

NARRABRI SOLAR FARM

Reflective Glare Assessment

Prepared for:
Providence Asset Group
704/99 Bathurst Street
SYDNEY NSW 2000

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BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Providence Asset Group (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

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DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
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610.30220-R01-v1.0	25 February 2021	Peter Hayman	Dr Peter Georgiou	Dr Neihad Al-Khalidy

EXECUTIVE SUMMARY

SLR Consulting Australia Pty Ltd (SLR) has been engaged by Providence Asset Group to carry out a Reflective Glare assessment of the proposed Narrabri Solar Farm (the "Project") under development by Providence Asset Group. The Project is located close to Narrabri and in particular Narrabri Airport, whose Runway 36 southern threshold lies approximately 1.1 km from the nearest perimeter of the Project.

The proposed (up to) 5 MWac facility (refer Section 2) will comprise 11,592 solar PV panels within a 15 ha project site area. The 540 W panels, measuring approximately 2.26 m by 1.13 m, will be positioned as currently understood on single-axis trackers oriented north-south with a spacing of 6.25 m.

The following potential glare conditions have been considered:

- Daytime Reflective glare (and glint) arising from the solar PV panels within the facility:
 - . Aviation Sector Reflective Glare;
 - . Motorist "Disability" Reflective Glare and Pedestrian "Discomfort" Reflective Glare;
 - . Rail Operator Reflective Glare;
 - . Industrial critical machinery operators (heavy vehicles, etc) Reflective Glare; and
 - . Residential "Nuisance" Glare
- Night-time Illumination glare if any 24/7 operational security lighting is incorporate into the Project in the future

Quantitative analysis using the FAA-SGHAT software tool has shown that there will be nil glare from the Project at Narrabri Airport with the solar array in normal tracking mode, ie panels tilting $\pm 60^\circ$. The SGHAT results show potential for glare involving the panels being left at a fixed tilt angle of between 30° (westwards) to 40° (eastwards).

The months when this occurs are April to August (over winter). Accordingly, such a situation should be avoided, eg during construction, during maintenance periods, etc, during these months. This situation should also be considered in the application of sophisticated "back-tracking" operational modes for the proposed facility.

Primarily due to the selection of the single-axis tracking system for the mounting of the ground-based array panels, there will be nil glare from the Project in relation to traffic disability glare in normal $\pm 60^\circ$ tracking mode. Similarly, the potential for rail traffic disability glare from the Project is nil.

The potential for nuisance glare from the Project to surrounding residential or other receivers is nil.

Night-time lighting is not currently incorporated into the Project. If 24/7 lighting is required in the future for operational purposes, there should be negligible impact, assuming the lighting design is in accordance with AS 4282-1997 Control of the Obtrusive Effect of Outdoor Lighting. This would also address any potential adverse eco-lighting issues in relation to nocturnal fauna within and surrounding the site, although, as far as is known, no biodiversity issues have been identified in relation to the Project. Any future lighting design should also be checked against CASA's NASF Guidelines (E & F).

When key Project decisions are finalised during detailed design (eg final panel selection, mounting details, etc), the present analysis should be re-visited to confirm the conclusions set out above if key assumptions made in the analysis change significantly.

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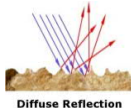
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Abbreviations and Definitions

Terms relevant to Daytime Reflective Glare

PV Panel	Photovoltaic (PV) panels are designed to absorb solar energy and retain as much of the solar spectrum as possible in order to produce electricity.
Glare	Glare refers to the reflections of the sun off any reflective surface, experienced as a source of excessive brightness relative to the surrounding diffused lighting. Glare covers reflections: <ul style="list-style-type: none"> Which can be experienced by both stationary and moving observers (the latter referred to as "glint"). Which are either specular or diffuse.
Specular	A reflection which is essentially mirror-like – there is virtually no loss of intensity or angle dispersion between the incoming solar ray and outgoing reflection. 
Diffuse	A reflection in which the outgoing reflected rays are dispersed over a wide ("diffuse") range of angle compared to the incoming (parallel) solar rays, typical of "rougher" surfaces. 
KVP	Key View Points (KVPs) are offsite locations where receivers of interest have the potential to experience adverse reflective glare.

Terms relevant to Night-Time Illumination

Luminous intensity	The concentration of luminous flux emitted in a specific direction. Unit: candela (Cd).
Luminance AS 1158.2:2005	This is the physical quantity corresponding to the brightness of a surface (e.g. a lamp, luminaire or reflecting material such as façade glazing) when viewed from a specified direction. Unit: Cd/m ²
Illuminance AS 1158.2:2005	This is the physical measure of illumination. It is the luminous flux arriving at a surface divided by the area of the illuminated surface – the unit is lux (lx) ... 1 lx = 1 lm/m ² The term covers both "Horizontal Illuminance" (the value of illuminance on a designated horizontal plane at ground level) and "Vertical Illuminance" (the value of illuminance on a designated vertical plane at a height of 1.5m above ground level).
Glare AS 1158.2:2005	Condition of vision in which there is a discomfort or a reduction in the ability to see, or both, caused by an unsuitable distribution or range of luminance, or to extreme contrast in the field of vision. Glare can include: <ol style="list-style-type: none"> Disability Glare – glare that impairs the visibility of objects without necessarily causing discomfort. Discomfort Glare – glare that causes discomfort without necessarily impairing the visibility of objects.
Threshold Increment (TI) AS 4282:2019	TI is the measure of disability glare expressed as the percentage increase in contrast required between an object and its background for it to be seen equally well with a source of glare present. Higher TI values correspond to greater disability glare.

1 INTRODUCTION

SLR Consulting Australia Pty Ltd (SLR) has been engaged by Providence Asset Group to carry out a Reflective Glare assessment of the proposed Narrabri Solar Farm (the “Project”) under development by Providence Asset Group. The Project is located close to Narrabri, NSW, approximately 2.5 km southwest of Narrabri town centre and 1.5 km from the nearest Narrabri suburbs.

The following potential glare conditions have been considered:

- Daytime Reflective glare (and glint) arising from the solar PV panels within the facility
- Night-time Illumination glare from 24/7 operational security lighting within the facility

1.1 Structure of Report

The remainder of this report is structured as follows:

- Section 2 describes the Project and surrounding environment;
- Section 3 describes the range of receptors surrounding the site with the potential to experience adverse reflective glare (or glint);
- Section 4 presents the acceptability criteria used for the study;
- Section 5 addresses the assumptions made in the glare impact analysis;
- Section 6 presents the results of the glare impact analysis of the Project;
- Section 7 presents the conclusions of the study.

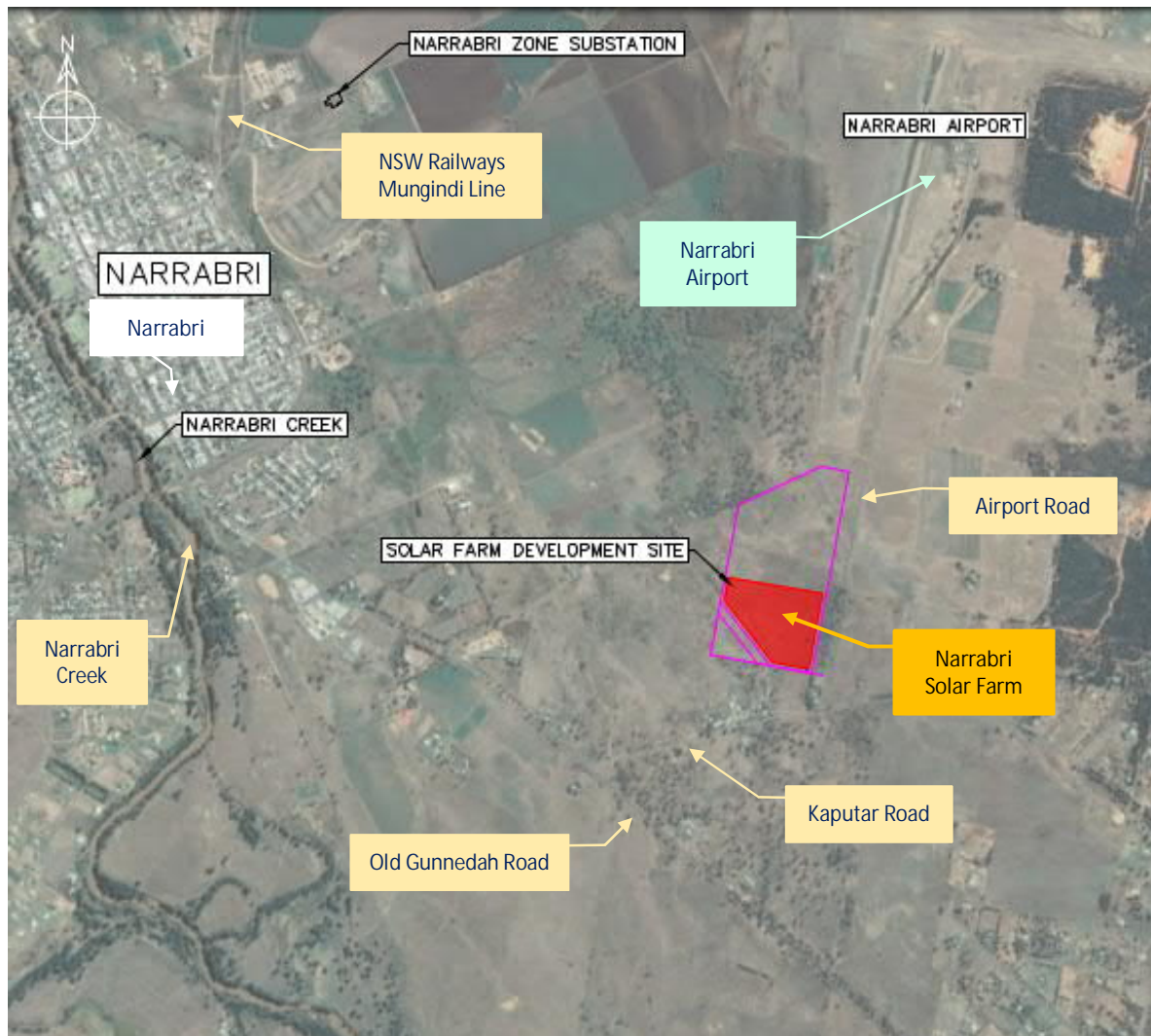
2 PROPOSED NARRABRI SOLAR FARM PROJECT

2.1 Site Location

The Project is seeking approval for an (up to) 5 MWac photovoltaic (PV) solar plant occupying a 15 ha area as shown in Figure 1. The Project is located approximately 3.5 km east-southeast of Narrabri town centre. The northern perimeter of the development site is approximately 1.1 km south of the southern end of Narrabri Airport's main Runway 18/36.

The land required for the Project has been subject to constraints identified by site investigation, i.e. native vegetation, and areas of cultural or heritage significance. The plan of the Project has been developed following completion of these site investigations and the assessment of any constraints and their impact.

Figure 1 Narrabri Solar Farm - Location Map



2.2 Site Description and Key Project Components

From a Reflective Glare point of view, the key components of the Project are:

- the photovoltaic (PV) modules in relation to their daytime reflective glare potential; and
- the facility's security/emergency lighting design in relation to potential night-time illumination glare issues (if such 24/7 lighting is incorporated into the Project).

