

Michael Luchich
Torsmond
Walcha NSW 2354.

23 Jan 2023

I object to the Winterbourne Wind Project for many reasons, these are some:

SOCIAL LICENCE

Legend has it that the genesis of the Winterbourne Wind Project began in the early 2000s. I say legend because there is barely any record of this in the public domain until the later years of the 2010's – perhaps 2018 onwards. Meetings were closed and limited to the developers and landowners. I believe that in 2017 the Mayor was invited to one of these closed meetings.

The proponents and the initial developers prepared for nearly 20 years what they would have considered a great act of benevolence and generosity for the greater good of Walcha and to contribute to the fight against climate change, and champion a new era of financial growth and prosperity for the area (not withstanding a little personal prosperity). One thing, however was forgotten, and that was to tell the greater community of the town, and more importantly discuss the issue.

I asked the initial developer what community consultation was done in the early days of the project and was told that he has spoken to 120 odd farmers/landowners. No information days, no public meetings. I also asked one of the landowners/director of WalchaWind the same question, he told me that in 2008, he bumped into a mutual friend in the supermarket and told him that he had signed a licence agreement. Neither of them told me what the responses were.

So effectively, most of the community knew very little about the project, and the few that had heard whispers, still know little of the detail of the project. One would have to reason that the scope and scale of the project in its conceptual and early form, was much smaller in terms of the size and number of turbines, As the project started to gain more exposure there was some more information available, but the full details were not brought to light by the developers in any form of media or advertising or public forums. Yes they did hold some open days, but it is much more confronting to have to talk to a salesperson one on one than to sit in the crowd and listen. The initial Voice for Walcha event in August 2022 offered opportunities to speak to Winterbourne Wind, Walcha Energy and board members of WalchaWind, all of whom thought that appearing in public to explain and answer questions about their project would not further their cause.

A survey run by Voice for Walcha determined that nearly 80% of the population, based on a sample of approximately 500 people, were not supportive of the project. The results of this survey were acknowledged by the Walcha Council in the Dec 2022 meeting.

<https://voiceforwalcha.com/walcha-community-survey-oct-22/>

The developer includes a very limited amount of information based on the various surveys that they ran at events over the last few years. The developer does not make any of the survey questions available, nor is any detailed analysis provided. The events are reported in Appendix R Social Impact Document - page 27 in the section titled WIDER COMMUNITY. Three surveys were run.

The first in March 2021 at the Walcha Show, which attracts thousands of Visitors over the 2 days it runs. This survey attracted 33 responses, and was summarised as having 20 respondents with no concerns. Disregarding the possibility that there is a likely hood that proponents who by this stage had formed an attachment to the Winterbourne Wind Team, may have been more likely to fill in a survey. This rates Winterbourne as having a 60% project approval.

The second survey was run at an open day in December 2021, a stand alone event at the Walcha Bowling club. The developer does not mention the number of attendees, but does mention the number of survey results collected, which in this case was 25. In this case the number of people with no concerns was 12 or 48%, or 52% having concerns.

The final reported survey in March 2022, again at the Walcha Show, with thousands of people attending, reports that 17 people responded. Of these only 4 responded with no concerns from which we can deduce that 76% of people responding had concerns.

So even if the developer wishes to disregard the survey results conducted by Voice for Walcha that have been acknowledged by Walcha Council, there are serious questions regarding the community support for the project, and an alarming trend of lack of support increasing over effectively a one year period.

The developer has also chosen to obfuscate the results in what one can only assume is an attempt to avoid this issue being noticed. Can the developer explain why, for example, in the March 2022 results they choose to highlight the lower number, and not even mention the 13 people with concerns. Why is there no analysis or explanation of this information.

The developer has not demonstrated anywhere that it has social licence from the entire community.

Can the developer explain why there were never any wider surveys conducted, why there were no forums and why they chose to decline the invitation to participate in a community forum discussing the issue, with somewhere between 2-300 residents in attendance.

Is the developer able to bring any other information to the table to demonstrate social licence? Before consent is granted the Department of Planning needs to run an independent survey to determine if there is indeed any greater social licence, or if the Independent Planning Process comes into play, then there is sufficient community opposition or concern to warrant in person hearings in Walcha.

