

Chapter 14, part 1 – Visual Impact on non-associated residences.

The revised Jupiter SEARs require the developer to:

”provide a comprehensive assessment of the visual impacts of all components of the project..... on non-associated residences (including approved but not yet developed dwellings or subdivisions with residential rights)....”

In response to this, Clouston Associates partly answered by providing in the LCVIA, Appendix A, a spreadsheet of Visual Impacts on the 140 residences and properties with approved DAs within 3 kms having previously admitted that:

“Visual impacts related to the Project are shown to extend across the study area, with the highest impacts concentrated within a 5km offset of the WTGs”¹

My first two questions are:

Did the Department give approval for the exclusion of properties with residential rights from this “comprehensive assessment”?

and

Did the Department give approval to limit the “comprehensive assessment” of visual impacts to residences within 3 km of a turbine?

Other submitters will comment in detail on the flawed and biased matrix system used to assess the Visual Impact on Public and Private Viewpoints which actually measures the Visual Non-Impact.

I would like to address the methodology Cloustons used to address the 140 residences within 3 kms of a turbine, the results of which are presented in Appendix A of the LCVIA.

Unfortunately there doesn't seem to be any methodology other than the opinion of the Clouston's “specialist”, and I'm sorry, but that is not good enough. As we have said before, Clouston Associates has no published body of work that would indicate the skills and experience required to assess the Visual Impact on wind farm residences, especially the 63 within 2 kilometres of a turbine.

Does distance enter into the assessment? In what way? Does magnitude of change?

Does the assessment rely on misleading photomontages from non-representative viewpoints?

If Cloustons has used the same matrix methodology as used for the representative viewpoints, surely each of the 140 residents are entitled to individual assessments (as in previous wind farm EISs). Until then, the VI assessment cannot be scrutinized by the community, the Department or the PAC.

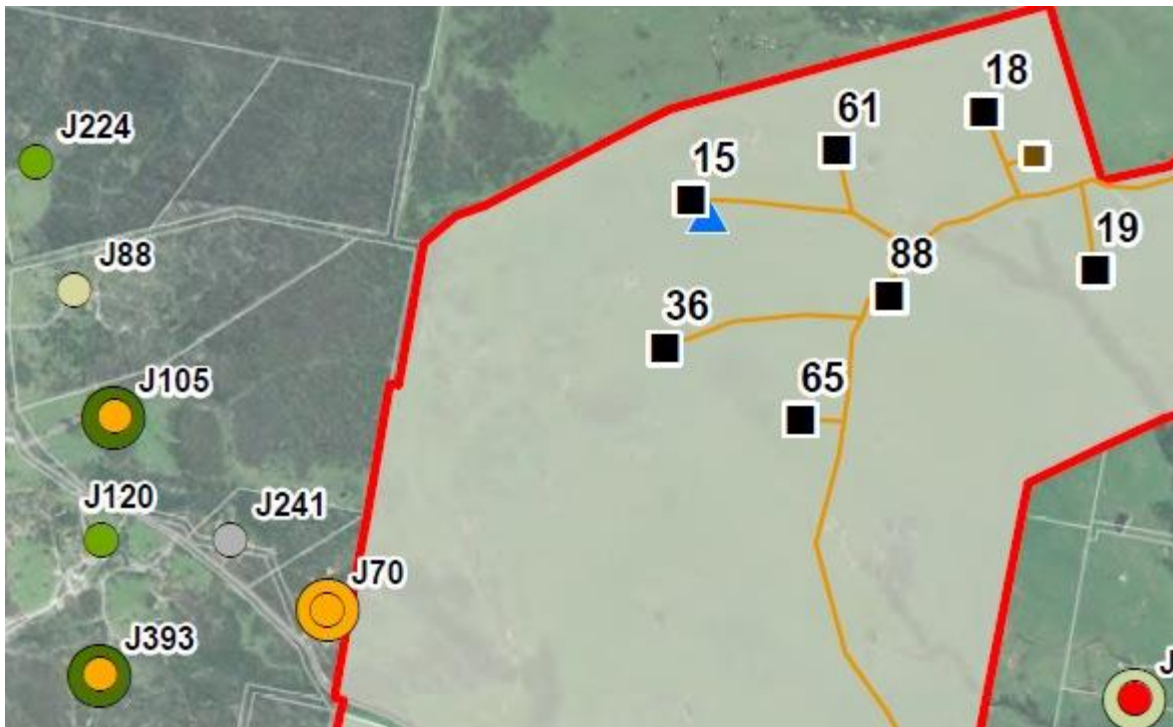
Therefore, my next set of questions to the Department start with whether they believe the Visual Impacts on the 140 residences within 3kms of a turbine have been adequately assessed by this methodology. Have they ever accepted this methodology before?

