

PROPOSED LEASE OF KATOOMBA AIRFIELD BY FLYBLUE

LX 602686

History.

Early in the nineties helicopter sightseeing operations were carried out for several years. These flights originated from the Katoomba Airfield and passed over the Megalong Valley on their way to the Jamison Valley to return to the airfield some time later by way of Megalong Valley. On most occasions this was repeated at various intervals for about three to four hours.

Operations ceased mid nineties either as a result of public reaction to the helicopter noise or to lack of patronage or possibly a mixture of the two.

We made representations to council at the time objecting to the noise of the helicopter passing directly over our house. In a telephone conversation to the operator I suggested that the flight path over Narrow Neck at the Golden Stairs be moved further South beyond Diamond Falls. He acceded to our request resulting in a lower noise level but still very noticeable.

Grounds for Objection to the Granting of the Lease

We oppose the proposed lease of the Katoomba Airfield on the following grounds:

- **1 Noise Pollution**
- **2 Lack of Information on Flight Plans**
- **3 Fire Risk in a Fire Prone Area**
- **4 Emergency Airfield**
- **5 Risk of Mid Air Collisions**

• 1 NOISE POLLUTION

Megalong Valley for the most part is a particularly quiet area enjoyed by its residents and visitors. The Blue Mountains City Council acknowledged this when some time ago it disallowed the setting up of a clay pigeon shooting range in the valley on the grounds of unacceptable noise.

Helicopters are the main source of aircraft noise in the valley. Mostly they fly at around 5000 feet ASL and follow the Great Western Highway on the edge of the Megalong Valley. These aircraft are mainly care flights, media operations and rescue craft. Sometimes there are fire, rescue and police operations below the cliff line. These are particularly noisy but essential and thankfully do not happen very often.

It may be said that the valley does have aircraft noise as the main flight path to Europe passes over the valley but at a height of over 20,000 feet ASL and a duration of less than thirty seconds the noise is not great.

Light aircraft do pass over Megalong Valley mostly in an East - West direction. Their height of five to eight thousand feet and air speeds of above 200 km/h mean that their presence is minimal.

Helicopter Scenic Flights and Joy Rides.

According to the Fact Sheet *"the department will not permit short-cycle /short-duration joy flights"* (DPI Proposed Crown lease Medlow Bath Fact Sheet). There is no definition as to what constitutes a short cycle / short duration joy flight.

These may be classified as discretionary operations as opposed to essential fire and rescue operations. Whereas the latter flights proceed at pace, the sight seeing flights proceed at a leisurely pace and so subject those on the ground to a much longer barrage of noise. Not only that, they are conducted at a lower altitude thus exacerbating the noise. Furthermore, low forward speed and changes in altitude increase the familiar "whop-whop" common to helicopters.

The proposed leaseholders have said *"FLYBLUE's target customers are by default "high-yield" as the scenic heli-charters on offer will be of not less than 30 minutes ... "* (flyblue.com.au). With a cruise speed of over 200 km/h and the limited size of the

scenic attractions it would mean that the forward velocity would be much lower resulting in a longer time over any particular location thus prolonging the noise problem.

• **2 LACK OF INFORMATION ON FLIGHT PLANS.**

The information supplied by the applicant shows flight paths for fixed wing aircraft. However the information as to the flight paths for the scenic helicopter paths is totally lacking. This is surprising as from reading the FlyBlue website these flights seem to be the major flight movements anticipated. Also there is no information on the maximum number of helicopter movements allowable per day.

Matters could be worse if several helicopters were involved.

• **3 FIRE RISK IN A FIRE PRONE AREA.**

Accidents can happen and have happened. The predominant wind directions in the area are westerly and north westerly. If an accident did happen on these days resulting in a fire, there is a high probability that it will spread in a south easterly direction towards the villages of Wentworth Falls, Lawson then on towards the villages in the lower Blue Mountains. The storage of Avgas and Avtur on site would compound the disaster.

• **4 EMERGENCY AIRFIELD.**

If the proposal is refused, it would be wise to maintain a small area for emergency helicopter operations. There is no need to maintain the full runway as it is too short for heavy aircraft suitable for water bombing. Likewise there is not a suitable water supply for such aircraft.

The location is ideal for helicopter water bombing, being adjacent to two water dams. The maintenance of a small helicopter landing ground would be nowhere as costly as maintaining the airfield in its current configuration.

• 5 RISK OF MID AIR COLLISIONS

As pointed out in this submission the East West corridor for helicopter traffic from Sydney to the West and vice versa would cross any flight path from the Katoomba Airfield to the Megalong Valley. Megalong Head obstructs vision between Narrow Neck and Megalong Valley in the region of Back Creek.

Added to that the RAAF occasionally conduct low level exercises with both transport and fighter aircraft in this East West corridor at roughly the same altitude as the helicopters from Katoomba, the paths crossing about at right angles.

It can be argued there is a low probability of this occurring but there is a very high probability of multiple fatalities.

CONCLUSION

In light of the above submission we respectfully request that the proposed lease of the Katoomba Airfield be refused.

PRIVACY AND CONFIDENTIALITY STATEMENT

We the undersigned wish that our contact details to be treated as confidential.

[Redacted signature area] 25/7/19 [Redacted signature area]
[Redacted signature area]
[Redacted signature area]

From: [REDACTED]
Subject: Helicopters in the blue mountains ref No 602686
Date: 26 Jul 2019 at 1:29:33 pm
To: airfield.submission@crowland.nsw.gov.au
Cc: [REDACTED]

I am writing to object to the proposed granting of crown land used for the commercial purpose of helicopter joy rides around the upper blue mountains. This is are last natural environment that is close to Sydney, I have because of the drought kangaroo's, possums and other wild life that are coming to eat and drink where they can find green shoots and water in the town of Blackheath the noise will scare these animal away , not that will matter to you when money is involved and just as long as your home isn't near the noise deny it if you will. Badgery creek airport is going to effect the mountains big time, don't think for one minute that we haven't heard the planes going over as flight paths have changed, do we have to put up with this helicopter commercial enterprise as well it will effect suburb after suburb in the mountains, do not talk about jobs as this is not creating jobs for mountain people. I hope money hasn't changed hands already for the lease on this land and I hope you do not behave in a corrupt manner. The crown land needs to be transferred to the national park and protected from helicopters and flooding think about this look around you where else close to Sydney is there wilderness for animals, for the air that we breath we know you want this pristine area that is Heritage listed off the list so you can develop it but I think that you seriously need to think of you and your children's future the buck stops with you. We have always welcomed the airstrip for emergency use but what you are intending to grant probably in the end will mean you will be out of a job yourself if you grant these joy rides.

Kind Regards

[REDACTED]



Kind Regards

2 August 2019

Contact: [REDACTED]
Telephone: [REDACTED]
Our ref: D2019/76492

NSW Department of Planning, Industry and Environment
PO Box 2155
Dangar NSW 2309
Airfield.submissions@crowland.nsw.gov.au

To whom it may concern,

Proposed lease of Katoomba Airfield (your ref: 602686)

I refer to the proposal for the lease and revitalisation of Katoomba airfield, currently open for comment. WaterNSW understands that the lease arrangement is for commercial operations at the airfield located at Medlow Bath, as the existing lease has come to an end.