Solar Panel Mounted Array – refer Figure 2

The proposed ground-mounted array (refer Figure 2(a)) would consist of 142 trackers oriented in a north-south direction, each supporting 84 x 540W solar panels (11,592 panels in total);

- The trackers are “single-axis” capable of rotating solar panels to a maximum of $\pm 60^\circ$ - refer Figure 2(b);
- The trackers are oriented north-south and spaced 6.25 m apart;
- Individual panels (2.26 m x 1.13 m) reach a maximum height above ground of 2.58 m at their full 60° tilt angle; and
- The eastern perimeter of the Project lies approximately 80 m from Airport Road with the southern perimeter just over 200m from Kaputar Road at its closest point. The northern perimeter of the solar farm site lies approximately 1,100 m from the southern threshold of Narrabri Airport's main Runway 18/36.

Figure 2 Narrabri Solar Farm Site Layout (to be updated with site layout drawing)

(a)
Site Layout

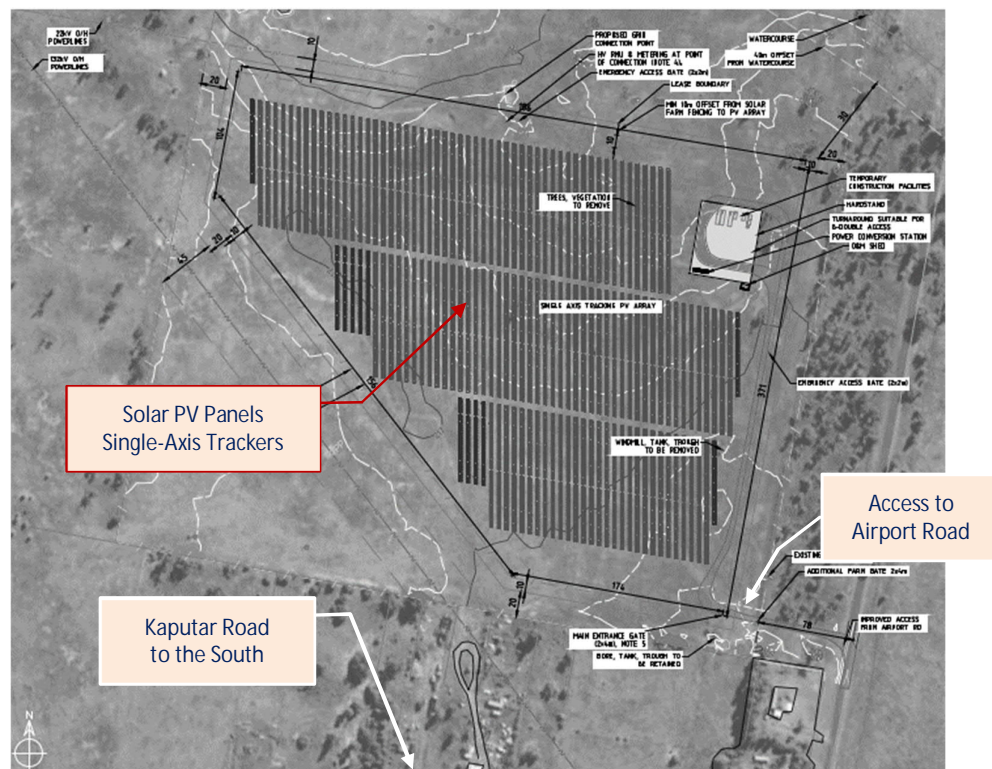
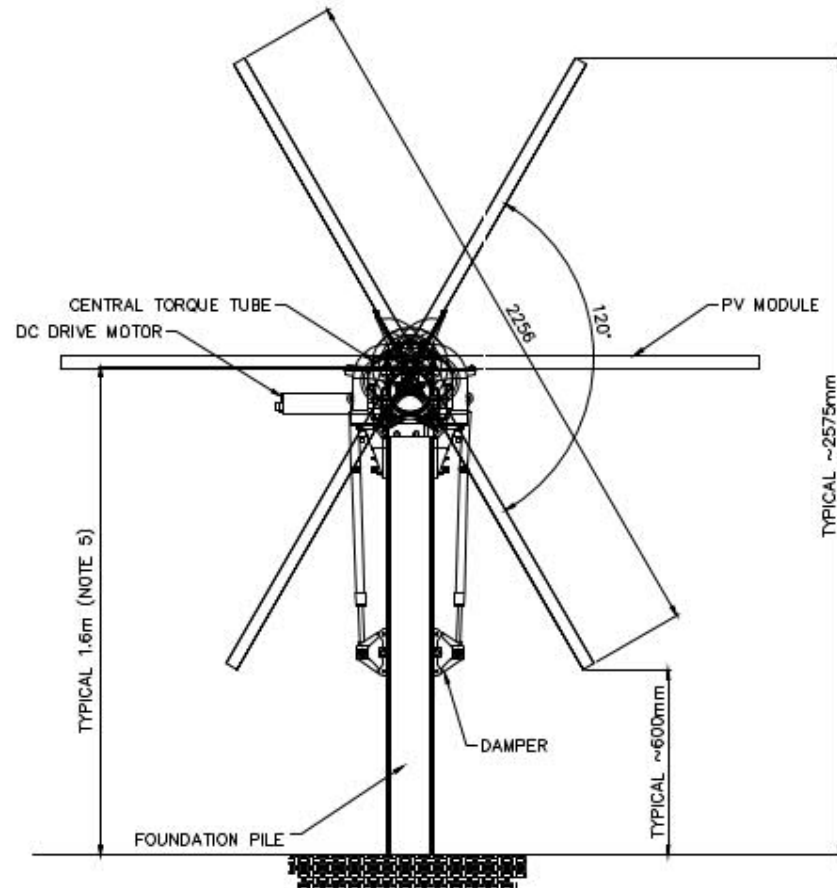


Fig.2 (cont'd)

(b)
Single-Axis
Tracker Profile
($\pm 60^\circ$ Tilt)



3 RECEIVERS AND ASSOCIATED IMPACTS

3.1 Receiver Impacts

The issues of concern in relation to daytime reflective glare and night-time illumination glare and the associated receivers of interest are detailed below.

Aviation-Related Glint & Glare (Aircraft, Helicopters, Airport Control Towers)

There have been several documented cases globally, none in Australia, of solar panel installations at airports interfering with Airport Control Tower operations. There is the added potential for reflective glare to impact pilots especially during the latter approach stages of landing, when the line of sight of the pilot is directed downwards.

Motorist Traffic Disability Glare on the surrounding road network

The issue of concern here is the potential occurrence of Traffic Disability Glare, which most often arises from incoming solar rays striking a reflective surface at a moderately high ("glancing") incident angle (typically greater than 70°) and altitude angle less than 25° (altitude angles greater than this would be intersected and obstructed by a typical windscreen roof-line).

Train Driver Disability Glare on the surrounding rail network

The issue of concern here is the potential impact of reflective glare interfering with or distracting a train operator's activities or the potential for reflections to obscure railway signals.

Industrial Critical Machinery Operators (draglines, heavy trucks, etc)

The issue of concern here is the potential impact of reflective glare interfering with or distracting the operators of critical industrial machinery.

Residential Nuisance Glare on surrounding receivers

The issue of concern here is the potential "nuisance" caused by extended periods of reflective glare. Nearest neighbours may also be impacted by light spill from night-time illumination.

3.2 Nearest Receiver Locations

Receivers of interest relevant to the Project are shown in:

- Figure 3 Nearest aerodrome;
- Figure 4 Surrounding road network;
- Figure 5 Surrounding rail network; and
- Figure 6 Nearest representative residential receivers.