Have they confidence in the result when over 75% of the assessments were done from the desk or the road? Hopefully, the Department's recently hired visual expert, Mr Terry O'Hanlon, will soon be up to speed on the Jupiter project.

In early January, I drove for the second time ever from Manar to Mulloon. Residence J241 caught my eye. Typical for an area of rural residential character, it is substantial and new.

Here is a snapshot from Figure 2 in LCVIA Appendix A

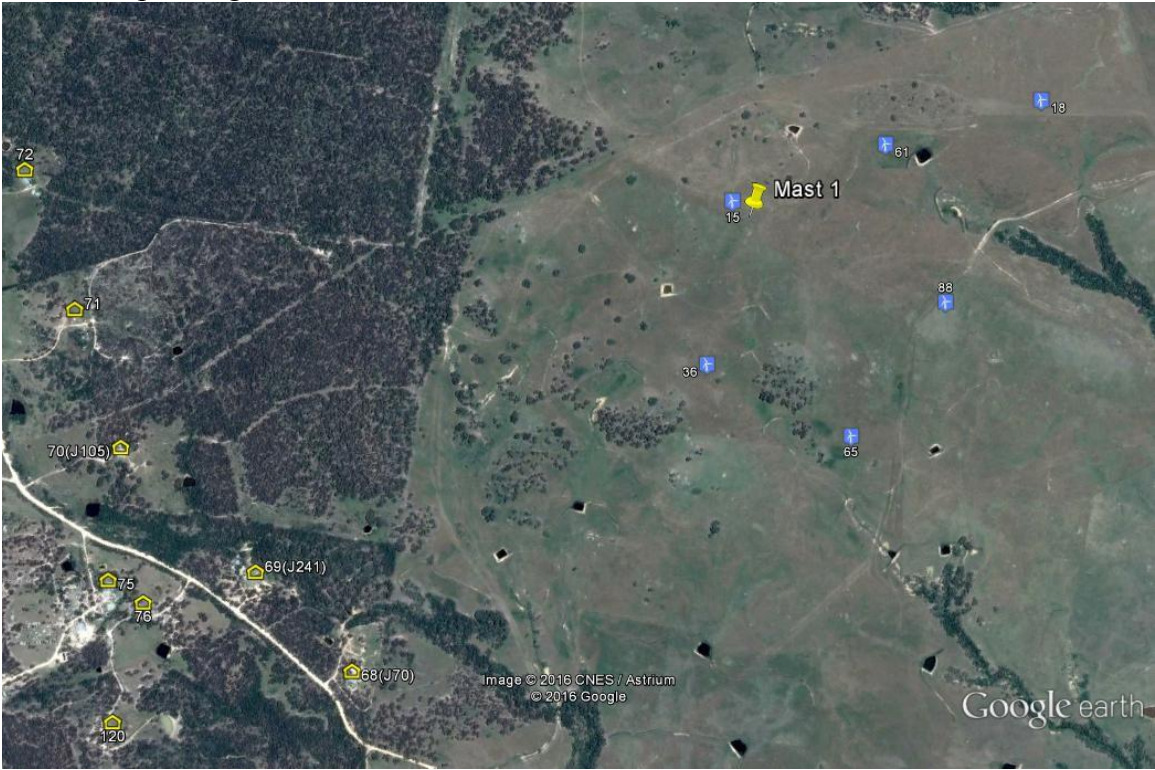
¹ LCVIA Page 105



Here is the Visual Impact rating for residence J241 from LCVIA Appendix A

J241	Dwelling 1 - 2km	739229	6091823	36	1193	NA	Dwelling surrounded by very dense tree planting. No views of WTGs.	Negligible
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This map below would appear to bear out Clouston’s assessment that “Dwelling is surrounded by very dense tree planting. No views of WTGs”²



