

The Flyers Creek VIA for turbines now proposed in Modification 4

I was delighted to see that the VIA was done by Green Bean Design (GBD). What a combination, Infigen and GBD and its Principal Landscape Architect, Mr Andrew Homewood.

Are we surprised that, once again, Mr Homewood determines that any change to a wind farm, no matter how big or small (and this one increases the turbine swept area by 56%), will make no difference to the original VI however wrong it is.

It doesn't matter how he gets there, and he has used various methods over the years in his role as the wind industry's goto VI consultant, the results will always be the same.

The first statement that strikes you is this one:

This VIA has not undertaken an assessment to verify the visual ratings determined in prior approved FCWF applications.

That's a bit like an engineer saying he was going to lift 56% more weight on a chain but he doesn't know, and isn't going to check, its breaking strain.

What it does say, is that Mr Homewood, like the engineer, accepts the original VI assessment from his industry peer. He confirms that in this VIA.

Having chosen not to verify the VI ratings of record, he makes extensive use of them, for example, in Table 8.

Can you imagine a Noise expert adopting this approach?

Can you imagine the Department of Planning allowing a Noise expert to adopt this approach?

Which leads us to the big issue.

The Big Issue

This is clearly a wind farm modification that must be assessed under the 2016 Wind Energy Guideline and this VIA under the 2016 Wind Energy Visual Assessment Bulletin.

On Page 4 of the Guideline, we are advised:

The Guideline also applies to applications for modification to an existing wind farm approval

There is nothing in either document that restricts the assessment of the visual impacts of the turbines to the changes that this modification proposes. If the drafters had meant to say that they would have.

On the contrary, the guidelines require *a visual assessment of the project in accordance with the Visual Assessment Bulletin*

We have to wait till Section 8 to find GBDs variant of an assessment under the 2016 Bulletin.

The introduction to section 8 claims:

Following the assessment of the magnitude of visual effects between the approved FCWF and the proposed Mod 4 wind turbines, this VIA has undertaken a further consideration of the potential visual effect of the Mod 4 project on people at dwellings surrounding the approved wind farm development. The consideration of visual effects has been prepared with regard to the Guidelines, and specifically the inputs required for the baseline study outlined in the Guidelines Appendix 1: Visual Assessment Process.

There are 35 non-associated residences under the black line at 2.15 kms. (there are another 41[43?] residences between the black and the blue line, at 3.2km. Mr Homewood ignores the Visual Impacts on these and any other residence further out than 3.2kms).

Any new wind farm with that number of residences below the black line would hopefully not get into the planning system if submitted today.

In Section 8, for the 35 residences, Mr Homewood repeats 35 times¹:

The Mod 4 amendment is not considered to result in any significant increase in wind turbine visibility from this dwelling location over and above the approved FCWF project.

To a reasonable person, this conflicts with the claim above.

¹ In Table 7, Mr Homewood repeated 35 times:

The observable scale of change would be partially limited by distance between the dwelling and closest approved FCWF wind turbine. There would be very limited change in the composition or contrast between the approved FCWF and proposed Mod 4 development. Magnitude rating Low – resulting in no change to the approved FCWF visual impact rating.

In arriving at the same assessment 35 times, Mr Homewood performed an evaluation under the 2016 Bulletin. He arrived at a rating for the Visual Influence Zone (VIZ).

Mr Homewood determined that 22 of these 35 residences are Visual Zone of Influence 1 (VZI1) and the remainder VZI2.

Surely he must be required to take the next step in the assessment.

The 2016 bulletin defines the actions required for VIZ1:

Avoid turbines or provide detailed justification of turbines below the blue line.

At a minimum, GBD owes us a detailed justification for the placing of turbines within 2.15 kms of 22 residences.

“I don’t have to, these turbines were approved years ago” is not an acceptable detailed justification.

How can you perform a VIA that is based on the VI increments. Infigen must be forced to produce a VIA for the Modification 4 turbine configuration under the 2016 Bulletin, especially as the original VIA is so deeply flawed. If the Department does not agree, this decision will join the list of examples we have compiled over the last 5 years of the Department being partial to Infigen.

Why does the original VIA totally lack credibility?

Mr Homewood advises he considered the impact of the proposed modification on the 78 residences within 3.2 kms of a turbine.

In the original visual impact assessment, not one, NOT ONE of these residences was deemed to have a visual impact of HIGH.

Did the department decision makers question that assessment? Of course not. Five years ago they were at the height of their arrogance and contempt for rural communities.

