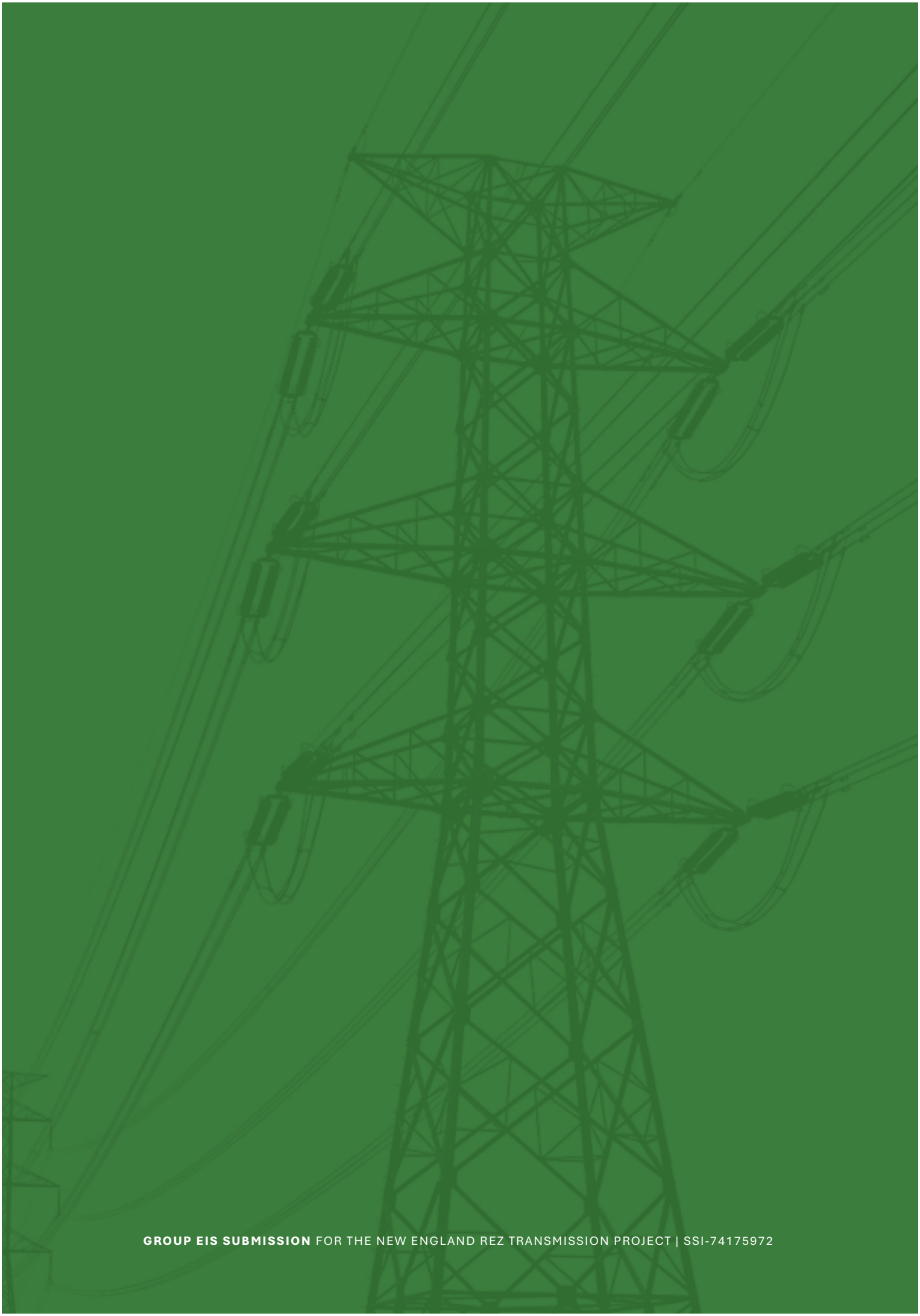
SECTION **20**

Visual Impacts

THIS IS **ONE** SECTION OF **TWENTY TWO,**
THAT FORMS PART OF A LARGER GROUP SUBMISSION
TO THE NEW ENGLAND REZ TRANSMISSION PROJECT
SSI-74175972



WALCHA HIGH COUNTRY GUARDIANS | Rouchel Brook ACTION GROUP | PROTECT THE VALLEY UPPER HUNTER RESPONSIBLE INFRASTRUCTURE GROUP | Voice for Walcha



GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION **20**

Visual Impacts

Key issues we have found ...