Figure 3 Nearest Aerodrome to Project Site



Figure 4 Surrounding Road Network

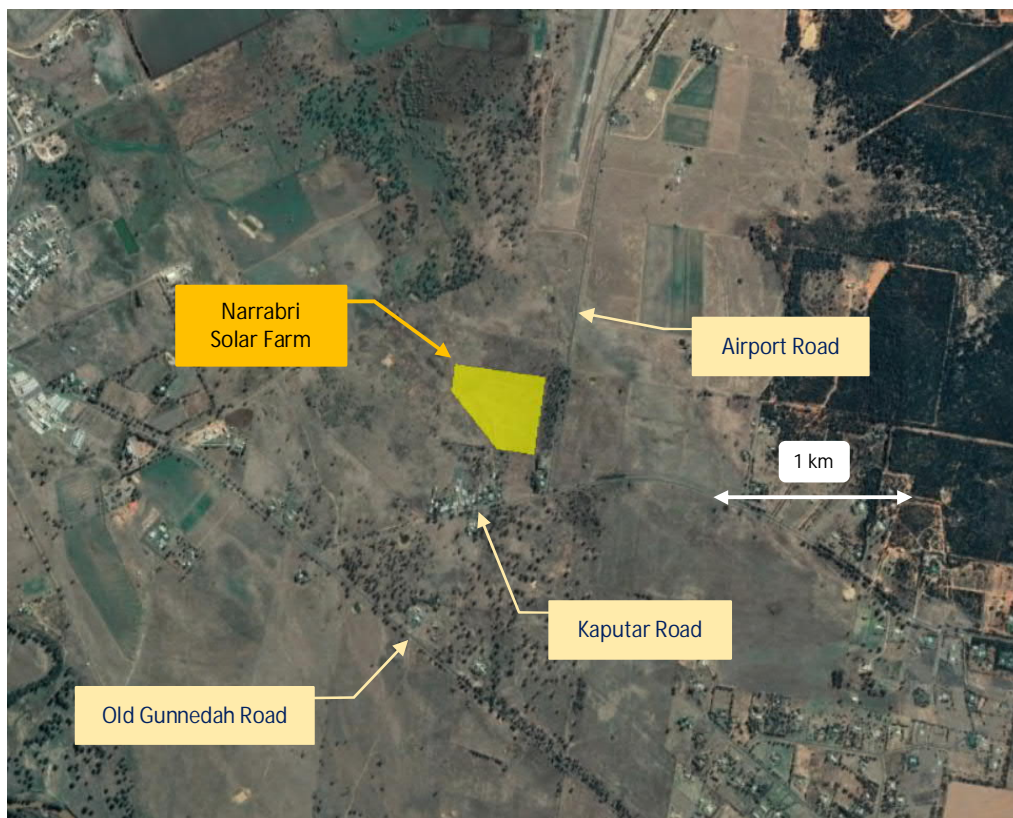


Figure 5 Surrounding Rail Network and NSW Rail Map

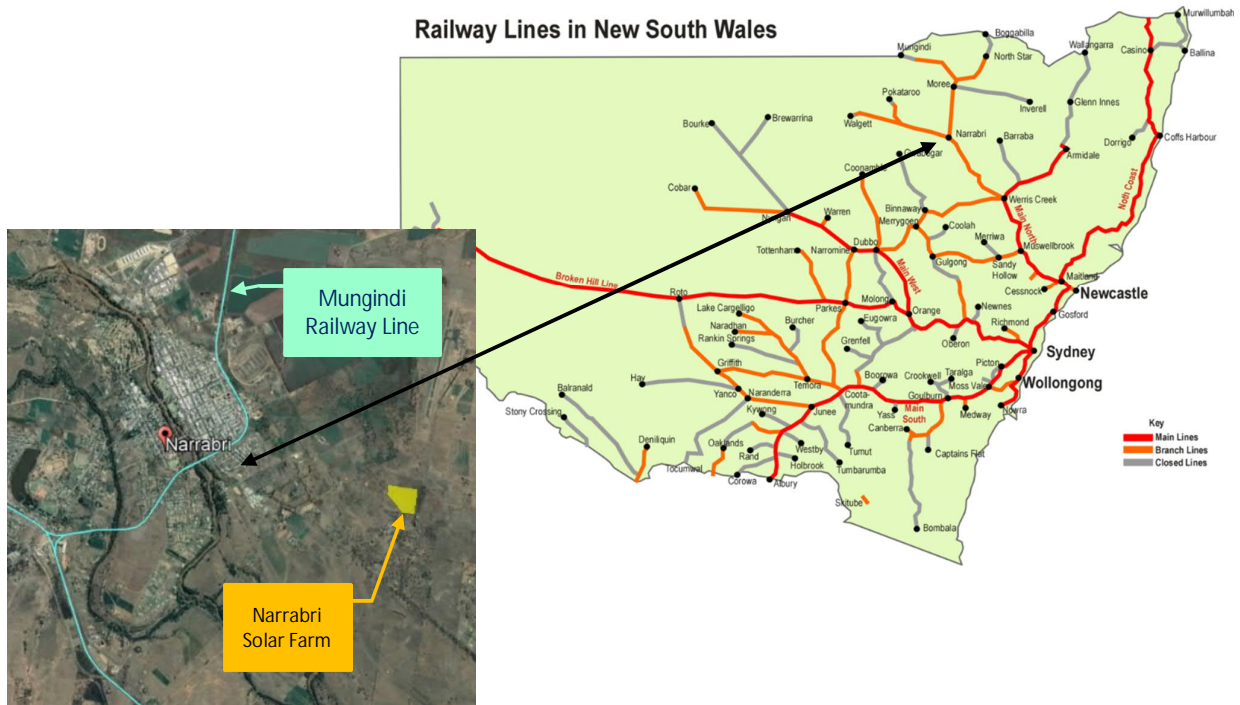
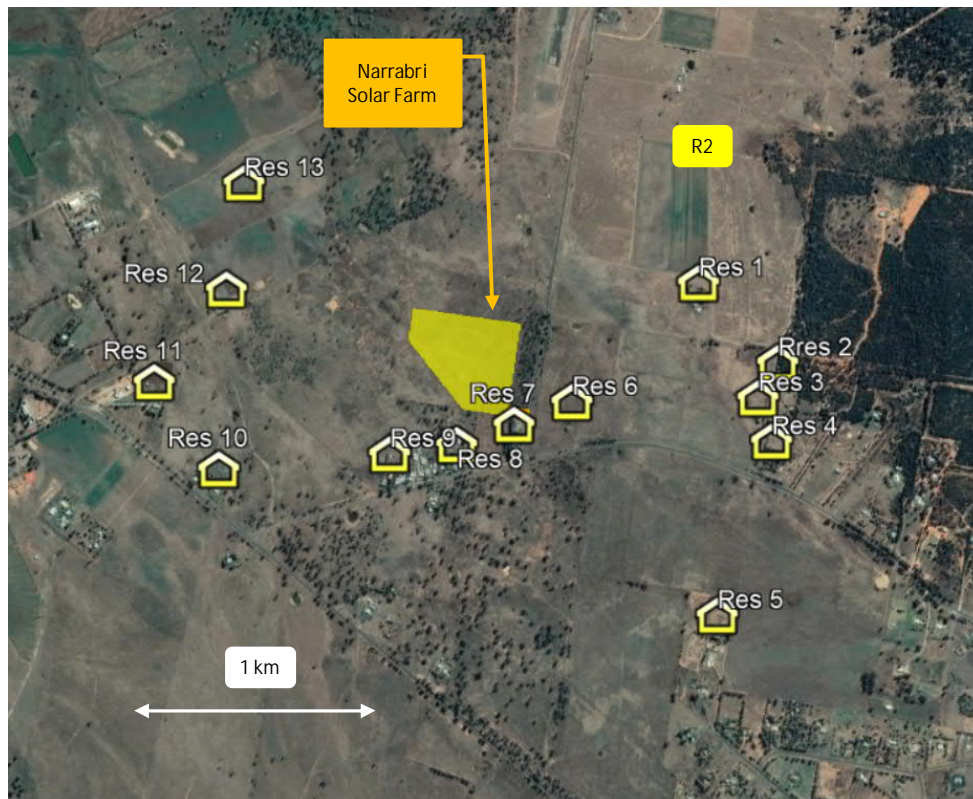


Figure 6 Nearest Representative Residential Receivers



4 GLARE ACCEPTABILITY CRITERIA

In relation to [daytime](#) reflective glare impact, the Project contains the following elements of interest:

- PV modules using solar panels on the Project ground array;

In relation to [night-time](#) illumination glare impact, the Project may, in the future, include the following elements of interest:

- 24/7 lighting for access roads to enable site maintenance, fire and other emergency events, and 24/7 lighting for the on-site Operations & Maintenance building and power conversion unit which provide connection to the local distribution network.

Night-time illumination is not presently incorporated in the current Project design.

4.1 Aviation Sector Reflective Glare

The impact of solar PV systems on aviation activity is something that solar developers today are addressing more and more often, given the (global) proliferation of solar projects, in particular those located either within or around airport precincts.

US FAA

In relation to the potential impact of solar PV systems on aviation activity, guidance is available from the US FAA which regulates and oversees all aspects of American civil aviation. On the basis of the above and other technical R&D references, the FAA issued a Technical Guidance Policy in 2010 and a subsequent (and over-riding) Interim Policy in 2013. The Technical Guidance Policy was updated in 2018.

- FAA, "Technical Guidance for Evaluating Selected Solar Technologies on Airports", Federal Aviation Administration, Washington, D.C., November 2010.
- FAA, "Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports", Federal Register, Oct. 23, 2013.
- FAA, "Technical Guidance for Evaluating Selected Solar Technologies on Airports", Federal Aviation Administration, Washington, D.C., Version 1.1, April 2018.

In support of the above, the FAA contracted Sandia Labs to develop their [Solar Glare Hazard Analysis Tool](#) (SGHAT) software as the standard tool for measuring the potential ocular impact of any proposed solar facility on a federally obligated airport. SGHAT utilises the Solar Glare Ocular Hazard Plot to determine and assess the potential for glare.

SGHAT is described in the following references:

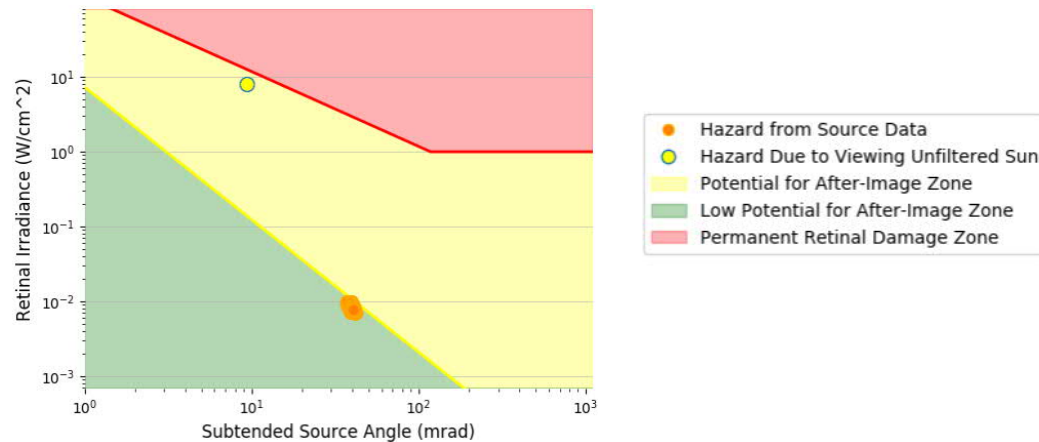
- Ho, C.K., Ghanbari, C.M. and Diver, R.B., "Methodology to Assess Potential Glint and Glare Hazards from Concentrating Solar Power Plants: Analytical Models and Experimental Validation", J. Solar Engineering, August 2011, Vol.133, 031021-1 to 031021-9.
- Ho, C.K. & Sims, C., "Solar Glare Hazard Analysis Tool (SGHAT) User's Manual v2.0", Sandia National Laboratories, Albuquerque, NM. August 2013.

A sample Solar Glare Ocular Hazard Plot is shown in Figure 7. The analysis contained in this plot is derived from solar simulations that extend over the ENTIRE CALENDAR YEAR in 1-MINUTE intervals, sunrise to sunset.

The SGHAT criteria state that a proposed solar facility should satisfy the following:

- Airport Traffic Control Tower (ATCT) cab: NO Glare
- Final approach paths for landing aircraft: Glare to NOT exceed "Low Potential for After-Image"

Figure 7 Example Solar Glare Ocular Hazard Plot (SGHAT Software Output)



In Figure 7, the following is noted:

- SGHAT ocular impact is a function of both the "retinal irradiance" (ie the light seen by the eye) and "subtended source angle" (ie how wide an arc of view the light appears to be arriving from).
- SGHAT ocular impact falls into three categories:
 - . GREEN: low potential to cause "after-image"
 - . YELLOW: potential to cause temporary "after-image"
 - . RED: potential to cause retinal burn (permanent eye damage)
- "After Image" is the term applied to a common retinal phenomenon that most people have experienced at some point or other, such as the effect that occurs when a photo with flash is taken in front of a person who then sees spots in front of their eyes for a few seconds. A more extreme example of "after-image" occurs when staring at the sun. "After-image" (also known as "photo bleaching") occurs because of the de-activation of the cells at the back of the eye's retina when subjected to a very bright light.
- The SGHAT plot provides an indication of the relative intensity of both the incoming reflection and the sources of light itself (ie the sun).
 - . The occurrence of glare is shown in the plot as a series of orange circles, one circle for each minute that a reflection is visible.
 - . A reference point is also shown in each SGHAT plot, the green circle, representing the hazard level of viewing the sun without filtering, ie staring at the sun.
- In Figure 8, it can be seen that the reflection visible by the receiver is roughly 1,000 times less intense than the light from the sun.

