

18 May 2026

Department of Planning, Housing and Infrastructure

Dear Jeffrey Peng,

Re: Objection to Emirates Wolgan Valley Resort – Modification 4

Project Number: MP06_0310 Mod 4

I write to formally object to the proposed Modification 4 application associated with Emirates Wolgan Valley Resort.

My family has lived and farmed in the Wolgan Valley for generations, and I am directly impacted by the environmental, acoustic, and amenity consequences of the proposed expansion in helicopter activity associated with this application.

The Wolgan Valley is a unique rural landscape surrounded by World Heritage listed national park and wilderness areas. The environmental character, natural quiet, and ecological significance of the valley are fundamental to both the local community and the broader values of the region. The proposed modification represents a substantial intensification of aviation activity within this sensitive environment and, in my view, is inconsistent with the original intent and scale of the approved development.

Excessive Intensification of Helicopter Operations

The scale of the proposed increase in helicopter activity is significant.

The current approval permits a limited number of helicopter movements associated with resort operations. Modification 4 seeks to substantially increase the frequency and regularity of helicopter activity, fundamentally altering the character of aviation operations within the valley.

This proposal no longer represents occasional or ancillary helicopter use. Instead, it would establish routine and frequent aviation activity within an otherwise quiet rural and wilderness setting.

The cumulative impact of this level of aircraft movement on residents, neighbouring landholders, visitors, wildlife, and the broader acoustic environment has not been adequately addressed.

While the application focuses primarily on the helipad and immediate operational area, the impacts of the proposal extend well beyond the resort boundary. Even if the proposed flight path avoids Carne Creek Canyon, it would still introduce repeated helicopter activity across sensitive rural, escarpment, and World Heritage adjacent landscapes within and around the Wolgan Valley. The application does not adequately assess the cumulative acoustic, ecological, visual, and amenity impacts of that activity.

Inadequate Environmental Assessment

It is notable that the application has been lodged under Section 4.55(2) of the Environmental Planning and Assessment Act 1979 rather than the pathway generally associated with minimal environmental impact modifications.

This alone reflects the fact that the proposal involves impacts beyond what could reasonably be described as minor or inconsequential.

Given the scale of the proposed increase in aviation activity, I do not believe the environmental assessment accompanying the application adequately addresses:

- cumulative acoustic impacts,
- impacts on wilderness character,
- ecological disturbance along flight paths,
- impacts on threatened species,
- or the long-term consequences of regular aviation activity within the valley.

The precautionary principle should apply in circumstances where environmental impacts have not been comprehensively assessed, particularly within landscapes of acknowledged ecological significance.

Biodiversity and Threatened Species Concerns

I am particularly concerned by the apparent absence of comprehensive ecological assessment relating to threatened bird species and wildlife movement corridors within the Wolgan Valley and surrounding escarpment environments.

Following the 2019-2020 bushfires, a number of threatened and sensitive bird species have gradually returned to the valley, including:

- Glossy Black Cockatoos,
- Regent Honeyeaters,
- Gang-gang Cockatoos,
- and Wedge-tailed Eagles.

These species are regularly observed throughout the valley and surrounding canyon systems.

Despite this, the application does not appear to contain detailed, flight-path-specific assessment of how substantially increased helicopter activity may impact feeding behaviour, nesting activity, movement corridors, or broader habitat utilisation.

Research referenced by the Blue Mountains Conservation Society and other environmental bodies identifies recognised risks associated with helicopter operations, including acoustic disturbance, behavioural displacement, habitat disruption, and stress impacts on wildlife species.

Whether or not those impacts ultimately prove significant, the absence of comprehensive assessment in a World Heritage adjacent environment is itself concerning.

Community and Amenity Impacts

The Wolgan Valley is not an urban environment or transport corridor. It is a rural residential and farming community defined by its environmental values, natural quiet, and low-intensity character.

The proposed escalation in helicopter activity would materially alter that character.

Many residents and landholders already continue to experience significant disruption and uncertainty associated with the prolonged road closure affecting the valley. In this context, the substantial expansion of aviation activity represents an additional and unreasonable burden on the local community.

I also remain concerned that previous consultation processes occurred during periods when the community was under considerable stress due to access limitations and ongoing uncertainty regarding road access and recovery works.

Conclusion

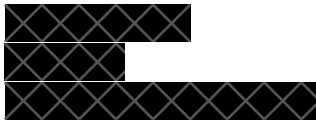
In my view, the proposed modification represents a substantial intensification of aviation activity within an environmentally sensitive rural landscape and has not been supported by an adequate level of environmental assessment.

The cumulative impacts on biodiversity, wilderness character, residential amenity, and the broader environmental values of the Wolgan Valley have not been properly addressed.

For these reasons, I respectfully request that the Department refuse the proposed modification or, at a minimum, require substantially more detailed environmental and ecological assessment before any determination is made.

Thank you for considering my submission.

Yours sincerely,

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