Submission
No 76

INQUIRY INTO RURAL WIND FARMS

Organisation: Superair Australia Lonoaks Pty Ltd

Name: Mr David Boundy

Position: Manager

Date received: 21/08/2009

SUPERAIR

21 August 2009

The Director
General Purpose Standing Committee No5
Parliament House
Macquarie Street, Sydney NSW 2000

Dear Sir / Madam,

Superair Australia's position on the proposed wind farm is that we "OBJECT", unless measures are put into place to allay our concerns regarding what we feel could be negative impacts on our business.

Firstly some background, I am presently the manager of Superair Australia which was established in 1964 in Armidale. Since then we have grown to become the largest aerial topdressing company in Australia. We have bases in Glen Innes, Armidale, Tamworth and Scone. We employ 22 local staff which comprises; aircraft engineers, commercial pilots, truck drivers and administration persons. We operate a fleet of over 10 aircraft and several trucks.

These wind farms will become a huge obstacle in performing our main occupation as an aerial topdressing company. These wind turbine structures are approximately 110 metres above ground level. As you may or may not be aware we carry out our flying operations between 20-30 metres above ground. The problems that we face would be quite apparent from these figures.

We have a hard time coming to grips with the fact that these towers will decrease our safety margins, which may ultimately lead to a negative effect on our turnover. This could contribute to a loss in local jobs. I hope I am proven to be wrong.

Until the towers are in place we do not know from a safety aspect or quality of work that, if in fact we will be able to continue aerial fertilizing in these areas as we have done for the previous 44 years. The Ben Lomond and Glen Innes area contribute a large amount of monies to our turnover and to lose this through no fault of our own, is going to make it a lot harder for survival in a high overhead profession and business that we operate.

There are other wind farms in Australia and aerial agricultural operations take place near them. The problem is that these wind towers are erected in a totally different topographical location, be it , altitude, topography, local wind strength, local wind shear,

dwellings, airstrip locations and several other factors dictate the ability to carry out low level aerial operations safely and cost effectively. Therefore each proposed wind farm has to be treated on a case by case basis and not just from an overall view of how interested parties such as the aerial agricultural industry are considered in the overall planning and assessment of the proposal.

Another disturbing fact is that all our submissions or correspondence seems to fall on deaf ears eg on Page 3 Chapter 12 Para 12.2.4 of the Connell Wagner Environmental Assessment, published October 2008 (copy enclosed) quote

> *"the wind turbine structures are not considered to be safety hazards to aerial agriculture operations as the structures are readily visible and the pilots can readily avoid them"* unquote.

This tells me whoever wrote this has not bothered or is not interested in finding out the facts or are trying to cover up what may be a huge safety issue that they do not want to address. Another extract from this same report says quote

> *"The Aerial Agricultural Association of Australia (AAAA) has been provided with the details of the proposed wind farm and invited to comment on the proposal. Prior consultation with the AAAA and individual members in relation to Crookwell, Blayney, Gunning and Capital wind farms has obtained positive support for the wind farm developments"* unquote.

This could not be further from the truth. I will leave it to the AAAA to respond with their position on this matter.

I have had meetings with the developers of the proposed wind farms. What I find frustrating is that each couple of years the developers seem to change through company restructuring or takeovers from another company. Any agreement we may have been in the process of negotiating has to start over again from the beginning. This means that I am not sure how legally binding any agreement is between the parties, if any agreement at all is reached.

The following is an extract from previous correspondence that I have sent to our aerial fertilizer clients that will be affected by having wind turbines erected on their properties or adjoining landholders that are affected as well. It explains in some detail the problems that we will and may encounter once the wind turbines are erected. As I have said before, we can not foresee all problems that may be encountered with something that you can not see at the present moment and have to try and visualise, as well as all the variables that we try to deal with in our present operation, being mainly the weather and terrain.

What I can say though, and this is definite, is that these wind turbines will – (this applies to both the property with the towers as well as the adjoining properties without towers)

- Decrease our safety
- Decrease our productivity
- Decrease accuracy of the fertilizer deposits
- Decrease productivity of the pastures to the landholder
- Increase costs to the landholder
- Decrease our revenue

I will try to expand on the points I have raised:

- **Decreased Safety** – the average height that we fly to aerial topdress pastures is between 20-30 metres. These towers are in the vicinity of 110 – 150 metres in height. Therefore the safety aspect is self explanatory.

