

Ralph B Holland

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Sent: Thursday, 13 September 2012 09:41
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Subject: Crookwell Aerodrome: Windfarm Obstructions and Wake Plumes
Attachments: Aviation Projects.pdf; generic-circuit.pdf; 11-rejected.jpg;
20091207CASAdrafting.pdf; wind-turbine.pdf; WindTurbines-2.pdf

Dear Mr Stone and Mr McCormack,

A general letter was addressed to the Aviation Stakeholder of Crookwell Aerodrome, which I believe needs to be distributed further to other Aviation Stakeholders, and I see CASA and DOIT also being part of that collective who should be informed.

In this letter it states that the Aviation Projects consultancy has been engaged by Goldwind Australia to determine operational parameters at Crookwell Aerodrome, and in the first instance they are suggesting that they will review the take-off and landing procedures giving due consideration to the location of wind turbines and other obstacles, surrounding terrain, aircraft performance, prevailing conditions, runway physical characteristics, regulatory requirements and any other operational limitations. The consultant then goes further and offers assistance to the Aviation Stakeholder with the development or amendment of operational procedures and leaves their contact details, presumably so all the users of Crookwell Aerodrome can engage him or assist him in his work, at their cost.

Eleven turbines were struck off by the Environment minister due to their proximity to the Aerodrome, and under the ruling of Commissioner Terry Moore, Environment Court NSW, this decision was upheld by the court and the turbines were subsequently removed from approval, pending a study at the proponent's expense to determine safe operational distances between turbines and Crookwell Aerodrome before they would consider re-instatement. We were under the opinion that it was to be a proper study done by a proper authority and not by the consultant that drafted the erroneous and miss-informed "Generic Circuit" that did not stand up to my critical analysis. I attach that analysis which was forwarded to the Environment Court. You may also read some of the background at <http://www.arising.com.au/aviation/windturbines/index.html>.

The 11 eliminated turbines were those closest to Crookwell Aerodrome and were proposed by the minister under some basis to which I was not privy, and had it been up to me I wanted more to be removed. I attach the original KML data that can be displayed in Google Earth, please note that the proponent is proposing to build KIA_01 and KIA_02 which was outside the meagre 2km from the runway and did not include a buffer zone from the circuit despite the fact that their wake plumes would impact on the circuit area. KIA_02 is only 1.96 nautical miles from the end of R09 and situated setback from the ridge line and I believe that KIA_01 and KIA_2 wake plumes would cross aircraft pathways on cross-wind and down-wind for the prevailing wind conditions.

I took great trouble making a realistic turbine model for the height and blades and if you tilt the Google Earth view, using my attached data, and look out from R27 SSW and pan around you will obtain an idea of what a pilot will be contending with at Crookwell Aerodrome when they let-down and when they are in circuit.

The Guidelines D as it stands, affords this Aerodrome little protection, because sentence 20 provides the Proponent with the loop-hole to opt out of reporting, and there being no other legislation means that it is up the council to protect the aerodrome on its own, under Common Law using Duty of Care and Tort Law. This was the only basis that I was able to draw on when I appeared before the Environment Court,

I believe this is a safety issue and Wind Farms do not know an Aerodrome is unregistered

Further, in the supplied data, the proponent says these tall structures near an Aerodrome will not be lighted, here we have a (foreign owned) company by the means of an Aviation Consultant informing the Department of Infrastructure and CASA that they will not be conforming with the safety intent that either bodies have or are proposing.

I now draw your attention to Reference 1. – being the findings of the Court in regards to the rejected turbines, sentences one to twenty inclusive. I also attach what appears to be the result of one of three attempts by the proponent to re-instate these turbines in Reference 2.

With the advent of the limited distribution letter drop from the Aviation Projects, we are concerned that the Goldwind and the original Aviation Consultant of “Generic Circuit” fame from the Eupron Aviation Assessment, a report that did not stand up to scrutiny, is now attempting to inform the government and pilots at Crookwell Aerodrome what is and is not a safe distance from wind turbines. Being parties with financial interest, this surely can't be in the interests of safety, will CASA and the Department of Infrastructure stand by and let this happen?

As Commissioner Moore states, an accident at Crookwell Aerodrome is the type of publicity that no one wants to happen, and as I mentioned in my earlier correspondences, my concerns and the concerns of others are documented and available for any coronial inquest.

What I would like the regulators to consider is that they honour the original intent of the letter from Mr Trotman (attachment 4). That between both CASA and the Department Of Infrastructure and Transport that you commission proper scientific evaluation and measurement of Windfarm wake plumes, to actually come up with a determination of a Safe distance based on those findings, and allow for a buffer zone around aerodrome: circling areas, PAN-OPS and OLS, irrespective of the registration status of the aerodrome, ALA or whatever you wish to call an infrastructure that regularly supports aircraft landings.

Such a study should take all due care to investigate the safety aspect by quantitative measurements which should take advantage of technology such as LIDAR Doppler Velocity measurements of airflow around and within the wake-plume behind, and in front of, existing Wind Farm placements, such as Cullerin Ridge - which is a little further to the South of the Gullen Range Windfarm Development Application, and situated in similar terrain with similar prevailing wind conditions.

I would also like the authorities to consider the safety aspect of not lighting these structures and come up with suitable obstruction markings and lighting proposals that are to be complied with by the proponents whether the turbines are near a registered or un-registered aerodrome, and perhaps ICAO and European guidelines of contrasting blade colours may be adopted. A grey blade, on a grey sullen moisture laden sky is invisible, this is why we paint our Military Aircraft grey. Do I need to point out my video “Windmills in the Mist” – reference 5?

Yours sincerely,

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Attachments:

- A. Aviation Projects letter drop
- B. My criticism of Aviation Projects Generic Circuit

- C. The 11 rejected turbines relative location to YCRL
- D. A promise from our regulator
- E. Part of submission to Environment Court
- F. Another submission to Environment Court

References:

1. Epuron and Mr Herron stating that the turbines represent no safety risk
<http://www.lawlink.nsw.gov.au/lecjudgments/2009nswlec.nsf/00000000000000000000000000000000/d808b2e199b42bb1ca2576aa000c72e1?opendocument>
2. Determination after three appeals to re-instate the stuck-off turbines:
<http://www.lawlink.nsw.gov.au/lecjudgments/2010nswlec.nsf/00000000000000000000000000000000/304ae50871294fc1ca25771a000ed960?opendocument>
3. Guidelines D: National Airports Safeguarding Framework
http://www.infrastructure.gov.au/aviation/environmental/nasf/files/4.1.3_Guideline_D_Wind_Turbines.pdf
4. Wind Turbine Wake Plumes are a Hazard to Aviation Safety
<http://www.arising.com.au/aviation/windturbines/index.html>
5. Windmills in the Mist
<http://www.arising.com.au/aviation/windturbines/WindmillsInTheMist20090904.MOV>