



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

E-Mail: bmc@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

NSW Department of Planning, Housing and Infrastructure
State Significant Infrastructure

Submitted via Major Projects Portal

16 May 2026

Submission re: **Emirates One&Only MOD 4 - Temporary Changes to Helicopter Transport**

OBJECTION

To Whom it May Concern,

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with more than 900 members and over 60 years of history advocating for the protection of the natural environment of the Greater Blue Mountains World Heritage Area (GBMWA). The Society's objectives are to conserve the region's unique natural heritage and to promote broader public awareness of environmental conservation.

The Society strongly objects to Emirates One&Only MOD 4 – Temporary Changes to Helicopter Transport and opposes the proposed increase in helicopter operations from the currently approved 14 flights per week under MOD 2 to 30 flights per day (210 flights per week). National Parks are for nature to thrive in their natural undisturbed habitat. We as a Community demand Government ensures any development to have a neutral or benefit effect on the environment. This proposal fails nature, and degrades its World Heritage quality, and adds no value for the Blue Mountains area. The scale of this increase would have substantial impacts on park visitors, local communities, wildlife, and the broader World Heritage landscape.

There is no justification for this five-fold increase in helicopter activity which is based on the suggestion that two-wheel-drive (2WD) access to the resort will remain unavailable for many years. This is incorrect. Wolgan Gap Road is expected to reopen to most 2WD vehicles by August/Q3 2026, making the proposed modification unnecessary (see Lithgow Mercury, 7 May 2026).

In effect, the proposal seeks to transform an existing resort helipad into a commercial heliport operation centred on transporting guests by air. Such a change warrants a significantly higher level of planning scrutiny and environmental assessment than has been applied through this modification process. The Justification Statement (section

9.1.13) indicates an intention to continue transporting patrons by helicopter even after road access is restored.

Importantly, the Modification Report fails to acknowledge that all supplies, food, linen, staff, contractors, and materials will continue to rely on Wolgan Gap Road once it reopens. Lithgow Council has advised that interim works are anticipated to be completed in Q3 2026, allowing access for trucks up to 12.5 metres and most two-wheel-drive vehicles.

Inadequate Noise Assessment

The noise assessment relies heavily on outdated data contained within Appendices 4 and 7, both of which pre-date the establishment of the Gardens of Stone State Conservation Area. Consequently, the assessment fails to adequately consider impacts on visitors using the conservation area and significantly underestimates the number of sensitive noise receptors within the GBMWA.

The report also understates the scale of impacts by excluding the Gardens of Stone National Park from its calculations, effectively reducing the reported affected area within the World Heritage property by almost half.

Existing noise analysis is primarily designed for residential settings and does not adequately address the impacts of aircraft noise on visitors and wildlife within protected natural environments. This is particularly concerning given the increasing investment by NPWS in nature-based tourism experiences across the Gardens of Stone region.

The revised flight path across the Newnes Plateau would directly affect the Acoustic Canyon, NPWS campgrounds, the Gardens of Stone Pagoda Walk, Birds Rock Lookout, and the broader Bird Rock precinct. These locations are valued specifically for their natural quiet and wilderness character. Persistent helicopter activity would significantly diminish the acoustic amenity and visitor experience of these areas.

In addition, NPWS is developing premium walking tracks, visitor facilities, and proposing the development of “bush luxury” accommodation within the Carne Creek catchment. Ongoing helicopter noise has the potential to undermine these public investments by degrading visitor experiences, generating negative publicity, and reducing the attractiveness of the region as a nature-based tourism destination.

Need for an Environmental Impact Statement

Although planning regulations may not explicitly require an Environmental Impact Statement (EIS) for this modification, the scale and significance of the likely impacts clearly justify one.

The current assessment framework is inadequate for evaluating aircraft noise impacts within a World Heritage landscape and protected conservation areas. New approaches are required to assess acoustic impacts in natural environments where peace, remoteness, and wilderness values are central to the visitor experience.