WaterNSW makes the following comments regarding the proposal:

- The site is not located within the Sydney Drinking Water Catchment but is located in close proximity to the Blackheath and Katoomba Special Areas, declared under the *Water NSW Act 2014* (Figure 1, attached).
- To limit the potential for any impact to the Sydney Drinking Water Catchment or Special Areas, flight paths should not be allowed over the water storages of Cascades Dams, Medlow Dam or Greaves Creek Dam, and should avoid the Blackheath and Katoomba Special Areas where possible.
- Any development or activity carried out on the land should ensure appropriate mitigation measures are in place to avoid impacts on the environment during construction and operation.
- Consideration should be given to increased traffic conditions through Medlow Bath and onto Rutland and Grand Canyon Roads as a result of the lease and revitalisation, all of which are in the Blackheath Special Area. Improvements to roads outside of the development area may be required to reduce any risk of accident or spillage.

WaterNSW requests that the Department continue to consult with us for any development that may have any impacts on our assets, infrastructure or land, using the email address Environmental.Assessments@waternsw.com.au.

If you have any questions regarding this letter, please contact [REDACTED]

Yours sincerely

[REDACTED]
Manager Catchment Protection



United Nations
Educational, Scientific and
Cultural Organization



Greater Blue Mountains Area
inscribed on the World
Heritage List in 2000



ADVISORY COMMITTEE

PO Box 6 Glenbrook NSW 2773

Phone: [REDACTED] 307 099

gbm.worldheritage@environment.nsw.gov.au

Our reference : DOC19/609297

Our contact : Jacqueline Reid ph: [REDACTED] 307 099

Mr Glenn Bunny
Group Director Estate Management
Department of Industry – Crown Lands
PO Box 2155
Dangar NSW 2309

Via email: airfield.submissions@crowland.nsw.gov.au

Katoomba Airfield LX 602686

Dear Mr Bunny,

Thank you for your letter dated 25 March 2019.

The Advisory Committee for the Greater Blue Mountains World Heritage Area (GBMWHA) acknowledges Crown Lands for the small-group meetings and drop-in information sessions held in June in Katoomba as part of the community and stakeholder consultation in the consideration to grant a lease for the Katoomba Airfield at Grand Canyon Rd, Medlow Bath.

Please consider this letter as the Committee's submission to the community consultation process.

The Committee is aware that the Department of Industry (DoI) Crown Lands continue to have statutory responsibility over the area that has a current short-term commercial lease. The proposal to grant a long-term commercial lease over the airfield for the purpose of providing recreational and tourist flights over the area, including helicopter flights, is of concern to the Committee.

As you are aware World Heritage listing is the highest level of international recognition that may be afforded to an area, acknowledging its outstanding universal values and global significance. The Committee is concerned that developments and activities, both within and on lands adjacent to the GBMWHA, should not impact detrimentally on these World Heritage values. Specific threats to the World Heritage values include:

- Disturbance of wildlife as a result of aircraft noise and rapid movements, particularly from helicopters. Anthropogenic noise and rapid movement can alter the temporal movement patterns, foraging activity or other behaviours of wildlife; and interfere with communications in relation to territories, mating and maintenance of pair bonds for fauna species which use vocalizations, including birds, mammals and frogs. The upper Blue Mountains is an important and well known north-south migration route for various birds, particularly honeyeaters, with thousands of individual migrating birds recorded passing specific locations on an hourly basis. The GBMWHA was declared an Important Bird and Biodiversity Area by Birdlife International in 2017, with this migration identified as a triggering criterion.

- Impact of helicopter and other low flying aircraft on visitor and resident experience of the World Heritage area, including at prominent tourist sites, such as lookouts, where many International and Australian visitors gather to appreciate and learn about the area. The educational experience and opportunities for interpretation of the World Heritage values at these locations are likely to be negatively impacted by the activity and noise from regular low flying tourist flights.

The GBMWhA Strategic Plan, the overarching management document for all agencies, prepared to assist in meeting Australia's responsibilities under the World Heritage Convention, notes 'potential threats to the appreciation of the area's aesthetic values include inappropriate lighting as well as overflights by helicopters, low-flying jets and other aircraft.'

The Strategic Plan states:

"Any adverse impacts on the natural beauty and aesthetic values are prevented, eliminated, or at least minimised. Recreational and tourist overflights do not interfere with the natural quiet, biodiversity and GBMWhA aesthetic values."

"Continue to work with the relevant agencies, aviation industry and military to implement and monitor the existing Fly Neighbourly program to ensure that any impact of aircraft on the GBMWhA (especially wilderness areas), park visitors and neighbouring communities is minimised."

"Seek the establishment of a Restricted Area under the Air Services Regulations to provide statutory restrictions on tourist flights over the GBMWhA."

The committee shares the concerns of the NPWS and other stakeholders about the potential impacts of low level or inappropriate scenic flights over Blue Mountains National Park and adjoining areas and refers you to the *NSW National Parks and Wildlife Regulation 2009*:

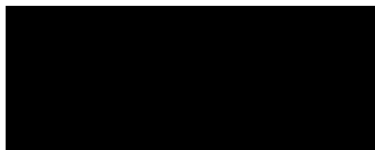
"13 Offensive conduct

(1) A person must not in a park:

(e) drive, ride, operate or use any machinery, plant, vehicle, vessel or aircraft (including any model vehicle, vessel or aircraft) in a manner likely to interfere with or cause a nuisance to any person or animal"

The committee supports boundary rationalisation to incorporate Katoomba Airfield, an area of public land, into the Blue Mountains National Park and to maintain the unsealed air-strip for emergency use only.

Yours sincerely,



Chair

Greater Blue Mountains World Heritage Area Advisory Committee

17 July 2019

Cc: The Hon. Sussan Ley MP, Minister for the Environment
The Hon. Matt Kean MP, Minister for Energy and Environment



The Sydney Bush Walkers Inc

PO Box 431

MILSONS POINT NSW 2061

Proposed New Commercial Lease – Katoomba Airfield (Crown Lands reference: 602686)

The Sydney Bush Walkers (SBW) is one of the oldest and largest bush walking clubs in Australia. SBW has been undertaking walks in the Blue Mountains since the 1920s and currently the Club runs a variety of bushwalking, canyoning and other activities in the Blue Mountains National Park and beyond. On average SBW would conduct several activities in the Blue Mountains area every weekend.

SBW provided a submission to Minister Pavey in April and we have become aware that a second round of community consultation is underway. This second submission reiterates our position to oppose a commercial lease.

SBW considers that a commercial lease is in direct contravention of recommendations from previous studies and consultations. SBW strongly supports the recommendations of Blue Mountains City Council and NSW Government agencies in 1999, 2000 and 2008 that the land should not be privately leased, and that the site be incorporated into the Blue Mountains National Park and used for emergency and bushfire air operations only.

We are particularly concerned that the awarding of a commercial lease could see the resumption of intrusive and noisy helicopter flights over the Blue Mountains National Park, including the Grose Wilderness Area. SBW members remember the intrusion of helicopters into the National Park when joy flights operated from 1992 to 1995. We do not wish to see this intrusion recommence.

Yours sincerely,



President

Sydney Bush Walkers



30 July, 2019.

SUBMISSION ON PROPOSED LEASE OF KATOOMBA AIRFIELD -ref No. 602686.

We have been the owners of the above property for over thirteen years, enjoying the peace and quiet the Blue Mountains – and Megalong – is renowned for.

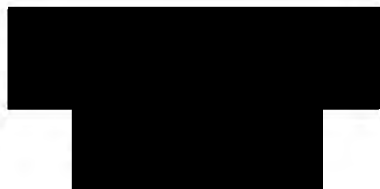
The so-called Community engagement and consultation has been a farce: the DoI personnel were extremely short on knowledge, and failed to adequately answer the most obvious of questions [eg. How many flights a day; what rental formula is the government proposing to justify a 50 year lease. Etc]. A complete lack of transparency resulting in more community suspicions that this is a 'done deal'.

