

Established VI Methodology Distorted to Mislead and Favour Proponent

The visual assessment consultant appears to have departed from its previously established visual assessment framework in such a way as to diminish the assessed visual impact of Biala wind farm.

Clouston Associates has a fairly well developed framework for assessing visual impact, which it has used on a number of other major projects. Had the consultant consistently applied that same framework to Biala it would have reported inconveniently (for the proponent) high visual impact. The consultant has evidently tampered with the framework and fudged its application in a way that produces a VI report favourable to the proponent – and unfavourable to the local community.

The LVIA should be rejected and the Department should carefully examine what Clouston Associates has done given the effect is clearly to provide false or misleading information in the EIS, which is prohibited under the relevant regulations.

Given that the Planning Minister in October 2014 announced toughened penalties for the offence of providing false or misleading information in environmental impact statements, the Department needs to examine the extent to which such penalties are warranted here.

Visual Impact Assessment Factors – Period of View

All LVIA authors endeavour to bring some “science” into the assessment process by postulating a number of factors that supposedly have some varying impact visually. There is no standard. Each landscape architect devises their own. Some factors are irrelevant or at best insignificant. The ultimate aim is to get the Impact Assessment in the moderate ho-hum range. Let us examine just one of the factors used by Clouston Associates, Period of view. This factor is commonly used by other landscape architects and indeed by Clouston Associates in their non wind farm LVIA's. Here are three Clouston examples:


Appendix A, Deadmans Creek Bridge LVIA (February 2013)

Duration		The length of time the visual receptor is exposed to the view. The duration of view affects the impact of the development on the viewer - the longer the exposure the more detailed the impression of the proposed change in terms of visual impact:
	H	Significant part of the day - high impact: usually residential property.
	M/H	5 minutes to several hours - high to moderate impact: often from a garden or park or commercial property and work places.
	M	10 seconds to 1 minute - moderate impact: usually from a road/driveway entrance, walking past or entrance to commercial property.
	M/L	5 to 10 seconds - moderate to low impact: often from a road or walking past.
	L	1 to 5 seconds - low impact: usually from a road or railway

Appendix A, Moorebank Intermodal Terminal LVIA (February 2015)

Duration		The length of time the visual receptor is exposed to the view. The duration of view affects the impact of the development on the viewer - the longer the exposure the more detailed the impression of the proposed change in terms of visual impact:
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	L	1 to 5 seconds - low impact: usually from a road or railway

Appendix A, Biala LVIA:

Period of view		<p>The length of time the visual receptor is exposed to the view. The duration of view affects the impact of the Proposal on the viewer - the longer the exposure the more detailed the impression of the proposed change in terms of visual impact:</p> <ul style="list-style-type: none"> • Significant part of the day - high impact: usually residential property. • 5 minutes to several hours - high to moderate impact: often from a garden or park or commercial property and work places. • 10 seconds to 5 minutes - moderate impact: usually from a road/driveway entrance, walking past or entrance to commercial property. • 5 to 10 seconds - moderate to low impact: often from a road or walking past. • 1 to 5 seconds - low impact: usually from a road or railway
		

Apart from the 1 minute/5 minutes typo finally picked up in the Biala version and the factor description, wording is identical. For some reason or other the clear 5 point assessment that served them well for some years has morphed into a sliding scale for Biala. Maybe they needed some more rating flexibility.

Also note in all three versions, residential property is rated as high. This rating is often given for residential viewers by landscape architects who use the duration/period of view factor. Clearly if the development is a bridge or a building complex, the rating for period of view is in the 1 to 5 seconds, 5 to 10 seconds or even the 10 seconds to 5 minutes range if it is a particularly long structure or you have a view of it for a period before you pass it.

Is it fair to assume that for a wind farm covering several kilometers from end to end, with a view of it sometimes for several kilometers before you get to the first turbine, that the “period of view” rating may well be in the range medium to medium/high inclusive? ie you will see it for more than 10 seconds and probably for more than 5 minutes.

But what do we find?

4.7 VISUAL IMPACT SUMMARY

From the analysis of visual receptors in the foregoing section, the summary of qualitative and quantitative visual impacts of the proposal are:

Receptor Identification	Receptor Type	Location	Receptor Sensitivity	MAGNITUDE					Overall Impact Rating
				Distance	Quantum of View	Period of View	Magnitude of Change	Summary of Magnitude	

Public Receptors

1	Major Road	Biala Gurrundah Road, looking north west	M	M	M	L	M	M	MODERATE
2	Minor Road	Sapphire Road, looking east	L	M	L	L	L	L	LOW
3	Major Road	Grabben Gullen Road, looking west	M	H	M	L	M	M	MODERATE
4	Major Road	Grabben Gullen Road, looking west	M	H	H	L	M	M	MODERATE

Private Receptors

5	Dwelling	Properties off Biala Gurrundah Road H13, H14 + H15	H	M	M	M	M	M	MODERATE/HIGH
6	Dwelling	Properties off Church Lane H03	H	M	H	M	H	M	MODERATE/HIGH
7	Dwelling	Properties off Grabben Gullen Road H06 + H07	M	H	M	M	M	M	MODERATE
8	Dwelling	Property off Grabben Gullen Road H05	H	M	L	L	L	L	MODERATE/LOW
9	Dwelling	Properties off Grabben Gullen Road H09, H11, H12, H17	H	H	L	M	L	L	MODERATE
10	Dwelling	Property off Sapphire Road H04	M	M	L	L	L	L	MODERATE/LOW

Table 07 - Summary of visual impacts of the Proposal across the study area

Source LVIA. Page 66

So in the Biala LVIA, why, for each of the public receptors, the period of view is assessed as Low when it should be Moderate, and why, having in all three LVIA's above, assessing the impact from a residential viewpoint as High, none of the private receptors is so classed. Four achieved a rating of Medium and two Low. There must be an explanation for all 10 ratings. It is not there or obvious.

It can't have anything to do with existing screening. As an example viewpoint 9 covers 4 dwellings and is rated low. A quick check on Google maps shows that "All four properties are surrounded by tree planting" is patently false. (even if they are talking about residences, not properties as they say on page 63). Besides, how would Cloustons know? It would appear they never assessed the view from inside any of these properties, otherwise they would have based a photomontage from there.

This just shows how one factor, incorrectly evaluated can skew the whole assessment. Perhaps others will review the other factors.

They are all vulnerable to a logical argument.

Not even the Department could support the proffered Visual Impact of 185 metre turbines on properties well under 2kms from the nearest turbine and on surrounding roads even closer.

This LVIA should be rejected. We believe that it is Clouston Associates first NSW wind farm LVIA but they seem to have fallen under the ERM spell. Their management should be ashamed.