

18 May 2026

Attn: Mr Jeffrey Peng
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150
Submitted via the Planning Portal

Objection to Emirates Wolgan Valley Resort — Modification 4 (MP06_0310-Mod-4) proposed increase in helicopter movements

Dear Madam/Sir,

4nature provides this submission in response to the public exhibition of Modification 4 for the Emirates Wolgan Valley Resort.

4nature is a non-profit environmental organisation committed to protecting the ecological integrity, biodiversity and wilderness values of New South Wales, with a particular focus on the Greater Blue Mountains landscape.

4nature strongly objects to the proposed modification. The application seeks to increase permitted helicopter flights from the currently approved four flights per week to between 210 and 220 flights per week, allowing up to 30 movements per day. This represents a significant escalation in aviation activity over a globally significant conservation area and established residential communities.

The Department of Planning, Housing and Infrastructure should refuse the application based on the following grounds.

1. The proposal is unnecessary due to the imminent reopening of Wolgan Road

The primary justification provided by the proponent for this substantial increase in flight frequency is the closure of Wolgan Road following landslip damage. This argument is no longer valid.

- Public records from Lithgow City Council confirm that temporary works are underway to safely reopen Wolgan Road to two-wheel-drive traffic and heavy logistics vehicles up to 12.5 metres by August 2026.
- A permanent planning modification is an inappropriate mechanism to resolve a short-term access constraint that will be resolved in less than three months. If the road infrastructure can safely accommodate heavy service vehicles, it is sufficient for guest transport and shuttle buses.
- Granting a permanent increase in flight numbers creates a long-term entitlement to high-frequency aviation. The commercial incentive to operate these flights will remain long after road access is fully restored, causing enduring environmental harm to address a temporary problem.

2. Cumulative acoustic impacts on residential areas, particularly the Lower Blue Mountains

The flight paths required to transit guests from Sydney and Bankstown airports to the Wolgan Valley cover the breadth of the Blue Mountains region. These impacts were poorly considered in the assessment. The following represents the main issues of concern:

- The proposal will introduce up to 30 helicopter movements per day directly over residential corridors, with a disproportionate cumulative effect on the Lower Blue Mountains.
- Due to the restricted airspace of the new Western Sydney Airport, helicopters will be forced to fly at low altitudes over residential areas and areas of national parks. At Springwood helicopters will be forced to fly close to the statutory legal minimum height for residential areas, which is 300 metres above the ground. At Glenbrook, helicopters will need to fly between 300 and 600 metres above the ground level.
- In national parks and wilderness areas, helicopters may fly as low as 150 metres above the ground over the national parks. This may increasingly occur if helicopters are forced to avoid residential areas.
- Residents in this region choose to live adjacent to natural areas due to the low ambient noise levels. Persistent low-frequency aviation noise throughout the day causes ongoing domestic disruption and reduces the standard of residential amenity.

3. Degradation of the Greater Blue Mountains World Heritage Area and State Conservation Area

The proposed flight corridors pass directly over some of the most ecologically significant and highly protected public lands in Australia. These include the Blue Mountains National Park, Wollemi National Park (both part of the Greater Blue Mountains World Heritage Area) and the Gardens of Stone State Conservation Area. Key areas of concern are:

- World Heritage and wilderness listings for the Grose and Wollemi Wilderness are designed to protect landscapes from urban and industrial impacts, and the wilderness values of these areas will be impacted by the proposal. Regular, low-altitude commercial flights directly undermine the wilderness character and remote values of these parks.
- The proposed frequency—averaging one flight every 20 to 30 minutes during peak hours—will cause chronic sound disturbance to native fauna. The sandstone escarpments of the Wolgan Valley and the Gardens of Stone SCA provide critical nesting habitats for protected raptors, including the peregrine falcon and wedge-tailed eagle, as well as roosting sites for threatened cave-dwelling bats. The application lacks a rigorous, independent species impact assessment to quantify these risks.

4. Loss of public recreational amenity, peace and quiet

The NSW Government has recently invested \$50 million in the Gardens of Stone SCA to develop walking tracks, lookouts and remote campgrounds to support nature-based tourism.

- Visitors travel to these protected areas specifically to experience natural quiet, isolation and acoustic clarity. Unlike residents, recreational users in campgrounds and on walking tracks have no structural protection from aircraft noise.

- Persistent helicopter noise will significantly diminish the quality of these public assets. Studies demonstrate that visitors to natural parks have a lower tolerance for mechanical noise than individuals in urban environments. The acoustic footprint of up to 220 flights per week will compromise the public value of these conservation lands for the benefit of a small number of private resort guests.

5. Inappropriate use of the modification process

An increase in transport movements from four per week to more than 210 per week is a fundamental shift in the scale and intensity of the development.

- This proposal results in an increased intensity, altering the function of the site from a resort with occasional helicopter access to a high-turnover commercial aviation hub.
- A change of this magnitude should not be assessed under the Section 4.55 modification pathway. It requires a comprehensive, newly exhibited environmental impact statement (EIS).
- The acoustic modelling supplied by the proponent fails to account for the acoustic amplification and echo effects that occur during take-off and landing within the narrow sandstone canyons of the Wolgan Valley, and it completely omits the experience of park users at elevated lookouts within the Gardens of Stone State Conservation Area such as at Birds Rock.

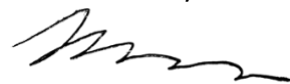
Conclusion

The Emirates Wolgan Valley Resort was originally approved on the basis that it would operate with minimal impact on its surrounding environment. The current proposal departs entirely from that principle by introducing a high-impact, high-emission aviation corridor over protected lands.

Because safe road access will be restored in August 2026, there is no justification for inflicting permanent ecological and acoustic damage on the Blue Mountains community and its World Heritage national parks.

4nature requests that the Department of Planning, Housing and Infrastructure refuse Modification 4.

Yours sincerely



Andrew Cox
President, 4nature