1. Like most others in the Megalong, we are against many aspects of the proposed lease.
2. Why a 50 year lease? The period suggests building up a considerable business which would return a significant profit. "Commercial in confidence" is not a reasonable approach to the use of this public asset when such a long lease is being proposed. Therefore full disclosure of the initial rental, details of reviews and review methods are required to better understand who actually is going to benefit from such a lease. A ten year lease subject to public tender thereafter would be a better start. Definitely no 50 years lease – yes to 10 with no automatic renewal.
3. Your website document has the words: *Although lease negotiations have not commenced, the department will not permit short-cycle / short-duration joy flights into or out of Katoomba airfield or circuit training, and any tenant will need to follow and apply strict environmental controls to prevent excessive noise and other environmental impacts created by the airfield's operation.*
 - 3.1 A further aspect to be considered is the danger to horse-riders – of which there are many in the valley - resulting from constant low-flying helicopters. Further, we have seen our cattle scatter madly when a rare low-flying helicopter passes overhead. Lastly, we fear that low flying, noisy helicopters will detrimentally the several pairs of wedge-tail eagles that frequent our valley. How does the proposed environmental impact statement cover these issues?
 - 3.2 Lastly, how do you propose to *enforce* any "environmental controls"? Surely at least some aspects of this should have been covered at the consultation meetings, especially regarding noise? So-called 'motherhood statements' are not good enough: details please. Or, is the commercial lease really a given? Google maps already shows Flyblue at the airfield...
 - 3.3 Noise pollution over the National Park, Heritage areas, towns and rural valleys (like ours) degrades the beauty of the area, destroys the peaceful ambience for bushwalkers, residents and visitors alike. Unfortunately these values do not get a dollar value when studies are

and visitors alike. Unfortunately these values do not get a dollar value when studies are undertaken and therefore don't receive the attention they deserve. How does the evaluation process incorporate such aspects into the determination?

- 3.4 Another issue of concern is the diminution of value to our property as a result of helicopter noise. Will this be considered in the investigation?
- 3.5 Helicopter noise pollution to many famous scenic areas around the world is well documented – the US Grand Canyon as well as our 12 Apostles, for example.
- 3.6 We submit NO TOURIST HELICOPTER FLIGHTS BE APPROVED, only fixed wing aircraft. Today there are a number of very good hi-wing monoplane aircraft that afford wonderful views and these could easily be used for tourism, and would not interrupt the lives of those below them. More tourists could be accommodated at less cost, benefitting the wider community.
4. The commercialisation of the Katoomba airfield is not opposed outright. We understand it is well placed for emergencies – even though it has rarely been used for such, and its continued maintenance and use for fixed wing aircraft and non-commercial (scenic) helicopter flights should be encouraged.
 - 4.1 There are no studies available to show the economic benefits accruing to the area as a result of scenic helicopter flights. Certainly, Flyblue is poised to make big money, but what of the rent that, we, the public owners will be receiving? Again, the full rent-calculation details must be disclosed in the interests of transparency: 'commercial in confidence' is all too often used by government to make deals that afterwards prove less beneficial to the public (and government) and highly profitable to the lessor and being legally binding, very hard to change.
 - 4.2 Before any decision is made the full business case for the proposal must be made available for our Blue Mountains community to consider.
 - 4.3 We support the airfield reverting to National Parks control, and/or becoming part of the Heritage area. Any development of the airfield would then require more details than has emerged from the current 'consultations'.
5. We have seen a number of more detailed submissions that expand on the concerns we have raised. Simply put: we object to a 50 year lease and any lease should be restricted to fixed wing and only ono-scenic/tourist helicopter flights. Use for emergencies to continue.

As one of valley members has experienced bullying from Flyblue, we prefer our submission to remain anonymous.



Department of Industry, Crown Lands
PO Box 2185 Dangar NSW
Email: airfield.submissions@crowland.nsw.gov.au

17 July 2019.

Dear Sir/Madam,

RE: Reference Number LX602686

The prospect of continuous Commercial Aviation based at Katoomba Airfield, Medlow Bath, is of great concern to our 2000+ members. The Blue Mountains National Park (World Heritage listed) is a precious historical country and tourist-magnet while it remains in the quiet, undisturbed, natural bio-system condition it now presents. Any further major developments will destroy and detract from the National Park which is already under threat from a major airport at Badgerys Creek and possible raising of the Warragamba Dam Wall.

The bushland is unique. Once destroyed, it will never be reclaimed.

- We understand that the small airport at Medlow Bath has been a part of **emergency services** for many years. It would be practical to retain it as such.
- The Airfield should be registered as a part of the surrounding **National Park** to protect it in perpetuity.
- **No Commercial Lease** with the attendant noise, fumes, dust and risks should be considered. We ask that the Department consider very carefully the long-term benefits of saving the natural ecosystem rather than short-term.

Surely Badgerys Creek Airport will provide ample facilities for Commercial aviation in Western Sydney and environs?

BirdLife Southern NSW and its members **object**, without further reserve, to the commercialisation of the Katoomba Airport at Medlow Bath.

Sincerely,

██████████, Conservation Chair
BirdLife Southern NSW
Newington Armory, Building 133
1 Jamieson St Sydney Olympic Park NSW 2127
Personal email: ██████████

Ref number 602686

Proposed lease of Katoomba airfield

Submission under the community engagement strategy

To the Director/Manager, NSW Crown Lands

from [REDACTED]

Contact details [please **do not** publish these contact details online]:

[REDACTED]

[REDACTED]

[REDACTED]

email [REDACTED]

Dear Sir,

Ref number 602686 Proposed lease of Katoomba airfield

Preliminary comments

I wish to comment on the above proposed lease. I have previously written to your department about the proposed airfield but have been told that such submissions are inadmissible because they pre-date the DoI community engagement strategy. This I find a huge nuisance and waste of my valuable time, but at least it has given me additional pause to realise just how **ill-founded** this proposal is – a commercial heliport, airfield and transport hub operating from inside the boundaries of a national park which is part of the Greater Blue Mountains World Heritage Area? Ridiculous, and it should never have reached this stage.

Before he died in a plane crash in 2016, the previous lessee of the site operated a low-use airfield, mainly of small fixed-wing aircraft. Here we should note the **significantly increased risk of further fatalities and crashes** due to more air traffic and a mix of general aviation, helicopters and hang gliders. It is a recipe for disaster, with any further accidents likely to cause catastrophic bushfires or, if in one of the nearby Blue Mountains village, severe loss of life and property.

Since 2016, the airfield had been derelict until the Department of Industry, for reasons which no one has been able to adequately explain, decided to run a competitive process for a new lessee. During this process it overlooked the natural successors to the former lessee, namely a local recreational aero club, and instead plumped for a commercial operation that will greatly increase impacts from air traffic movements (both helicopters and fixed-wing) and associated ground traffic along the unsealed roads leading to the airfield.

We should remember that the national park was gazetted after the airfield was originally leased in the 1960s at a time when the population was less than half its current level. Any impacts from the airfield then would have been lesser and fewer. There have been **numerous recommendations over**

the last 20 years to make the land part of the national park, but these have been ignored in seeking a new lessee for the land.

The community was not consulted before the temporary licence was granted, which could have saved everyone a lot of time and energy. Many other shortcomings of the consultation process have been spelt out by the Blue Mountains community at the Dol public meetings held in Katoomba, including:

- inadequate preparation for the community response
- poor venue choice
- lack of a PA system (even after the first meeting when it became clear that people wanted town-hall style meetings); and
- a meeting format which to many seemed to 'divide and rule', to stifle the free flow of information and be weighted in favour of the proponent.