COMMUNICATION

My interactions with the developer have led me to believe that they do not desire to have an open dialog or share important or real information with the community.

In March 2022 I contacted Winterbourne Wind via phone and had a very pleasant chat with one of their staff, Suzanne, we discussed getting more details on noise, the community surveys, support from government departments and if we were able to see some of the montages that had been on display at some of the public events.

Attachment 1 – confirmation from Carolena Kostas regarding a discussion I had with Suzanne noting main points and deliverables. This is a fair summary of what we discussed.

From: Carolena Kostas

To: michael@alternation.com.au

Subject: Winterbourne Wind Farm Enquiry

Date: Thursday, 3 March 2022 10:25:15 AM

Attachments: image001.png

Good morning Michael,

Thank you for your patience with your enquiry.

We worked to answer all your questions and all the information that we are able to share publicly at this time is below:

1) Photo montages

Due to file formats we are unable to provide digital versions, however these and other photomontages will be presented in the Environmental Impact Statement (EIS) that we expect to be submitted and put on the exhibition for community review in April 2022.

2) Support of the project

Relevant government agencies will provide written comment about the project to the NSW Department of Planning and Environment as part of the EIS and the development application process, and no such comment has been provided to date.

That said the council and local landowners have shown strong community support for the project. We also have a Community Consultation Committee that ensures that community concerns on the project are addressed and guides the decision-making for the project. For more information on this, [click here](#).

Also by the community initiative, the project is set up so a proportion of its profits will go to a financial contribution scheme for the community. For more information about the scheme, with strong input from community members, please see the public webpage which you can access through [this link](#).

3) CCC minutes from February 2022 / survey data from the Community Open Day survey

We are not able to share minutes from the CCC meeting in February 2022 or individual survey data however the summary outcomes from the meetings and all of community feedback, including from surveys at community events, will be made publicly available during EIS Exhibition.

4) Noise surveys – audio frequency range, how do we measure it? What's the lowest frequency that we measure?

The assessment of operational noise from the wind turbine generators has been conducted in accordance with the *Wind Energy: Noise Assessment Bulletin*.

- Background noise monitoring has been conducted at dwellings in the vicinity of the proposed wind farm with sound level meters.
- The sound level meters used to conduct noise monitoring for wind farms, operate over the full audio frequency range between 20Hz and 20,000Hz.
- The predictions of environmental noise from the Project have been based on the CONCAWE noise propagation model and SoundPLAN noise modelling software.

The sound propagation model considers the following influences:

- o sound power levels of each individual noise source;
- o the locations of noise sources;
- o separation distances between noise sources and dwellings;
- o local topography;
- o influence of the ground;
- o air absorption; and,
- o meteorological conditions.

I am attaching a poster with more information about the impact of noise and the mitigation measures to be put in place.

If you have any additional questions, please note that Winterbourne will have a stand at the Walcha Show on both Friday and Saturday next week. We will have technical experts there and they will be able to answer any additional questions you might have.

Please do not hesitate to contact me if you have any other questions. We are available by email or call our 1-800# at 1 800 252 040.

Kind regards,
Carolena

Attachment 2 – My reply, specifically noting the file formats were not an issue, and that the noise mitigation poster was not attached and pressing to see the questions that we asked in a public survey.

From: Michael Luchich
To: "Carolena Kostas"; michael@alternation.com.au
Subject: RE: Winterbourne Wind Farm Enquiry
Date: Thursday, 3 March 2022 11:08:05 AM
Attachments: [image002.png](#)
Hi Carolena,

Thanks for getting back to me. Can you please forward or share via file sending the montages in whatever format you have, we are tech experts and will draw in whatever resources we need to open them. We are really keen to see how the area will look given we live here, and to date all the imagery used by winterbourne are from much smaller overseas projects. I believe there were posters in the walcha office, so there must be artwork for printers – that would be fine too.

It also appears the noise information poster was not attached.

Finally, if you are unable to provide the survey data itself, are you at least able to provide the details of the questions asked.

