

Mr Jeffrey Peng
NSW Department of Planning, Housing and Infrastructure
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17 May 2026

Dear Mr Peng,

I object to Modification 4 of Emirates Wolgan Valley Resort MP06_0310.

From a wider community perspective, the opportunity for ALL people to engage in genuine nature-based experiences within our national park and world heritage estate - *without the risk of interruption from the regular movement of aircraft climbing and out of the Wolgan Valley* - must be protected. This fact deserves paramount consideration.

As a landowner who resides on one of the closest properties to the proposed flight paths in this application I object to this proposal from a personal perspective.

I purchased land in the Wolgan Valley as I wanted to invest in a place where I can connect with the peaceful natural environment. Allowing 210 helicopter movements weekly near my land is not acceptable. I did not buy land decades ago with the view of being near a busy heliport with multiple helicopter movements per hour.

The Emirates Resort has become a high impact operation that keeps pushing to increase the impact of their operational footprint.

Despite claims of creating a development with a conservation and environment focus, the reality is that the Emirates Wolgan Valley Resort has become a high impact operation. The resort no longer places any emphasis on broader conservation and Wolgan Valley community enhancement. By pushing to constantly expand the footprint of their operations – both at ground level and now in the air – they are forever increasing their impact on the character and peacefulness of the Wogan Valley.

The basis for this proposal is not valid

The applicants claim that due to the closure of Wolgan Road they require this dramatic increase in aircraft movements to allow their clients access.

But the reality is the Wolgan Road will be reopening soon on a controlled basis for 2-wheel drive vehicles. To support the day-to-day operations of the resort, a very large number of vehicle movements in and out of the valley will need to recommence no matter what. All logistical support – fuel, food, staff etc must come in by road and thus the road route must be deemed safe for all people to traverse. Hence there is no reason why guests arriving at the resort cannot also come in via this access route. Prior to the access road's failure this is how the bulk of guests have arrived – so ultimately little will have changed.

It is my view that the applicant is attempting to use the landslip event as leverage and as an excuse to apply for infrastructure that will allow them to expand their operation beyond original intentions. In turn the proponent will unacceptably increase the impact on their neighbours and the wider community who use national park estate.

Finally, Lithgow Council has secured considerable funding to fully rehabilitated the road to support full public access – plans for which are well underway.

The application contains inaccurate statements which misdirect

The proponent uses inflammatory statements like *“If the modification is not approved the resort will remain closed for another 7 to 8 years....”* A statement like this is clearly false as the valley access is due to be reopened to managed 2WD access this year. This will allow residents and businesses and their visitors to come and go with any kind of vehicle.

In Section 4 the application also states that *“Council stated that it could not repair the road due to financial feasibility, high construction and operational risks, costs likely disproportionate to the risk improvements over the long term and costs would likely greatly exceed the value of the assets of the road itself.”* Apart from wanting to misdirect, this statement has no relevance to the current situation. The fact is council has secured significant funding to rebuild. In conjunction with Transport for NSW, Lithgow Council has been working hard to develop new access plans.

Section 4.4 states *“In light of the NSW government’s funding announcement and the projected timeframes to restore road access to the valley and the resort, Emirates do not wish to leave the resort closed for another 7/8 years to 2032/33. Instead, they propose to reopen the resort by relying upon helicopters for guest transport supplemented by limited 4WD access via Donkey Steps.”* This is also a misleading statement. Again, managed 2WD access for landholders, and visitors to those landholders, is expected to be available this year under current plans.

Section 10 states the modification is *“unlikely to increase impacts on the amenity of the Greater Blue Mountains World heritage area”*. Yes, this may be true. But it ignores stating it will have an impact on the neighbouring Gardens of Stone Conservation areas. The protection of this neighbouring conservation estate is no less valid and hence their argument is based on misleading principles.

The application has not been compiled with the level of diligence that such a high impact proposal ought to attract

For example Section 6.1.2 states *“the closest the [poposed] flight path is to a dwelling not associated with the resort is 2250m.”* The reality is that the closest proposed dwelling is within 1600 meters away.

The proposal also references extensive the use of EC120 aircraft, a model of helicopter which is recognised for its relatively low noise footprint. The fact is there are now very

few EC120 aircraft in commercial operation in Sydney and I question whether the company that will be running these transfers own any EC120 aircraft at all. A significant portion of this company's helicopter fleet are larger aircraft which carry a greater noise footprint than the EC120.

The Section 10 conclusion states that the EC120 helicopter will be used for 6 out of 10 trips. How is this possible if there are few or no EC120 aircraft in the general commercial helicopter fleet?

The previous noise studies were done with the Carne Creek flight path in mind. The new flight path pushes much further to the south and west and thus comes much closer to many private properties. There has been no noise analysis for these areas.

Additionally, there has been no discussion about the visual impact of the proposed flightpaths. These can no longer been 'concealed' behind Donkey Mountain and the Carne Creek escarpments.

The proponent understates the impact on conservation areas by focussing more on the impact on the formally gazetted World Heritage Area. It omits reference to the Gardens of Stone Conservation area which ultimately is a much more accessible section of the conservation estate.

Impacts on tourism and recent large investments in nature-based activities in the area.

The NSW Government is spending \$50 million on the Gardens of Stone State Conservation Area. The heart of this area is going to be directly impacted. This area is planned to host some of the most publicly accessible parts of the new Gardens of Stone SCA. The NPWS is already well into a program of upgrading road access, lookouts, walking tracks and campgrounds.

Visitors to areas like this expect and deserve peace and quiet.

The proposed flight path will directly impact what will become some of the most publicly accessible of the famous rock formations (pagodas) in the Gardens of Stone. It will pass over a public campground, multi day and day walking tracks and the Birds Rock Lookout.

Emirates Claims to have consulted with the wider community in the past, and that all responses have been supporting of past proposals. This is wrong – but why say this if it is not true?

Section 7.1 states that the proponent previously undertook public consultation with other residents of the valley. They claim to have sent a letter to 31 local residents and stake holders and "*only two responses were received supporting a past modification.*"

I did not receive a letter from them. Had I received such contact I would have not supported their past proposals.

The proponents also say “*it is understood there is general community support of the proposed modification.*” On what basis is this statement made? Emirates has not actively consulted the community with regards this specific change. Residents only know about Mod 4 following letters and emails from the Department of Planning.

Additionally, there are past submissions to the Department of Planning as recoded on the planning portal which have not been in favour of increases and changes to helicopter movements. Mod 2 shows there were 4 objecting and 2 supporting submissions. Mod 3 shows there were 11 objecting and 3 supporting submissions.

Why should the flight path be changed just because NPWS wants to develop new glamping and lodge infrastructure?

In 2018 the approved *Mod 2 – Helicopter Pad and Flights* application proposed a flight path down Carne Creek arguing that his route would ensure helicopter movement remain well clear of other valley residents. (The reality is I have still heard movements based on Mod 2 plan). But now, just because NPWS wishes to develop luxury tourism infrastructure near this area, the proponent is applying for a change that will have a much greater impact on areas used by the public and on many private landholders in the valley.

Where is the equity in this argument? If it's not OK to fly near NPWS luxury bush camp developments, why is it ok to fly over public campgrounds, walking tracks and lookouts, and closer to other private landowners?

Conclusion

Emirates has disengaged from its original charter of being an active and constructive community member. They have constantly pushed the limits of their operational impacts on the Wolgan Valley. Step by step they have sought to expand their level of impact on the natural environment, valley residents and visitors.

The constant and every increasing impact of this operation must stop.

Thank you for the opportunity to comment.

Yours Sincerely,

Peter

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