



Coastal Concern Alliance: Background Note

Photomontages and Visual Impact Assessment of Offshore Wind Farms

1. Inadequate Assessment of Visual Impact

The visual impact of offshore wind farms is a matter of significant and legitimate public concern wherever such installations are proposed close to shore. This is particularly so in Ireland, where our unspoilt coastal landscapes, many close to urban centres, are a unique part of our heritage, quality of life and economy.

CCA is concerned that the visual impact of the two large scale offshore wind farms permitted in Ireland's near-shore zone, 10/12 km off County Wicklow, has not been properly or independently assessed, so threatening a key part of our heritage. These two wind farms, the 520MW Arklow Bank Wind Park and the 1100MW Codling Wind Park will involve a total of over 400 huge turbines, each up to 150 metres high, covering a total area of 120km² (46 sq miles) off Wicklow. This extensive development will industrialise the seascape /coastal landscape of the entire county, designated as an Area of Outstanding Natural Beauty in recognition of its scenic importance.

Under the outdated and undemocratic Foreshore Act 1933, the Minister for the Marine has sole authority to award foreshore leases for construction in coastal waters with:

- No statutory involvement of local authorities(their authority ends at the shoreline)
- No public right of appeal against the Minister's decision to an independent planning appeals board (such as An Bord Pleanala).

The developer's Environmental Impact Statement is assessed by a Marine Licence Vetting Committee, (MLVC), a committee of technical and scientific experts who advise the Minister on whether to accept or reject the foreshore lease application. The final decision rests with the Minister. The MLVC does not have a landscape professional as a member.

This unsatisfactory situation means that, with regard to the large-scale Wicklow developments outlined above, no independent professional assessment of the developer's assessment of landscape impacts, contained in the EIS, has been carried out.

2. Inadequate Methodology

The methodology used by developers to prepare the photomontages contained in the EIS for the Wicklow offshore wind farms, serves to underestimate to a significant degree the actual visual impact of developments.

- * To carry out a balanced visual assessment, **photomontages** must represent as closely as possible the predicted human visual experience when viewed from the particular viewpoint.
- * **Visibility**, apparent **size** and apparent **distance** are the three critical issues.
- * Photographs used in Photomontages therefore must be very **high resolution**, must not be taken with an artificially **wide angle lens** and must be **printed** large enough.
- * Guidelines by the **EPA** and **The Landscape Institute** state that a camera lens no greater than 50mm focal length should be used (35mm camera format) This is regarded as a "normal lens" It has an **angle of view of 39 degrees**
- * The wind industry typically uses much wider angles of view in its photomontages and prints are much too small to visually assess properly.
- * The Arklow Bank photomontages were produced using a 180 degree angle of view. Four and half times wider than recommended.
- * The Codling Bank example is similarly too wide to properly assess and together with a print width of A3 size is grossly inadequate.
- * The consequences of this are to deliberately **understate the visual impact** of proposed windfarms.

- * The only **true test** of a photomontage is to take the printed photomontage to its camera location and compare it to the "actual view". Only then can the assessor judge the **visibility**, **size** and **apparent distance** of objects.

3. Photomontages: Limited Public Access

The EIS for the Arklow Bank and the Codling Bank developments were subject to very limited, one- month, public consultation. The photomontages, a key part of the EIS, were not available on the web thus depriving citizens of accessible information about the visual impact of these developments on the unspoilt coastlines of S. Dublin, Wicklow and N.Wexford – a key matter of legitimate public concern.

The EIS Non Technical Summary, the key document prepared for public consultation contained very limited and misleading information on visual impact. For example, the Non Technical Summary for the Codling Wind Park, then the biggest offshore wind farm proposed anywhere in the world, (comprising 220 turbines, each 5MW or 150 metres high) contained just one photo of a **single 2MW turbine**. If the public wished to see the photomontages (contained in a separate appendix), it was necessary to purchase this document at an exorbitant price .

SUMMARY

The inadequate, undemocratic assessment of visual impact, the misleading methodology of the photomontages, the limited one- month consultation and the very limited access to photomontages combined to ensure that the public had no proper idea of the visual impact of the developments proposed. With regard to the Codling Wind Park permitted in 2005 (the biggest offshore wind farm proposed anywhere in the world at that time), no submissions were received from the public and no objections

. The impact of offshore wind farms on designated /valued coastal landscapes is a matter of legitimate public concern. It appears that no-one, (neither the Minister for the Marine, the MLVC, Wicklow planning authorities, public representatives or indeed the public), has seen an accurate representation of what the two huge developments permitted off Wicklow will look like. **This is a gross failure of governance and contrary to all principles of proper planning and sustainable development. Once again the interests of developers appear to ride roughshod over democracy and heritage protection.**

Coastal Concern Alliance call on the Government

- To commission an independent professional assessment of the landscape impact (individual and cumulative) of the Arklow Bank Wind Park and the Codling Wind Park, on the unspoilt coastline of S.Dublin, Wicklow and N. Wexford.
- This assessment should be based on the “in the field reality” of the first seven 3.6 MW turbines erected in the Arklow Bank project.
- It should include the visual impact of the attendant on land development necessary to connect these extensive developments to the grid.

The visual impact of offshore wind farms in the near- shore zone is recognized internationally as a very heavy external cost which must be assessed in any valid cost/benefit analysis of the pros and cons of development. In the case of the two large-scale developments permitted off Wicklow under outdated and undemocratic legislation, this key external cost has not been assessed.

It is clear that no taxpayer’s money should be devoted to furthering these developer-led projects via price subsidies or grid development until the above

visual impact assessment has been carried out and presented for proper public analysis.

Coastal Concern Alliance: 2009