

Submission Objecting to the Wallaby Creek Application

Project: Wallaby Creek Wind Farm

Application: SSD-60247211

Objection to the Wallaby Creek Wind Farm

As a member, and committee member, of the Narromine Gliding Club (NGC), I object to the Wallaby Creek Wind Farm project proceeding in its current form, as described in the Environmental Impact Statement EIS).

My objection to the current application in its current form, is that it would have a severely negative impact on:

- The Aviation Safety and ongoing viability of gliding operations at the Narromine airport (YNRM).
- The Aviation Safety of Sports aviation at YNRM.
- The ability of NGC to host inter-club, national and international gliding events at YNRM.
- The ability of NGC to host international glider pilots to participate in cross country flying at YNRM.
- The ability of NGC and the Sport Aircraft Association of Australia (SAAA) to conduct state and national sports flying events at YNRM.
- The ability of Recreational Aviation Australia (Raus) training organisations to operate at YNRM.
- The continuing economic viability of the NGC and gliding at YNRM.

Our objection covers 5 main areas where the application is seriously deficient. These are:

- EIS Stakeholder Engagement Omissions and Aviation Impact Assessment (AIA) Flaws
 - Aviation Safety Impact
 - Public Interest Considerations
 - History and economic benefit of NGC to Narromine
 - Future of NGC and Gliding at Narromine
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EIS Stakeholder Engagement Omissions and Aviation Impact Assessment (AIA) Flaws

As shown in Section 5- Community and Stakeholder Engagement of the EIS, there was no consultation with any of the YNRM aviation stakeholders.

The AIA, Appendix Q of the EIS, is completely flawed as it does not address the impact on YNRM aviation operations and the YNRM community and is solely based on Civil Aviation Safety Authority (CASA) and Air Services (AS) requirements and procedures for Regular Public Transport (RPT), general aviation (GA), instrument flight rules (IFR), and aerial work activities.

YNRM has no RPT or IFR activity and when compared to the gliding activity, minimal GA or aerial work.

In not engaging with GA, NGC or SAA, it would appear that Aviation Projects (AP) was either unaware of, or disregarded the fact that, CASA has delegated authority for the governance, regulation, safety and operations of gliding and sports flying to Gliding Australia (GA) and SAAA, with NGC having responsibility for gliding operations at YNRM..

In terms of number of take-offs & landings, hours flown and number of aircraft involved, about 90% of flying operations at YNRM would be gliding and sports flying.

As shown in Section 5 of the AIA, AP only engaged with aviation stakeholders associated with Dubbo Regional Airport, such as Dubbo City Regional Airport Management, Royal Flying Doctor Service, Rex Regional and Link Airway.

At no time did AP engage with GA, NGC or SAA - the real stakeholders at YNRM.

Conclusion

As a result of this flawed process, and absence of any relevant stakeholder engagement, the EIS does not address any of the significantly negative impacts of the Wallaby Creek Wind Farm project on aviation and aviation organisations at YNRM.

Aviation Safety Impact

Introduction

Narromine is not simply another regional aerodrome. It is widely regarded as one of Australia's premier gliding locations and has long been recognised nationally and internationally for its unique combination of airspace, terrain, and meteorological conditions. The area supports regular recreational flying, pilot training, cross-country operations, and competitive events that attract participants from across Australia and overseas and brings significant income to the Narromine township.

Gliding is fundamentally different from powered aviation. Aircraft operate without engines, are dependent on naturally occurring lift, and routinely fly at low altitudes across broad areas of rural land. Safe operation relies on the pilot's ability to maintain situational awareness, preserve energy, and retain access to unobstructed airspace and suitable landing areas at all times. It is within this context that the proposed development must be assessed.

While the Aviation Impact Assessment (AIA) concludes that risks are manageable, it is our considered view that the assessment does not adequately reflect the realities of gliding operations, nor does it demonstrate that the risks introduced by the development have been reduced to an acceptable level in accordance with the *Environmental Planning and Assessment Act 1979*, the National Airports Safeguarding Framework, and CASA guidance material.