² Map Source: Author

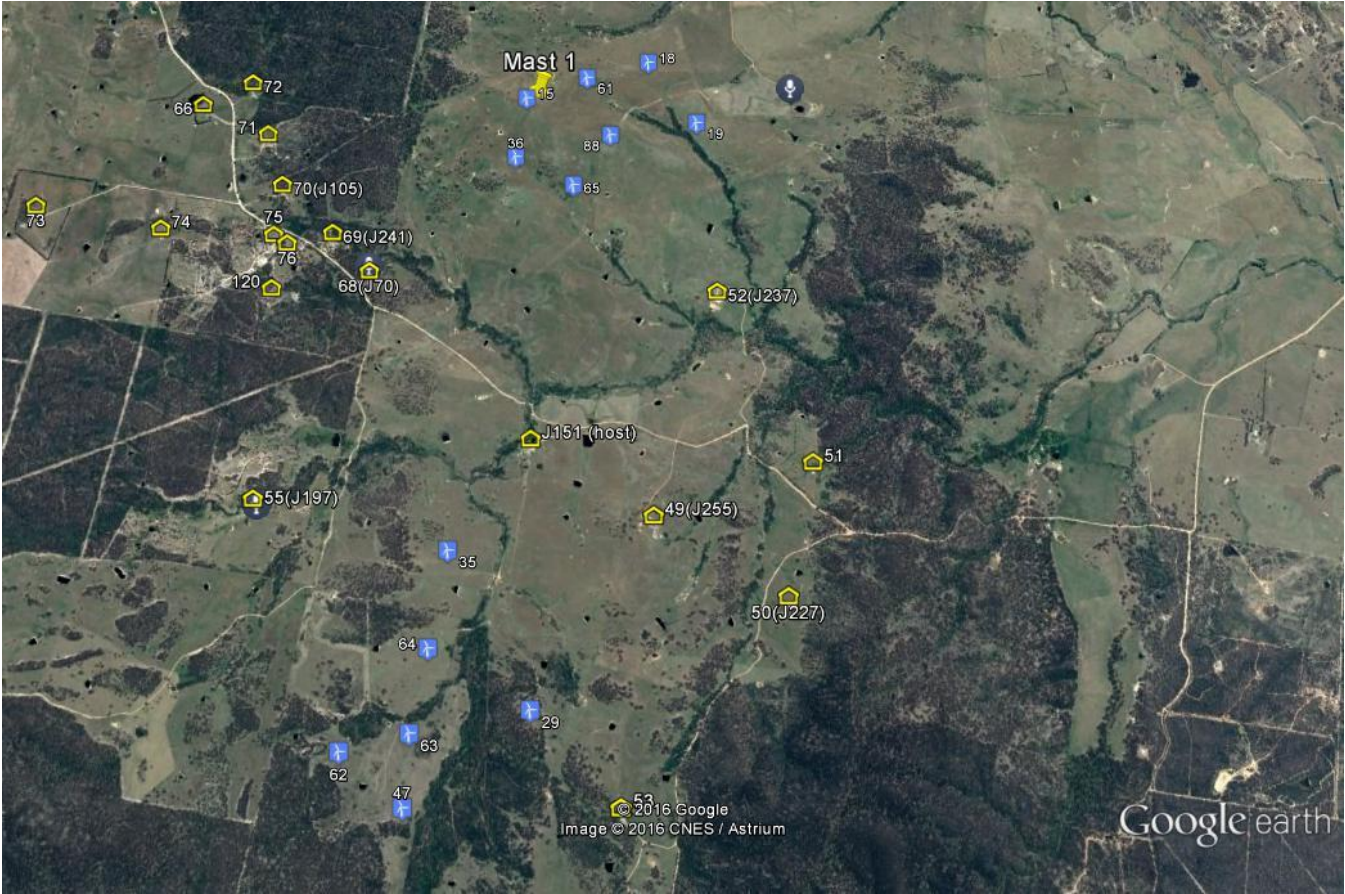
Representatives of Epyc, ERM and Clouston Associates have probably been past this residence more times than I have.

Did any of them notice the wind measurement tower behind the residence? Not just a portion of it but pretty much the whole damn 82 metres of it.

Turbine 15 is next to the measurement tower. So this resident will see, from the curtilage of their residence, virtually the whole of a 173 metre turbine. And we know from Green Bean Design³, one turbine can ruin the view. This resident will see more than one.

The Visual Impact assessment of “negligible” is obviously invalid.

Whilst down South, Mr O’Hanlon should have a look at J255 (centred below)



Cloustons tells us that the relevant photomontage was PM17

J255	Dwelling 1 - 2km	741085	6090116	35	1149	PM17	Little screening vegetation exists around this property and direct views likely available to 7 turbines on a ridge in the middle of the view.	Moderate/High**
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which is described as being "Representative of J255 - taken from nearest publicly accessible location on Manar Road".

