

Mr David McNamara
Director
Independent Planning Commission of NSW
GPO Box 3415
Sydney NSW 2001

Dear Mr McNamara

Bango Wind Farm (SSD 6686)

Thank you for your correspondence requesting additional advice from the Department regarding the visual impacts of the Bango Wind Farm, specifically in relation to:

- the assessment of visual impacts of turbine Layout Option 2; and
- the visual impacts on non-associated residences 26, 62, 165 and 260, with reference to the additional photomontages provided by the Applicant for these residences.

Layout Option 2

The Department's assessment report considered the visual impacts of both Layout Option 1 and 2. However, on 24 April 2018, the Applicant formally amended the development application for the project by withdrawing Layout Option 2 (see Attachment 1).

The Applicant is now only seeking approval for Layout Option 1, containing up to 75 wind turbines, and as such there is no need to comment further on the Department's assessment of Layout Option 2.

Photomontages for Residences 26, 62, 165 and 260

It is important to note that photomontages are only one tool used by the Department to assess visual impacts of wind farms, and there are limitations associated with their interpretation.

That is why the Department's assessment of this project (and other wind farm proposals) is supplemented by a number of additional inputs. In this case, this comprised several site visits by Departmental assessment officers, advice from an independent visual expert, analyses of wireframes, and consultation with affected landowners.

Notwithstanding, the Department has considered the additional photomontages provided by the Applicant, and can confirm that they do not alter the findings of the Department's assessment of visual impacts on non-associated residences 26, 62, 165 and 260.

In this regard, the Department considers that the visual impacts on residences 26 and 62 would remain medium/high. This is primarily based on horizontal views from these residences which would capture a relatively large number of turbines in both clusters, and the proximity of the nearest turbines which would be relatively close to these properties (i.e. at around 3 km).

The Department has considered a range of mitigation measures to reduce the visual impacts at these residences, including removal of turbines and visual screening. In this case, the Department's recommendation to remove turbines 19, 65, 72 and 79 would result in some reduction in visual impacts on these residences, although the Department acknowledges that any material reduction in impact would require the removal of many more turbines.

However, the Department considers that the nature and extent of the impacts does not warrant further removal of turbines beyond 19, 65, 72 and 79. Instead the Department considers there would be an opportunity on both properties to supplement existing vegetation to further screen views of the turbines.

Accordingly, the recommended conditions allow the owners of these properties to ask the proponent to undertake additional visual mitigation measures at or adjacent to their residence to reduce the visual impacts of the project.

In regard to residences 62 and 260, the Department considers that the photomontages do not accurately reflect the potential visual impacts on these properties at all locations within the curtilage.

While the Department acknowledges that the photomontages illustrate there is significant vegetation screening on some parts of the property, the advice of the Department's independent expert was based on site visits including consideration of impacts from other locations within the residential curtilage. In these locations, there would be views of a relatively large number of turbines (primarily in the Kangiara cluster), and the nearest turbines would be relatively close to these residences (i.e. around 3 km).

Consequently, the Department considers that the visual impacts would remain at a medium/high rating, albeit that the partial vegetative screening would reduce these impacts to the lower end of this category.

Updated Conditions

As requested by the Commission, the Department has amended the conditions of consent to reflect the removal of Layout Option 2, remove the option for an agreement with residence 282, and retain turbines 19, 65, 72 and 79 in the southern portion of the Kangiara cluster.

While the Department acknowledges that the removal of turbines 19, 65, 72 and 79 would result in a limited reduction in visual impacts on residences to the southwest and southwest of the Kangiara cluster as outline above (e.g. residences 26, 62, 165 and 260), it considers the removal of these turbines would materially reduce the impacts on the nearest residences in this locality (i.e. residences 76 and 235).

This finding is based on advice from the Department's independent visual expert which highlighted that the removal of these turbines would reduce the dominance of the most visually prominent turbines at these residences and reduce the overall cluttering effect created by multiple rows of turbines.

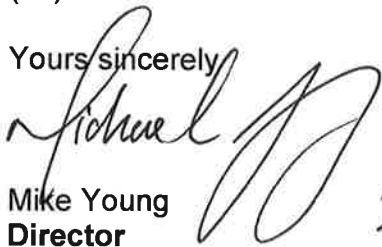
In this regard, the Department notes that the nearest turbines to residences 76 and 235 would be considerably closer than other properties (i.e. at around 2 km) and all 4 turbines recommended for removal would be within 2.7 km of these residences (noting that the NSW Government's *Wind Energy Framework* recommends 'avoidance' where possible for 200 metre turbines at distances of up to 2.7 km from non-associated residences).

Finally, the Department has also updated the conditions to (see Attachment 2):

- reflect recent amendments to the *Environmental Planning and Assessment Act 1979*; and
- provide further clarify regarding the conditions defining the designated heavy vehicle and over-dimensional vehicle route.

I trust this response adequately addresses the matters raised by the Commission. However, if you have any questions or require further clarification, please contact me on (02) 8217 2091.

Yours sincerely



Mike Young
Director

27/4/18.

Resource and Energy Assessments

Enclosures:

Attachment 1 – Letter from applicant amending development application

Attachment 2 – Amended Conditions of Consent