My experience and qualifications

First, I have 16 years' experience working in the field of environmental science in three States. I hold an honours degree in biological science from Adelaide University and am a trained ecologist with considerable consulting experience in environmental assessments, community consultation and management reporting.

Second, I have lived in Katoomba since 2016, long enough to know that there is already considerable air traffic here (and, I believe, the whole of the Blue Mountains). This activity, coupled with the road noise from the Great Western Highway, especially trucks, means that parts of Katoomba are already quite noisy, perhaps more than I realised before moving here, but this noise is at a tolerable level because it is intermittent or only occurs at certain times of the day.

So I am not a wilting flower when it comes to noise. A certain amount is expected in urban centres like Katoomba. However, any government decision or action should seek to **minimise** the undesirable impact of noise, for environmental and public health reasons. The impacts from air and road noise are cumulatively negative.

This now brings me to my specific objections to the proposal. I have arranged my detailed comments under the following themes but **it is important also to consider the summed negative impacts** of all themes taken together. These overwhelmingly indicate that the proposed lease should not be granted:

- Noise and other impacts on the visitor experience
- Noise and other impacts on residents
- Noise and other impacts on wildlife and ecology
- Social justice
- Emergency uses.

Noise and other impacts on the visitor experience

More than 5.2 million people visit the Blue Mountains World Heritage Area each year. Their main reasons for coming are to enjoy a wilderness experience, either by bushwalking or looking out onto one of the most beautiful wild landscapes in Australia.

The proposed flight paths for the commercial helicopter tours being proposed from Katoomba Airfield include many of the most popular bushwalks and lookouts that the Upper Mountains has to offer. Therefore many, **many visitors will be negatively affected** by the increase in aviation activities from Katoomba Airfield.

It is worth considering here what is a wilderness experience. It involves much more than an appreciation of the visual landscape. There is also the **soundscape**, comprising the sound of the breeze in the trees, birdsong and, importantly, silence. These values would be directly compromised by any increase in aircraft activity and will detract from many visitors' experiences. The **natural fragrance** of the bush would also be affected by fuel and emissions from traffic on land and by air. Helicopter activity also destroys the illusion of **solitude** or distance from development, which is another key part of the wilderness experience.

Helicopter noise is particularly intrusive. When flying low (coming in to land or during take-off) **helicopter noise is acutely distressing** for many people (and may even be traumatic for bushfire survivors and ex-service people suffering from PTSD). When cruising (at say 500 or 1000 feet) helicopters produce an ugly noise which disrupts the wilderness experience over a very wide area. The proponents' "fly neighbourly" policy is fundamentally flawed as **no** increase in aircraft activity can be considered 'neighbourly', and flying helicopters at higher altitudes simply distributes the noise over a much larger area, affecting greater numbers of visitors and residents.

Visitors who come to the Blue Mountains for a wilderness experience only to have it disrupted by helicopter noise would be unlikely to return or to recommend the experience to others. In turn, **this will negatively affect the local economy** (accommodation business, restaurants, cafes, art galleries and others) in a region where tourism is the second-largest employer. Blue Mountains tourism must be managed sustainably by protecting our brand values relating to the natural environment. Helicopter tourism has no place in the mix.

There are numerous examples where helicopter tourism has negatively affected visitor experiences, including at the Twelve Apostles in Victoria, the former joy flights (in the 1990s) around Echo Point in Katoomba; Fjordland in south-western New Zealand, and many others. We don't need to repeat these mistakes. **Our competitive advantage as a tourist destination is increased** if we say no to helicopters.

It is time that the federal and state governments consider tightening controls on all types of air traffic over national parks, especially in the Blue Mountains, by designating no-fly zones around popular tourist lookouts and bushwalking areas. For example, the USA National Parks & Wildlife Service has long implemented policies that **minimise all air traffic** over natural areas, even those required for management purposes by NPWS rangers and emergency crews. Such a move here would help fill a gaping policy gap between the objectives of nature conservation and eco-tourism sustainability.

The potential negative impacts on tourism from air traffic movements associated with the airfield should be sufficient reason to quash this ill-thought-out proposal. The proposed lease should not be granted.

Noise and other impacts on residents

Many people in Medlow Bath, North Katoomba and Blackheath live within earshot of the airfield. Many more would be subject to noise from increased aircraft movements coming to and from city and suburban airfields to use Katoomba Airfield, affecting residents from at least Linden north to Mount Victoria.

Aircraft noise has a chronic impact on the health of people living near airfields, increasing stress and other diseases. As noted above, it can be traumatic for survivors of bushfires and for ex-service people. It also has the effect of lowering property values, especially in the vicinity of the airfield.

The increased transport of aviation fuels, and storage at the airfield site, also seriously **increases the risk of catastrophic bushfires** and the associated risks to life, property, the environment and tourism-related businesses in the Blue Mountains.

The increased noise and other impacts from air traffic movements on local residents are unacceptable and the proposed lease should not be granted.

Noise and other impacts on wildlife and ecology

The Blue Mountains is home to a diversity of birdlife in particular with around 250 bird species (Smith & Smith 2017, <https://bmnature.info/docs/flora-fauna/gbmwha-birds-checklist-version-3.pdf>). Thirty-one of these are threatened species.

However, potentially **all bird species would be negatively affected** by any increase in air traffic and noise. Birds use their songs and calls in order to find mates, to stay in touch with their young, to avoid predators and for some species to locate their flocks. All of these important ecological functions of the soundscape are readily disrupted by noise, especially from helicopters, which will tend to reduce the populations and diversity of bird species in the park.

Some species such as the Yellow-faced honeyeater are migratory. "Thousands of birds may pass by in the space of an hour as they migrate north along the Great Divide each autumn and return south each spring. These migratory flocks often contain smaller numbers of other migratory species, especially White-naped Honeyeaters" (Birdlife Australia <http://www.birdlife.org.au/bird-profile/yellow-faced-honeyeater>). These migrations are an astounding natural phenomenon with migrating birds flying directly through the areas around the airfield and nearby valleys. The location of the airfield makes it **high risk for bird strike**, which has the potential to cause accidents as well as impacts on bird populations.

The operation of a commercial airfield within the national park is incompatible with the aims of the park. To protect these values in the national park, the proposed lease should not be granted, and the airfield land should be incorporated into the Blue Mountains National Park.

Social justice

If the airfield proceeds it will benefit only a very few people -- the airfield operator, its immediate customers, some tour operators – and perhaps the local aero club which seems to have cut a deal with the operator to support the proposal in return for favours later on. Chain-of-supply deals between hotels, restaurants, tour operators and similar will ensure that very few of the tourism dollars spent by visitors using the airfield will benefit the local economy.

National parks are **not** a natural resource waiting to be exploited -- they are set aside for specific purposes under the law, including the conservation of important natural areas and their associated habitats and biodiversity.

The wealthy ('time-poor') tourists who take heli-tours may not realise (or care) that they are detracting from the experiences of visitors and residents alike. This is the '**tragedy of the commons**' popularised by Garrett Hardin in the 1960s, where the 'commons', a resource which belongs to us all, is exploited by a few for their benefit while the costs are borne by everyone.

Avoiding the tragedy of the commons calls for policies that protect sustainable management of key natural resources like the Blue Mountains National Park. **The environmental costs of operating a commercial airfield outweigh any private benefit to be gained by the leaseholder.** The airfield land should be incorporated into the national park and managed for nature conservation and the benefit of all, not squandered on an ill-considered commercial operation that compromises the very values which support the wider regional economy and lifestyle of residents.

