5 May 2026

Department of Planning, Housing and Infrastructure Via NSW Planning Portal: planningportal.nsw.gov.au/major-projects

RE: SUBMISSION IN OBJECTION – Wallaby Creek Wind Farm | Application No. SSD-60247211 | Applicant: Acciona Energy Australia Global Pty Ltd

My name is Rachel Greig. I grew up in Narromine Shire, and while I no longer live in the area, my connection to it has never faded. My father still calls it home. He served as a Narromine Shire Councillor and continues to give his time as a volunteer with the Narromine Aero Club, amongst other organisations. When I read of this proposal, I felt compelled to write – not only as someone who understands the planning process, but as someone who loves that part of the world and has seen first-hand what the airfield and gliding community means to the people there.

I write to formally OBJECT to the State Significant Development application for the Wallaby Creek Wind Farm (SSD-60247211), located approximately 3.5 km south of Narromine. My objection is directed at what I consider to be a fundamental failure in the Environmental Impact Statement (EIS) to adequately assess the impact of this project on aviation at Narromine Airport – and in particular on the extraordinary gliding operations that have put this small town on the world map.

1. What Narromine's Airfield Means – and Why It Cannot Be an Afterthought

Narromine Airport (YNRM) is not a minor country airstrip. It is a certified aerodrome that serves the Royal Flying Doctor Service, agricultural operators, recreational pilots, and – most significantly – the Narromine Gliding Club, which has earned a reputation that reaches every corner of the world where people fly gliders.

For those who haven't encountered it, the sport of gliding is not a casual weekend hobby. Pilots fly engineless aircraft across hundreds of kilometres of open country, flying entirely by the invisible architecture of the atmosphere – thermals, ridge lift, wave systems. It demands exceptional skill, judgement, and intimate knowledge of the landscape below. The flat, sun-baked plains of the Narromine district produce some of the finest thermal soaring conditions in the Southern Hemisphere, and the gliding community has built something genuinely remarkable around them.

The Narromine Gliding Club's record speaks for itself:

- 37th FAI World Gliding Championships (December 2023): Eighty high-performance gliders from 21 nations converged on Narromine for the most prestigious gliding competition in the world – an event governed by the Fédération Aéronautique Internationale. Competitors raced over central NSW for up to seven hours a day, covering up to 600 km per race. The town of a few thousand people welcomed the world, and by all accounts, the world went home impressed.
- World Junior Gliding Championships (2015): Narromine hosted this earlier international event with ten competition days out of eleven possible, and Australian pilot Matthew Scutter became World Champion in Standard Class. It was the proof of concept that led to the full World Championships eight years later.

- Regular national championships: The Club hosts Australian national gliding championships on a regular basis, including the National Twoseat Championships, drawing competitors and visitors from across the country.
- Economic and community significance: The 2015 Junior Worlds alone contributed an estimated $2 million to the regional economy. The 2023 World Championships – with competitors, crews, officials and spectators staying for weeks – generated a far greater windfall for Narromine, Trangie, Dubbo and surrounding communities. This is the kind of event that puts a small NSW town on the itinerary of people from Germany, Poland, the Netherlands, Denmark and Finland. That is not nothing. For a community like Narromine, it is a great deal.

The Aero Club and the Gliding Club have worked for decades to build something special at that airfield. The volunteers, the committee members, the pilots, the tow plane operators, the ground crews – these are people who have invested years of their lives. To see that investment treated as a minor footnote in a development assessment is deeply disheartening.

2. The EIS Fails to Properly Assess the Impact on Gliding Operations

The Aviation Impact Assessment (AvIA), prepared by Aviation Projects Pty Ltd and included as Appendix Q of the EIS, is simply not adequate when it comes to gliding. The EIS acknowledges that the Narromine Gliding Club was contacted as a consultation stakeholder. It acknowledges that community members raised concerns about gliding impacts. And then it provides no substantive assessment of those impacts at all.