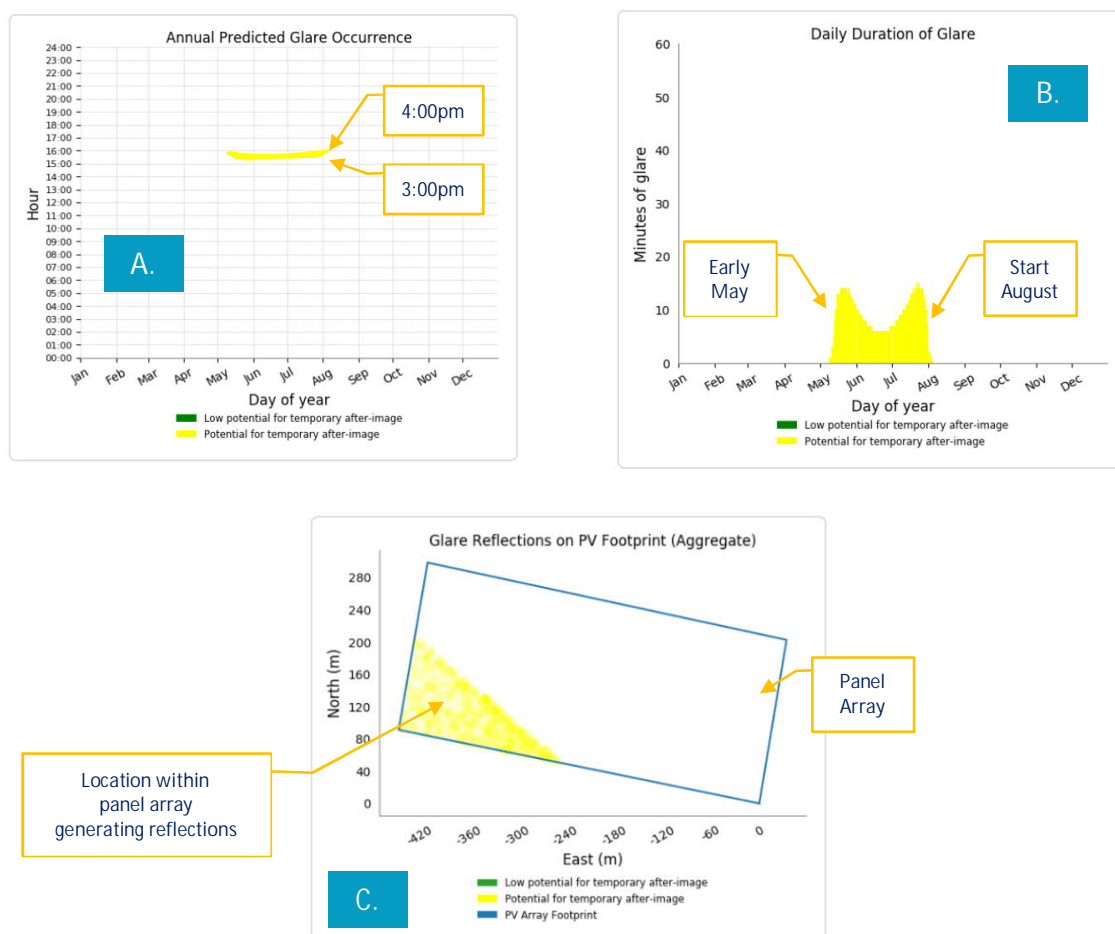
- Finally, in relation to PV Solar facilities, it is important to note that the third SGHAT Ocular Plot “RED” category is **not possible**, since PV modules DO NOT FOCUS reflected sunlight.

Additional Information Available with the SGHAT Analysis Tool

In addition to the above “assessment” output, the SGHAT software package also produces information which reveals the extent of visibility of reflections at any chosen receiver position, regardless of whether the reflections constitute a glare condition or not – an example is shown in Figure 8.

- Figure 8-A: shows the am/pm time periods when reflections occur at a specific position throughout the year, in this case typically between around 3:30pm and 4:00pm.
- Figure 8-B: shows the months during the year and the minutes per day when reflections occur at a specific position, in this case from early-May to the start of August.
- As noted above, this information is made possible because the SGHAT analysis covers the entire solar annual cycle in 1-minute intervals to ascertain any potential impacts on surrounding receivers.
- Finally, Figure 8-C shows WHERE within the solar farm panel array the reflection rays of interest are emanating from, in this case from panels near the southeast corner.

Figure 8 Example Solar Glare Output Plots (SGHAT Software Output)



4.2 Motorist “Disability” Glare and Pedestrian “Discomfort” Glare

The criteria commonly used by Australian Local Government Authorities to assess the acceptability or otherwise of potential adverse reflections from glazed façade systems onto surrounding roadways and pedestrian crossings utilise the so-called **Threshold Increment** (TI) Value of the reflection condition.

TI Value Definition

AS/NZS 4282:2019 defines Threshold Increment (TI) as:

“the measure of disability glare expressed as the percentage increase in contrast required between an object and its background for it to be seen equally well with a source of glare present. Note: Higher values of TI correspond to greater disability glare.”

The TI Value is calculated as the ratio of “veiling” luminance (eg from a reflection) to the overall average background (“adaptation”) luminance, with the necessary constant and exponent parameters provided in AS 1158.2:2005.

The formula for calculating the TI Value is ... $TI = 65 L_v / L_{tb}^{0.8}$, where:

- L_v = veiling luminance from a source of interest (eg reflection) – Cd/m²
- L_{tb} = so-called “adaptation” luminance (total background) – Cd/m²

TI Value Acceptability Criteria

The acceptability criteria adopted by Australian Local Government Authorities to assess the acceptability or otherwise of potential adverse reflections from glazed façade systems onto surrounding roadways and pedestrian crossings utilise the so-called **Threshold Increment** (TI) Value of the reflection condition (refer above for definition and calculation equations).

For (Motorist) Traffic Disability Glare, the TI Value should remain:

- Below 10 for major roads
- Below 20 for minor roads

For Pedestrian Discomfort Glare, the TI Value should remain:

- Below 2 at critical locations such as pedestrian crossings
- Below 3 for other locations

For the present study, Pedestrian Discomfort Glare is relevant to the potential for residential nuisance glare from surrounding receivers.

It should be noted that while Pedestrian Discomfort Glare can occur over a wide range of solar altitude angles, in most such instances, a pedestrian has the ability to adjust their line of sight to a more horizontal view away from the glare source, thereby rendering TI values essentially negligible.

4.3 Rail Operators Reflective Glare

Almost all Australian Rail Authorities have guidelines covering glare in general (ie not specific to solar PV panel glare) aimed at avoiding discomfort/distraction to train operators and obscuring train signals. Most guidelines refer either to Table 2.10 of AS 1158.3.1 for the TI Value criterion and/or Table 3.2 of AS 1158.4 for the Cd (Candela) criterion associated with the control of glare.

- For Rail Traffic Disability Glare, the relevant AS1158 criteria are:
 - The TI Value should remain below 20%
 - The Cd Value at 70° incidence should remain below 6,000.

4.4 Residential “Nuisance” Glare

Instances of documented nuisance glare associated with solar PV panels (grid-scale, industrial or residential) and nearby residential receivers have been relatively infrequent globally, especially given the widespread and rapid increase in the take-up of residential solar panels in Australia and elsewhere.

There are currently no national or state guidelines in Australia governing the acceptability or otherwise of residential nuisance glare specific to solar PV.

Existing guidance that exists in relation to solar panels from state governments typically covers installation audits and compliance checks. Additional guidance in relation to compliance with Australia Standards is provided by:

Clean Energy Council

Website: <https://www.cleanenergycouncil.org.au/industry/products/modules>

Accordingly, to assist in addressing residential nuisance glare, reference has been made of the concepts used for glare acceptability criteria outlined in the preceding sections.

4.5 Industrial Critical Machinery Operations

There are currently no (Australian) national or state guidelines governing the acceptability or otherwise of reflective glare for industrial site critical operations. Instead, the concepts used for acceptability criteria in the preceding sections, in particular Traffic Disability Glare, can assist when dealing with this issue.

The issue most commonly arises in relation to mining operations where machinery operators can be located in elevated locations, eg dragline operations, where a line of sight may be possible to a solar facility located in close proximity. Ports with their observation towers are another potential source of elevated receivers of interest if located adjacent to a solar facility.

No such industrial operations exist in the present case.

4.6 Night-Time Illumination Glare

The effect of light spill from outdoor lighting impacting on residents, transport users, transport signalling systems and astronomical observations is governed by AS 4282-2019.

The adverse effects of light spill from outdoor lighting are influenced by a number of factors:

- The topology of the area. Light spill is more likely to be perceived as obtrusive if the lighting installation is located higher up than the observer. Lighting installations are usually directed towards the ground and an observer could hence have a direct view of the luminaire.
- The surrounding area. Hills, trees, buildings, fences and general vegetation have a positive effect by shielding the observer from the light installation.
- Pre-existing lighting in the area. Light from a particular light source is seen as less obtrusive if it is located in an area where the lighting levels are already high, eg in cities. The same lighting installation would be seen as far more bothersome in a less well-lit residential area.
- The zoning of the area. A residential area is seen as more sensitive compared to commercial areas where high lighting levels are seen as more acceptable.

Typical illuminance levels for a variety of circumstances are given in Table 1 for comparison.

Table 1 Typical Illuminance Levels for Various Scenarios

Lighting Scenario	Horizontal Illuminance (lux)
Moonless overcast night	0.0001
Quarter Moon	0.01
Full Moon	0.1
Twilight	10
Indoor office	300
Overcast day	1,000
Indirect sunlight clear day	10,000-20,000
Direct sunlight	100,000-130,000

Recommended criteria of light technical parameters for the control of obtrusive lighting are given in Table 2. The vertical illuminance limits for curfew hours apply in the plane of the windows of habitable rooms or dwellings on nearby residential properties. The vertical illuminance criteria for pre-curfew hours apply at the boundary of nearby residential properties in a vertical plane parallel to the boundary.

Values given are for the direct component of illuminance, i.e. no reflected light is taken into account.

- Limits for luminous intensity for curfew hours apply in directions where views of bright surfaces of luminaires are likely to be troublesome to residents, from positions where such views are likely to be maintained.
- Limits for luminous intensity for pre-curfew hours apply to each luminaire in the principal plane, for all angles at and above the control direction.

Table 2 Recommended Maximum Values of Light Technical Parameters (AS4282-1997)

Light Technical Parameter	Time of Operation	Commercial Areas	Residential Areas	
			Light Surrounds	Dark Surrounds
Illuminance in vertical plane (E_v)	Pre-curfew hours	25 lx	10 lx	10 lx
	Curfew hours	4 lx	2 lx	1 lx
Luminous Intensity emitted by luminaires (I)	Pre-curfew hours	7,500 Cd (for a medium to large area with Level 1 control)	100,000 Cd (for a large area with Level 1 control)	100,000 Cd (for a large area with Level 1 control)
	Curfew hours	2,500 Cd	1,000 Cd	500 Cd

The Project is located outside the Narrabri town area and has the potential to impact on surrounding residential properties – refer Figure 6. As these properties are not located within township environs proper, they would therefore be classed as being in a residential area with “Dark Surrounds” - refer Table 2.

The applicable limits for adverse spill light will depend on the time of operation for the lighting installation.

For the Project, it is possible that internal access roads and any equipment buildings in particular, will be operational 24/7, suggesting the application of the more restrictive limit relevant to curfew hours.

Accordingly:

- Light spill from the Project onto the facades of the surrounding residential dwellings should be kept below 1 lux during curfew hours

Finally, it has been known for some time that night-time artificial lighting has the potential to disrupt the natural behaviour of nocturnal fauna species such as arboreal mammals, large forest owls and microbats. The standards mentioned above do not contain limiting lux levels in relation to the mitigation of such eco-lighting impacts.

Mitigation recommendations in relation to adverse eco-lighting therefore centre on feasible night-time lighting minimisation, bearing in mind the provision of appropriate health and safety and security conditions given the nature of the site. Biodiversity associated with the Project is discussed in the Flora and Fauna Assessment Report prepared for the Project. As far as is known, no adverse eco-lighting issues are apparent.

5 GLARE IMPACT ASSESSMENT - ASSUMPTIONS

The following potential glare conditions have been considered:

- Daytime Reflective glare (and glint) arising from the solar PV panels
- Night-time Illumination glare if any 24/7 operational security lighting is located within the site

5.1 Assumptions – Solar Panel Geometry

The glare assessment discussed in detail in following sections is based on the following assumptions:

- The solar panel array trackers are “single-axis” capable of rotating solar panels to a maximum of $\pm 60^\circ$.
- The trackers are oriented north-south and spaced 6.25 m apart;
- Individual panels (2.26 m x 1.13 m) reach a maximum height above ground of 2.58 m at their full 60° tilt angle;
- The eastern perimeter of the Project lies approximately 80 m from Airport Road with the southern perimeter just over 200 m from Kaputar Road at its closest point. The northern perimeter of the solar farm site lies approximately 1,100 m from the southern threshold of Narrabri Airport’s main Runway 18/36.

