

To whom it may concern,

Project: Emirates Wolgan Valley Resort – Modification 4 of MP06_0310

Modified Helicopter Flight Path and Increased Helicopter Movements

Thank you for the opportunity to comment on the proposed modified helicopter flight path and increased helicopter movements.

I strongly object to the Emirates Wolgan Valley Resort proposed Modification 4 of MP06_0310. This modification is not necessary as the Wolgan Gap Road will be reopening later this year.

Introduction

I have lived in the local area since the late 1970's and have extensively bushwalked and camped throughout the Gardens of Stone National Park and Gardens of Stone State Conservation Area. I have been leading bushwalks for the past 40 years for the local bushwalking and community groups and involvement environmental education.

I have come to know Wolgan Valley and Newnes Plateau area intimately and have deeply valued its extraordinary natural landscape, flora and fauna, its wilderness qualities, particularly the internationally significant sandstone "platy pagoda" formations, high cliffs, canyons and deep secluded valleys.

I have close family members living in the Wolgan Valley moving here for its well-recognised qualities of tranquillity, natural landscape, wildlife and scenic isolation. As current residents, they potentially will be exposed to the noise and visual impacts of the proposed flight path, with effects on their lifestyle, increased anxiety and wellbeing.

1. Basis of the objection

Objection of the modification is based for the following issues,

- No community consultation since Modification 3 providing little time to consider modification
- Potential noise and visual impacts on Wolgan Valley residents
- Impacts on farmland environment, livestock and domestic animals
- Impacts on sensitive species and habitats
- Impacts on sandstone canyon and upland swamp ecosystems
- No environmental impact statement undertaken
- No relevant baseline data requiring on-ground vegetation and fauna surveys
- Inconsistency with National Park and UNESCO World Heritage conservation obligations
- Reduced of visitor experience and recreational values
- Increased aviation safety risks
- Helicopter emission impacts
- Alternative modes of transport

2. Impacts on the Wolgan Valley and residents

The impacts on farming properties and rural residences is a major concern. The proposal relies on noise modelling from the original flight path, which is no longer applicable for the modified flight path.

The flight path modification will create a new environmental impact footprint much further away to the west/southwest direction above the Wolgan Valley floor and rising over the pristine southern sandstone escarpment of Gardens of Stone National Park. This is part of the UNESCO Greater Blue Mountains World Heritage Area. This impact will affect at least approximately dozen residences that were not included in previous study area.

The sandstone escarpment is highly reverberant, and helicopter noise will echo between the high cliffs, rebounding noise in ravines and across the Wolgan Valley. The flights have the potential for prolonged echoing propagating long distances within the Wolgan Valley and on Newnes Plateau. The Wolgan Valley is a very quiet landscape consisting of rural properties, residences and surrounded by national parks and conservation areas. Potential noise impact on rural residences, farming properties, livestock, domestic animals and wildlife from exposure to intrusive and unpredictable noise, including noise rebound effects across the valley. Impacts on resident's peaceful lifestyle and wellbeing.

The modification is flawed as there is no existing ambient noise data for the new flight path footprint due to the absence of noise receivers south of noise receivers #8 and #9. This is a major deficiency and requires comprehensive on-ground monitoring and proper assessment before any approval is considered.

There was no Wolgan Valley community engagement or consultation for Modification 4.

2. Impacts on Ecosystems

The Wolgan Valley and Newnes Plateau support a rich assemblage of native fauna, many of which are sensitive to noise disturbance. Some of the threatened species are known to inhabit the area include:

- Koala
- Greater glider
- Spotted-tailed quoll
- Peregrine falcon
- Wedge tailed eagle
- Regent honeyeater
- Glossy black cockatoo
- Gang gang cockatoo
- Blue Mountains water skink
- Giant dragon fly
- Multiple bat species

These species rely on:

- Quiet habitats
- Predator-prey behaviour
- Stable breeding areas and roosting sites
- Communication calls and mating calls
- Undisturbed foraging areas
- Wildlife movements and seasonal bird migration

Helicopter noise and visibility have the potential to disrupt these species.

2.1 Impact on Canyon Ecosystems

Helicopters will fly low over Wolgan Valley southern sandstone escarpment and very near to Sunnyside Canyon and Bushrangers Creek Canyon. The canyons are in Gardens of Stone National Park World Heritage Area. The canyons are on each side of assessment point 6 (Figure 11, Page 15, Biodiversity and Ecological Assessment Report).

Sunnyside Canyon also known as *Acoustic Canyon* named due to the large resonant sandstone chambers within the canyon. There is anecdotal evidence of a bat colony within Sunnyside Canyon, indicated by guano deposits. Disturbance to roosting bats is a concern requiring fauna surveys.

This will now a *hot spot* for aircraft noise impacts. Predicted noise levels in the report indicates ranges from 70–80 dB(A) and is highly inappropriate for a peaceful remote location where natural background noise is extremely low. World heritage stated a natural quiet baseline range typically 20 -25 dB(A).

The proposal relies on the NSW State Vegetation Type Map to predict plant communities and threatened ecological communities along the flight path. Prediction alone is insufficient possibly missing important ecosystem data, particularly in very steep and dissected sandstone terrain. Due to lack of important data this will require on ground vegetation and fauna surveys that are essential to accurately assess ecological impacts along the flight path.