Gliders are not small powered aircraft. The difference matters enormously for this assessment:

- No engine: A glider pilot who finds themselves at low altitude near large turbines, in degraded or turbulent conditions, cannot simply apply throttle and climb away. There is no throttle. The consequences of encountering turbine wake turbulence at low altitude are potentially fatal, and the EIS contains no assessment of this risk whatsoever.
- Thermal dependence: Gliders rely entirely on naturally occurring columns of rising air. Wind turbines are known to disrupt the convective boundary layer – the very atmospheric layer in which thermals form and in which gliders operate. The loss of useable lift in the project area is not a theoretical inconvenience; it directly affects whether pilots can safely complete flights and return to the airfield.
- Low-altitude operations: Gliders routinely descend to very low altitudes when searching for thermals, particularly during the start and finish of competition tasks, and when "landing out" in paddocks during cross-country flights. Thirty-eight turbines, some reaching nearly 690 m above mean sea level, situated 3.5 km from the runway, is not a minor obstacle in this environment.
- Competition task areas and contingency safety: In national and world championship events, tasks are set that radiate from Narromine in every direction, covering hundreds of kilometres. A cluster of 38 turbines immediately to the south of the airport will permanently constrain which task configurations are safe to use. But the concern goes further than competition planning. Glider pilots cannot always fly where they intend. Weather changes, unexpected sink, or other difficulties mean a pilot may find themselves lower than planned and closer to the airport than expected, with limited options. In those situations, reaching a safe landing area is everything. A wind farm

immediately to the south does not just remove a task direction — it eliminates a critical contingency option across an entire sector. A pilot caught low to the south of Narromine, who would ordinarily glide back to the runway, may now find 38 turbines between themselves and safety. When you account for this across all possible conditions and all directions from which a pilot might need to return, the wind farm may not merely constrain gliding operations at Narromine — it may effectively make safe gliding operations from the airport impossible. The EIS does not acknowledge any of this, let alone assess it.

2.1 The Acknowledged Minimum Sector Altitude Infringement

The EIS itself concedes, at Table 6-59, that WTG 68 will infringe the minimum sector altitude for Narromine Airport, requiring it to be raised by 91.44 m. The EIS then describes this as having a "minor impact on regular aircraft operations."

I find this characterisation difficult to accept. The minimum sector altitude is the lowest altitude at which an aircraft can safely fly in a given sector around an aerodrome, with guaranteed obstacle clearance. Raising it is not a minor administrative adjustment. It has real consequences for:

- Gliders and tow aircraft returning from the south in deteriorating conditions;
- Competition retrieval operations, where vehicles and tow planes must collect gliders that have landed out;
- Start and finish gate procedures, where dozens of competition gliders operate simultaneously in the immediate vicinity of the airport at relatively low altitude; and
- Any future instrument flight procedure design for the airport, which affects reliability of RFDS and other essential aviation services.

The phrase "regular aircraft operations" used in the EIS reads as if the authors have powered aircraft in mind – aircraft that can fly at whatever altitude they choose and simply go around an obstacle. That is not the world glider pilots inhabit. The failure to apply the MSA assessment specifically to glider operations is a significant gap.

2.2 Wake Turbulence and Thermal Disruption – Simply Not Assessed

Wind turbines generate substantial wake turbulence extending downwind for many rotor diameters. The proposed turbines will have rotor diameters of considerable size, and 38 of them operating simultaneously will alter the local atmosphere in ways that have not been assessed in this EIS. For gliders working the thermal environment around Narromine, this creates genuine safety risks that go beyond what the AvIA's regulatory framework – designed for powered aircraft – is equipped to evaluate.

The absence of any gliding-specific aerological assessment is not a minor oversight. It is a fundamental gap. The community raised concerns about gliding impacts. The Narromine Gliding Club was consulted. The response in the EIS is, in effect: "we have noted your concern, please see Chapter 6.10.1." Chapter 6.10.1 says nothing specific about gliding at all.

2.3 The Obstacle Lighting Question Remains Unresolved

The EIS recommends that no Aviation Hazard Lighting (AHL) be fitted to the permanent turbines, while acknowledging that CASA is yet to make its own determination. This is an unsatisfactory situation to exhibit to the public. The assessment cannot tell us whether 38 turbines nearly 700 m tall will be lit or unlit, yet it asks us to accept that the impacts are manageable. For pilots – particularly in the dusk conditions that are common at the end of a competition day – this is not a minor detail.