5.2 Project Site Solar Angles – Annual Variations

One of the challenging issues encountered with daytime solar panel glare is the varying nature of the reflections, whose duration will vary with time of day and day of the year as the sun’s rays follow variable incoming angles between the two extremes of:

- summer solstice - sunrise incoming rays from just south of east, maximum angle altitude rays at midday, sunset incoming rays from just south of west
- winter solstice - sunrise incoming rays from the northeast, minimum angle altitude rays at midday, sunset incoming rays from the northwest

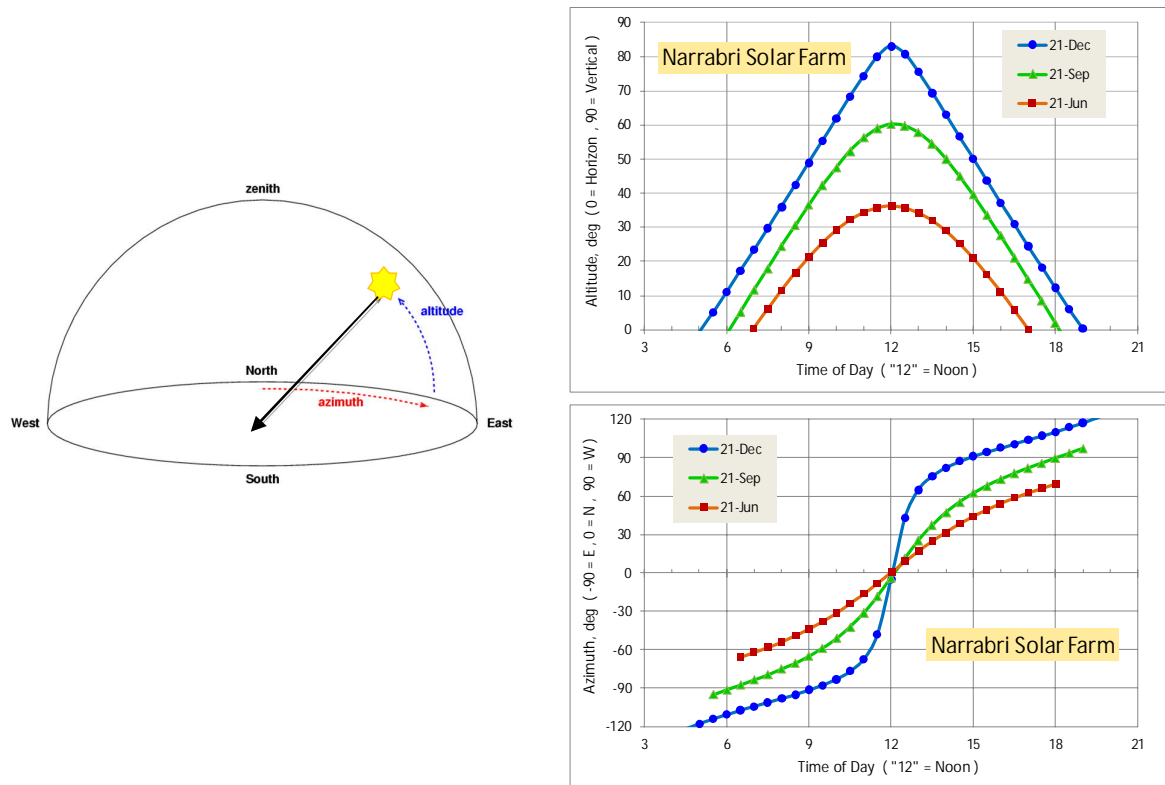
Any solar glare analysis must take into account the complete cycle of annual reflection variations noted above.

The potential range of incoming solar angles at the Project site relevant to daytime glare is shown in Figure 9 with relevant critical angles summarised in Table 3.

Table 3 Key Annual Solar Angle Characteristics for Project Site

Day of Year	Sunrise	Sunset	Azimuth Range (sunrise-sunset)	Max Altitude
Summer Solstice	5:04 am	7:02 pm	117° E of North to 117° W of North	83.0°
Equinox	6:06 am	6:09 pm	91° E of North to 91° W of North	60.2°
Winter Solstice	6:58 am	5:00 pm	63° E of North to 63° W of North	36.2°

Figure 9 Project Site Incoming Solar Angle Variations



5.3 Project Solar Reflections

The project will use single-axis tracking panels (with the axis of rotation oriented north-south) as described in Section 2.2. In "plan" view, reflections from the project's panels will be directed as shown in Figure 10 for a representative area of panels, with the direction of reflected rays shown for typical mid-summer days.

As a result of the tracking motion of the solar panels throughout the day, reflections will generally be directed upwards and hence not visible by ground-based receivers at roughly the same elevation as the facility. Where such reflections can be observed by surrounding elevated receivers they would typically be seen as "low incidence" reflections with corresponding low reflectivity. This is the inevitable outcome of the objective of maximising the solar gain of each panel (where the reflectivity would ideally be minimal) and justifying the additional cost of using a tracking system for the panels which follows the sun, rather than a fixed panel system.

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FOR 15m OFFSET FROM SOLAR PANEL TRACKING TO PV ARRAY

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Standard PV Solar Panels

Representative reflectivity curves are shown in Figure 11.

Figure 11 Typical Reflectivity Curves as a Function of Incidence Angle

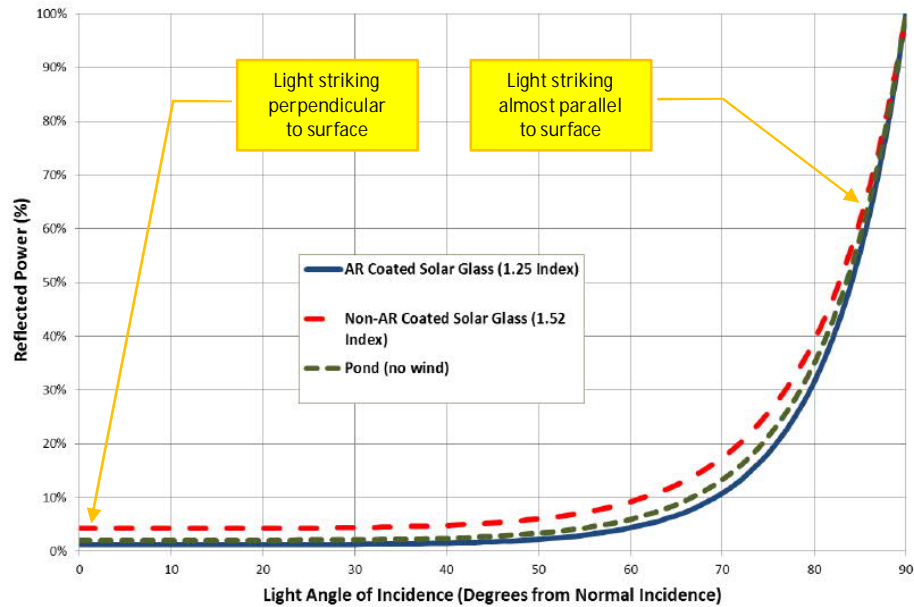


Figure 11 shows that:

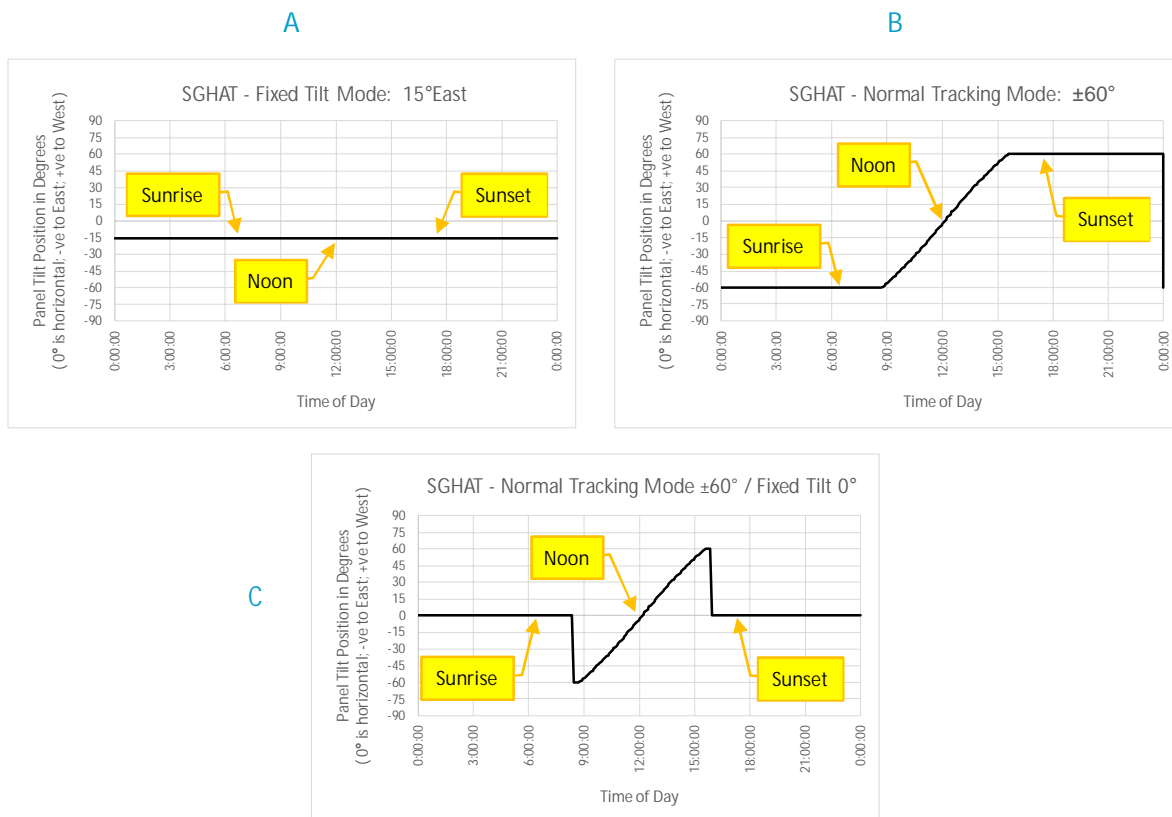
- When an oncoming solar ray strikes the surface of a solar PV panel close to perpendicular to the panel surface (i.e. low “incident” angle), the reflectivity percentage is minimal (less than 5% for all solar panel surface types).
- It is only when an incoming solar ray strikes the panel at a large “incidence” angle, i.e. almost parallel to the panel, that reflectivity values increase. When this happens, reflections become noticeable and potentially at “glare” level for all solar panel surface types.
- However, for very high incidence angle, it would almost always be the case that the observer (motorist, train driver, pedestrian, etc) would perceive reflections coming from virtually the same direction as the incoming solar rays themselves. Such a condition would not constitute a glare situation as the intensity of the incoming solar ray itself would dominate the field of vision perceived by the observer.

5.5 Modelling Real-World Tracking Axis Operational Modes

The SGHAT software tool is capable of modelling solar farm panel positions in one of three modes – as shown in Figure 12.

