

28th June 2010

Planning Panels Victoria

Level 1

8 Nicholson Street

East Melbourne 3002

Dear Panel,

RE: Final Report, Stockyard Hill Wind Farm Hearing, Comments and Analysis on Hawker Submission Material, J0325 by the Ambidji Group to Origin Energy.

The above-mentioned document contains significant errors and misleading information. This has the potential to place our family and other users of the Hawkwood private airstrip in danger while conducting aviation operations.

We have had a map prepared showing the location of turbines within 5 kilometres of our airfield¹. This map has night operation dimensions extending to the West overlaid.

In addition, we asked Mr Ralph Holland to conduct an analysis on wind turbine wake plume velocity deficit and turbulence.

Mr Holland presented information to the NSW Land and Environment Court, which upheld the rejection of 11 turbines at Crookwell on the basis of aviation safety. The courts commissioner's findings can be found at:

<http://www.austlii.edu.au/au/cases/nsw/NSWLEC/2009/1444.html>

Please find below specific reference to errors and misleading information:

2.1.1 Regulative Comment

The Ambidji group have quoted CAAP 92-1 (1) and stated from inspections of figures 2-4 and 2-5 'it can be seen that all the turbines are located outside the physical boundaries of these surfaces'.

CAAP 92-1 (1) is a guideline only. Graham Bryce, Chief Pilot / Chief Flying Instructor Ballarat Aero Club stated in his expert advice that was part of our panel submission that the CAAP recommendations can be totally unrealistic in certain situations.

¹ The map was prepared by converting the turbine co-ordinates as supplied in the Marshall Day Acoustic Australia report to GPS co-ordinates and plotting them in relation to the GPS co-ordinates of each end of the airstrip. This information has been presented on a background map supplied by Land Channel Victoria.

He went further to say that in the case of multi engine operations that the issue was more serious and that the turbines would prevent any possibility of safe night operations.

The airfield sketch provided was not prepared by Field Air, as stated. It was prepared by ourselves.

2.1.2 Qualitative Risk Comment

The standard circuit height is 1,000 feet above ground level (AGL). Under conditions where low cloud is present, which is common in this area, a circuit height of as low as 500 feet AGL is allowed under Civil Aviation Safety Authority rules.

The proposed turbines are 430 feet (132m) in height. In some cases, the turbines within 5 kilometres of our airfield are located on higher ground, leaving no margin of error while manoeuvring to land.

Turbines T40, T52 and T59 pose a particular risk while landing to the East and the Ambidji group is dangerously negligent in reporting them as having a low aviation risk.

2.2.1 Airstrip Re-orientation

The orientation of the airstrip was selected to provide adequate length and to be clear of houses, powers lines and trees to the South. ***It is not possible to move the strip in an anti clockwise direction as stated.***

The airstrip is a substantial and permanent structure. A 200m section of high voltage, single wire earth return power line has been placed underground to specifically accommodate it. The surface has been raised above the surrounding paddock level and drains placed the full length either side. A taxi way and aircraft parking area have been constructed, along with a high volume water filling facility for aerial spraying. The surface has been planted to Perennial Ryegrass to allow it to be operated under wet conditions.

2.2.2 Special Procedures

Details of the airstrip are available in the En Route Supplement Australia (ERSA). Ambidji stated in their report that it is not documented in the ERSA.

2.3.1 Normal Light Aircraft Operations.

Turbines T52, T59 & T40 have been stated in the report as located either nearly or more than 3 kilometres from the end of the strip.

From the turbine location data provided by Origin Energy, the actual distances from the end of the strip for turbines T52, T59 & T40 are actually 2,154 metres, 2,381 metres and 2,610 metres respectively.

This represents an unacceptable level of error in their analysis.

2.6 The turbulence arguments the Hawkers make about flying operations around turbines, and whether the turbines would have this effect on the Hawker's aerial operations.

Origin Energy, along with the developers of all wind energy facilities, are aware that wind turbines have an affect on wind flow, as this is required to be considered in the planning of a facility.

Ambidji lost in the NSW Land and Environment court in relation to the Crookwell airstrip for this exact reason. They 'could not provide either a sound or safe opinion on what represents a safe distance from the Crookwell landing area to the nearest turbines'.

The analysis conducted by Ralph Holland recommends that a set back distance of 50 turbine blade diameters or 5,200 metres is required to be observed for safe aircraft operation. He has recommended in his letter that an independently reviewed, comprehensive study is to be undertaken under the developer's responsibility for duty of care if they intend to erect turbines within this distance of the airfield.

Yours sincerely,

Philip Hawker