Emergency uses

The proponent has made much of the need to maintain the airfield as a resource for use in bushfires and other emergencies. If this function is seen to be essential emergency infrastructure for bushfire control, it behoves the NSW government to take responsibility and ensure that the airfield is adequately maintained. We don't lease out fire trails to four-wheel drive clubs in order to pay for their maintenance and upkeep, so why do the same for an airfield?

In any case, some people have raised questions about whether such facilities are actually needed for emergency use. Large firebombing planes need a much larger airstrip (and they operate from Richmond during an emergency anyway). The airfield was successfully used as a staging area for helicopters during the 2013 bushfires, with only basic facilities. We don't need a commercial airfield to be operated there for this purpose and the land should be incorporated into the national park.

[end]



31st July, 2019

Attn.:
Department of Industry of New South Wales – Crown Lands
Dangar, NSW 2309
Airfield.submissions@crowmland.nsw.gov.au

Feedback on the proposed lease and revitalisation of Katoomba Airfield
Ref-No: #602686

With regards to the FlyBlue proposal to revitalise the a.m. site as a hub for recreational aviation and promote sustainable management of the site, I raise the following concerns in line with the guidelines provided at a drop in meeting at Hotel Blue in Katoomba:

1. The expiration of the previous lease has not been made widely known in the Blue Mountains community and the expression of interest process in 2017 did not include communication and collaboration with members of the affected community. I believe this to be a significant administrative shortcoming. Especially so, since a previous proposal, albeit many years ago, had clearly indicated that the community did not wish for such a proposal to go ahead.
2. The Blue Mountains area, especially the upper Blue Mountains, is widely known, acknowledged and successfully marketed as a pristine, relaxing and quiet environment for residents, tourists and visitors alike. Thousands of visitors come here every year to experience the quiet, clean and heritage listed environment. Flying tourists into this area and offering sight-seeing flights will severely impact this experience.
3. Highly popular hiking trails that are highlighted by the solitude and sought out for exactly that experience lie in the proposed flight paths. Drones flown by tourists already negatively impact this experience and every airplane or helicopter that already flies over the valleys for whatever reason is not only noticeable but noticed. There is no opportunity or option to escape this impact.
4. The Blue Mountains are home to a large range of native wildlife. I have grave concerns not only for the welfare of some rare species, but also for all wildlife that will be impacted by the flight routes. The noise and environmental impact of aircraft will affect their behaviour and it is likely that the operation of an airfield and flights will force them seek other habitats, removing them from our lives and the enjoyment and enrichment they bring us human beings. It is already rare to see a flock of black cockatoos, should this opportunity be completely lost?
5. The Blue Mountains are a World Heritage listed area. The exact meaning of being a World Heritage listed site is as follows:

“A World Heritage Site is a landmark or area which is selected by the United Nations Educational, Scientific and Cultural Organization (UNESCO) as having cultural, historical, scientific or other form of significance, and is legally protected by international treaties.”

The UNESCO defines what it means to be inscribed on the World Heritage List:

“Once a country signs the World Heritage Convention, and has sites inscribed on the World Heritage List, the resulting prestige often helps **raise awareness among citizens and governments for heritage preservation**. Greater awareness leads to a general rise in the level of the protection and conservation given to heritage properties. A country may also

receive financial assistance and expert advice from the World Heritage Committee to support activities for the preservation of its sites.”

The proposed activities are in stark contrast to the preservation of heritage and culture, and especially so since the proposal does not give any indication of scope, frequency, numbers, etc.

Is this proposal worth losing the World Heritage listing?

6. Operations of and at the airfield are not clearly outlined and described in the proposal. Will there be maintenance of aircraft and fuel storage? The storage of chemicals and fuels pose a significant danger to a fragile environment. Fires regularly affect the larger Blue Mountains area and any storage of flammable goods further increases the danger of damage. Should a fire occur at or near the airfield, the storage of dangerous goods might even prohibit the usage of the airfield in an emergency.
7. The proposal mentions
 - a) New and upgraded facilities for visitors to the airfield
 - What type of facilities are envisaged? If the aim, as stated under c) is to support tourism and benefit the local community, then these facilities must be limited to necessities to ensure the clients access the local shops and facilities. The underlying assumption for me is that visitors will come to the area not to visit an airfield, but the area. If the facilities include food and drink, the benefit for the local community will be lost.
 - b) A biodiversity agreement that will result in substantial planting of new trees
 - Why and where would new trees be planted? Are new trees being planted because existing and old trees need to be removed to allow for the proposal to go ahead. That would be counter-productive. It takes years for new trees to reach the potential of existing trees. The airfield as it currently operates can do so without any changes to the existing flora and fauna. This section of the proposal gives the impression of a “get-out-of-jail-card”.
 - b) An investment that will support tourism and benefit the local economy
 - For the airfield to support tourism, a large number of flights or larger aircraft will have to utilised. On the assumption that a helicopter can accommodate 4 clients, for this to increase and support tourism, 25 helicopter flights would be required to even raise tourist numbers by a 100. A fluctuation of 100 tourists would be well and truly within the existing rise and fall of tourist numbers. And 25 flights per day is unacceptable for the community. Any income generated by either in- or outbound flights or sight-seeing flights will be the income of FlyBlu, an organisation that is not resident in the Blue Mountains. That is not a benefit to the local economy.
 - If clients book a flight from Sydney to the Blue Mountains, what incentive is there by and through FlyBlu for them to stay overnight or even a couple of days to really benefit the local community? By flying to the area, their range of activities is limited by the means of existing transport to get from one attraction to another. Clients are far more flexible to do what they want to do when they want to do and likely to stay longer if they bring their own means of transport. More buses in the area, especially in Leura, Katoomba and Blackheath will only exacerbate the already existing problem of parking of the buses during site visit. And since the bus operators are not necessarily residents in the Blue Mountains, there is no economic benefit to the local community only more traffic jams.
 - Given the likely expensive flight fare from Sydney to the Blue Mountains - \$2000 per flight has been rumoured – clients that would overnight would most likely overnight in the upscale resorts such as Lilienfels and the Hydro Majestic. These resorts have existing staff and will not need to hire additional staff to cater for the most likely limited number of additional tourists generated by the flights. There does not seem to be any additional economic benefit to the community as any additional income generated would not be reinvested into the local community by the operators.
8. The beneficiary of the lease income is the Department and not the local community or the local economy. It is highly questionable whether the Department should in this case be the one to negotiate and let the lease. The Department is in this scenario not neutral and there is strong cause for conflict of interest.

Recommendation:

Incorporate and integrate the airfield in perpetuity into the National Park to be managed by the National Park as an integral part of the Park as decided on in previous agreements. This would solution would not only honour discussions and agreements made with National Parks decades ago, but also reflect the wishes of the local community. The walk-in sessions at the Hotel Blue clearly indicated that the community is not in favour of the proposal.

Retain and maintain the airfield for emergency services as required and as previously used.


With regards to Privacy:

I consent to this letter being publicised in full only as deemed necessary to support the rejection of the proposal including my name and township of residence only, but not my address or email. Any excerpt or partial publication can only be made after consultation with and authorisation through the author and may not be taken out of context.

I confirm that I have written this submission independently and on my own, based on publicly available information and walk in sessions I personally attended.

A large black rectangular redaction box covering the signature area of the document.

