

24th September 2025

NSW Government Major Projects

Dear Sir/Madam,

RESPONSE TO THE HUNTER TRANSMISSION PROJECT EIS

Gliding Australia (GAus) is the national body responsible for the administration and oversight of gliding in Australia under the Civil Aviation Safety Regulations (CASR) Part 149 framework. We are entrusted by CASA with setting standards, approving operations, and ensuring safe practices for over 80 gliding clubs and thousands of members nationwide.

We submit this response to the Hunter Transmission Project (HTP) EIS with a focus on the impact of the proposed development on **Warkworth Airfield** and the operations of the **Hunter Valley Gliding Club (HVGC)**.

Gliding Australia has concerns with the aviation sections of the EIS. Specifically:

1. Lack of Risk Assessment

- The Aviation Impact Assessment (AIA) within the EIS fails to apply an objective or formal risk assessment methodology consistent with CASA guidance on Safety Management Systems (SMS 3 – Safety Risk Management) and GAus Manual of Standard Procedures Part 5 Safety Management System.
- Subjective statements are made about acceptable clearance heights and impacts, despite well-documented accident evidence (e.g., ATSB Wirestrikes involving known wires Report AR-2011-028) demonstrating that powerlines represent a high consequence, high likelihood hazard.
- The **Bow Tie risk analysis** (see Appendix A) undertaken by GAus illustrates multiple accident pathways (launch failure, engine failure, towplane malfunction, or forced outlanding) leading to potential collision with the proposed 500 kV transmission line, or to cascades high consequences such as loss of control in attempting a return to the aerodrome in the absence of alternative safe landing areas. These scenarios are not addressed in the EIS.
- The climb out and return pathways stated do not reflect reasonable, foreseeable risk scenarios where atmospheric conditions, reduced climb out performance and the absence of alternative landing areas are assessed. CASA's requirements for mitigating obvious, foreseeable aviation safety risks are not met, even in the case where power lines are moved beyond obstacle surfaces, particularly noting that Warkworth aerodrome is surrounded by un-landable terrain on N, W and S sides.

2. Lack of Consultation

- Gliding Australia, as the national administrator, was not consulted during the EIS preparation despite our statutory role under CASA Part 149.
- HVGC, as the operator of Warkworth Airfield, experienced minimal, delayed, and inadequate consultation with EnergyCo and its consultants. The Aviation Impact Assessment was prepared without a site visit and contains multiple factual errors about gliding operations, launch procedures, and circuit patterns.
- Consultation records in the EIS misrepresent the extent and nature of engagement, omitting HVGC's formal submissions and downplaying concerns repeatedly raised.

3. Unfounded Mitigations

- The sole mitigation proposed in the AIA (providing coordinates of tower locations to pilots) is at the lowest level of the risk control hierarchy and does not reduce the inherent hazard.
- Statements that gliders would “climb away from the corridor” or that “other transmission lines present similar considerations” are operationally incorrect and dismissive of the unique risks gliders face, particularly in abnormal or emergency scenarios.
- The assumption that 220 ft clearance is “safe” is unsupported and contrary to accepted aviation risk methodology.
- The assumption that safe landing areas can always be reached in fallacious from a 3D volumetric flight path methodology.
- The assumptions of high rate of climb and angle of climb, or return glide in extremis, may not be achievable by towplanes, touring motor gliders and towplanes suffering performance difficulties, particularly in hot weather.

4. Failure to Consider Operational Realities

- Warkworth Airfield supports more than 3,700 aircraft movements annually, exceeding traffic levels at some certified regional aerodromes. Its use by gliding, General Aviation, Recreational Aviation Australia, training flights, and emergency services is significant to the region.
- Abnormal scenarios, such as tug engine failures, rope breaks, or partial power during launch, routinely place gliders at low altitude with limited options. The proposed transmission line corridor cuts off the only suitable emergency landing areas to the east of the airfield, creating unacceptable risk.
- Assertions made in the study are not supported by reliable data and analysis; rather they reflect a conspiracy of optimism that neglects the realities of (1) obvious (2) foreseeable risks that are (3) insufficiently mitigated from an aviation safety risk perspective.

Recommendations

Gliding Australia requests that:

1. A formal, independent aviation risk assessment be undertaken, using CASA-compliant SMS risk methodology and considering both normal and emergency gliding operations.
2. EnergyCo and its consultants engage in documented consultation with Gliding Australia (as the Part 149 administrator) and HVGC (as the operator) to properly understand gliding operations at Warkworth Airfield.
3. Alternative alignments that avoid intrusion into the OLS and preserve emergency landing options be examined and adopted.
4. The current AIA findings be set aside until a valid, risk-based assessment is conducted.

Conclusion

The Hunter Transmission Project, in its current form, poses an unacceptable safety risk to Warkworth Airfield, HVGC operations, and the broader gliding and aviation community. The EIS conclusions that the project will have no adverse aviation impact are misleading at best.

As the CASA-approved administrator for gliding, Gliding Australia strongly opposes the approval of this project without proper consultation and will seek implementation of effective risk controls. Further, Gliding Australia will be representing these concerns to CASA.

Submitted by:

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Appendix A GAus Bow Tie Risk Analysis