3. The Proposed Mitigation Does Not Address Gliding at All

Table 6-60 of the EIS sets out the aviation mitigation and management measures. They consist of four items: reporting WTG details to CASA and Airservices (a regulatory requirement); issuing NOTAMs during construction (a standard obligation); notifying local aircraft operators before construction begins (information, not mitigation); and marking met masts in accordance with the National Airport Safeguarding Framework.

Not one of these measures addresses:

- The permanent restriction on gliding competition task areas to the south of Narromine;
- The impact of turbine wake turbulence on glider safety at low altitudes;
- The disruption to thermal soaring conditions in the project area;
- The constraints the project would place on the Club's ability to host future national and international events;
- The raised minimum sector altitude and what it means specifically for glider operations; or
- Any ongoing formal engagement with the Narromine Gliding Club during the operational life of the project.

Informing the Narromine Gliding Club that the turbines exist is not the same as assessing or mitigating the impact of the turbines on the Club's operations. These are not problems that can be solved by a NOTAM.

4. What I Am Asking For

I am not writing this submission because I am opposed to renewable energy. I understand the importance of the energy transition, and I recognise that wind farms have a role to play in it. But that transition should not be pursued at the cost of communities and institutions that have built something irreplaceable – and it certainly should not proceed on the basis of an impact assessment that fails to properly examine the risks.

I respectfully request that the Department:

- Refuse consent to this application unless and until a comprehensive, gliding-specific aviation impact assessment is provided that genuinely addresses the impacts on Narromine Airport's gliding operations, including competition events of national and international significance.
- Direct the applicant to engage substantively with the Narromine Gliding Club and Gliding Australia – not merely to notify them, but to sit down with them and genuinely assess what 38 turbines 3.5 km from the runway means for competition task areas, thermal soaring conditions, and low-altitude glider safety procedures.

- Commission independent expert assessment of wake turbulence and thermal disruption from a suitably qualified specialist in gliding operations and aerology – not an assessment constrained to the regulatory framework for powered aircraft, which simply does not capture the relevant risks.
- Require the CASA determination on aviation hazard lighting to be finalised and made public before any consent is granted and ensure that any conditions of consent address turbine lighting in a manner that is adequate for glider operations, including twilight conditions.
- Genuinely consider whether this location is appropriate for a wind farm of this scale, given its proximity to a certified aerodrome and a gliding club of world championship standing, and whether alternative layouts or a reduced number of turbines could address the most serious impacts.

5. Conclusion

Narromine's gliding community has built something genuinely world-class – not by luck, but through decades of dedication by volunteers, pilots, and supporters. The conditions in this part of central NSW are among the finest for thermal soaring anywhere in the world. That is not a local boast; it is why the FAI chose Narromine to host a World Championship. It is why competitors travel from Europe and beyond to fly there. It is a rare and irreplaceable combination of geography, climate, and community.

A wind farm of this scale, 3.5 km from the runway, does not merely inconvenience that. Based on the safety concerns outlined in this submission – the elimination of contingency options to the south, the disruption to thermal conditions, the raised minimum sector altitude, the unassessed wake turbulence risks – it is difficult to see how the Narromine Gliding Club could continue to safely host events of national or international significance. It may not be possible to safely conduct gliding operations from Narromine at all.

The EIS, as exhibited, does not grapple with any of this. The aviation impact assessment does not contain a single paragraph specifically about gliding – despite the Narromine Gliding Club being consulted, despite community concerns being raised, and despite the project sitting 3.5 km from a runway that has hosted the FAI World Gliding Championships.

That is not good enough. I urge the Department to require a proper assessment before this application proceeds any further.

Submission Details Project: Wallaby Creek Wind Farm Application No: SSD-60247211 Position: OBJECT Date: 5 May 2026 Name: Rachel Greig Address: 390 Aberbaldie Rd, Walcha NSW 2354

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