Concerns include:

- Identified noise “hot spot” at assessment point 6 with predicted levels of 70–80 dB(A)’
- Natural background noise levels in this World Heritage landscape are typically ~20–25 dB(A).
- Sunnyside Canyon (“Acoustic Canyon”) possibly exhibits strong sound amplification due to its geological structure”
- There is anecdotal evidence of potential bat roosting habitat requiring fauna surveys
- An adequate fauna impact assessment based on ground surveys has not been provided.

3. Impact on Park Visitors and Recreation

The Wolgan Valley and Newnes Plateau areas are popular for:

- Bushwalking
- Bush camping
- Day sightseeing and picnicking
- Cultural engagement and education
- Birdwatching
- Mountain biking
- Canyoning
- Rock climbing and abseiling

Visitors seek these areas specifically for their solitude, natural quietness, wilderness experience, sense of remoteness and support for wellbeing. Helicopter movements will significantly reduce visitor experience.

The proposed flight path crosses areas important montane peatlands and swamps, creeks, ravines and crosses multi-day Pagoda Walk north of Broad Swamp. This walk has the potential to become a world-class walking experience linking the Gardens of Stone SCA to Wollemi National Park.

Noise and visual impacts on the proposed Gardens of Stone SCA Forest Park Camping Ground in the headwaters of Carne Creek is planned to have 60 camp sites.

Aircraft noise and visibility is incompatible with this vision.

Increase in noise and visual impacts from helicopters flying over Glow Worm Tunnel tourist road and all the way to and from Sydney, affecting Blue Mountains communities, world heritage national parks and environment.

4. Impact on World Heritage Values

The modified flight path crosses the most isolated and quietest part of the Newnes Plateau. An area valued highly because of absence of low flying aircraft part of the path and is in UNESCO World Heritage Area.

Impacts will affect:

- Gardens of Stone National Park World Heritage Area
- Gardens of Stone State Conservation Area, widely regarded as a “national park in waiting” and is currently being assessed for inclusion in the World Heritage Area.

These landscapes are internationally significant for their threatened species, pagoda formations, montane peatlands and swamps and wilderness qualities.

Helicopter noise directly undermines these values and is inconsistent with Australia’s obligations under the World Heritage Convention.

5. Air Safety Concerns

The Wolgan Valley and Newnes Plateau are subject to challenging weather events and are subject to:

- Low cloud down to below plateau level
- Sudden weather changes
- Strong winds around escarpments
- Reduced visibility around high cliffs and valleys

Increased helicopter traffic raises the risk of aircraft encountering other aircraft along the flight path particularly across Newnes Plateau and the lower Blue Mountains from congested and restricted low level flight path from the Western Sydney Airport forthcoming flight plan changes.

These risks have not been adequately assessed.

6. Exhaust Emissions and climate change

Increased helicopter movements will have a carbon footprint and increase in emissions of:

- Carbon dioxide (CO₂)
- Nitrogen oxides (NO_x)
- Particulates
- Unburnt hydrocarbons

7. Alternative modes of transport for resort cliental

- Wolgan Gap road is reopening later this year providing access for 2WD private vehicles
- Use of bus or shuttle transport to Wolgan Valley
- Opportunity of using passenger trains between Sydney and Lithgow Station. Wallerawang Station will be reopening end of this year
- These alternatives will be part of the visitor experience

The alternatives would avoid all the issues impacting Wolgan Valley residents, the environment, cultural, national parks UNESCO World Heritage impacts from the proposed helicopter operations.

List of identified impacts

The proposed increase in helicopter movements and the modified flight path will result in unacceptable noise, visual and ecological impacts on:

- Wolgan Valley residents and their wellbeing
- Farming properties, residences, livestock and domestic animals
- Wildlife and biodiversity
- National parks and UNESCO World Heritage values
- Wilderness values
- Cultural practices and awareness
- Scenic and aesthetic values
- Outdoor recreation activities
- Current and future eco-tourism
- Visitor experience
- Cultural engagement and education
- Visitors seeking solitude, wellbeing and natural quiet environment
- Lower Blue Mountains residents and visitors

Conclusion

- There were only two weeks for submissions to assess and send submissions for modification 4 without any prior notice and community consultation by the proponent
- The modified flight path and increased flights will potentially affect Wolgan Valley resident's lifestyle, with increased anxiety levels and impact on wellbeing. Noise impacts on livestock, domestic animals and wildlife.
- Additional noise receivers were not provided for monitoring noise levels along the modified flight path footprint leading to inadequate and inconclusive noise data.
- The assessments provided are flawed as the predictions were based on desktop information with no ground surveys undertaken used for ground truthing.
- There is no environmental impact statement (EIS) provided for the modified flight path and increased flight numbers.
- The modified flight path and an increase in flight numbers is not justified as there will be alternate transport from the reopening of the Wolgan Road providing 2WD drive access later this year. This will avoid all the issues impacting Wolgan Valley residents, the environment, UNESCO World Heritage and cultural impacts.
- These landscapes should be managed for conservation, wilderness protection and sustainable low-impact recreation, not subjected to intrusive aircraft operations.
- Air safety from increased helicopter traffic raises the risk on Newnes Plateau and the lower Blue Mountains from congested and restricted low level flight path from the Western Sydney Airport forthcoming flight plan changes.
- Based on the issues identified and the magnitude of potential impacts, the proposal should not be approved.

I have for a long time had a strong connection to the Wolgan Valley and Newnes Plateau natural landscape. I am very concerned for the potential impact on family members and other residents residing in the Wolgan Valley, I therefore strongly oppose the proposed modification.

Thank you for considering this submission.

Yours Sincerely,

Dennis Byrne

Wallerawang NSW