Impact on Aviation Safety

The introduction of wind turbine generators, wind monitoring towers, and associated infrastructure represents a substantial increase in obstacles within navigable airspace. CASA guidance makes clear that tall structures—even outside the immediate vicinity of aerodromes—pose a risk to aircraft operating at low altitude, particularly those operating down to 500 feet above ground level.

For gliding operations, this is not a marginal concern; it is central to flight safety. Gliders routinely operate within this altitude band during launch, circuit operations, and while searching for lift in weak conditions. Unlike powered aircraft, gliders cannot simply climb away from hazards. Their ability to manoeuvre is constrained by available lift and airspeed, and avoidance options are often limited, particularly in the latter stages of flight.

The presence of tall structures across a wide geographic area therefore introduces a persistent and unavoidable hazard. The risk is heightened by the nature of some of the infrastructure proposed. Wind monitoring towers and their associated guy wires are widely acknowledged as being difficult to detect visually, even in good conditions, and present a known hazard to low-level aviation. For a glider pilot operating at low altitude with limited manoeuvring options, such hazards are of particular concern.

Wake Turbulence and Flight Performance

Beyond the physical presence of obstacles, the aerodynamic effects of wind turbines must also be considered. National Airports Safeguarding Framework guidance identifies that wind turbines generate wake turbulence that may extend for considerable distances downwind.

For powered aircraft, such turbulence may be an inconvenience. For gliders, it can materially affect safety. Gliders operate at lower speeds and rely on smooth, predictable airflow to maintain lift. Turbulence generated by turbines has the potential to disrupt thermals, degrade climb performance, and introduce instability during approach and landing. These are not theoretical concerns; they go directly to the core of how gliders remain airborne and how pilots manage risk.

Loss of Usable Airspace

Gliding operations depend on access to large areas of usable airspace. Pilots must be free to deviate from planned routes in response to changing weather conditions and the location of lift. The introduction of a wind farm of the proposed scale effectively creates a zone that must be avoided, not because it is legally restricted, but because it becomes operationally unsafe.

This has a cascading effect. Avoidance of turbine arrays reduces access to thermals and lift lines, increases pilot workload, and limits cross-country flying options. Over time, this reduces the viability of gliding operations in the area and undermines the value of Narromine as a nationally significant gliding location.

The National Airports Safeguarding Framework is explicit in its objective of protecting the ongoing viability and safety of aviation operations through appropriate land-use planning. The effective sterilisation of usable airspace is inconsistent with that objective.

Impact on Emergency Landing Safety

A defining feature of gliding is the need to always maintain a safe landing option. Unlike powered aircraft, gliders cannot rely on engine power to reach an aerodrome. Instead, pilots must continuously identify and preserve access to suitable landing areas throughout the flight.

The proposed development materially reduces the availability of such areas. The introduction of turbines, transmission lines, and associated infrastructure increases hazard density across otherwise suitable paddocks and agricultural land. In the event of a forced landing, the presence of these obstacles increases both the likelihood of an incident and the severity of its consequences.

This represents a fundamental erosion of the safety margins that glider pilots rely upon and is not adequately addressed in the AIA.

Proximity to Narromine Gliding Operations

Narromine Airport includes dedicated gliding runways and supports extensive gliding activity. The surrounding airspace is routinely used for launch, circuit operations, and transition to cross-country flight.

The proximity of the proposed wind farm to this established aviation environment raises serious concerns. The introduction of tall structures within the broader operational area has the potential to interfere with circuit patterns, reduce manoeuvring space, and complicate both launch and recovery operations.

Under the *Narromine Local Environmental Plan 2011*, development must not compromise the effective and ongoing operation of the aerodrome or expose the community to undue risk from aviation activities. It is difficult to reconcile the scale and location of the proposed development with these requirements.

Deficiencies in the Aviation Impact Assessment

While the AIA has been prepared in accordance with relevant guidelines, it does not contain a dedicated assessment of gliding operations. Instead, it focuses on general aviation, instrument flight procedures, and aerial work activities.

This represents a significant omission. CASA Advisory Circular AC 139.E-05 makes clear that all developments of this nature must be assessed in terms of their impact on aviation safety, particularly for low-level operations. Gliding operations are a prominent and established component of aviation activity in the Narromine region and should have been specifically considered.