100 homes deliberately excluded	The assessment excludes 100 homes on properties hosting the line, leaving their visual impacts unmeasured and denying equivalent visual protections.
Desktop downgrades remove mitigation requirements	Twelve homes were downgraded without site visits, removing mitigation requirements; contradictory ratings elsewhere expose further failures in the assessment process.
The wires count for nothing	The visual magnitude calculation ignores conductors and towers beyond 1,527 metres; dwelling assessments disregard what farmers see across working properties.
Blocking views is not mitigation	Proposed screening can replace valued rural outlooks with trees, relying on unsupported growth assumptions and no binding commitment to maintenance.
Full landscape impacts remain unassessed	Unapproved wind projects are excluded, local night skies neglected and pastoral landscapes left unrated, obscuring the scale of visual impacts.
Visualisations show the wrong community	EnergyCo produced community visualisations for Woolomin, now outside the route; the EIS records no equivalent illustrations for communities actually affected.

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SECTION **20**

Visual Impacts

EXECUTIVE SUMMARY

100 homes on host properties get no visual assessment at all. TR5 identifies 100 easement-affected dwellings in the visual study area and assesses none of them, because "no visual impact assessment is required" for a property that hosts the line. Only 57 neighbouring homes are assessed. (TR5 9.4.1, p. 145)

Most of the detailed assessments were done from a desk. Access was not obtained for 17 of the 26 homes needing a detailed assessment. Twelve of those 17 were then downgraded to low, very low or nil impact using LiDAR renders, and need no mitigation. (TR5 12.2, pp. 162–163, Table 35)

The method undercounts what people will see. Transmission lines are not counted at all; towers more than 1,527 m away are not counted; only the view from the house is assessed, not the farm; and construction impacts "may not be fully assessed". (TR5 1.7.2, p. 19; 8.3, p. 139; 11, p. 153)

The results are inconsistent. One landholder's own assessment rates the same view as High on one page and Moderate on another, with scenic quality changing from Moderate to Low. Tourist accommodation and a church are rated at a lower sensitivity than TR5's own table assigns them. (Landholder assessment, receiver I-8 D9, pp. 2, 4; TR5 Tables 29, 36)

The mitigation is trees that block the view they are meant to protect. It is offered rather than guaranteed, rests on trees reaching 5 m in five years, and is described by EnergyCo as "indicative". One landholder whose view is rated High says the proposed screening blocks the outlook it is supposed to protect. (TR5 17, p. 200; Table 45, p. 199)

The pastoral cultural landscape is described but never assessed. The heritage report defines the landscape by its open grazing lands, homesteads and long views, then gives it no significance or impact rating, assesses homesteads from the road and develops no visual mitigation. (TR3 pp. 56–57, 456–460, 481)

The only community visualisations were made for Woolomin, which the line no longer passes. Nothing comparable has been produced for Walcha or any community now on the route. (EIS pp. 56, 168, 170)

What we ask: (a) assess every dwelling, including those on host properties; (b) field-verify every downgraded result; (c) count conductors, the whole project and views from the working farm; (d) correct the inconsistent ratings; (e) make mitigation binding, funded and maintained; (f) set enforceable no-tower setbacks for high-impact homes; (g) redo the cumulative assessment with all REZ projects; (h) assess the cultural landscape as a whole; (i) publish visualisations for every community on the current route.

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1 | 100 Homes *excluded* from assessment

1.1 Evidence

TR5 states: "If a private landholding would host the proposed transmission infrastructure and be affected by an easement (referred to as an easement-affected dwelling or receiver), no visual impact assessment is required in accordance with the Technical Supplement." Within the visual study area it identifies **100 easement-affected private receivers** and **57 non-easement affected private receivers** (TR5 9.4.1, p. 145). The 100 are listed in the assessment as "No intermediate assessment required – easement affected dwelling".

The 377 m visual setback applies only to non-easement dwellings. TR5 notes that all non-easement dwellings are outside it except one (I-7 DB1), which receives a no-tower exclusion zone (TR5 9.2, p. 143; Measure LV10). No setback of any kind protects the 100 host homes.