31/7/2019



Thursday, 1 August 2019

Department of Planning, Industry and Environment
email: Airfield.submissions@crowland.nsw.gov.au

Re: Proposed lease of Katoomba Airfield
Ref: 602686

I am writing to express concern over the proposed lease of Katoomba Airfield (KA) to FlyBlue for commercial operation.

Of particular concern:

- 1 The impact due to significant increase in noise pollution to the Greater Blue Mountains World Heritage Area (GBMWH A)
- 2 The impact due to significant increase in noise pollution to the amenity of local residents within proximity of KA
- 3 Apparent inadequacy of details of the proposal

Although KA is not located specifically within GBMWH A, commercial aircraft would be operating at low altitudes over the GBMWH A particularly on landing approach and takeoff. Unique wilderness areas of GBMWH A including iconic walking trails to Lockleys Pylon and Blue Gum Forest from Mount Hay Rd would be directly under proposed north and east bound flight paths according to flight procedures on Flyblue's website. Northbound flights would also skirt close to the edge of the Gross Valley which acts as an echo chamber and undoubtedly reverberate sound throughout impacting visitor experience throughout this valley system.

The GBMWH A provides locals and visitors to the area access to a superb natural experience of iconic and unique wilderness. This in turn is what drives to a large degree tourism which is the economic backbone of the Blue Mountains. Allowing a concentration of commercial aircraft to operate at low altitudes in these areas will degrade the experience of the GBMWH A and is completely inconsistent with the objectives of World Heritage listing recognition.

The proposed commercial flights would offer an experience to a very small proportion of locals and visitors to the area at the significant expense to the vast majority.

According to the Flight Procedures published on Flyblues website there are No Fly areas covering the main residential areas including a small buffer. The topography of the Blue Mountains area means sound travels very long distances and reverberates in some valley

systems. Helicopters are used to great effect in the Mountains by emergency services in search and rescue, bushfire and patient transfer scenarios however these activities are audible across vast residential areas even when the aircraft are operating at altitude over non residential areas. A proposed commercial operation of KA would see a continual background level of noise pollution that would impact large areas of residents particularly on the northern side of the local communities. Again, this would see a benefit to a very small group of operators and patrons at the expense of basic amenity to large parts of the local population.

Whilst Flyblue has provided details of flight paths, flight procedures, noise abatement and curfews there is no information regarding the frequency of flights or the anticipated numbers of flights on any given day. For KA to be commercially viable, there would be minimum and optimum flight numbers that are critical to accessing the potential impact of a commercialised KA and should be released as part of the public consultation.

There also appears to be no reference to any type of thorough Environmental Impact Statement or independent assessment of the like. Given the proximity of KA to the GBMWHA and residential populations it would appear to be a mandatory requirement as part of any assessment in the granting of land usage such as this.

In summary, the commercial operation of KA as proposed would benefit a very small contingent at the expense of the vast majority of local residents, visitors to the area and the integrity of the GBMWHA environment as a whole and as such should not be approved. The site should remain for the use of emergency aviation use only.

Yours Sincerely

██████████



THE COLONG FOUNDATION FOR WILDERNESS LTD.

Wednesday 3rd July, 2019

Mr Glen Bunny
Department of Industry, Crown Lands
PO Box 2155
DANGAR NSW 2309

Airfield.submissions@crowland.nsw.gov.au

Dear Mr Bunny,

Application 602686 – objection to proposed lease of Katoomba Airfield

Since our inception, the Colong Foundation for Wilderness has sought to protect the Greater Blue Mountains National Park system from inappropriate exploitation. If this airfield lease is approved, future generations will not have the opportunity to experience the peace and wonder of the Blue Mountains wilderness without having their enjoyment spoiled by the intrusive noise from helicopter and fixed wing aircraft using this airfield.

The Colong Foundation objects to the proposed lease for Katoomba Airfield, which is situated on a parcel of public land wholly surrounded by national park, which instead should be added to the park estate, with the Airfield being reserved for emergency use only.

An EIS is required for World Heritage Area overflights

For Uluru and Kakadu National Parks, a minimum height for aircraft operations of at least 4,000 feet has been established under their plans of management. In the Blue Mountains, regular commercial air traffic is understood to already prevent tourist flights operating at heights of 4,000 feet. Western Sydney Airport will increase conflict between commercial operations and any proposed air traffic movements to and from Katoomba Airfield. The contingent worsened noise impacts, arising from the necessary separation of aircraft movements, are not considered by the proposed lease application and supporting documents.

The proposed lease of Katoomba Airfield requires an environmental impact statement (EIS) because its associated aircraft movements **will impact** the integrity of the Greater Blue Mountains World Heritage Area. Further, aircraft overflight pathways associated with the proposed lease must be referred under the *Environment Protection and Biodiversity Conservation Act, 1999* (EPBC Act) as these activities are likely to be a controlled action.

In December 2016, the Australian Government approved, subject to an Airport Plan, the construction of the Western Sydney Airport which is being developed about eight kilometres east of the Greater Blue Mountains Area. The Airport airspace and flight path design which must take into account and minimise, to the extent practicable, the impact of Aircraft Overflight Noise on the Greater Blue Mountains Area, will be the subject of a separate referral under the EPBC Act. This is expected to be released for public comment in 2021.

The determination of this lease application should consider that the Airport Plan includes approval conditions in relation to airspace design and aircraft overflight pathways as follows:

Condition 16 Airspace Design Process:

(5) The airspace and flight path design must take account of the following principles, in addition to the principles in section 2.2.5 of the Airport Plan: ...

(d) airspace and flight path design must minimise to the extent practicable the impact of Aircraft Overflight Noise on the following:

...

(iii) the Greater Blue Mountains World Heritage Area (GBMWhA) – particularly areas of scenic or tourism value; and

(iv) Wilderness Areas.

While the above environmental assessment for GBMWhA overflight noise is required by the Western Sydney Airport Plan, the airport's Environmental Impact Statement (EIS) concluded (correctly or not) that there was unlikely to be a significant impact on the listed values of the Greater Blue Mountains Area, but that there may be some noise impacts on amenity within the property.

Despite this, the impacts of aircraft flights over the Greater Blue Mountains World Heritage Area are required to be considered by the Airport Plan.

This prescription sets a regulatory precedent and an assessment threshold that the proposed Katoomba Airfield meets, because it is located *within* the World Heritage Area, compared to the Airport which is eight kilometres distant from it. Aircraft movements from the proposed airfield will have a greater direct impact on the World Heritage property. Whatever the alleged claims about the so-called Fly Neighbourly Agreement and other regulations governing aircraft operations, aircraft must land on and take off from the Airfield, and if this does not occur over residential areas, then it must occur over the GBMWhA where such activities are subject to EIS and review.

It is alleged that intended flights from Katoomba Airfield will be more than 30 minutes duration and are likely to be over areas of scenic or tourism value, and include wilderness areas that Condition 16 for the Western Sydney Airport Plan concerns itself with. Flights in these locations are required to be taken into account for aircraft overflight pathways associated with Western Sydney Airport. It is clear then that an EIS must be required for flights originating from Katoomba Airfield over the World Heritage Area.

The presence of aircraft from Katoomba Airfield above wilderness areas of the World Heritage Area will add to negative impacts from existing tourist flights commencing elsewhere and future Western Sydney Airport flights.

Previous use of the airfield for commercial joy flights was controversial and strongly opposed by the community, with residents in Medlow Bath, North Katoomba and areas adjacent to scenic lookouts in Leura, Katoomba and Wentworth Falls particularly impacted. Walkers and park users also complained of low-flying aircraft, including in remote areas.