The proposal should therefore be subject to a more rigorous environmental assessment process, including consideration of a “Limits of Acceptable Change” methodology commonly applied in protected area management.

Risk Analysis and Regulatory Oversight

The Modification Report also fails to adequately assess operational risks associated with the proposed increase in helicopter traffic. In particular, it does not address the risk of collisions between inbound and outbound aircraft, despite the fatal Sea World helicopter collision on the Gold Coast in 2023 demonstrating the serious consequences such incidents can have.

Operational details remain vague and insufficient to allow effective regulatory oversight, particularly in relation to impacts on nearby visitor infrastructure and park facilities. This issue is compounded by the challenging topography of the area, with the Newnes Plateau rising approximately 500 metres above the Wolgan Valley floor.

Reliance on the existing Fly Neighbourly Agreement is also inadequate because the agreement has not been updated to reflect the establishment of the Gardens of Stone State Conservation Area.

The report’s assertion that helicopter operations will be “inaudible or only barely audible” is inconsistent with likely visitor experience and appears to rely on flawed modelling. Figure 9 fails to properly account for the elevation of Birds Rock Lookout (1,181 metres), meaning helicopters may overfly the area at significantly lower relative altitudes than the modelling suggests.

The most sensitive noise receptors are likely to be visitors to the Gardens of Stone State Conservation Area, including campers, walkers, and users of proposed glamping developments. However, these users are not adequately considered within the modification report or accompanying acoustic assessments.

The proposal also relies on the refused Fairmont Resort helipad application as a comparative precedent. That proposal involved substantially fewer helicopter flights and was ultimately refused due to environmental impacts. Furthermore, the Fairmont site is located on an escarpment, whereas the Wolgan Resort sits within a valley system with very different acoustic characteristics. It therefore provides little meaningful guidance for assessing the impacts of this proposal.

International research further demonstrates that visitors to wilderness areas are significantly more sensitive to aircraft noise than residents in urban environments. The United States Department of Agriculture Forest Service, in its *Report to Congress: Potential Impacts of Aircraft Overflights of National Forest System Wilderness* (1992), found that wilderness visitors were approximately 10 dB(A) less tolerant of aircraft noise than urban residents. Despite this, the modification report does not adequately assess impacts on these highly sensitive users.

Increased Helicopter Noise in the Blue Mountains

The proposed 30/day at a frequency of two helicopter flights per hour over the Blue Mountains towns and the World Heritage Area during daylight hours has obvious increase helicopter noise impacts on residents throughout the Blue Mountains.

Because helicopter operators typically follow the Great Western Highway for visual navigation, helicopter traffic servicing the Emirates Wolgan Resort is likely to generate significant additional noise impacts for communities between the Wolgan Valley, and the mountain townships through to Sydney.

This is likely to generate strong community opposition and pressure to divert helicopter routes away from residential areas and over adjoining national parks, where lower flight altitudes are permitted. Such a shift would extend helicopter noise impacts deeper into remote areas of the GBMWA, affecting both visitors and native wildlife far beyond the immediate vicinity of the resort.

Conclusion

The Society considers MOD 4 to be unnecessary, inadequately assessed, and environmentally unacceptable.

The proposal is based on incorrect assumptions regarding road access, relies on outdated and incomplete acoustic modelling, fails to adequately assess impacts on protected natural areas and sensitive park visitors, and risks permanently degrading the wilderness character of the Gardens of Stone State Conservation Area and the Greater Blue Mountains World Heritage Area.

The proposed increase to 30 helicopter movements per day provides no demonstrated public benefit to the Blue Mountains or Lithgow communities while imposing substantial environmental, social, and acoustic impacts on residents, visitors, and wildlife.

For these reasons, the Blue Mountains Conservation Society strongly urges that MOD 4 be refused.

Thank you for the opportunity to comment on this development. If you have any queries in regard to this submission, please contact me on president@bluemountains.org.au

Yours sincerely



Annette Sartor
President
Blue Mountains Conservation Society