Regards
Michael Luchich
(02) 6778 0110
0423 775 809
misha@alternation.com.au
<https://alternation.com.au>

Attachment 3 – Here begins the brush off

From: Carolena Kostas
To: Michael Luchich; michael@alternation.com.au
Subject: RE: Winterbourne Wind Farm Enquiry
Date: Thursday, 3 March 2022 12:12:35 PM
Attachments: [image001.png](#)

Hi Michael,
Apologies I am not able to share the files publicly at this point, however they will be available when the EIS is released.
We do surveys at every community event and you are welcome to attend our next one at the Walcha show next week on 11 and 12 March.
Warm regards,

Carolena

Attachment 4 - Following this response, I was surprised as my initial phone call had been most pleasant and obliging, and there was no pushback at all. I emailed Doug Landfear, the Vestas director of the project – this included all the contents of mails already posted.

From: Michael Luchich
To: "dglia@vestas.com"
Subject: FW: Winterbourne Wind Farm Enquiry
Date: Friday, 4 March 2022 3:05:00 PM
Attachments: [image001.png](#)

Hi Doug,

Can you please confirm that the responses I received from Carolena at ERM represent Winterbourne Winds position on openness and transparency with the Walcha community. I also note that the question around montages not being in the "right format" quickly changed to an outright no, I would appreciate an explanation as to why a misleading answer was provided in the interim email, and why these montages have never been on open/public record (I know they have been shown, but for those of us who were unable to make it to open days it would be go to see) and why WW is so reluctant to share these with the community?

I spoke to Suzanne last week and she was most obliging in her commitments to provide photo montages and information around the survey, and at a minimum the actual questions that were asked. I note that some survey info was included in your last report to the CCC, so if you are able to provide the full list of questions that were asked that would be great.

Finally, do you have a list of the proposed towers and their gps coordinates, or will this be included in the EIS?

Cheers
Michael

Attachment 5 – Final response Mr Landfear of Vestas.

From: Doug Landfear
To: Michael Luchich
Subject: RE: Winterbourne Wind Farm Enquiry
Date: Monday, 7 March 2022 10:56:56 AM
Attachments: image001.png
Hello Michael

All of the information that you have requested will be presented in the Environmental Impact Statement. We are currently working to finalise the EIS and hope to have it completed in the next two months. The EIS will be made publicly available in hardcopy and electronically on both the project website and the Dept of Planning and Environment website. We are unable to provide you with digital files at this time, however we will present the same information from the Open Days at the Walcha Show this coming weekend, and we would be happy to discuss any questions you have about the information.

Regards
Doug

A number of direct questions regarding the previous communications were totally disregarded. And the resulting information provided fell well short of the expectations set in the initial call.

Can the developer explain the reasons for the misleading information regarding access to montages, and why the montages that had been on public display were suddenly not available but could be viewed at an event. After viewing the montages in the EIS, one could suspect that perhaps they wished to delay thorough scrutiny of the images.

DECOMMISSIONING

The proposed approach to decommissioning seems to err on the most optimistic scenario and as such suggests that there is no need to provide any bond payments. The concept of not putting any funds towards decommissioning until close to the end of life is an unsatisfactory approach. This project has already changed hands several times, and Winterbourne Wind Pty Ltd is a special purpose vehicle, which are commonly known to be used to isolate risk and debt by a parent company. This combined with the developer's lack of any successful or operational wind farms in Australia (as a developer rather than operator) presents a significant risk to the landowners, and in the case of their abandonment of property by said landowners, to the Walcha and Uralla councils and their constituents and ultimately state or federal governments.

UNCERTAINTY/UNKNOWN SUPPLY OF WATER/GRAVEL

The developer needs to determine where the water and gravel required for the project is coming from, and then revise the traffic and transport movements. Relegating such a critical part of the project to a 'to be determined' status, does not give the community, council or even the land owners a true picture of the traffic movements and essentially hides a these movements from this analysis.

The developer has not detailed the modification of the traffic routes that would be required to deliver oversized items, it has not given a realistic picture of the delays that would occur on the Oxley highway.

SUMMARY

The developer has failed to adequately engage with the wider community, has developed very strong relationships to the landowner hosts, and avoided the majority of the community wherever possible. If the developers wishes to be part of the Walcha community over the long term of the project, then they need to try a lot harder than to engage 10s of people at the Walcha Show and give out a few Lego Turbines to the children.

Thank you for the opportunity to make comments on this submission.

Michael Luchich