We as the directors of Alternation Pty Ltd based in Walcha NSW, object to the Winterbourne Wind Project.

We believe that the developer should be honest and open with all members of the community. From our observations of the developers behaviour to date, we do not believe the developer has achieved this.

While this is not an extensive list of all the issues, we would like to highlight those that fall closer to our professional work in regards to graphic and web design. We have chosen to discuss the issues we have identified in both the marketing material and website and also in visual amenity reports.

USE OF MISLEADING IMAGERY IN MARKETING MATERIALS

Some examples of misleading imagery.

1) Winterbourne Wind website – downloads page – banner image https://www.winterbournewindfarm.com.au/downloads/

The use of focus to draw ones attention to the animal/s in the foreground, the turbine is very distant and blurred, and is a much smaller single turbine than those proposed for this project, creating a false impression of how the final project will appear. Many landowners, neighbours and residents will see a substantial number of turbines from their dwellings.



Project Documents

2) The very first FactSheet March 2020 https://winterbournewindfarm.com.au/wp-content/uploads/2020/09/WinterbourneWind FactSheet201.pdf

The photo is from a Vestas project in Lake Turkana, Kenya. The turbines from this project are Vestas V52 – 850kW. The turbines proposed for Winterbourne Wind are V162 – 6200kW (6.2MW).

So to compare the brochure turbine with what the developer is proposing is as follows.

	V52 – 850kW	V162 – 6.2MW	Difference times real
			vs picture
Hub Height	45m	157m	3.48
Rotor Diameter	52m	162m	3.11
Blade Tip	71m	238m	3.35
Power Generated	850kW	6200kW	7.29

So in terms of physical sizes the developer has used an illustration of a towers approximately $1/3^{rd}$ the size of what they are proposing and a generation capacity of 15% of what is being proposed.

Can the developer explain how this is not an attempt to mislead the community.



3) Factsheet March 2021

https://winterbournewindfarm.com.au/wp-content/uploads/2021/03/WW2001 Fact-Sheet March-2021 04.pdf

Once again a glamour shot of a foreign wind farm has been used. This time it is of the Wolfe Island project in Canada. The towers in this project are approximately 127m tall to tip height, which is just over half the height of the proposed winterbourne towers. The power capacity is 2.3MW compared to the 6.2MW towers proposed.

The picture features 3 towers, 2 of which are barely visible.

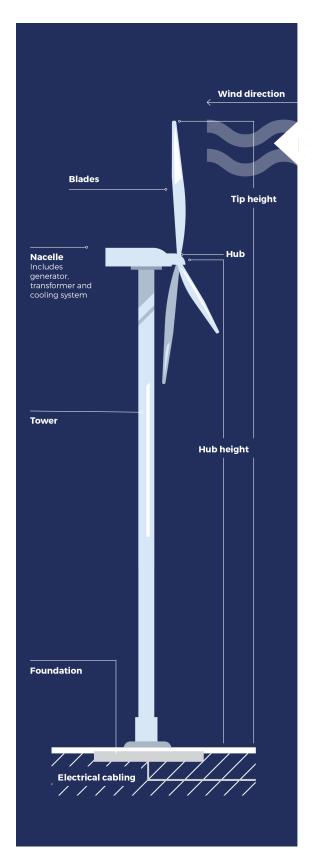


Is the developer able to explain the rationale behind their choices of images?

While these issues do not fall directly under the review of the EIS, it paints an unsatisfactory picture of the developer's engagement with the community, and we believe an attempt to downplay and gloss over the impact that this project will have on the community, this is just one way they are doing this.

Can the developer advise if they have used imagery of towers of a similar size to what is proposed from the Winterbourne project in any public communication or marketing material.

We further note that the diagram of a wind turbine on page 4 of the community guide to the EIS does not contain any sizes, and the scale of the tower to blade size is seriously misrepresented.





Winterbourne Wind Community Guide to the EIS

Why is this project needed?

Australia and the world are transitioning from traditional fossil fuel energy generation. Wind energy is a clean and inexhaustible resource that generates zero pollution or carbon emissions during operation and is cheaper than new generation from coal and natural gas. Together with solar and other renewable energy projects, wind energy is helping to drive down the cost of wholesale electricity.

The Federal Government wants to reduce emissions of greenhouse gases in the electricity sector and encourage electricity generation from sustainable and renewable sources. It has a target to reduce greenhouse gas emissions by 43% below 2005 levels by 2030.

The NSW Government has a goal to reach net zero emissions by 2050. The NSW Electricity Infrastructure Roadmap is the Government's plan to transform the State's electricity system into one that is cheap, clean and reliable.

The Roadmap establishes the framework to deliver the State's first five Renewable Energy Zones (REZs) in strategic areas across the state. The REZs will play a significant role in delivering renewable energy generation to help replace existing fossil fuel power stations as they come to their end of operational life.