- **Fixed Tilt Mode:** in this mode, all panels are assumed to remain at a user-defined fixed angle all day long, eg horizontal, 15°East, 10°West, etc – refer Figure 12-A.
- **Normal Tracking Mode:** in this mode, panels move between maximum tilt angles once the sun is above the relevant altitude angle (eg an altitude angle of 30° for $\pm 60^\circ$ single-axis trackers). They remain at the maximum tilt angles at all other times, switching over during the night – refer Figure 12-B.
- **Normal Tracking Mode / Fixed Tilt Stowed:** in this mode, panels move during the day in “normal tracking”: mode, but can then move (instantaneously) to any user-defined fixed tilt angle at all other times – refer Figure 12-C where the panels move to a horizontal position (ie 0°) outside of “normal tracking” hours.

Figure 12 SGHAT Panel Mode Simulation Options



"Backtracking" Mode

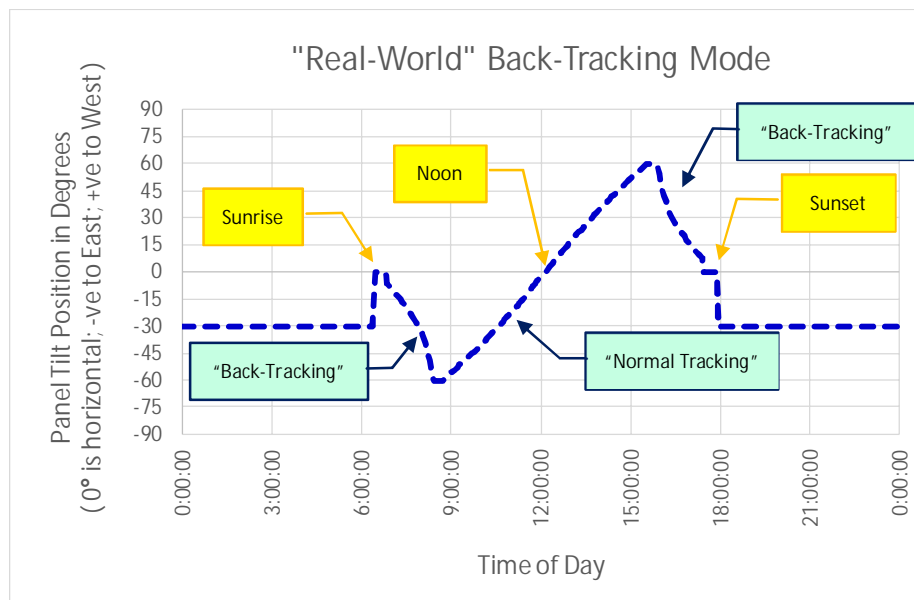
Most recently, sophisticated "back-tracking" operational modes have been developed, typically by the manufacturers of the tracking systems that support solar panels.

- Algorithms are developed (usually fine-tuned during the commissioning stage of a solar facility) aimed at minimising inter-row shading in the early morning and late afternoon. These algorithms are based on the location of a solar facility (ie its latitude), topography, panel row spacing, etc.
- They typically involve constantly re-positioning panels in the early morning and late afternoon starting and ending in a more horizontal position, that "just" avoids inter-row shading.
- During these early morning and late afternoon periods, panel motion is referred to as being in "back-tracking" mode.
- During the remaining hours in the middle of the day, solar panels follow the simplified "normal tracking" mode, ie moving between their maximum ($\pm 60^\circ$) tilt positions.
- There is typically a transition period between the two tracking modes (say ~15 minutes), calculated according to the local site tracking system algorithms.

A real-world example of a "back-tracking" mode is shown in Figure 13.

- The sun reaches an altitude angle of 30° in the morning at around 8:30am and again in the afternoon at around 3:45pm. During these hours (ie between around 8:30am and 3:45pm), the panels operate in "normal tracking" mode, ie from -60° facing East to $+60^\circ$ facing West.
- From sunrise till 8:30am and from 3:45pm to sunset, the panels operate in "back-tracking" mode, starting at sunrise and ending at sunset in a horizontal position.
- Overnight, the panels are "stowed" in a fixed (in this case, -30°) position to minimise wind loading and ensure any moisture (dew or rain) does not pool on the panel overnight and cause increased soiling.

Figure 13 Example 24-Hour "Back-Tracking" Operational Mode (around equinox)



SGHAT has not evolved yet to deal with sophisticated “back-tracking” operational modes of the type shown in Figure 13. They can only simulate solar farm panel positions in the three simplified modes shown in Figure 12.

It will be appreciated therefore that care must be taken when comparing the glare predictions of simplified SGHAT-type simulation modes, such as those shown in Figure 12, with possible real-world reflectivity behaviour of operational panel modes as shown in Figure 13.

6 GLARE IMPACT ASSESSMENT - RESULTS

6.1 Aviation Sector Reflective Glare

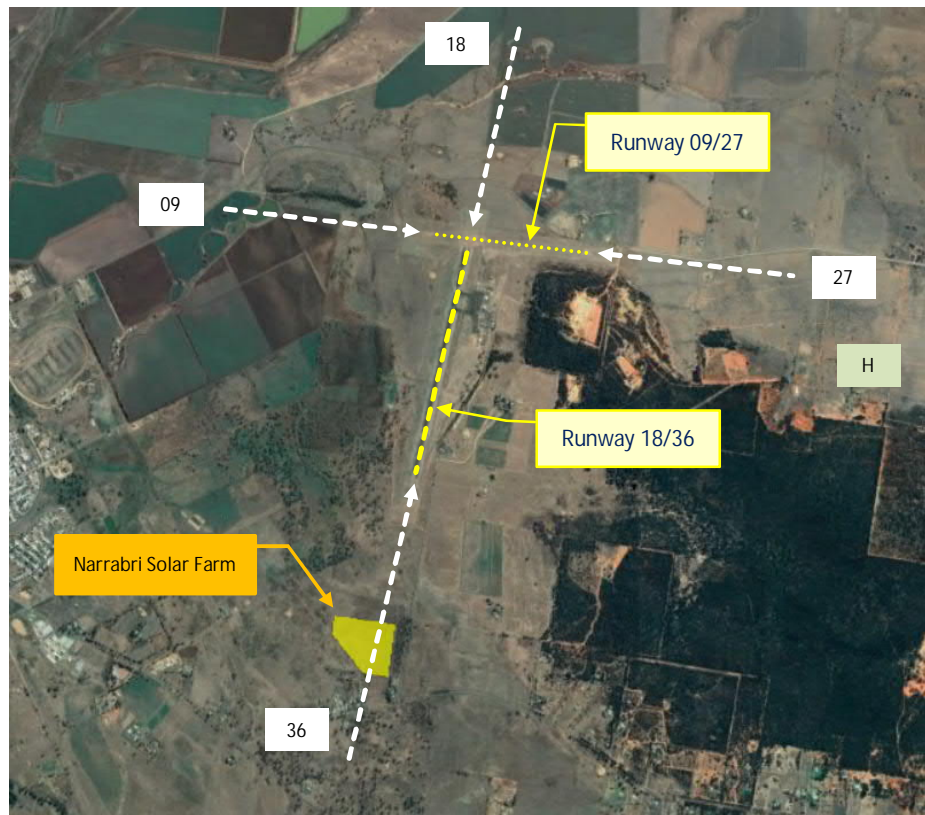
Narrabri Airport (IATA: NAA, ICAO: YNBR) is the nearest aerodrome to the site. It is located immediately to the north with the southern threshold of its main Runway 18/36 approximately 1.1 km from the northern perimeter of the Project. The airport is serviced by Link Airways (which operate a fleet of SAAB 340B Plus and Fairchild Metro 23 turboprop aircraft), general aviation aircraft and helicopters.

- The airport's main runway is 1,524 m asphalt Runway 18/36, oriented roughly north-south.
- The airport's secondary runway is 1,213 m grass Runway 09/27, oriented roughly east-west.
- The airport does not have a control tower (and as far as is known to SLR, none is planned).

Figure 14 shows (landing) flight paths of interest:

- The approach path to Runway 36 would have a direct line of sight towards the Project and its reflections at the commencement of final approach (taken to be approximately 2 miles (3.2 km) from the runway threshold); no reflections exist for final approach on Runway 18;
- Runway 09/27 approach paths are essentially perpendicular to the site.
- Helicopter flight paths can be highly variable and landing approach paths in the direct line of sight of the Project are possible, although there is greater flexibility in adjusting helicopter flight paths if required.

Figure 14 Flight Path Geometry for SGHAT Analysis



Accordingly, a quantitative analysis was carried out using the Sandia Labs Solar Glare Hazard Analysis Tool (SGHAT) software tool to examine potential worst-case scenario flight path approaches and take-offs and their ability to create adverse and unacceptable glare (and glint) conditions.

- The aircraft flight paths are all for landing scenarios (worst-case with the pilot looking downwards).

The flights paths assessed for the Project are shown in Figure 14.

SGHAT Modelling Assumptions:

- All runway approaches shown in Figure 13 were examined.
- A range of worst-case flight path scenarios has been assessed, named after their respective runway designations.
- For all Runways, landing flight paths are aligned with their respective runways.
- All aircraft landing flight paths are 2 miles in length, on a 3° glide angle (standard SGHAT protocol).
- The SGHAT analysis examines ALL possible solar angles throughout the year – in 1-minute intervals.
- The reflectivity of the PV panels was assumed to be the same as that shown in the standard solar glass shown in Figure 11.

In terms of the relative heights of flight paths and the solar farm for the critical Runway 36 approach paths of interest:

- Ground elevations (ASL) of Narrabri Solar Farm range from 217 m to 220 m;
- Ground elevations below Runway 36 flight paths are in the range 216 m to 224 m.

From the above, it can be seen that the terrain in the Narrabri area is reasonably flat, with only some surrounding receivers (residences, vehicles) just slightly elevated compared to the solar farm.

A number of panel scenarios were assessed:

- "Normal Tracking": panels tilt $\pm 60^\circ$ about a north-south horizontal axis
– this would be the normal operational mode for the solar farm;
- "Fixed Tilt": panels remain fixed at angles of 0° (horizontal) and $\pm 10^\circ$
– this is a scenario theoretically possible under a situation involving: shutdown, maintenance, pre-commissioning, etc
- "Tracking + Stowed": panels tilt $\pm 60^\circ$ about a north-south horizontal axis
and then rest for the remainder of the time at a fixed angle of 0°

SGHAT Results – “NORMAL TRACKING $\pm 60^\circ$ ”

The SGHAT Ocular Plots results for this scenario for all flight paths shown in Figure 14 are presented in Table 4, which shows the total number of minutes in a year that solar panel reflections would be potentially visible within any relevant SGHAT “zone” (refer Figure 7).

It will be recalled that solar panel reflections (glint and glare) are acceptable according to the FAA-SGHAT protocol if there are no “Yellow” zone or “Red” zone results for aircraft flight paths.