1.2 EIS shortcoming

- The households who will live closest to the towers, often within a few hundred metres, are excluded from the only assessment of what they will see from their homes.
- The EIS therefore reports 4 high and 5 moderate impacts project-wide (TR5, Executive Summary). That figure leaves out almost two-thirds of the dwellings in the study area.
- Hosting an easement does not mean a landholder consented or was compensated for the view. Many hosts have not agreed to the line at all.

> POSITION SOUGHT

More work. Require a visual impact assessment of every easement-affected dwelling, reported alongside the other results, and apply the same setback and mitigation framework to them.

2 | Results decided from a desk

2.1 Evidence

Access was "not granted or could not be reasonably arranged for 17 dwellings (out of 26 private receivers requiring a Detailed Assessment)". For these, primary living areas and viewing directions were inferred from aerial imagery, building footprints and, "where available, real estate imagery" (TR5 12.2, p. 162). TR5 accepts that this "cannot account for fine-grain elements such as detailed garden vegetation, specific window locations or interior viewing conditions".

Outcome after LiDAR desktop assessment	Number of homes	Receivers	Source
Downgraded to low, very low or nil; no mitigation required	12	Q-40 D3, O-29 D1, O-28 D3, P-25 DN2, N-23 D1, H-12 SR1, I-8 D5, I-8 DN12, I-8 D3, I-7 D4, G-4 D15, G-4 D2	TR5 Table 35, p. 163
Remained moderate or high; mitigation required	5	O-32 D2, I-8 D9, I-8 SRA1 (Rouchel church), I-8 D7, H-5 D2	TR5 Table 35, p. 163

> Table 1 - **Desktop (no-access) detailed assessments and their outcome**

One tourism and recreation facility (P-25 DN2) dropped from High (38 cells) at the intermediate stage to Low (13 cells) on a desktop render alone (TR5 Table 35, p. 163).

Privacy. Landholders have received LiDAR renders of their homes, yards and sheds, generated from assumed window positions, and these outputs are published in the exhibited EIS (TR5 Appendix G). One landholder near Nundle described the render from her bedroom window as removing the privacy and security she had built with tree lines, walls and guard dogs, "with police 1 hour away". Another landholder states that access was not given and asks whether images were taken on the property without permission. (Landholder correspondence, 29 and 30 October 2026)

2.2 EIS shortcoming

- Most results that removed the need for mitigation were reached without anyone standing at the home.
- Using real estate listing photos to infer how people live is not a substitute for asking them.
- Publishing rendered views of identifiable rural homes and yards raises security concerns the EIS does not address.

> POSITION SOUGHT

More work. Require field verification, with the landholder, of every desktop result before it is accepted; offer landholders the right to have their own viewpoints assessed; and remove identifying renders of private homes from public documents unless the owner consents.

3 | A method that undercounts what people will see

3.1 Evidence

Element	How TR5 treats it	Citation
Conductors (the lines themselves)	"Cells containing only conductors or transmission lines are not counted as occupied cells"	TR5 8.3, p. 139; 11, p. 153
Towers beyond 1,527 m	"Transmission towers located beyond the Visual Study Area … are therefore excluded from the calculation", even where shown in the photomontage	TR5 11, p. 153; 12.1, p. 162
Views from the rest of the farm	Assessment is "strictly confined to the views observed from the dwelling itself, excluding views from the property boundaries or other ancillary parts of the property"	TR5 9.4.1, p. 145
Construction	Construction effects (cranes, laydowns, compounds) "may not be fully assessed"; ancillary infrastructure assessed only qualitatively	TR5 1.7.2, p. 19; §14
Seasons and weather	Seasonal vegetation changes "have not been separately modelled"	TR5 1.7.2, p. 19
Final tower locations	Assessment is based on a reference design; towers may be micro-sited anywhere in the approved project area	TR5 1.7.2, p. 19

> Table 2 - **What the visual magnitude count leaves out**

The project is dual 500 kV double-circuit lines, assessed at 80 m towers (TR5 9.1, p. 143). For a farming family, the line is seen all day from paddocks, yards and work areas, not only from the kitchen window.

