



17 May 2026

Via Planning Portal

Dear Sir/Madam,

Emirates Resort, Wolgan Valley – MP06_0310-Mod-4 Helicopter Flight Path and Numbers

The Wolgan Valley Association (the WVA) objects to the proposal by Emirates Hotels (Australia) Pty Ltd to increase helicopter flights into the Wolgan Valley Resort from 14 helicopter flights per week to 105 helicopter flights per week (or a maximum of 15 trips per day), until 2 wheel drive access is restored to the Valley and then dropping to 50 trips a week (or a maximum of 10 trips per day), as well as the proposal to change the flight path.

The underlying concern about the helicopter proposal relates principally to the noise and disturbance impacts, consequent on both the number of flights and the change in flight path. Those impacts will significantly affect residents of and visitors to the Valley, the ecology of the Valley (especially rare and sensitive birdlife), and the overall character of the area as one of great and tranquil natural beauty, surrounded by national parks and bordering an immense wilderness area.

The WVA is conscious of the particularly severe impact which the closure of Wolgan Road in November 2022 has had on the resort and its ability to operate. These impacts have also been felt in varying degrees by all members of the Valley community, as well as the many thousands of visitors who used to regularly come to enjoy the peace and connection with nature that the Valley offered.

The WVA is also immensely proud of having the resort as its neighbour. From the outset and for the last 20 years the resort has seen conservation and “touching the earth lightly” as central to its purpose and brand. Throughout, it has genuinely endeavoured to balance its ecological footprint and credentials with the luxury expectations of its clients. This conservation vision aligns closely with the objects of the WVA, a copy of which is attached to this submission.

Indeed, this ethos was reflected in the resort’s statement of purpose:

After five years of planning, Emirates opened the 1,600-hectare Emirates Wolgan Valley resort in October 2009 – one of Australia’s first luxury conservation resorts. Nestled in the Wolgan Valley beneath spectacular sandstone escarpments, this environmentally sensitive resort is in keeping with the unique wilderness of the Greater Blue Mountains World Heritage area in New South Wales – about three hours drive from Sydney. Bordering the Wollemi and Gardens of Stone National Parks, guests enjoy a true wilderness experience during their stay – while still enjoying the finest luxury hospitality. <https://www.emirates.com/english/about-us/our-planet/wolgan-valley/>

The WVA is keen to support the re-opening and ongoing operation of the resort in any manner that it reasonably can. We have always believed that the resort was an important way of showcasing not

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only the outstanding natural values of the Lithgow LGA, but a pathway for better public/private conservation initiatives that were also commercially sustainable.

The present concern, however, is that the proposed changes to helicopter operations represent, in our view, a significant deviation from the original vision for the resort and one, which in the longer term, may actually be counter to the commercial interests of the resort to the extent that they diminish the reputation of the Valley as a place of quietness and solitude, two defining features of wilderness. This desire for solitude has been central to the design of the resort and is one of the key values that led Emirates to invest in the area in the first place. Its importance to guests is also seen in the hundreds of glowing reviews that the resort has received over the years.

The WVA is open to supporting a modest increase to flights into the resort while 2 wheel drive access remains cut-off, however, the current proposal (10-15 flights per day) is considered excessive and unwarranted. In the last few months, changes at Lithgow City Council, have given hope that such access may be available much earlier than the 7 or 8 years flagged in the Modification Report, although we certainly share the resort's frustration with the road restoration process to date.

To increase the number of helicopter flights to the levels proposed also conflicts with the LGA's destination management plan and the emerging 7 Valleys tourism plan which envisages marketing the Capertee, Wolgan and Kanimbla Valleys as the antidote to the bustle and noise of the main tourist centres of the Blue Mountains.

Acoustic impact on humans

A number of further comments can be made about the noise studies and impacts. The first and perhaps most important is that ambient noise levels can be misleading. The nature of the noise can be far more significant, as perceived, than the decibel level. Ambient noise in the Valley during the day largely comprises birdsong, frogs and insects. Mechanical noise such as chainsaws, generators and helicopters cause an instant and jarring contrast to the natural background sounds. To the extent that they become regular, the character of the area can shift from wilderness, to rural, to almost urban. Furthermore, residents have come to associate helicopters with emergencies. In the warmer months, the sound of a helicopter can trigger anxieties about bushfires given the heavy role that they play in monitoring and fighting fires. The sound of a high-altitude helicopter will draw people outside to inspect what is going on in a way that fixed wing aircraft, even when louder, do not.

The second comment is that the narrow and enclosed nature of the Valley with large surrounding cliff lines amplify and transmit sounds over much greater distances than in open country. Acoustic modelling can be misleading if it fails to take close account of the reverberation that results from the exposed cliffs.

The third comment is that the change of flight path away from Carne Creek results in more direct impact on the residents of the Valley. While we understand that this may be preferred as a means of protecting the Gardens of Stone State Conservation Area and Wollemi National Park, it will mean that residents are exposed to noise levels well beyond what they have experienced over the last 20 years.

We have seen a copy of the submission prepared by Martin Krogh, a scientist and former president of the WVA, and we adopt his comments in relation to concerns about the technical reliability of the studies supporting the proposal.

Impact on birds

Aside from the human impacts of significantly increased flights, there is the potential for adverse impacts on wildlife. The Valley has been identified as an important habitat for the critically endangered regent honey eater. Recently, Local Land Services approached landholders in the centre of the Valley to sound out their interest in habitat management work as part of a program to protect the species, noting its existing suitability. While the risk is not collisions or strikes, the increased noise

from helicopters can disturb breeding, feeding and nesting. Glossy black cockatoos which are also endangered and found in the Valley are similarly susceptible.

