

18 May 2026

Mr Jeffrey Peng

NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Re: Objection to Modification 4, Emirates Wolgan Valley Resort (MP06_0310)

Dear Mr Peng,

Bushwalking NSW Incorporated (BNSW) is the peak body for recreational bushwalkers in New South Wales and the Australian Capital Territory, representing over 11,500 bushwalkers from more than 70 affiliated clubs.

BNSW objects in the strongest possible terms to Modification 4 of MP06_0310, which would authorise up to 210 helicopter movements per week (30 per day) to and from the Emirates Wolgan Valley Resort. We ask the Department to refuse the modification.

The proposal is unnecessary. The proponent's central justification, that the Wolgan Gap Road remains closed, has been overtaken by events. The road is scheduled to reopen to 2WD traffic, including 12.5 metre trucks, by August 2026. A road that can carry heavy goods vehicles servicing the resort can plainly carry guests in private vehicles. The original 2007 approval contemplated four flights per week; this proposal seeks more than fifty times that figure, a permanent transport regime in answer to a problem with a fixed end date.

The proposal targets two of the most popular and currently tranquil bushwalking landscapes in New South Wales. The Newnes area on the floor of the Wolgan Valley, taking in the historic industrial ruins, the Glow Worm Tunnel and the Wolgan River, is a major destination for our affiliated clubs. The Newnes Plateau above it, a quite separate landscape, encompasses the Pagoda Walk, Birds Rock Lookout, Forest Camp, the Lost City and an extensive network of routes used year-round by bushwalkers and canyoners. Both areas are presently extraordinarily quiet by the standards of parks within reach of Sydney, and that tranquillity is central to the \$50 million the NSW Government is investing in walking tracks, lookouts and campgrounds across the Gardens of Stone SCA.

The acoustic assessment is unfit for purpose. It relies on noise data that predates the Gardens of Stone State Conservation Area and gives no meaningful weight to bushwalkers and campers, who unlike residents cannot retreat behind walls and are demonstrably less tolerant of aircraft noise (in the order of 10 dB(A), per United States Forest Service research). It also understates the affected Greater Blue Mountains World Heritage Area by close to half, omitting Gardens of Stone National Park.

The wildlife impacts have not been seriously addressed. The Wolgan Valley and Newnes Plateau support threatened species including the Greater Glider, Yellow-bellied Glider, Spotted-tailed Quoll, Brush-tailed Rock-wallaby, Powerful Owl, Sooty Owl and Glossy Black-Cockatoo, alongside pagoda complexes and hanging swamps listed as Endangered Ecological Communities. Sustained low-altitude rotary-wing overflights at the proposed frequency are well documented in the scientific literature as causing flushing, nest abandonment, masking of acoustic communication essential to nocturnal and arboreal species, and chronic

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physiological stress. Thirty movements a day is not a disturbance regime this landscape has ever experienced.

Increasing approved helicopter movements by more than two orders of magnitude is not a minor amendment to a 2007 consent; it is a materially different operation requiring a full Environmental Impact Statement, a proper mid-air collision risk analysis at the elevations involved, and a cumulative noise assessment that incorporates the post-2026 Western Sydney airspace design. The proponent's history of unfulfilled obligations to the National Parks and Wildlife Service, including land exchange commitments outstanding since 2007, gives little confidence that conditions on a 'temporary' increase would be honoured.

BNSW asks the Department of Planning, Housing and Infrastructure to refuse Modification 4 of MPO6_0310.

Yours sincerely,

John Flint

(Acting) Conservation Secretary, Bushwalking NSW
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