

Glen Innes wind farm Visual Impact

All EA sections of this modification must be assessed under the December 2016 Wind Energy Guideline. In particular, the VI EIS section as submitted pays lip service to the Guideline and the supporting VI Bulletin, and therefore should be rejected.

The December 2016 Wind Energy Guideline states:

“The Guideline also applies to applications for modification to an existing wind farm approval submitted after the date of publication of this Guideline.”¹

Mr Homewood from Green Bean Design would appear to accept that statement. However we differ in interpretation. I maintain that the Visual Impact of the proposed modified Glen Innes wind farm needs to be assessed under the 2016 Guidelines, whereas Mr Homewood believes that only Modification 4 and its Visual Impact needs to be thus assessed.

If that were correct, Mr Homewood would do as he has done in the past for modifications to turbine numbers and sizes. He would conclude in his professional opinion that the modification alone would have no significant visual impact both uniquely and cumulatively.

And he has. As always he takes 50 pages to say it.

Environmental Property Services on page 20 of the EA confirms the requirement for the visual impact to be assessed under the 2016 Guideline stating:

“The assessment (Green Bean Design, 2017) takes into account, and addresses, the visual impact process included in the New South Wales State Government Wind Energy: Visual Assessment Bulletin December 2016, as applicable to the Modification 4 application.”

In my opinion, GBD(2017) does not “take into account” or “address” etc, but I guess that depends on your interpretation of “take into account” and “address”.

Mr Homewood, in GBD(2017) is much more cautious in his claims:

“This VIA has been prepared with regard to the visual assessment process outlined in the New South Wales State Government Wind Energy: Visual Assessment Bulletin December 2016 (the Guidelines) as applicable to the Modification- 4 Application.”

but I guess that depends on your interpretation of “with regard to”

Having made his Visual Impact assessment, without reference to the Guidelines, Mr Homewood, in section 8 (EIGHT), tacks on some repetitive pages that pay lip service to the Guidelines. He makes no attempt to discuss genuine mitigation strategies for the 23 residences (the EA ignores properties with residential rights), all of which have a VI of Moderate or High. No consideration, for instance, was given to “voluntary acquisition” for any of these properties.

The Glen Innes wind farm modification history reinforces why the VI for the modified wind farm needs to be addressed, as this is the second modification to the physical size of turbines. In each case, the EA author (current DPE planner Anthony Ko for Modification 2 on behalf of Aurecon

¹ The Visual Impact Bulletin confuses the issue of course by stating:

“It will also apply to any modification applications submitted after the date of the Bulletin that propose additional turbines, or a significant reconfiguration or increase in height to the approved turbines.”

Obviously, the Guidelines override the supporting Bulletin.

and Andrew Homewood on behalf of Green Bean Design for Modification 4) has claimed that the visual impacts of the respective modification alone are insignificant, but when you can consider that the two modifications together have resulted in an **increase** in swept area (the bit that grabs our attention) of **96%**, on top of towers that have increased in height by **37.5%**, logic dictates that the 2016 Guidelines must be more broadly applied.

In addition, both the original DA and subsequent modifications have assessed the Visual Impacts on 14 of the 23 surrounding residences within 3 kms as High.²

It doesn't ring true that the VI for those residences originally rated as less than High have not been further impacted by an increase in swept area of 96% on taller towers.

A few comments on the VIA itself:

The wireframes.

No wireframe supplied will give anywhere near an assessment of the visual impact suffered at the viewpoint. I don't know why GBD bothered. Even the Department knows they are grossly misleading as published and certainly don't meet the requirements on page 13 of the Visual Assessment Bulletin.

Methodology

I have read and commented on a number of GBD LVIA's. Mr Homewood consistently tells us that he has made a site visit(s) often calling it field work. The methodology³ for the Glen Innes modification 4 indicates that Mr Homewood didn't visit the site. How could you assess the wind farm as per the 2016 Guideline if you haven't been there? With the White Rock and Sapphire wind farms under construction, wouldn't it have been prudent to confirm your professional judgement on cumulative impacts?

Properties with residential rights.

Where is GBD's assessment of properties with residential rights? As Secretary McNally advised me on May 25, 2017,

“it is important for proponents to identify all land that may be affected by a proposal”

The Department must err on the cautious side for this first modification under the new Guidelines.

To not do so would indicate to all future modification submitters that the new Guidelines do not apply, and they would probably be backed up by legal opinion on precedent.

It will also weaken the department's stance on any new wind farm application.

² This probably explains why Mr Homewood chose not to review the original visual impacts as he is not known for rating VI as High in all but exceptional circumstances. However, by not questioning prior ratings he endorses the existing ones by omission.

There is some confusion about what the “approved” VIs were, but Environmental property Services clarifies it by stating:

“All ratings remain unchanged from those assigned in the visual impact assessment that supported Modification 2, prepared by Aurecon in 2013 (see Appendix D.1 of Aurecon 2013, Table 3).”

³ This was not an accidental omission. Site visits, as part of the methodology employed, are missing from the methodology sections on page 20 of the summary section and from page 13 of the VIA