The New England region has been identified as one of the REZs in NSW, with the aim to combine wind, solar, hydroelectric and energy storage, together with high-voltage transmission lines, to generate and deliver clean, renewable energy. The New England REZ encompasses some of Australia's best natural energy resources. The location of the New England REZ was selected based on identified areas of high renewable energy resource potential (e.g. wind speeds, sunlight), proximity to existing transmission infrastructure, and interactions with existing land uses.

The Winterbourne Wind Farm project is anticipated to prevent approximately 1.8 million tonnes of carbon emissions per year, relative to the current NSW energy generation mix. This represents around 3% of the total emissions reduction target for NSW to 2030.



VISUAL AMMENITY

The issue of visual amenity has been of interest for some time, it is also an important issue for many members of the community and neighbours of the project.

The LVIA Appendix I on page 37 8.0 Public Viewport Analysis – this section discusses the methodology that was used to create the photo montages that are displayed in the Appendix I - LVIA App D Photomontages and Wireframes_1 and Appendix I - LVIA App D Photomontages and Wireframes_2 documents.

The Analysis methodology claims that panoramic photos are taken in accordance with the Scottish Natural Heritage Visual Representation of Wind Farms Guidance version 2.2. https://www.nature.scot/sites/default/files/2019-09/Guidance%20-%20Visual%20representation%20of%20wind%20farms%20-%20Feb%202017.pdf

On examination of the document, we would draw your attention to section 3 Viewpoints, points 89 & 90 – reproduced below

89 Most importantly, the location chosen must avoid the view of the wind farm being misrepresented by the inclusion of atypical local features, such as a single tree in the foreground. Where this has mistakenly occurred, the viewpoint location should be revised and the photographs retaken. Conversely, it is also unacceptable to move too far from the most prominent viewpoint in order to avoid typical foreground objects, for example moving into a neighbouring field when the view is intended to be from a road, in order to avoid typical foreground objects, unless these would obscure views to the wind farm. An alternative location may be required.

90 Viewpoints should be free from any avoidable foreground objects and other obstructions such as fences, walls, gates, roadways, road furniture, summit cairns and unnecessary foreground, trees, shrubs or foliage unless these are typical of the view. It is also important that viewpoints are publicly accessible, for example not within private property.

We will now draw you attention to the following images from the LVIA.

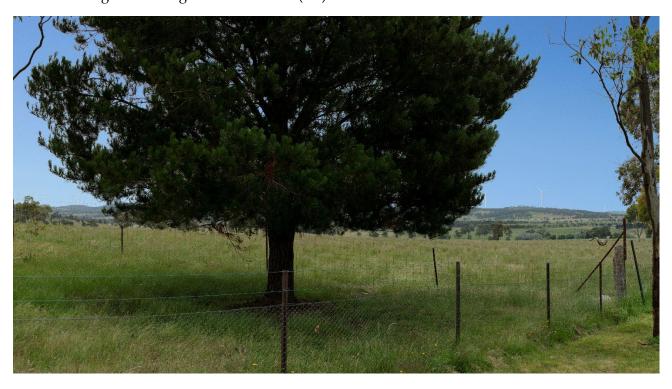
Photomontage 1.

Note the fence in the foreground, and the large bushy tree in the centre. One can see a gate in the fence, and the question needs to be asked, why was this photograph not taken on the other side of the fence and the tree. While technically there is not single tree in the foreground, by the time it appears in 1B/1D it has essentially become a single tree in the foreground.

On closer inspection of 1B/1D one can observe the following. The towers on the left B082,171,081,169.168 are all behind the fence, this in combination with the haze effect applied to the turbines in the background obscure the view in a deceptive manner.

The large tree that is the sole tree in the foreground, based on reefing back to the wireframes, approximately 16 turbines that would have been obvious should the photographer have been positioned on the other side of the tree and fence as the guidelines recommend.

This is the original montage used in the EIS (1D).



This version of the montage has been enhanced to increase the colour vibrance and dehaze, and demonstrates that much of the information regarding the towers is obscured by the imagery and settings used by the developer. It is well known that the eye can see much more detail than a photograph on an A4 page can show. We believe that a genuine developer would not try to disguise the impact and visual amenity in this way. You will need to zoom in to see the full detail.



There are many such images in the LVIA submission, a number taken through high fences, with the turbines and fence mesh intersecting and obscuring the turbines. We request that the developer redoes the montages and keeps in mind the critical aspects and purpose of the visual assessment, and that is to give a true and accurate representation of how the visual amenity will appear, without resorting to trickery.

CONCLUSION

If the developer is wishes to be involved in the Walcha community, they need to be honest and frank with everyone, including landowners, neighbours, the wider community and government. The EIS needs to be a complete and solid document, not a fluid and moving one. We suspect the issues raised here only touch the surface. It should not have to be left to communities across the state to scrutinise these documents by developers, the resources consumed by the Walcha community to review and comment are immense, and potentially used by developers to bring their work up to an acceptable level.

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