These impacts have become more significant as they now occur in a World Heritage Area and in consequence require an EIS to be considered and adequately reviewed. As an EIS has not been prepared, the lease application should be refused.

Unenforceable Fly Neighbourly Agreement

The so-called Blue Mountains Fly Neighbourly Agreement (BMFNA) is a voluntary agreement and weak and inadequate for regulation for aircraft flights over World Heritage listed national parks. There is no compliance monitoring or enforcement of this existing Agreement, and objectors have limited avenues for complaints. We believe the BMFNA will be totally ineffective in managing the impacts of commercial joy flights from Katoomba Airfield within Blue Mountains national parks, particularly helicopter flights.

The current community consultation for the proposed long-term commercial lease over Katoomba Airfield is unable to consider how commercial joy flights or other low-flying, intrusive flights over the World Heritage Area will impact on those who visit its national parks or live in affected residential areas. The flight paths indicated in the Airfield documentation are notional, not mandatory routes.

The proponent argues that many helicopter services are offering flights, and while this is the case, these are infrequent and do not operate out of Katoomba Airfield. The airfield is planned to operate in concert with Western Sydney Airport, and the amount of aircraft movements to and from Katoomba Airfield may become significant, but the Fly Neighbourly Agreement will continue to be unenforceable. In this context, the environmental restoration proposals in the information package are window dressing for the impacts that will arise from increased aircraft movements over the World Heritage Area.

In 1994, Mr Gary Dann, a proprietor of Blue Mountains Charter Service, stated that he wanted to run 400 joy flights a day. According to Mr Dann, he would employ only twelve people in such an expanded operation. The undertakings by the proponent promising to limit joy flights, in the documents accompanying the lease application, are worthless, as aircraft activities are regulated by the Civil Aviation Authority, not by the issue of Crown leases.

FlyBlue publicity makes reference to "light footprint tourism" which they say will have minimum negative impact on the Greater Blue Mountains World Heritage Area, but the proponent has not explained how the airfield lease can deliver this outcome. FlyBlue also claims it has a new enforceable Fly Neighbourly policy with more appropriate flight paths, away from residential areas (i.e. in the GBMWhA), operating hours and general use of the airfield with noise abatement procedures¹. This statement is misleading at best as the Fly Neighbourly Agreement is not enforceable. The statement also underplays flight impacts on the World Heritage. In addition, the

¹ Deep Hill Media, 5 June 2019 <https://www.bluemts.com.au/news/katoomba-airfield-public-submissions-invited/?current-news>

Fly Neighbourly policy can't really ban flights over populated areas if aircraft must land at the airfield by passing over them.

The issue of a Crown lease can, however, be contingent on the production of a satisfactory EIS report and review that considers the impacts of flight paths over the World Heritage Area.

Addition to the National Park

The Crown Lands office undertook assessments and community consultations in 2000 and 2008 on the long-term future of the site. Both processes concluded that the airfield should not be privately leased but be incorporated into the Blue Mountains National Park and used for emergency and bushfire air operations only. The Blue Mountains City Council supported the addition of the airfield into the national park.

The 36 hectare parcel of Crown land sits in a key location above the sensitive Grand Canyon, on Greaves Creek, and is surrounded by important habitat for a number of threatened species including *Dasyurus maculatus*, the spotted tailed quoll. This parcel of public land should be added to the national park to prevent adverse impacts on the GBMWhA.

Aircraft Noise Pollution and National Parks and Wilderness Areas

The Colong Foundation understands that for residential areas, noise pollution standards for human activities are usually set at or near an acceptable minimum of background noise, plus 5dB(A).

Noise pollution standards regulating helicopter use should impose a noise reduction penalty of minus 5dB(A) to mitigate the 'impulsive characteristics' of noise generated by these machines. This penalty is usually applied by pollution control agencies to mitigate loud impulsive noise. The whooping sound generated by rotating helicopter blades is impulsive in character and should carry this noise reduction penalty.

The noise standard for helicopters in residential areas should be set at background level. That is, background plus 5dB(A) for non-impulsive noise, then minus 5dB(A) for the impulsive characteristics of helicopter noise.

The disturbance by helicopter noise in residential areas, however, is less than the disturbance experienced by visitors to natural areas. Visitors to wilderness and national parks often loathe aircraft noise as it spoils their experience of protected areas. In National Parks, helicopter noise can be experienced as harassment by an exclusive few of the earth bound majority.

Background noise in national parks and wilderness areas is substantially less than for residential areas, and has pleasurable tonal characteristics. It is called natural quiet. Noise pollution standards for national parks and wilderness areas should be set well below background noise levels so that sound pollution from machinery does not compete with natural sounds.

The Colong Foundation for Wilderness submits that an acceptable worst case noise level (the L10 level) for non-intrusive activities in national parks and wilderness areas should be no greater than background noise minus 5dB(A).

The Foundation further submits that an acceptable worst case noise level (the L10 level) for impulsive noise generating activities such as helicopter joy flights in wilderness and national parks should be no greater than background levels minus 10dB(A). The acceptable worst case noise level (the L10 level) for non-impulsive noise generating activities such as fixed wing joy flights in wilderness and national parks should be no greater than background levels minus 5dB(A).

Daytime background noise levels (LA90, 15min) of the Blue Mountains National Park measured in remote areas, but near to walking tracks is 23 to 27dBA. At the same areas during gusty wind events, background noise levels increased to 45dBA. Scenic helicopter flights can only achieve the proposed noise standard of background minus 10dB(A) and fixed flights a background level of minus 5dB(A) by keeping well away from national park and wilderness boundaries. This argument using proposed noise standards is of course the opposite of the flight operations plan proposed by FlyBlue, which is the point the Colong Foundation is illustrating.

Helicopter use in emergency, and public work commissioned for or undertaken by the National Parks and Wildlife Service on the other hand, can be justified by the public benefits of protection of life and of public property that compensate for the loss of amenity.

The public receives no benefit from helicopter and fixed wing joy flights and the associated loss of amenity is not compensated by a public benefit.

Flight paths that traverse the cliffs of the Grose Gorge or circuit Mount Solitary are insensitive to the needs of park users. In determining these flight paths for the Fly Neighbourly Agreement, the Civil Aviation Authority in 1994 placed the pleasure of a few tourists in helicopters before that of the thousands who wish to view Blue Mountains wilderness unspoiled by mechanised intrusion.

Mount Solitary is one of the most popular destinations for day walks in the Blue Mountains National Park. The Grose Gorge containing the famous Blue Gum Forest, was the site of the first conservation battle in Australia. The Forest was acquired by members of the Sydney Bush Walkers in 1931 for public benefit. The late Ms Dot Bulter, a former member of the Colong Foundation, was the key fund raiser for this forest campaign. Permitting helicopter joy rides in these areas abuses this heritage.

The Grose and Kanangra wilderness areas are both key places of origin for the wilderness conservation movement of Australia. Joy flights in these areas are an attack on this integral part of Australia's heritage.

Under the *NSW Wilderness Act 1987*, large sections of the Blue Mountains National Parks must be managed by the NSW National Parks and Wildlife Service to provide for the experience of solitude and natural quiet. Maintenance of natural quiet in Blue Mountains National Parks and wilderness areas is incompatible with frequent overflights that will arise from the proposed issue of a lease over Katoomba Airfield. Peace and solitude will be lost forever over those parts of the World Heritage Area subject to frequent overflights, particularly in the Grose Wilderness Area and the Grand Canyon that will also be subject to take-off and landing noise.