Unfortunately, the GPS coordinates for PM17 tell us that it was taken from the front gate of residence J151 500 metres to the west.

³ GBD LVIA for the Sapphire wind farm Modification 1 as a footnote in the Appendix:
“Observations and measurements for individual residential dwellings must also take into account the potential visual effect of single or small numbers of wind turbines within a proposed wind farm development. Single or small numbers of wind turbines may give rise to moderate and high visual impacts under certain circumstances.”

J151 is a host and accessible, so there was no reason why you would take that picture from the road.

Cloustons made another mistake.

Be that as it may, PM17 taken from the correct position at the front gate of J255 would still show all seven turbines clearly from the ground up.⁴



Now, imagine climbing up the drive to the residence J255, which is 25 metres higher than the "nearest publicly accessible location"

Imagining this, Cloustons was only able to begrudgingly offer

"direct views likely available to seven turbines on a ridge"

How "likely" do you think it is?

That view in itself rates a HIGH Visual Impact to any normal observer.

But wait, there's more.

In its assessment in "Appendix A: Detailed assessment of dwellings within 3km of a turbine" of the visual impact on J255, Cloustons didn't mention the VI from the residence and its curtilage of the 6 turbines to the west, the closest being turbine 35 at 1149 metres. From the curtilage of the residence, T35 will be completely visible, base to tip, as will the other five to varying degrees. So the owner of J255 will be subjected to a horizon to horizon vista.

We don't know what methodology Cloustons used to evaluate VI on individual residences. Even if we use the flawed matrix used for representative viewpoints, Receptor Sensitivity is HIGH, Distance is HIGH, Quantum of View is HIGH, Period of View is HIGH, Magnitude of Change is HIGH so therefore the Visual Impact on residence J255 can't be anything other than HIGH.

To that you must add the possibility from that elevated residence that multiple turbines in Jupiter Central are also visible.

⁴ Sized approximately A1, so therefore about one half of actual VI. Only 6 turbines fit the frame. There is another one to the right. Page 160 LCVIA Part 2. If taken from the front gate of J255, it would be even more striking given that Manar Rd at that point is 8 metres higher than the photograph location on Manar Rd.

To that you must add the overhead 33kV transmission line taking power from Jupiter South to the Kings Highway approximately 4 kms away.⁵

This is also one of those examples where Mr O'Hanlon should consider the views from the driveway. The occupants, on their daily commutes, will have a long and expansive view of the turbines, coming and going.

Vegetative screening for both these residences is a nonsense. (See Chapter 8). J255 has some existing vegetative screening, but that is likely to be reassessed in view of its proximity to the residence and further development within the curtilage. It's the wrong time for developers and the Department to recommend vegetative screening given the recent Capital wind farm fire.

Below is a picture of the only house lost in that fire, surrounded by screening trees of the configuration suggested by the developer.



Is it my responsibility to check each of the 140 assessments? If the LVCIA had some assessment methodology it would be easier. I believe it is Clouston's initial responsibility to get it right, then ERM's responsibility for checking it. You can't expect much out of Epyc.

My final question therefore is, given the visual impact "comprehensive assessment" was at significant variance to the requirements in the SEARs and,

The methodology used to perform this comprehensive assessment was unknown and,
Some individual assessments are incorrect, not just as a matter of opinion, but factually,

How was this accepted by the Department in the revised EIS given the criticisms of Visual Impact assessment in the Letter of Rejection for the first EIS?

I ponder. Why am I one of the lucky ones to spot these errors, be it an important number, a significant citation, a botched calculation or a gross inconsistency?

Errors that most often seem to favour the developer.

⁵ A number of EIS Maps, if blown up, show that section of the transmission line as a series of straight lines, implying an overhead line, despite the "preference" for underground (all to be decided after approval of course). To keep within the road crown lease they have had to resort to short spans. The line is therefore carried by up to 15 poles, potentially visible from J255 and its curtilage and other residences.

I believe the Department of Planning has allowed wind farm EISs to descend into mediocrity and their authors to become complacent as the hurdles they have to jump are low and getting lower. After all, wind farm approval has been a foregone conclusion. Logically, if you upset the occupants of hundreds of lifestyle properties, you can anticipate a strong comeback from some of them, especially if you don't understand lifestylers.

I also wonder whether this applies to other DA categories. I have an interest in mining approvals especially since EPYC advised a severely impacted Roseview resident that their view would either be of the Jupiter wind farm or an open cut mine. Oh for some more time.