Table 4 SGHAT Analysis Results (No of Minutes Reflections are in SGHAT Zones)

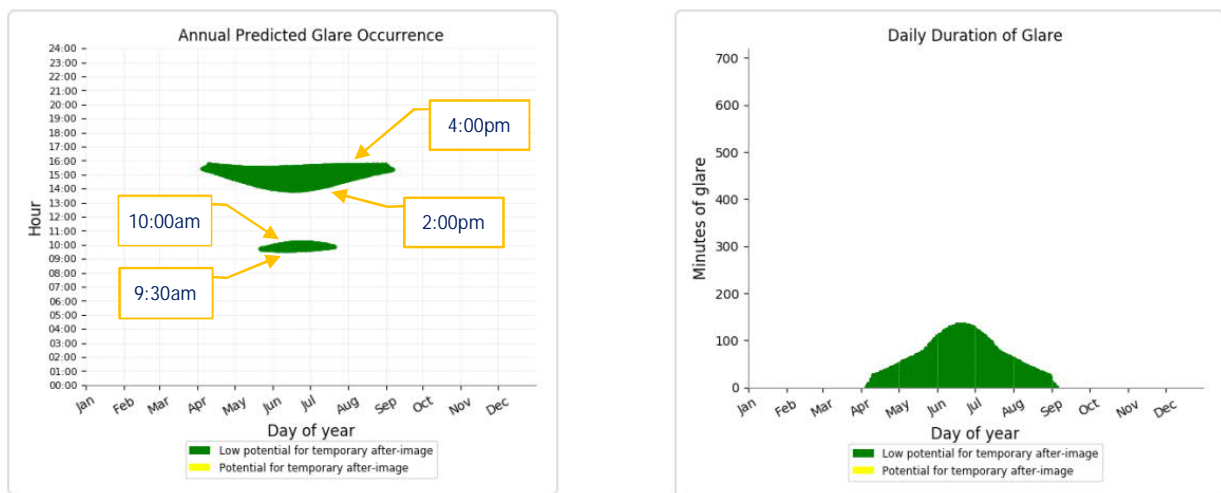
Flight Path	SGHAR Results for “NORMAL TRACKING” $\pm 60^\circ$ Scenario		
	“Green” Zone	“Yellow” Zone	“Red” Zone
09	0	0	0
18	0	0	0
27	0	0	0
36	11,792	0	0

Representative Results

Figure 15 shows representative reflection conditions occurring at different times of the year for Runway 36:

- Reflections are visible during the winter months (low altitude solar rays) both in the morning and afternoon; during this period, reflections are visible for periods ranging from several minutes to almost two hours each day

Figure 15 Selected SGHAT Results: Standard “Normal Tracking” Mode (Runway 36)



SGHAT Results – FIXED TILT Scenarios

The SGHAT Ocular Plots results for these scenarios for all flight paths shown in Figure 14 are presented in Table 5, which shows the total number of minutes in a year that solar panel reflections would be potentially visible within any relevant SGHAT “zone” (refer Figure 7).

It will be recalled that solar panel reflections (glint and glare) are acceptable according to the FAA-SGHAT protocol if there are no “Yellow” zone or “Red” zone results for aircraft flight paths.

Table 5 SGHAT Analysis Results (No of Minutes Reflections are in SGHAT Zones)

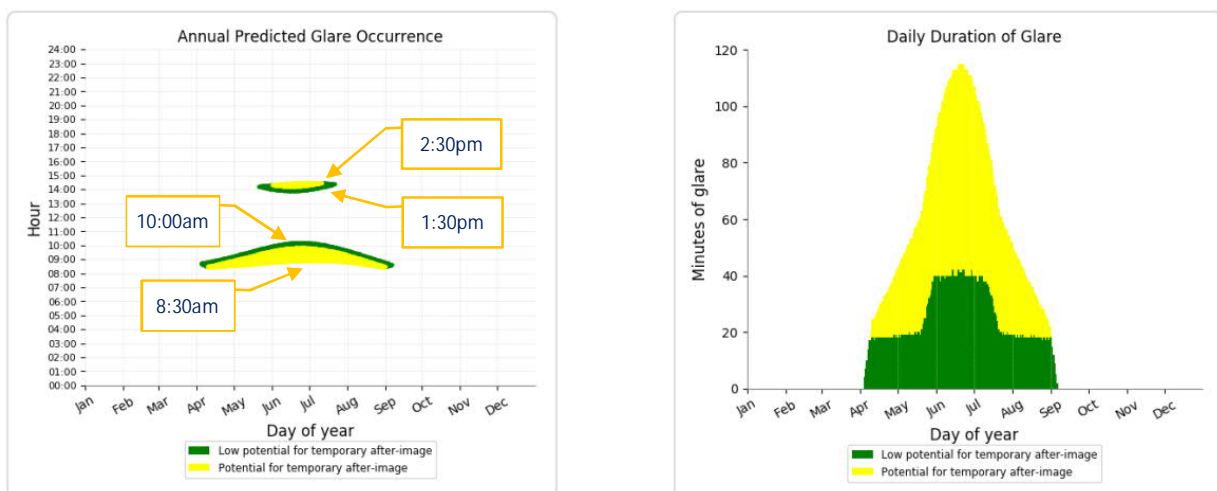
Flight Path	SGHAT Results for “FIXED TILT” Scenarios								
	15° East Tilt			0° (Horizontal)			15° West Tilt		
	“Green” Zone	“Yellow” Zone	“Red” Zone	“Green” Zone	“Yellow” Zone	“Red” Zone	“Green” Zone	“Yellow” Zone	“Red” Zone
09	-	-	-	-	-	-	-	-	-
18	-	-	-	-	-	-	-	-	-
27	-	-	-	54	-	-	-	-	-
36	4,946	2,655	-	3,942	5,624	-	9,950	1,461	-

Representative Results

Figure 16 shows representative reflection conditions occurring at different times of the year for Runway 36:

- Reflections are visible during the winter months (low altitude solar rays) both in the morning and afternoon; during this period, reflections are visible for periods ranging from several minutes to almost two hours each day.

Figure 16 Selected SGHAT Results: FIXED TILT 0° Mode (Runway 36)



SGHAT Results – TRACKING + FIXED TILT Scenarios

The SGHAT Ocular Plots results for these scenarios for all flight paths shown in Figure 14 are presented in Table 6, which shows the total number of minutes in a year that solar panel reflections would be potentially visible within any relevant SGHAT “zone” (refer Figure 7).

It will be recalled that solar panel reflections (glint and glare) are acceptable according to the FAA-SGHAT protocol if there are no “Yellow” zone or “Red” zone results for aircraft flight paths.

Table 6 SGHAT Analysis Results (No of Minutes Reflections are in SGHAT Zones)

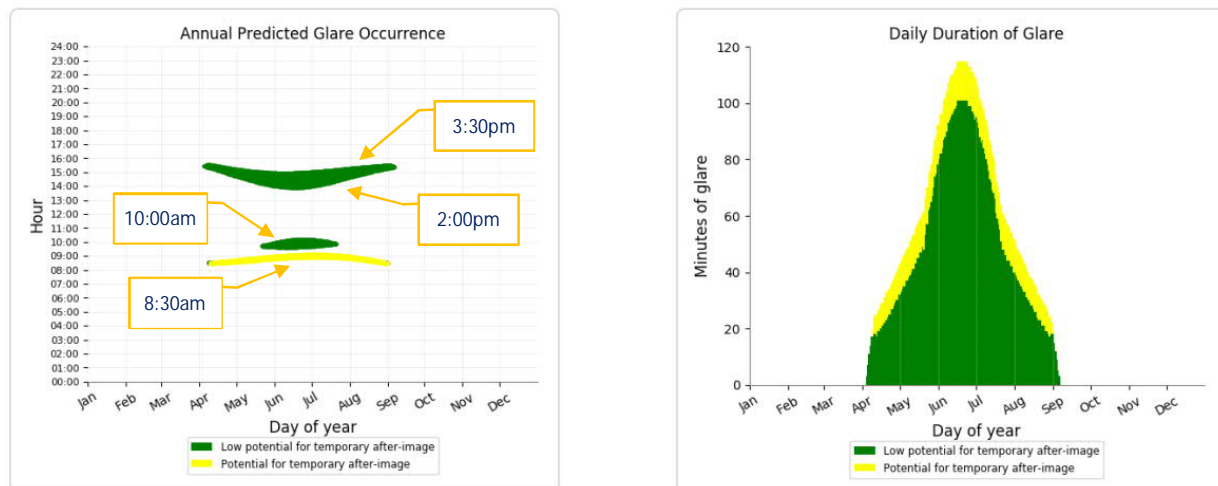
Flight Path	SGHAT Results for “±60° TRACKING + 0° FIXED TILT” Scenario		
	“Green” Zone	“Yellow” Zone	“Red” Zone
09	-	-	-
18	-	-	-
27	54	-	-
36	7,86	1,706	-

Representative Results

Figure 17 shows representative reflection conditions occurring at different times of the year for Runway 36:

- Reflections are visible during the winter months (low altitude solar rays) both in the morning and afternoon; during this period, reflections are visible for periods ranging from several minutes to almost two hours each day

Figure 17 Selected SGHAT Results: “±60°TRACKING + 0°FIXED TILT” Mode (Runway 36)



Summary of SGHAT Results:

" $\pm 60^\circ$ Normal Tracking"

- In " $\pm 60^\circ$ Normal Tracking" mode, the SGHAT results indicate reflections in the so-called "GREEN ZONE" for all runways - this COMPLIES with the FAA criteria.

"FIXED TILT at -15° , 0° and $+15^\circ$ "

- In ALL of the "Fixed Tilt" modes, the SGHAT results indicate reflections in both the called "GREEN" and "YELLOW" ZONES for Runway 36 – this does NOT COMPLY with the FAA criteria.

" $\pm 60^\circ$ Tracking + FIXED TILT 0° "

- The SGHAT results for Runway 36 indicate reflections in both the called "GREEN" and "YELLOW" ZONES – this does NOT COMPLY with the FAA criteria.

Other "FIXED TILT Scenarios: $\pm 20^\circ$, $\pm 25^\circ$, $\pm 30^\circ$, $\pm 35^\circ$, $\pm 40^\circ$ "

Additional runs were undertaken to establish what fixed tilt angles (either east or west) would result in NIL "YELLOW" zone SGHAT glare:

- NIL "YELLOW" zone SGHAT results are achieved all-year-round for an EASTwards tilt of 40° ; and
- NIL "YELLOW" zone SGHAT results are achieved all-year-round for a WESTwards tilt of 30° .

Recommendation:

- The proposed solar farm will comply with SGHAT requirements under standard " $\pm 60^\circ$ Normal Tracking" mode, where the panels are at 60° eastwards from sunrise until the solar altitude angle reaches 30° above the horizon, at which time that commence tracking the sun until the solar angle reaches 30° above the horizon (to the west), where they then remain until sunset.
- The potential for "Yellow Zone" SGHAT occurrences on Runway 36 for scenarios involving the panels being left at a FIXED tilt angle is NIL for an eastwards tilt of 40° (or more), and for a westwards tilt of 30° (or more) on an all-year-round basis.
- The months leading to the "Yellow Zone" exceedances are the winter months of April to August. Accordingly, if the more sophisticated "back-tracking" mode is being considered for the facility, the tracking system manufacturer should be made aware of the horizontal tilt issue and the months of concern, so that the facility's algorithms can be adjusted to ensure nil occurrence of "Yellow Zone" exceedances.

6.2 Motorist "Disability" Glare and Pedestrian "Discomfort" Glare

The "major" and "minor" thoroughfares in the immediate vicinity of the Project are shown in Figure 5, including:

- | | |
|---|---------|
| Old Gunnedah Road – eastbound and westbound | "major" |
| Kaputar Road - eastbound and westbound | "minor" |
| Airport Road - northbound and southbound | "minor" |

The relevant TI criteria for the above roads would be:

- For (Motorist) Traffic Disability Glare, the TI Value should remain below 20 for "minor" roads and below 10 for "major" roads; and

- For Pedestrian Discomfort Glare, the TI Value should remain below 2 at pedestrian crossings and below 3 for other locations.