Joy flights over the Greater Blue Mountains World Heritage Area may not result in increased Blue Mountains tourist dollars as stated by FlyBlue. Potential visitors to the exclusive Fairmont Resort and Lillianfels, or even visitors to the Kedumba emporium and associated picnic grounds, will reconsider such visits, or may not return to the Blue Mountains if, instead of a peaceful mountains retreat, they are subject to the intimidating echoes and whooping of helicopters slicing through the morning air and the noisy despoilation of pristine scenery.

Blue Mountains tourism is known to be sensitive to adverse environmental impacts, as was demonstrated by the significant downturn in visitor numbers following the 2013 bushfires. The post-fire downturn halved tourism income, despite the fact that most of the popular tourist areas were free of bushfire impacts.

Aircraft noise is also known to be highly offensive to tourists, and joy flight operations will degrade the currency of this World Heritage listing globally. In other words, listing becomes meaningless if participating countries like Australia do not respect the integrity of these special areas.

It is impossible to operate aircraft from Katoomba Airfield and not have acoustic impacts on neighbouring residents. The aircraft have to land at the airfield, and doing so obviously makes the Fly Neighbourly Agreement meaningless.

The Colong Foundation submits that in order to reasonably protect the acoustic amenity of national parks and wilderness areas, the lease application for Katoomba Airfield must be declined.

Joy flights are a 'Disneyland' approach to national parks, and an anathema to the wilderness and national park management principles established by our forebears. This airfield proposal, the proposed raising of the Warragamba Dam wall, discharge of mine water to the Wollangambe River and loss of Thirlmere Lakes, are cumulative impacts on the Greater Blue Mountains World Heritage Area that could see it listed on the World Heritage In danger list.

Australia is not meeting its obligation to protect the integrity of this World Heritage Area. If the lease application for the proposed Katoomba Airfield is not refused, our Blue Mountains will become the subject of global shame.

Thank you for the opportunity to comment.

Yours sincerely,



Director

The Colong Foundation for Wilderness Ltd

Department of Industry, Crown Lands
PO Box 2155
DANGAR NSW 2309
Airfield.submissions@crowland.nsw.gov.au

RE: LX 602686 – submission opposing the lease of Katoomba Airfield

I strongly oppose the issuing of a commercial lease for the Katoomba Airfield.

It is hard to not get emotionally involved in this proposal when the effects on one's community and environment may be profound.

I begin by saying that I believe that there is a serious question of probity and process that needed to be addressed before the current licence was issued – let alone when considering a 50 year lease. These are detailed in several of the submissions I have read including the Blue Mountains Conservation Society's.

My reasons for opposing the granting of a commercial lease are:

1. Noise
2. A Flawed Process
3. World Heritage Area and Wilderness Area status
4. Misleading Statements
5. Impact on the local communities
6. Impact on the local economy.

1. Noise.

The proposed flight paths as shown at the Dept's drop-in community information sessions, showed them turning at Flat Top. Flat Top is a 1000m Trig Station off Mt Hay Rd and on the edge of the Grose Wilderness.

I walked to the top of Flat Top last week and was again met by the tranquillity of nature. The only sound was the bees buzzing around the Heath Banksias (*Banksia ericifolia*) which are now in flower, and the occasional New Holland Honeyeater and Red Wattlebirds.

This is the calm many of us seek away from the madding crowd and the busy lives we lead.

The peace at Flat Top was disturbed by commercial airliners flying at 5,000m above which tended to drown out the gentle natural sounds.

I then tried to imagine what a helicopter flying 500m above Flat Top would be like – it would shatter the tranquillity and make you very agitated. You wouldn't return.

Countless visitors and bushwalkers marvel at the tranquillity. Regular helicopter flights would destroy this.

On a personal level, since my open heart surgery a few years ago, I have become more anxious when confronted with noise and seek the tranquillity of the bush. Just to simply be and recharge my batteries. This respite would be lost.

2. A Flawed Process

Why is it only now that the community is being asked to comment on the vague notion of a commercial airfield lease. A proposed lease with no detail. Surely the first step is to ask the community what they believe **their** Crown land should be used for.

12,200 signatures on a petition (that was discussed in parliament on Thursday 1st August) gives a clear indication what they want.

There are so many questions left unanswered, like –

- How many flights a day is proposed and can the number, flight paths, height, time of day, be restricted?
- What is the size, noise and emission profile of the aircraft that will use the airfield and can this be restricted?
- Can Fly Neighbourly really be enforced?
- How many cars and buses will be using the inadequate road to the airfield?
- How much fuel will be stored at the airfield and what are the safety procedures?

I attended two of the recent community information sessions and was disturbed to note that the questions asked and answered were not recorded. So the Department's assurances meant nothing.

As detailed in the Blue Mountains Conservation Society's submission –

(<https://www.bluemountains.org.au/documents/submissions/2019/bs190722-katoomba-airfield-lease-lx602686.pdf>) **1.2 Objections To Commercial Lease Process** – there's a very disturbing flaw in the whole approach to even entertaining that a commercial lease should be given.

The objections as detailed in the Society's submission and others that raise fundamental probity and process concerns need to be formally addressed before any further action is taken.

The basis for several of the Department's decisions are based on agreements before the Greater Blue Mountains was listed as a World Heritage area in 2000, and the Grose Wilderness declared in 2001.

Furthermore, a quality environmental impact assessment should have already been undertaken on the surrounding national park, water supply and local community well before the point of considering issuing a lease.

One would be thrown to the conclusion that the Department is simply going through a charade before issuing a lease.

3. World Heritage Area and Wilderness Area status

Surely assurances need to be given by the appropriate authorities that the effects of low-level flights by commercial aircraft – quoting number of flights, noise at ground level and emissions – will not affect the World Heritage listing and Grose Wilderness declaration.

4. Misleading statements

Frankly, I can't accept that the primary use of the airfield will be to take people further afield – to Mudgee and Orange etc. Tourists coming to the Blue Mountains aren't here to fly to Mudgee. They want to see, sense and enjoy the Grose and Jamison Valleys and the Greater Blue Mountains World Heritage Area in general. (And not be buzzed by aircraft!)

What is proposed are joy flights pure and simple. These are the money spinners - and the only way that an investor is going to make money on a commercial airfield lease.

Assurances that there won't be joy flights is not sufficient.

It was mentioned by the Dept. at the Community Consultations sessions that the Fly Neighbourly agreement could be made mandatory. My understanding is that this is not possible, and even if it could, it would not be possible to monitor and would only apply to the leasee's aircraft.

I personally believe that the lease, if granted, will be on-sold at the earliest opportunity. And from what was said at the community information session, this can not be prevented.

5. Impact on the local communities

I imagine that no recent measurement of noise and air quality has been made in the lead up to granting the current licence and more recently to the lead up to possibly granting the lease.

Measurement of noise to the nearby communities and over the popular bushwalking tracks taken in varying weather conditions – especially during the prevailing northerly winds.

Measurement of air quality over nearby communities, native vegetation and dams – and again in varying weather conditions.

The absence of these measurements would lead to a lease having no existing yard-stick with which to compare post-lease noise and emissions. This is unacceptable and again reflects on the Department's cavalier approach in this process.

6. Impact on the local economy

I can't accept that this lease would be beneficial to the local economy.

House prices in Medlow Bath, Blackheath, Katoomba, Leura and Wentworth Falls would be affected.

Tourist accommodation in those areas would also suffer as visitors won't want to stay near an airfield that is proposed to operate through all daylight hours.

Tourism in and near the Grose Valley would decline.

I can't envisage any businesses that would increase sufficiently to balance this.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]