3.2 EIS shortcoming

- The lines, the most continuous visible element of a dual 500 kV project, count for nothing in the rating.
- Following the Technical Supplement is not the same as measuring the impact people will experience; the assessment does not test whether the supplement's simplifications understate impacts here.
- Because towers can move within the corridor, a home rated "low" today may face a tower in a different place after approval. EnergyCo has told one landholder the "final impact would be ascertained once the infrastructure locations have been finalised" (EnergyCo email, 27 October 2026).

> POSITION SOUGHT

More work. Require a supplementary assessment that counts conductors and all visible towers, assesses views from working areas of affected farms, assesses construction-phase visual impacts, and is repeated on the final design before construction.

4 | Inconsistent and Contradictory Ratings

4.1 Evidence

Issue	What the documents say	Citation
Same view, two ratings	Receiver I-8 D9 (Rouchel Road): page 2 gives scenic quality Moderate and visual impact High; page 4 of the same assessment gives scenic quality Low and visual impact Moderate, for the same 38 occupied cells	Landholder assessment, I-8 D9, pp. 2, 4
Tourist accommodation and places of worship	TR5's viewpoint sensitivity table lists "tourist and visitor accommodation" and "places of worship" under high sensitivity, yet tourist accommodation H-12 SR1, tourism facility P-25 DN2 and Rouchel church I-8 SRA1 are each given moderate viewpoint sensitivity [VERIFY AGAINST TABLE 29 LAYOUT]	TR5 Table 29, p. 140; Table 36, p. 164
"Low" told to a landholder	EnergyCo told one landholder near Nundle the impact was low and "no visual mitigation is required", while also saying the final impact would be known only once tower locations are finalised	EnergyCo emails, 23 and 27 October 2026
Niangala Road (Walcha)	PVP-07 has 64 occupied cells, the highest count in the public results, rated Very High magnitude, but only Moderate impact because the road is given low sensitivity; the road crosses the corridor twice	TR5 Table 37, p. 165; Table 46

> Table 3 - **Inconsistencies in the ratings**

4.2 EIS shortcoming

- If one property's assessment contains two different ratings, the Department cannot rely on any rating without checking it.
- Lower sensitivity ratings directly lower the impact rating and remove the requirement for mitigation.

> POSITION SOUGHT

More work. Require EnergyCo to audit and correct every detailed assessment, publish a change log, and re-issue corrected results to landholders before determination.

5 | Mitigation That Blocks the View It Is Meant to Protect

5.1 Evidence

- Mitigation is "supplementary vegetation screening" that "will be offered to the landowner". The measures are "indicative and would be subject to further consultation" (TR5 Table 45, p. 199).
- Residual ratings assume planting reaches about 5 m in five years and gives "partial filtering … rather than complete screening" (TR5 17, p. 200). At I-8 D9, "upper tower sections and conductors are likely to remain visible" after five years.
- The Technical Supplement's performance objective requires that mitigation "would not result in a significant obstruction of views" (TR5 Table 44, p. 196). The I-8 D9 landholder states that the proposed screening blocks the view across the valley.
- At Rouchel Brook TR5 concedes denser planting "may also reduce the open outlook from the property" (TR5 Table 45, p. 199).
- By contrast, a binding no-tower setback has been given to only one receiver, I-7 DB1 (Measure LV10).
- On a local level – trees need to be able to survive frosts and drought in our regions. The growth rate noted at 5m in 5 years is not supported by documentation in the EIS that this can be achieved.

5.2 EIS shortcoming

- Replacing a rural outlook with a wall of trees is not mitigation of a visual impact; it is a different visual impact.
- Nothing in the EIS commits EnergyCo to establish, maintain, water or replace plantings, or sets a test of whether they work.
- Design changes (moving or lowering towers) are mentioned only as things EnergyCo "will continue to investigate … where feasible and reasonable".

> POSITION SOUGHT

Specific protection.