- **Decreased Productivity** – when we carry out the aerial operation we fly a grid pattern in straight lines. The flight lines, directions & spacings, are influenced by the
    - **Safe operation of aircraft**
    - **Topography**
    - **Layout of the property or section being treated**
    - **Co-efficient of variation of the deposition pattern (evenness of application)**
    - **Weather conditions existing at the time**

  If any or all of the factors influence too heavily on safety or productivity, we may not be able to carry out the aerial topdressing at all. A set of towers will effectively change the topography. They will also change our line directions causing a decrease in productivity (eg. Shorter runs, more turns). To enable productivity to be as high as possible we carry as much payload as is safe to do so. If we have to climb an extra 100 metres or greater, our payload will have to be decreased, therefore causing a decrease in productivity. This cost would have to be borne by the landowner in increased charges. One major factor that would not be measurable until the towers are in place is the turbulence generated by the structures. If this was too great, the operation may have to cease. Another decrease in productivity, whereas before it would have not been a problem.

- **Decreased accuracy of fertilizer deposits** – commonly referred to as co-efficient of variation. We as pilots fly anywhere between 20-30 metres depending on several factors – safety , topography, size of treatment area & shape of treatment area. If we have to fly at 150 metres or greater, we cannot accurately determine or would not give guarantees as to the accuracy of fertilizer deposits onto the property, or that we would even maintain them within the boundaries at all times. I would feel that there would be areas that we could not treat at all.

- **Decreased productivity to the landowners** – because of the accuracy being compromised and sections of land not being able to be treated properly, the growth rate of pastures would be affected, therefore decreasing productivity on the at property.

- **Increased cost to landholders** – there will be an increased cost to landholders because of the explained above. This could be anywhere from $5 per hectare, bearing in mind if we are able to do the job at all.

- **Decreased Revenue** – what I can see but hope it would not happen is that because of our decreased accuracy, some of our landholders may look to get fertilizer applied by different means eg Groundspreading. This means our income would be directly affected and properties that we have traditionally done for many years we would lose to alternative application methods.

These towers are a massive obstacle to our operation. We as agricultural topdressing pilots already have a high concentration level with the associated risks that we presently deal with. These towers will add another dimension to our occupation, which I can honestly say we would not welcome for obvious reasons.
I am only too happy to offer an insight into our operations and complexities that do not exits in another form of commercial flying operations in the world. I would offer to take anyone interested for a simulated topdressing flight in our aircraft at a time & place convenient to both parties. It may be only then that a somewhat minor understanding of what our occupation entails would be achieved by the developers of these wind turbines, and then they may realise the adverse effects on our business.

" If the following suggestions could be agreed to with developers before construction occurs, then it would go a long way to alleviating our concerns about the whole wind farm development in our operations areas"

Increased flying time and costs

Where a surcharge for additional flying time for aerial operations is incurred by a landowner with wind turbines located on his/her land due to the presence of those turbines, the developer shall meet the full cost of this surcharge. This may include adjoining properties without wind turbines on that land, but proximity of the turbines causes flight path changes to complete aerial operations.

The surcharge shall be calculated by the aerial operation as a fir charge for additional flying time.
The developer or the controlling body shall pay the surcharge directly to the aerial operator upon receipt of an invoice and sufficient information to justify the surcharge.

It is believed that a fair surcharge rate per hectare per property, independent of weather conditions, could be negotiated in Year 1 & 2 and applied to each subsequent aerial operation to save detailed cost justification of every operation on each property. This agreement would have to last the natural life of the wind turbines.

Decreased accuracy of fertiliser spreading

It is understood that a decrease in fertiliser spreading accuracy is likely to only occur over a proportion of the properties being considered for wind farm development, depending upon the configuration and proximity of turbines. Specifically fertiliser spreading accuracy along property boundaries appears to be the most critical issue, avoiding fertiliser application on the neighbours land.

In response to this the following is proposed:

An additional 5-10% of fertiliser by volume will be purchased by the developer or controlling body for each fertiliser spreading operation on each property that is likely to incur spreading inaccuracy along a property boundary or adjoining property boundaries. With the additional flying time incurred to spread this additional amount of fertiliser, the associated cost will be met by the developer or controlling body.

Decreased Revenue

If we were to lose traditional customers to alternative means of fertiliser application, eg ground spreading operations. We would like to see a clause in the development consent or approval that: "IFANY PARTIES ARE ADVERSELEY AFFECTED AND MAY LOSE REVENUE THROUGH CONTRUCTION OF A WIND FARM, EVEN THOUGH THEY MAY NOT BE THAT LANDOWNER, THAT A PROCESS OR AGREEMENT DOCUMENTED FOR COMPENSATION TO THESE BUSINESSES" This agreement would have to last the natural life of the wind turbines.

To sum up, I can see our business being adversely affected through no fault of our own by these wind turbines. All I am asking for is a fair outcome for us or any other parties that may be affected as well. I can be contacted on any of the numbers listed at any time if there are any questions that anyone may have. If we all communicate and address the problems that we have raised I would hope that it is only positives coming out of these types of developments for all concerned.

Kind regards

David Boundy
Manager
Superair Australia