Severe deficiencies and oversight contained in the Jupiter Windfarm Aeronautical Assessment Report, Annex J

I would like to question the background research that has been conducted in order to publish this document. It would appear that this document has suffered as a result of the fact that this project has been almost devoid of public consultation from its inception.

In section 4.2, affected aircraft landing areas (ALA), it is stated that "*the closest identified ALA is approximately 12km from the project Area boundary*". What this statement completely overlooks are the two private landing strips located at Kalbili Close and Barnet Drive. Both of these private air strips are active, and ultra-light aircraft use them regularly. The strip at Kalbili Close also regularly hosts members from a Sydney Ultra-light club, who fly in and out using ultra-light aircraft and gyrocopters.

The formula proffered in this document for assessing the wind turbine wake turbulence distance of these turbines id 16xD (D= rotor diameter) and has been calculated as 2016m for turbines of this size. What this calculation does not describe is the type of aircraft being affected. It does not take Einstein to work out that smaller aircraft are more susceptible to turbulence than larger ones. Neither does this account for differing aircraft types. Is a gyrocopter more affected by turbulence than a fixed wing ultra-light, or paraglider?

These two overlooked airstrips have take-off approaches that encroach within this 16D turbulence zone, as both strips are within 2.5 and 2.8km of the nearest turbines
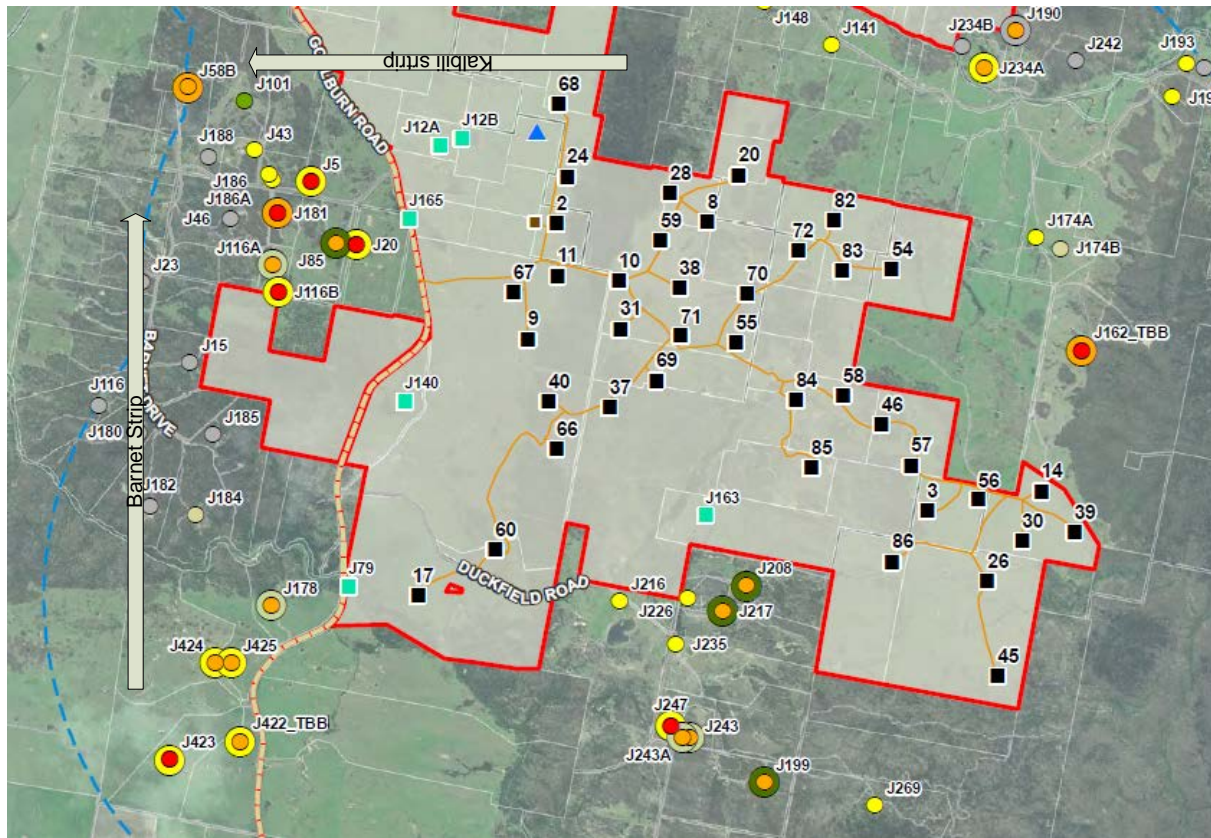
Strip 1 - Kalbili Close:
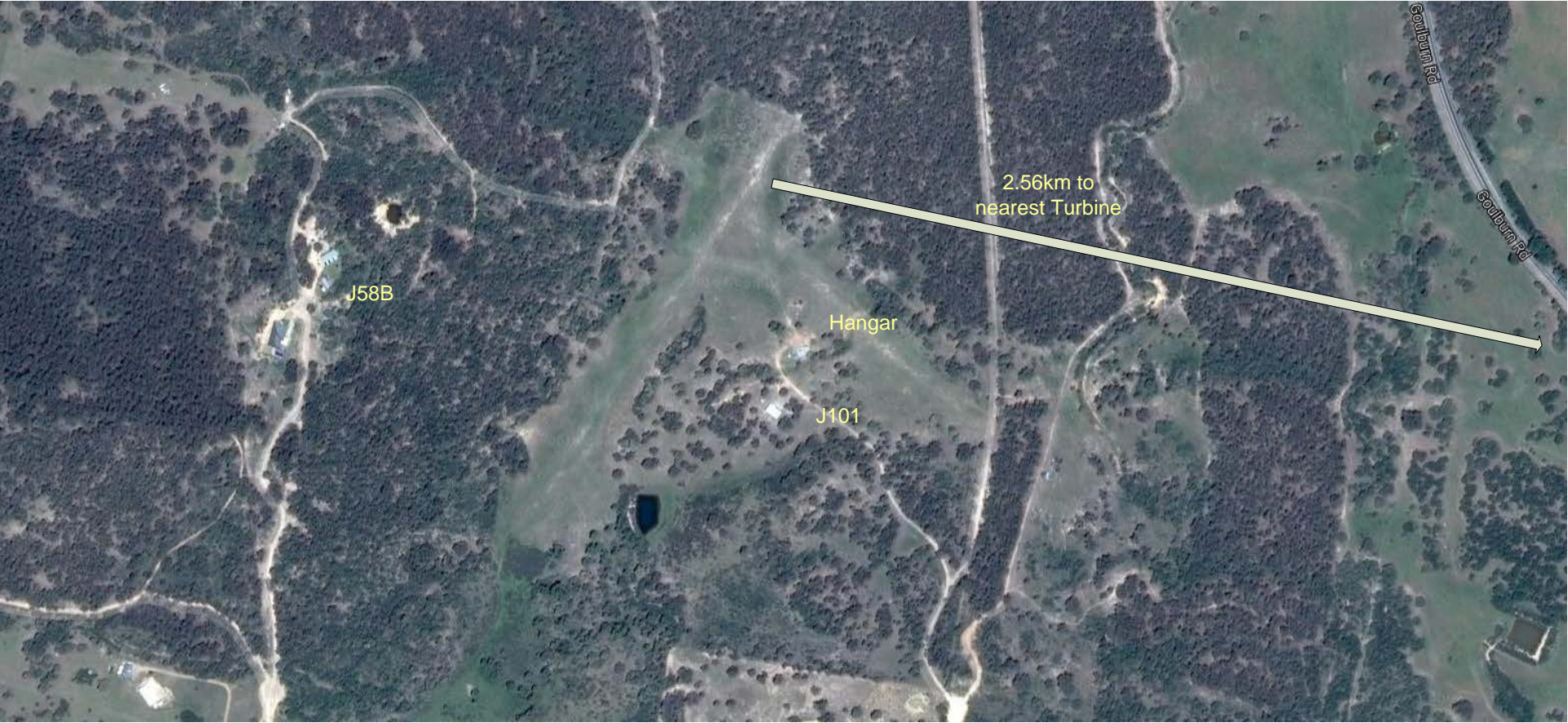
Strip 2 - Barnet Drive
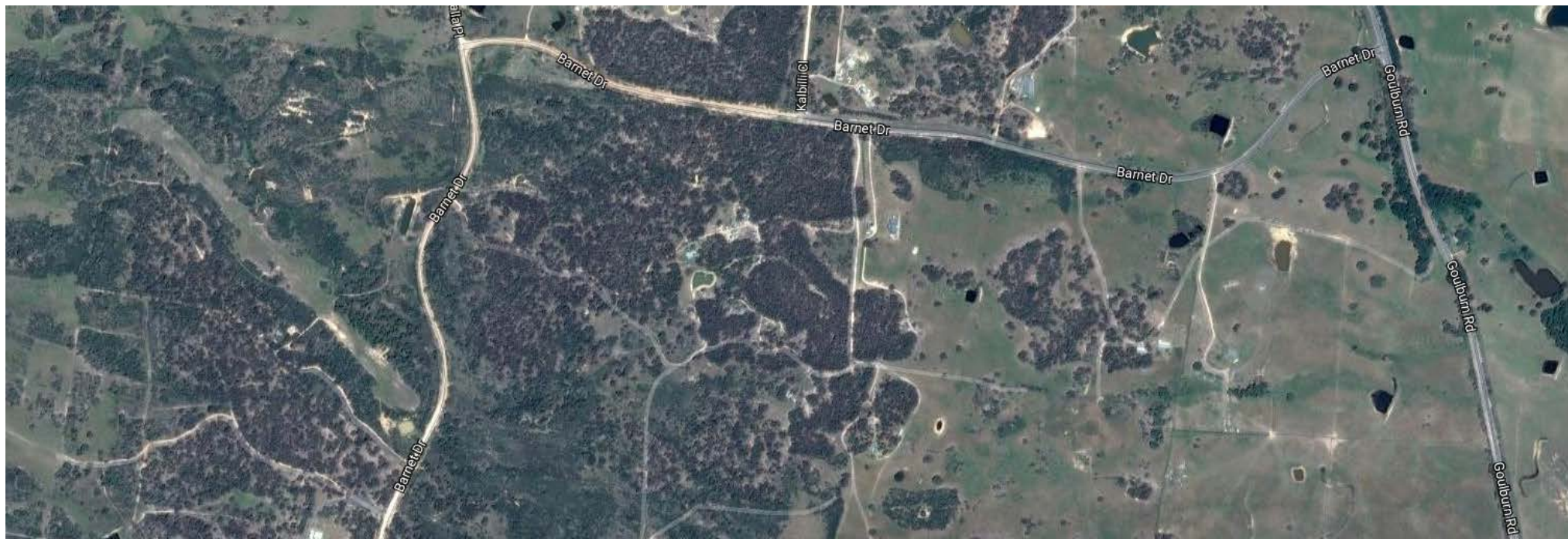
The following graphic copied from the Visual Impact assessment document illustrates the proximity of these airstrips to the turbines as shown:

Clearly, these two ALA's that have not been identified in the assessment are:

- Situated at the very edge of the 16D turbulence zone,
- Have take-off and landing approaches that encroach well within this 16D zone
- Utilise aircraft that are highly susceptible to turbulence by virtue of their
  1. Weight and
  2. Design

In conclusion, the omission of these two well used private ALA's within this assessment has placed the pilots who frequent these strips at elevated risk of accident through the risk of turbulence, and the risk of collision with turbines in take-off and landing.

Interestingly, three turbines initially scoped for the property "Red Hill" were apparently deleted by the proponent upon a request/complaint from the owner of the Kalbili airstrip. As a result, it would be difficult for anyone to accept that the proponent was not aware of at least one of these ALA's and as such, the endorsement of the statement:

"*The closest identified ALA is approximately 12km from the project Area boundary*" would appear to be a deliberate omission of fact within this report. "Either EPYC knows or ought to have known of these private airstrips through its alleged consultation. Thus it appears a clear contravention of Schedule 2 of the Environmental Planning and Assessment Regulation 2000, Part 3, s 6(f) (iii) "that the information contained in the statement is neither false nor misleading.", and the Environmental and Planning Act 1979 which contains the following provision:

148B Offence--false or misleading information

(1) A person must not provide information in connection with a planning matter that the person knows, or ought reasonably to know, is false or misleading in a material particular.

This section of the wind farm should be deleted or the entire proposal rejected due to the significantly increased risk to local air traffic that whilst apparently known to the proponent, has been overlooked within this assessment. The aviators affected purchased their land in this locality specifically in order to own private airstrips. This proposal destroys or severely impacts their ability and right to continue to do what they specifically bought in this locality to do, or forces them to the exposure of significantly elevated risk in order to continue.