The NSW Wind Energy Guideline similarly requires that proponents identify and assess impacts on aviation safety, including low-level flight operations, and demonstrate that risks have been appropriately mitigated. In the absence of a gliding-specific assessment, it cannot be said that this requirement has been met.

Conclusion

The application does not adequately demonstrate that aviation safety risks have been reduced to an acceptable level.

Public Interest Considerations

In determining this application under section 4.15 of the *Environmental Planning and Assessment Act 1979*, the consent authority must consider the public interest, including the safety and sustainability of existing land uses.

Gliding is a long-established activity in the Narromine region, contributing to the local economy, tourism, and aviation training. It is also an activity that depends on the preservation of safe and usable airspace. The introduction of a development that materially degrades that environment raises serious public interest concerns.

The National Airports Safeguarding Framework emphasises that land-use planning decisions must protect both the safety and ongoing viability of aviation operations. Where a development introduces enduring risks that cannot be fully mitigated, refusal or redesign is the appropriate planning response.

The proposed Wallaby Creek Wind Farm presents a range of aviation safety risks that are particularly acute for gliding operations. These include increased collision risk, exposure to turbine-induced turbulence, loss of usable airspace, and a reduction in safe emergency landing options. The proximity of the development to Narromine further amplifies these concerns.

From the perspective of the gliding community, these impacts are not minor or theoretical. They go directly to the safety of pilots and the continued viability of gliding operations in one of Australia's most important flying locations.

Conclusion

As the application does not adequately demonstrate that aviation safety risks have been reduced to an acceptable level, it is not in the public interest in its current form.

History and Economic Benefit of NGC to Narromine

NGC has long been recognised as one of the premier gliding sites in the world, and each year attracts international pilots from around the world to fly cross country at YNRM.

NGC has operated at YNRM for over 50 years, being established at Narromine aerodrome in 1974.

During this time NGC has hosted a number of world gliding championships, Australian championships, NSW championships, youth championships and women's championships.

These competitions attract competitors from both overseas and interstate, as well as their families and friends.

Each year, NGC also hosts a number of other gliding activities which attract pilots, together with their families and friends, from across NSW as well as from interstate.

These activities include instructor training courses, cross-country training courses, female flying courses and junior flying courses.

As well, groups from other Australian gliding clubs hold annual camps at NGC for organised cross-country flying.

The operation of NGC has been, and continues to be, a consistent economic benefit to the economy of the Narromine shire.

As well, gliding conducted by NGC at YNRM, raises a general awareness of the Narromine shire, which in turn attracts tourism activity outside of gliding.

Conclusion

Gliding at YNRM, conducted by NGC, has for over 50 years, drawn inter-state and international visitors to Narromine and provided an on-going economic benefit to the Narromine shire.

Future of NGC and Gliding at Narromine

Gliding Operational Requirements are dictated by the prevailing weather and soaring conditions.

Due to these weather and soaring conditions, a significant percentage of flying needs to be conducted over the area impacted by the Wallaby Creek Wind Farm.

Specifically, the Wallaby Creek Wind Farm will impose significant restrictions on NGC flying operations. These restrictions would result in:

- Inability to use runways 22 and 18.
- Inability to use a significant part of the current circuit areas and task start areas.
- Inability to conduct cross country tasks to the south of Narromine.

This would result in a significant reduction in days flyable, as flying would not be possible on those days where use of the impacted runways, start areas and task areas is required due to the prevailing weather and soaring conditions.

Under these circumstances NGC would be unable to attract:

- Major gliding competitions
- International pilots
- Other gliding events

If NGC is unable to attract, major gliding competitions, international pilots and other gliding events, then the operation of NGC would become economically unviable.

If the operation of NGC becomes unviable, then gliding would cease at YNRM with the corresponding reputational and economical loss to Narromine shire.

Conclusion

If this application is accepted, as currently presented, the operation of NGC would become economically unviable.

If economically unviable, NGC would be wound-up and all future gliding activity at Narromine would cease, and the value it brings to Narromine Shire would be lost
