

James Bellamy

From: Alder, David <David.Alder@casa.gov.au>
Sent: Thursday, 13 June 2024 5:38 PM
To: James Bellamy
Cc: Airspace Protection
Subject: RE: F23/34649-7 Major Projects – New Request for Advice - Narrabri Solar Farm (SSD-71855714) (Narrabri Shire) CASA Comments [SEC=OFFICIAL]

Categories: Follow Up

OFFICIAL

James

The SEARs advise:

- Aviation Safety - assess the impact of the development under the National Airports Safeguarding Framework principles and guidelines;

Unfortunately, the NASF Guidelines don't cover glare from solar panels. The closest, assuming solar panels are buildings, is NASF Guideline E which says:

The potential for glare caused by reflected sunlight from structures such as buildings has been raised in some quarters as a potential source of distraction to pilots. However, CASA has advised that glare from buildings tend to be momentary and therefore unlikely to be a source of risk. The potential for risk from building glare is further attenuated by the use of sunglasses which pilots normally wear in bright daylight.

However, the EIS should probably at least cover off on the potential for glare to affect aviation.

I notice that the SEARs includes: **"Glint and Glare** – provide a glint and glare assessment prepared in accordance with the Solar Guideline."

Suggested Options for the SEARs (include something along the lines):

The glint and glare assessment is to consider glare from the panels which could affect aircraft pilots.

OR

The glint and glare assessment should confirm that there will not be excessive glare from the panels for aircraft pilots.

OR

The glint and glare assessment is to consider whether there could be excessive glare from the panels for aircraft pilots.

OR

The glint and glare assessment should confirm that reflected glare from the solar panels will not present an aviation hazard.

Sundry Perspective Comments:

We have been using the FAA - Federal Aviation Administration (US) Advisory material when Planning Authorities ask for comments on proposed solar farms, although there have not been many lately.

The runway at Narrabri is 7.5km+ away from the solar farm and offset from approaches. Also, depending on the tracking arrangement; sun / panels / approaching aircraft alignment for pilots approaching Narrabri Aerodrome is very unlikely.

To quote the most recent advice from the FAA: “*FAA has subsequently concluded that in most cases, the glint and glare from solar energy systems to pilots on final approach is similar to glint and glare pilots routinely experience from water bodies, glass-façade buildings, parking lots, and similar features.*” <https://www.federalregister.gov/documents/2021/05/11/2021-09862/federal-aviation-administration-policy-review-of-solar-energy-system-projects-on-federally-obligated>.

(I don't know about crop spraying or if there are any local Aircraft Landing Areas in the vicinity (apart from Exact near the north east corner))

Some of the NASF Guidelines (probably 2) would be relevant to the Exact Aviation Aeroplane Landing Area visible on Google Earth. None of the NASF Guidelines are relevant to Narrabri Aerodrome in this case.

The Scoping Report touches on windshear and turbulence and dust. Windshear and turbulence (or dust) will not be an issue for Narrabri Aerodrome, but might be for Exact ALA.

We are not allowed to recommend products, but there is a ForgeSolar Solar Glare Hazard Analysis Tool software program that I have seen several consultants use (although one got it all wrong). The expert who does the glint and glare assessment would be familiar with it.

Happy to compare notes.

Regards

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From: James Bellamy <james.bellamy@dpie.nsw.gov.au>

Sent: Tuesday, June 11, 2024 4:20 PM

To: Government and Parliamentary Services <GPS@casa.gov.au>; ANAA Corro <ANAA.Corro@casa.gov.au>; Airspace Protection <Airspace.Protection@casa.gov.au>

Subject: Major Projects – New Request for Advice - Narrabri Solar Farm (SSD-71855714) (Narrabri Shire)

To Whom It May Concern,

The Department is requesting advice from CASA in relation to the proposed Narrabri Solar Farm. The due date for this request is 24/06/24.

The scoping report can be found [here](#), and the draft SEARs can be found attached. Please provide your advice by responding to this email.

Please feel free to reach out to me should you have any further questions about this request.

Kind Regards,

James Bellamy
Student Planner
Energy Assessments
Department of Planning, Housing and Infrastructure

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I acknowledge the traditional custodians of the land and pay respects to Elders past and present.

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