Condition:

a. no-tower setbacks, on the model of LV10, for every dwelling rated moderate or high;

b. tower relocation or height reduction before screening is relied on;

c. any screening to be agreed by the landholder, funded, established with advanced stock and maintained by EnergyCo for the life of the asset, with replacement of failures;

d. independent re-assessment after five years, with further measures if the residual rating is not achieved;

e. share studies of the predicted growth rates of the trees being achieved i
n the northern tablelands

6 | Cumulative Impacts and Night Lighting

6.1 Evidence

- "Only approved wind energy projects have been included." Projects proposed or under assessment are excluded (TR5 13, p. 172). Only two wind farms are considered: Bowmans Creek Stage 1 and Thunderbolt Stage 1.
- Lighting at energy hubs, including Central South Hub near Walcha, "would operate from dusk until dawn, seven days a week" (TR5 15.5, p. 195). The only dark-sky receptor assessed is Siding Spring Observatory, about 200 km away.
- TR5 accepts that new lighting "may be more noticeable where introduced into darker rural settings" (TR5 15.2).

6.2 EIS shortcoming

- The REZ exists to connect many more generation projects reportedly (although we are unsure what they are). Excluding everything not yet approved means the combined landscape the community will live with has not been assessed. The assessment should use all the reported projects that energyco continue to cite as reasons for building these transmission lines.
- It is not noted whether towers will have any lights on them (e.g. red lights) as seen in other regions. Equally it is not noted what would be in place to manage this if this was the case. This would have significant impact on our regional communities like Gundy where there is one tower in scone 40km away that they can see only.
- Rural night skies around Walcha are treated as having no value unless they serve an observatory. This is inadequate.

> POSITION SOUGHT

More work. Require a cumulative visual assessment including all REZ generation and transmission projects publicly proposed or under assessment, and a night-lighting assessment for dwellings near each hub and camp, with lighting limits set as conditions. Require visual impact assessment on possible lights on towers and visual impacts to landowners and neighbours

7 | The Pastoral and Cultural Landscape is not Assessed

7.1 Evidence

Much of the project area is a living heritage landscape. Oxley crossed this country in 1818 and squatters took up runs from the early 1830s. The pattern they set down is still visible: stations and family holdings, homesteads in sheltered valleys, woolsheds and yards, stock routes and early roads along the ridges, old huts, gold workings and graves, set within open granite and basalt country, remnant woodland, rivers, gorges and long, uninterrupted views. Generations of the same families have worked this land, and parts of the route cross barely cleared country that landholders have deliberately looked after.

The Historical Heritage Impact Assessment (Technical Report 3) recognises this. It defines the regional cultural landscape by its "open grazing lands… homestead complexes… and long views across valley systems", and says its significance depends on "the persistence of land use patterns, spatial relationships and community connections to the landscape". It records that community heritage feedback "primarily related to the natural landscape character of the project area". (TR3 §5.5, pp. 56–57; p. 31)

Issue	What the EIS and TR3 do	Citation
No significance rating for the landscape	TR3 says the landscape "is not defined by individual heritage items", yet the cultural landscape is never assessed against the NSW heritage criteria or given an impact rating. It accepts the landscape is "a representative example" of NSW pastoral development, which is itself a recognised heritage value	TR3 pp. 56–57
Assessed from the road	Listed items were viewed from public roads, in some cases using Google Street View and aerial imagery. Photomontages were all taken "from the closest public location", not from the homestead	TR3 pp. 28, 244, 456–460
Ratings understate proximity	Homestead "Warrane" is 0.95 km from the nearest tower but rated "low", counting only the nearest tower. The Timber house (I82) is rated "negligible" although TR3 could not identify which building is listed. Belltrees was rated without access	TR3 pp. 457–458, 460
No visual mitigation	"No specific management measures for visual impacts have been developed." At Barry Station, the only item rated moderate, the response is archival recording	TR3 p. 481
"Consistent with" existing development	The EIS concludes the change "is considered consistent with the existing pattern of infrastructure and rural land use development", and that cumulative impact is not significant "subject to implementation of the recommended mitigation"	EIS Ch 9, p. 376
Two standards	TR3 accepts that less modified areas with "more intact rural character", such as Rouchel Brook and Gundy, have "greater potential to introduce perceptible change". The Walcha Tablelands fit that description but are not assessed on that basis	TR3 p. 470

> Table 4 - **How the heritage assessment treats the landscape**

7.2 EIS shortcoming

- Twin 500 kV lines on towers up to 75–80 m, a 140 m cleared easement, new access tracks across slopes and ridges, energy hubs and camps change the landscape physically and permanently. They are not just seen differently.