Did the department decision makers question that assessment when they were considering Modification 3? Of course not. They open their assessment of the visual impacts with:

“The proposed modification would reduce the visual impacts of the wind farm.”

Why did Mr Homewood choose not to verify the original Visual Impacts?

Methodology

The methodology (Section 3) looks remarkably similar to that carried out by GBD for the recent Glen Innes wind farm, modification 4. In my submission to that modification I queried whether Mr Homewood had actually been to the site. In the RTS², the proponent confirmed that he hadn’t.

Is it therefore reasonable to assume that Mr Homewood has done this VISUAL IMPACT ASSESSMENT without going to the site? The proponent can’t use the lame excuse offered for Glen Innes that he’d been in the area in previous years working on other wind farm LVIA’s.

The original Flyers Creek VI assessment was done in 2011. Has anything changed?

If, indeed, Mr Homewood did not go to the site, a number of statements in the VIA must be questionable. For example:

Whilst the assessment includes a determination of visual effects from dwellings, it also takes into account any curtilage surrounding each dwelling which may be considered an extension to the dwelling for domestic or social activities.

Even if he did make a site visit, how many of the 78 residences within 3.2 km of a turbine did Mr Homewood visit?

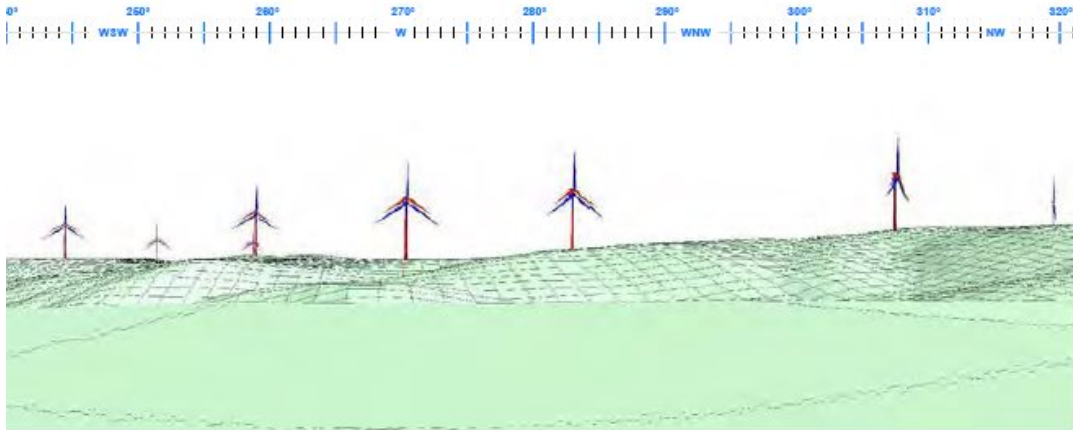
One must assume the answer is none, as he deliberately chose to accept the original Aurecon VI assessments.

Grossly misleading wireframes

And we thought the Glen Innes Mod 4 wireframes were misleading.

² Glen Innes RTS, Page 31

The Visual Impact Assessment was a desktop assessment, but with conclusions drawn from previous field work by Green Bean Design. Green Bean Design has undertaken previous site work within and surrounding the Glen Innes Wind Farm site including multiple site inspections for the White Rock Wind Farm, Sapphire Wind Farm and White Rock Solar Farm. Green Bean Design has an understanding of the landscape and receiver locations surrounding the Glen Innes Wind Farm site and demonstrated this in numerous Visual Impact Assessment reports prepared for the DP&E.