In the case of wedge-tailed eagles, which are common in the Valley on account of the orographic lift and perching and nesting sites offered by the cliffs, helicopters pose not only a habitat disturbance threat but also one of collision.

The ecology of the Valley is still recovering from the 2019 bushfires. One benefit of the closure of the road has been that it has assisted in the recovery of wildlife within the Valley being much quieter and low vehicle traffic resulting in a reduction in road kills. Nevertheless, the intrusion of bell and noisy miners have contributed to the stresses on the pre-fire bird ecology and a very significant increase in helicopter traffic is only likely to add to those stresses.

The Modification Report comments that “*noise levels [from helicopters] are likely comparable to what would be expected from frogs and cricket mating calls, as well as bird mating and territorial calls, which could be at similar or higher volumes and durations*”. This repeats the mistake that noise impacts relate only to volume. Despite also noting that “*fauna can be highly sensitive to sounds in their landscape*”, the equation of frogs and crickets to helicopters is relied on by the consultants in forming an opinion that “*overall, there is sufficient evidence from the academic literature that none of the predicted species were likely to be significantly impacted by the modification (unlikely to low likelihood of significant impact)*.”

While the Report focuses on the “temporary” nature of the increase, it also assumes a 7-10 year duration and downplays the increase from 14 flights per week to 105. It also discounts the proposed permanent increase from 14 flights per week to 50 flights following the restoration of 2WD access. This latter increase is still over 3.5 times the existing limit.

Justified need

The Modification Report does not substantiate the need for such a significant increase. Given the seriousness of the impacts, the starting point in any consideration of the proposal should be some demonstration of that need.

The resort has made extensive arrangements to bring guests in by special 4WD vehicles with a transfer station at Wallerawang. Allowing that some guests may need or wish to travel by helicopter, the issue is why the existing allocation of flights is not sufficient. Having regard to the very high cost of using helicopter transfers from Sydney, there is a serious question as to whether there would be the demand even if the proposal was approved. The fact that the road is closed to 2WD vehicles or that there is a diversion on the Great Western Highway does not, of itself, answer this question.

In saying this, we repeat that the WVA would be open to supporting a reasonable temporary increase if really needed, but not at the scale proposed.

Need also relates to expectations. Many great wilderness lodges around the world do not allow helicopter access, or strictly limit it, if road access or boat access is otherwise available. Similarly, many national parks such as Yosemite prohibit it altogether. The Wolgan Valley contains and immediately adjoins declared world heritage areas. We are confident that most guests would be open to understanding why at least the last leg of their journey to and from this outstanding resort should generally be undertaken by vehicle, if for no other reason than helping preserve the experience of tranquillity for the other guests.

Consultation

The modification report states that:

“Consultation with the community and with the Lithgow City Council and the relevant NSW government agencies by the applicant recognise the need for the resort to reopen and generally

understand that temporarily increasing approved helicopter trips to and from the resort is necessary to achieve this."

While there is scope for confusion, WVA and Emirates have engaged very closely and constructively over the closure of the road and options for restoring road access. There has not, however, been any community discussions about the current helicopter proposal.

As a general position, the WVA avoids commenting on landholder proposals unless there is the prospect of significant impact on neighbours and a groundswell of concern amongst members. Regrettably, the current proposal is one of those occasions.

In relation to the 2023 proposal (Mod-3 Withdrawn), we note that it involved significantly less concern at that stage on account of the measures being temporary only (ie no component of the proposal seeking a permanent increase) and following a flight path up Carne Creek, away from the Valley residences. Since that time, the current proposal changes the flight path and proposes the permanent increase from 14 flights to 50 flights per week.

Finally, to reiterate, the WVA is very keen to support the resort in reopening and is willing to consider supporting some temporary increase in weekly helicopter flights while the Valley has no 2WD access. However, the scale of increase in the current proposal, as well as the changed flight path, represents such an increase in impact that the WVA feels obliged to object.

If you wish to discuss this submission, please contact Andrew Chalk, President, on 0427 270 555 or by email at andrew@andrewchalk.com.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Andrew Chalk', with a stylized flourish at the end.

Andrew Chalk
President

Wolgan Valley Association

Objects

- 1) To provide an organisation by which landholders and residents in the Wolgan Valley can take collective action which they believe is in the best interests of protecting and promoting the natural, scenic, cultural, economic, and social values of the Valley for current and future generations, (*the Principal Object*).

In pursuing the Principal Object, the Association shall endeavour:

- a) to build collegiality and goodwill amongst its members, as well as other landholders and residents in the Valley,
- b) to operate in a manner that respects the rights of members, as well as that of other landholders and residents, to make decisions in their own best interests,
- c) to advocate to government and others for services to the Valley, such as in relation to the maintenance of reliable road access, which promote the Principal Object,
- d) to co-ordinate land management initiatives between landholders, including seeking funding and support for such initiatives, especially where those initiatives involve multiple properties,
- e) to work respectfully with the traditional owners and other Aboriginal people who have a connection with the Valley,
- f) to advocate to government in relation to existing or proposed planning controls and other regulatory measures that promote the Principal Object,
- g) to advocate and promote the natural, scenic and cultural values that make the Valley so unique,
- h) to work constructively with local, State and Federal governments, including agencies such as Local Land Services, the National Parks and Wildlife Service, the Rural Fire Service, and Forestry Corporation,
- i) to be a model of community led effective conservation and land management excellence, and
- j) to act as a trustee of any charitable fund established to promote one or more elements of the Principal Objects.