Important factors influencing the potential for traffic disability glare include:

- Any difference in elevation between the motorist and the solar panel array;
- The potential for solar reflections of concern to be obstructed by intervening terrain and topography as well as dense vegetation;
- The difference between the line of sight of a driver (i.e. in the direction of the road) and the line of sight relative to incoming reflections. Significant TI values can only occur when this difference is small. In some cases, eg when traffic is moving away from the line of incoming reflections, such reflections become essentially invisible to the motorist – this would apply for example to traffic on Aircraft Road moving northwards after passing the site.

Figure 18 shows that some of the potential road glare scenarios for the Project site. In most cases, the difference in line of sight of a driver and the Project (and hence potential reflections) is reasonable, ie not small. Note also the presence of vegetation providing line of sight interruption to the site from some roadway locations, in particular the trees along the west side of Airport Road in the vicinity of the Project.

SLR has undertaken TI Value calculations for the roadways discussed above. Calculation locations were varied along the relevant carriageways, focussed on positions where the line of sight of drivers was close to the angle of potential incoming solar reflected rays.

Table 7 shows the results for the standard “±60° Normal Tracking” mode.

Table 7 TI Value Results – Combined Results from ALL PROJECT SOLAR PANELS

Location	Classification	TI Value	Occurrence	
			Time of Year / Day	Duration
Old Gunnedah Road	eastbound	Major	all-year-round	na
	westbound			na
Kaputar Road	eastbound	Minor	all-year-round	na
	westbound			na
Airport Road	northbound	Minor	all-year-round	na
	southbound			na

The TI calculation results shown in Table 7 indicate the following:

- TI Values registered for all carriageways were zero at all times of the year.

In all cases, the relevant Motorist Traffic Disability Glare criteria and Pedestrian Discomfort Glare criteria are satisfied. The reasons for this result are:

- Essentially the same elevation for motorists and the solar array panels, with some intervening vegetation and trees in between in the case of Airport Road; and
- The single axis trackers which support the panels – these cause outgoing reflections for all incoming solar angles to be redirected upwards away from the ground.

Figure 18 View of the Project from Surrounding Roads

Driving east along
Old Gunnedah Road



Driving along
Kaputar Road
(looking north)



Driving north along
Airport Road
(looking west)



6.3 Rail Operator Reflective Glare

Figure 5 shows the Mungindi Railway Line approaching Narrabri from the south-southeast and then branching towards the north and west. At its closest approach, the rail line is just over 2.3 km from the nearest perimeter of the Project.

SLR has undertaken TI Value calculations for two sections of rail line shown in Figure 19, focussed on positions where the line of sight of train drivers was closest to the angle of potential incoming solar reflected rays.

Figure 19 Mungindi Railway Line – Glare Assessment Areas



In all cases, the TI Values for Disability Glare were NIL due to:

- Essentially the same elevation for train drivers and the solar array panels, along with intervening buildings and vegetation; and
- The single axis trackers which support the panels – these cause outgoing reflections for all incoming solar angles to be redirected upwards away from the ground.

6.4 Industrial Critical Machinery Operators

There are no industrial operations in the vicinity of the Project (e.g. mining operations) and none planned (mining or otherwise), with the kind of machinery where the relevant operators have the potential to experience reflective glare from the Project, eg elevated cabins in draglines, etc.

6.5 Residential “Nuisance” Glare

The nearest residential receivers to the Project are identified in Figure 6.

- They surround the site at varying distances from the nearest respective site boundary.
- Their ground elevations are similar to the Project, with only selected receivers slightly higher.

There are no formal TI Value (or alternative) criteria governing reflective glare from solar facilities.

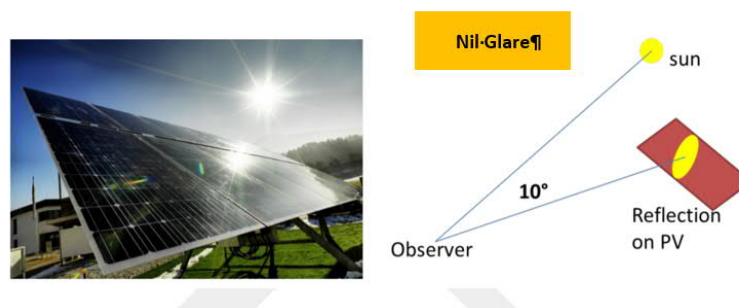
Accordingly, SLR has carried out TI Value calculations for the receivers discussed above, to gain an understanding of the potential for nuisance glare conditions from the project. The results are shown in Table 8.

Table 8 TI Value Results – Residential Receivers

Scenario	Receivers (refer Figure 6)	TI Value	Occurrence	
			Time of Year / Day	Duration
±60° Normal Tracking	R1 to R13	nil	all-year-round	na
	R5, R7-R11	nil	all-year-round	na
Fixed Tilt 0°	R1-R4, R6	Up to TI ~ 5	very early morning	0-8 min / day
	R12-R13	up to TI ~ 5	very late afternoon	0-3 min / day

The results indicate the following:

- For the “±60° Normal Tracking” mode, there will be NIL impact on surrounding residential receivers; and
- For the “0° Fixed Tilt” mode there is potential for reflections to be noticeable. However, for these occurrences, the angle of the incoming reflections will almost be coincident with the incoming solar rays themselves. When this angle difference is no greater than 10, see graphic below, reflections are considered to constitute a glare condition.



6.6 Night-Time Illumination Glare

Although presently not fully defined, it is assumed that an area within the Narrabri Solar Farm Project site will be set aside for an Operation and Maintenance buildings, power conversion unit, fire access routes and egress, etc, and that some of these may need to be operational 24/7.

Although night-time illumination is not presently planned for the Project, it may be required in the future for some of the above relevant areas and, as such, is addressed in principle in this assessment.

The only potential for any future night-time illumination glare would be associated with the nearest thoroughfares and residential and other sensitive receivers to the Project. Consideration has also been given to the potential for adverse eco-lighting impacts on nocturnal fauna habitats in close proximity to the Project site, especially within any close-by native vegetation areas. On the basis of the Flora and Fauna Assessment Report carried out for the Project, there are no such habitats close to the Project site.

The recommendations set out below are therefore made in the event that future 24/7 lighting is incorporated into the Project, to achieve the best lighting performance (taking into account safety considerations) while having a minimal impact on the surrounding properties, carriageways and nocturnal fauna.

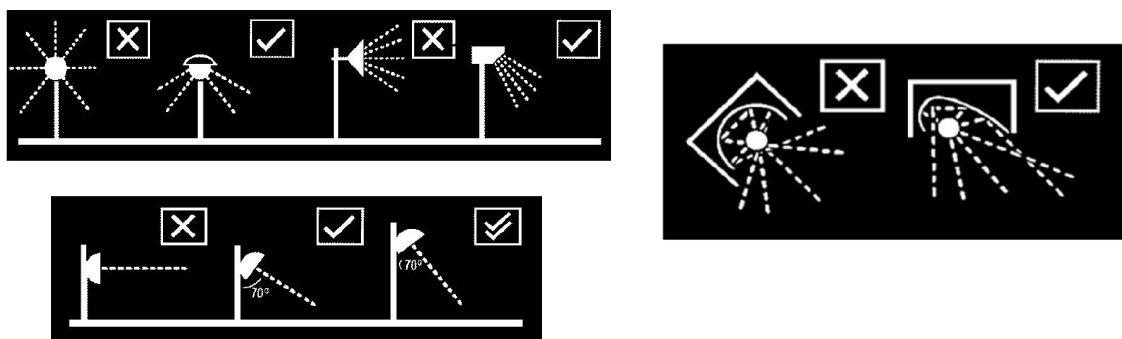
In terms of any future potential night-time lighting, the adopted goal of limiting night-time light spill to no more than 1 lux falling on the nearby residential facades during curfew hours will be easily achieved given the distances to the nearest residential and other receivers.

Accordingly, the potential for any future nuisance glare will be non-existent.

AS4282-1997 Control of the Obtrusive Effect of Outdoor Lighting sets out general principles that should be applied when designing outdoor light to minimise any adverse effect of the light installation.

- Direct lights downward as much as possible and use luminaires that are designed to minimise light spill, e.g. full cut-off luminaires where no light is emitted above the horizontal plane, ideally keeping the main beam angle less than 70°. Less spill-light means that more of the light output can be used to illuminate the area and a lower power output can be used, with corresponding energy consumption benefits, but without reducing the illuminance of the area - refer Figure 20.
- Do not waste energy and increase light pollution by over-lighting.
- Wherever possible use floodlights with asymmetric beams that permit the front glazing to be kept at or near parallel to the surface being lit.

Figure 20 Luminaire Design Features that Minimise Light Spill



7 CONCLUSION

SLR Consulting Australia Pty Ltd (SLR) has been engaged to carry out a Reflective Glare assessment of the proposed Narrabri Solar Farm (the "Project") under development by Providence Asset Group.

The following potential glare conditions have been considered:

- Daytime Reflective glare (and glint) arising from the solar PV panels within the facility:
 - . Aviation Sector Reflective Glare;
 - . Motorist "Disability" Reflective Glare and Pedestrian "Discomfort" Reflective Glare;
 - . Rail Operator Reflective Glare;
 - . Industrial critical machinery operators (heavy vehicles, etc) Reflective Glare; and
 - . Residential "Nuisance" Glare
- Night-time Illumination glare if any 24/7 operational security lighting is incorporate into the Project in the future

The Project is located close to Narrabri and in particular Narrabri Airport, whose Runway 36 southern threshold lies approximately 1.1 km from the nearest perimeter of the Project. The proposed (up to) 5 MWac facility will comprise 11,592 solar PV panels within a 15 ha project site area. The 540 W panels, measuring approximately 2.26 m by 1.13 m, will be positioned as currently understood on single-axis trackers oriented north-south with a spacing of 6.25 m.

Aviation-Related Potential Glare

Quantitative analysis using the FAA-SGHAT software tool has shown that there will be nil glare from the Project at Narrabri Airport with the solar array in normal tracking mode, ie panels tilting $\pm 60^\circ$. The SGHAT results show potential for glare involving the panels being left at a fixed tilt angle of between 30° (westwards) to 40° (eastwards).

The months when this occurs are April to August (during winter). Accordingly, such a situation should be avoided, eg during construction, during maintenance periods, etc, during these months. This situation should also be considered in the application of sophisticated "back-tracking" operational modes for the proposed facility.

Motorist and Rail Traffic "Traffic Disability" Glare and Residential Nuisance Glare

Primarily due to the selection of the single-axis tracking system for the mounting of the ground-based array panels, there will be nil glare from the Project in relation to traffic disability glare in normal $\pm 60^\circ$ tracking mode. Similarly, the potential for rail traffic disability glare from the Project is nil.

The potential for nuisance glare from the Project to surrounding residential or other receivers is nil.

Night-Time Illumination Glare

Although presently not incorporated into the Project, consideration has been given to the future potential for night-time lighting related to equipment and/or buildings, fire access routes and egress, etc. Recommendations have been made to ensure that the potential for any future possible night-time illumination glare will be non-existent. Any future lighting design should also be checked against the requirements of CASA's NASF Guidelines.

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