- The "existing pattern of infrastructure" the EIS relies on is in the Upper Hunter. No existing transmission line, extractive industry or built renewable project of this scale is identified on the Walcha section.
- The cumulative conclusion depends on mitigation that TR3 says has not been developed, and is tested only "at a regional scale", which hides concentrated local loss. It also omits the REZ generation projects the line exists to connect.

> POSITION SOUGHT

More work. Require an assessment of the pastoral cultural landscape as a whole, against the NSW heritage criteria and with an impact rating, including the Walcha Tablelands on the same "intact rural character" basis applied to Rouchel Brook and Gundy; homestead settings assessed from the homestead with owner consent; and landscape-scale mitigation developed before determination.

8 | What the Community Was Shown

8.1 Evidence

- In 2024, in response to feedback from Woolomin residents, EnergyCo produced two animations showing what the lines would look like from Woolomin, with and without vegetation, and published them on its website and YouTube (EIS Ch 5, Table 5.4, p. 168).
- The corridor was later moved and now "avoided the communities of Woolomin and Dungowan" (EIS Ch 2 §2.7, p. 56).
- When the new study area between Muswellbrook and Walcha was announced in October 2025, the only animation produced showed the "size and scope" of the new study area at a regional scale (EIS Ch 5, p. 170). No comparable view-specific visualisations are recorded for Walcha, Niangala, Rouchel, Gundy, Barry or any other community now on the route.

8.2 EIS shortcoming

- The only community-level visualisations reported in the EIS are for a community the line no longer affects.
- Communities and landholders on the current route are asked to comment without being shown what the line will look like from their towns, roads and homes, beyond individual assessments for 26 dwellings.

> POSITION SOUGHT

More work. Require EnergyCo to publish visualisations, with and without vegetation, from each town, village and community on the current route, and from key local roads, before the end of the submission period or in a re-exhibited assessment.

9 | Questions for EnergyCo

1. Why were the 100+ easement-affected dwellings excluded from visual assessment, and will they now be assessed and offered the same mitigation as their neighbours?
2. For each of the 12 homes downgraded to low or nil using desktop LiDAR only, will EnergyCo field-verify the result with the landholder before determination?
3. Were real estate listing photos used to infer living areas at any home, and which ones?
4. Was any photography or survey carried out on private property where access had not been granted?
5. Will identifiable renders of private homes and yards be removed from public documents unless the owner consents?
6. Why do conductors count for nothing in the visual magnitude rating, and what would the ratings be if they were counted?
7. Will the visual impact on working areas of farms (paddocks, yards, sheds), not only dwellings, be assessed?
8. Why does receiver I-8 D9's assessment give two different scenic quality and impact ratings for the same view, and how many other assessments contain similar errors?
9. Why are tourist accommodation, a tourism facility and Rouchel church rated at moderate rather than high viewpoint sensitivity?
10. Will every visual rating be re-assessed on the final tower locations before construction, and will landholders be able to comment on the result?
11. Will EnergyCo commit to no-tower setbacks, as given to I-7 DB1, for every dwelling rated moderate or high?
12. Who will fund, plant, water, maintain and replace screening vegetation, for how long, and what happens if it fails or does not reach 5 m in five years?
13. How does screening that blocks a landholder's outlook satisfy the performance objective that mitigation must not significantly obstruct views?
14. What will be done at Niangala Road (PVP-07), which records 64 occupied cells, beyond retaining roadside vegetation?
15. When will a cumulative visual assessment be done that includes all proposed REZ wind, solar and transmission projects? (the same projects that EnergyCo reportedly utilise to justify the build of this transmission line that residents aren't aware of).
16. What are the lighting levels, hours and light-spill limits for Central South Hub, and which Walcha dwellings will see it at night?
17. Why has the pastoral cultural landscape not been assessed as a whole against the NSW heritage criteria and given an impact rating?
18. Why were heritage homestead settings assessed only from public roads, Street View and aerial imagery, and will they be assessed from the homesteads with owner consent?
19. Which existing infrastructure on the Walcha section supports the conclusion that the project is consistent with the existing pattern of development?
20. What landscape mitigation will be developed, given TR3 says no visual management measures have been developed?
21. Why were animations produced for Woolomin, which the line no longer affects, but not for Walcha, Niangala, Rouchel, Gundy, Barry or other communities now on the route? Will they be produced?

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