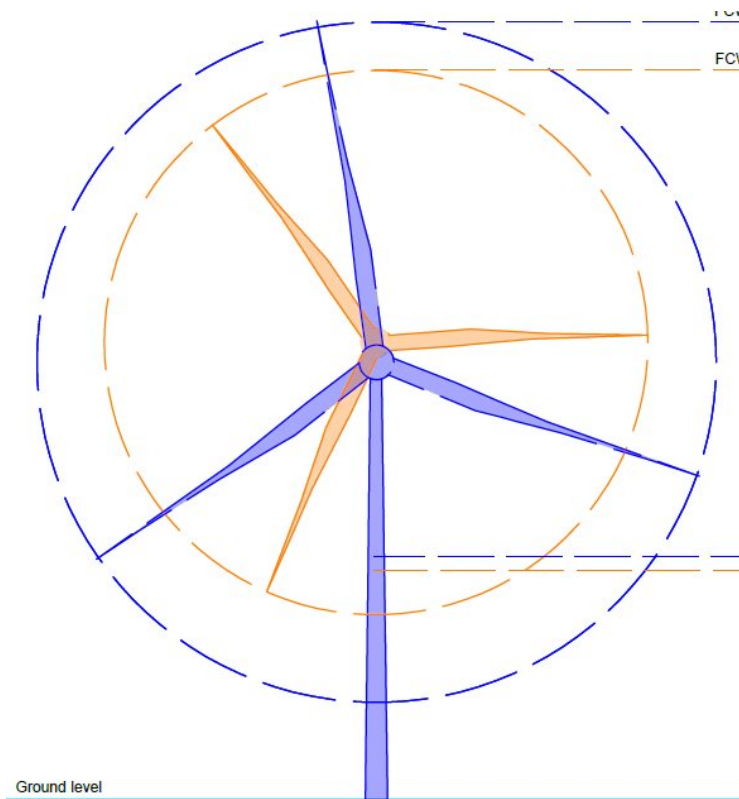


The above image is a section of wireframe Fig 20 showing the nearest turbines to residence 89, the closest turbine being 1144 metres from the dwelling.

This is **not** a wireframe designed to show how many turbines may be visible from the residence.

This is **not** a wireframe designed to show the layout of the wind farm from this viewpoint.

This is a wireframe designed specifically to show the visual difference between the approved turbines and the proposed turbines from that viewpoint.



This second image is from Fig 7 and it shows the approximate size turbines at a similar distance would look in real life if printed at A4 and held at arms length.

So, these two images are designed to show the same thing. Never have I seen a wireframe or photomontage so divorced from reality and so misleading and I dare say, neither has anyone in the Department.

If Mr Homewood thinks I've got it wrong, I invite him to publish his version of those two images to scale.

This sham applies to all 15 wireframes.

I would also ask Mr Homewood to confirm that the wireframe shown in Fig 8, if printed at A4 and viewed at arms length, is a true representation of what the resident at R14 will see.

Mitigation

The VIA concludes with the sentence:

The implementation of both on site and off-site landscape works would provide visual mitigation for a number of dwellings surrounding the approved FCWF wind farm site in accordance with the Conditions of Consent.

“therefore, these viewers at these residences must have minimal visual impact. Whilst this may be an accurate analysis, the LVA provides no details to demonstrate or confirm how many of the surrounding dwellings this applies to.”

I didn't write that last section in parentheses. Mr Homewood did, in his peer review of the LVA for the Golden Plains wind farm (Vic)

Does his criticism also apply to him?

Properties with residential entitlements

The 2016 Wind Energy 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

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

Viewer Sensitivity

I have previously been critical of Mr Homewood's opportunistic adoption of the reduced level of viewer sensitivity from rural residences afforded by the 2016 Wind Energy Guide. He continues in this VIA, rating all residences as having a level 2 viewer sensitivity.

In his peer review of the Clouston Associates LVIA for the Biala wind farm he took issue with the author on the “key issue” (Mr Homewood's description) of viewer sensitivity:

Within the category of sensitivity it would be expected that views from residential dwellings to be the most sensitive locations

Mr Homewood would appear to have been consistently of this view having, for instance, in his Bango and Rye Park wind farm LVIAs, and no doubt others, rated residential properties as having the “Highest Sensitivity”

In his recent LVIA for the Crystal Brook wind farm in Victoria, Mr Homewood maintains that rating.

Perhaps Victorian residents are more sensitive to wind farms than their NSW counterparts.

Villages

The areas classed as having the highest viewer sensitivity (Level 1) in the 2016 Wind Energy Guidelines include viewers in villages.

In his LVIA for the Alberton wind farm in Victoria, Mr Homewood considered the impacts on the 5 closest villages/townships, being between 2.75 kms and 7.8 kms from the nearest turbine.

In this Flyers Creek modification, and indeed in the original EIS, no consideration has been given to the village of Carcoar between 4 and 5 kms away from the nearest turbine.

Finally

There is no “approved visual impact rating” as GBD claims on multiple occasions. There is only an approved wind farm. If Mr Young would like to confirm that he agrees with the visual impact ratings for the approved wind farm, then we can progress from there. If not, then his only course of action is to insist that a genuine VIA is carried out on the proposed wind farm as modified by Modification 4. Otherwise, he cannot perform a genuine merit assessment.