



AIR NAVIGATION, AIRSPACE AND AERODROMES BRANCH

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**RESPONSE TO SUBMISSIONS AND AMENDMENT REPORTS – DINAWAN WIND FARM  
SSD-50725708 CASA COMMENTS**

CASA has reviewed the Aviation Safety aspects of the following:

- Submissions Report August 2025 by EMM / Spark, including 4.4 ‘Civil Aviation Safety Authority’.
- The new Aviation Impact Assessment March 2025; which supersedes May 2024.
- The Amendment Report by EMM of 8 August 2025 specifically ‘6.11.5 Aviation Safety’.
- The Amendment Report Appendix D.13 ‘Indicative aviation obstacle lighting plan’ which is an Aviation Projects to EMM letter titled: “Re: Dinawan Wind Farm – Wind Turbine Obstacle Lighting.”

The number of turbines remains the same. The tip height has been revised 30m down to 250m. The indicative obstacle lighting plan provided in Appendix D.13 requires that 67 of the 200 WTGs be lit with two low intensity steady red lights.

CASA does not agree with the following part of the RTS Response 4-4: “*amended aviation impact assessment has been prepared and considers the revisions to the WTG layout (Appendix D.11 of the amendment report). The assessment concludes that there will be an acceptable level of aviation safety risk associated with the potential for an aircraft collision within a WTG without obstacle lighting on the WTGs*”. Similar affirmations are made in the Submissions Report 5.1.1 (ii) and in the new Aviation Impact Assessment Executive Summary paragraph 11 and Section 10 Risk Assessment Table 7/8/9 Residual Risk. vis; “It is considered that the significant cost of obstacle lighting (which is not a preventative control), may only slightly reduce the likelihood of a collision given that the pilot is already in a highly undesirable situation (and not in all situations – such as where the obstacle light may be obscured by cloud) and hence is not justified.”

Despite the reduced tip height, the original CASA assessment of 24 July 2024 remains applicable, specifically: “*CASA considers the proposed wind farm will be a hazard to aviation safety and recommends that the wind farm is obstacle lit with steady medium-low intensity red obstacle lighting in accordance with the National Airports Safeguarding*

*Framework Guideline D*". CASA considers Aviation Safety. CASA does not consider cost or visual amenity etc.

CASA agrees with the other responses at Submissions Report 4.4.

CASA has reviewed the "Re: Dinawan Wind Farm Renewable Hub – Wind Turbine Obstacle Lighting." letter including the Obstacle Lighting Plan by Aviation Projects. CASA has no issues with the letter and the Obstacle Lighting Plan is satisfactory.

CASA has no issues with the Amendment Report. However, it could be noted that most of the issues described in the '6.11.5 Aviation Safety' (also at Submissions Report 4.3); including changes to Minimum Safe Altitudes and Lowest Safe Altitudes etc; are assessed and managed by Airservices Australia. CASA is interested, but Airservices is the primary stakeholder for air navigation type issues.

Amended Aviation Impact Assessment, Section 12 'Recommendations' 'Notification and reporting' 1. (The requirement to notify CASA of proposed structures 100m+ above ground level) can be deemed to be complete.

To be sure, CASA does not object to the 'Dinawan Wind Farm' project.

It is noted in the Amendment Report Appendix C 'Amended mitigation measures':  
*AV07 Overhead transmission lines and/or supporting poles that could adversely affect aerial application operations will be identified in consultation with local aerial application operators and marked in accordance with Part 139 MOS 2019 Chapter 8 Division 10 section 8.110 (7) and section 8.110 (8) and AS3891.2, Air navigation — Cables and their supporting structures — Marking and safety requirements.*

Incidental comment: This is a very worthwhile initiative. The consultation could include airstrip owners / landowners where spraying is conducted.

Yours sincerely

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