

Crown Lands
NSW Department of Industry
airfield.submissions@crowland.nsw.gov.au

**Proposed Lease of Katoomba Airfield
Reference 602686**

Please remove my contact details before my submission is published.

28.7.2019

As part of the NSW Department of Industry community consultation process in relation to the FlyBlue proposal for the Katoomba airfield site, I have had the opportunity to hear many and varied perspectives at two information sessions, a stakeholder meeting. I have also researched the issues in depth and had the opportunity to talk with Crown Lands /DOI staff, local residents, fixed wing pilots from the Blue Mountains Aviators Group, and Floyd Larson.

Local support for the FlyBlue airfield proposal seems twofold, mostly to do with restoring the airport for use by emergency aircraft, or the benefits to tourism. In both instances, supporters can really only agree in principal to the proposal, as in practice there is no publicly available information on the scope and limitations of the business, or a business plan. The benefits in this case would mainly be to FlyBlue Management Trust and to the detriment of many. The negative impact on the amenity of the National Park, World Heritage area and the Blue Mountains as a destination for its natural environment has been strongly demonstrated during the consultation process.

I have come to the conclusion that I am against the commercialisation of the airfield.

I would hope the airfield could be maintained as a Crown Lands or National Parks utility for emergency aircraft and limited use for non commercial aircraft using public funding to upgrade and provide ongoing maintenance of the airfield.

Maintaining the airfield for emergency aircraft and fixed wing pilots:

The current commercial application is putting the cost of maintenance on to a private commercial operator rather than public funds. I believe the losses to the community and environment from a commercial helicopter operation are more important to consider than benefits to FlyBlue and other airfield users. Once a commercial lease for helicopters is in place it cannot be rescinded. The airfield needs to be maintained with public money for use by non profit community groups – emergency services, and clubs already mentioned in the history of the airport. As an example, Tibooburra airfield is a public airfield operated by Crown Lands.

[https://www.crc.id.au/xplane/charts/ERSA-2015.../Tibooburra%20\(YTIB\)%20FAC.pdf](https://www.crc.id.au/xplane/charts/ERSA-2015.../Tibooburra%20(YTIB)%20FAC.pdf)

The Blue Mountains as a tourist destination brings many visitors from Australia and overseas, ongoing income to private business, and revenue to State and Federal Governments through taxes. It would be a fair allocation of public funds to contribute to the maintenance of an emergency airfield to support the area. As mentioned at one of the sessions, the airfield is a valuable resource in a bushfire prone area and needs to be public infrastructure, just as our fire, rescue and other community services are.

Impact on my place of residence – Megalong Valley:

Part of the justification for the proposal is expansion of tourism networks to the Blue Mountains and Central West as a 'Hub and Spoke' model to tourist destinations. On this point, as a resident of Megalong Valley I am not in favour of commercial flights over, or into the Megalong Valley. We are in the flight path to the Central West with a flight height allowance of 500 ft. CASA can also grant permits for lower flying height if applied for. We have at least 3 vineyards, a horse riding establishment, many holiday cottages, a Tea Rooms, a multipurpose holiday farm and popular bushwalking tracks into the Wild Dog Mountains and Coxs River which all value peace and quiet. Some of these businesses could also be potential destinations with plenty of space to land a helicopter. