specifically chosen to exploit. My views deserve to be considered by this assessment. Instead, they have been ignored.

## **The deliberate use of deceptive photography techniques within the assessment.**

In Appendix F, paragraph 4.7.1, it is stated with respect to the photo montages that:

*“These photos have a horizontal field of view slightly wider than human vision (approx. 86° degrees compared to a 46°). This wider-angle lens allows more of the site context to be visible, consistent with a viewer turning their head from side to side. This has the affect of making objects appear slightly more distant than when viewed with the human eye but allows more of the visual scene to be represented.”*

What an ambiguous statement. What context does “slightly” have in this paragraph? As far as the horizontal field of human vision is concerned, it would appear that “slightly” means a 2:1 increase (46 degrees compared to 86 degrees). Does this in turn mean that the resulting affect (sic) that occurs to the prominence of objects within this distorted field of view is in turn reduced by an equivalent ratio (1:2)? It is commonly accepted that a 50mm lens in portrait mode reasonably reproduces what the human eye will see. Why then, is it considered acceptable to provide photo montages and wireframes that are inherently misleading and deliberately understate the prominence of objects? Is this sleight of hand tactic allowed to be dismissed with the simple statement above? Is it ok to provide misleading photomontages as long as you acknowledge it in the fine print? What level of accuracy is sought in a state significant project of this magnitude and why are not multiple individual photographs required, in a format most closely reflective of what the human eye can see, affording the viewer the chance to most reasonably understand what they will see in any particular direction?

## **The failure of the EIS as exhibited and made available by the Department to reasonably assess the photo montages and wireframes.**

Each photo montage and wireframe contains the following disclaimer:

*“To gain a perceptually accurate view of the photomontages they will need to be printed and viewed at A1/A0 sized sheets and held at arms length”*

Where are images of this format available? Images of this size have not been provided in the publically available copies of the EIS. Does the Department believe that these commercial grade printers exist in home office environments? Further, the resolution of the montage and wireframe images that appear in the EIS as available on the Department of Planning and Environment are of insufficient resolution to print to that size. As a result, the public is denied (deliberately or otherwise) the opportunity to view these montages with any clarity, notwithstanding that the photography method used deliberately understates the impact as previously acknowledged. These montages as provided, both in hard copy and electronic format are useless, exposing a serious failing of the exhibition process. Again, this failing occurs at the public’s expense, and the proponents favour.

## **The failure of J58 Montage to accurately represent the impact from the residence**

The montage taken from my property (J58) has been taken from the side of my house, on the edge of a hill. My house has a large raised deck built facing the East primarily to enjoy the vista toward Ulladulla. Why would the montage photograph be taken from the lowest geographical location possible and not from an area that has obviously been created to be used as an outdoor living area? I can only surmise that the loss of several metres in height is advantageous to minimising the impact of objects in the montage (in addition to the use of panoramic photography), or conveniently hid the 110m wind monitoring tower at Braxton Park, thus removing a vitally important point of reference from the photograph.

Should there not be an expectation that any montages should be taken from locations that are most commonly used?

## **The inappropriate use of vegetative screening as a VI mitigation strategy**

Throughout the VI assessment, there is only one mitigation strategy offered, that being the use of vegetative screening. Does the proponent and their agent understand that the majority of residences on the western side of Braidwood road are living in a designated high risk bushfire zone? Had local residents been consulted by Clouston and Associates, they would have been able to advise this to be the case. In order to achieve relevant Bushfire Assessment Levels (BAL) required to build and inhabit a residence in this area, there must be certain asset protection zones applied around residences and out buildings. The maintenance of these zones dictates the ability of a residence to be insured, and in the case of my property, the zones must be maintained in order to achieve and maintain a certificate of occupation. What course of action is planned to be taken if a property becomes uninsurable due to vegetative screening? In my case, this asset protection zone is large (35 to 50 metres depending on direction) and applies in all directions from my residence and out buildings. It is highly inappropriate to suggest the planting of tall vegetation around these high bushfire risk properties as the only mitigation strategy, when doing so may render insurance invalid, or rescind my right to live there. The entire project area was subject to a forced evacuation due to bushfire in December 2013 (Sandhills Road fire) and a significant amount of the project area was burnt out in December 2016 (Boro Road fire). Clearly this area is deservedly assessed as bushfire prone, and relies heavily on the use of aerial fire fighting for its protection (beyond the scope of this submission).

## **The failure of the VI assessment to adequately assess the impact to my dwelling (J58)**

Cumulatively, the VI assessment conducted for my property contains a number of failings, those being;

- The inexperience of the VI consultant in the assessment of windfarms, especially those with residences within 2Km of turbines, and the numbers of turbines proposed;

- The lack of consultation with the landowner;
- The lack of a realistic assessment level of extreme, given the size, number and proximity of the proposal to my residence;
- The use of mitigation strategies that are at odds with my bushfire asset protection requirements;
- The use of deceptive photography techniques;
- The failure of the EIS to provide me with a montage from my property that I can gain any adequate visual perception from.

As a result, the VI assessment contained within the EIS inadequately addresses the true impact upon my residence from this proposal.

Clearly, the VI assessment has been written with the express purpose of minimising the impact to non-hosting properties, and does not reflect reality. It should be dismissed as not fit for purpose as assessment criteria for this proposal.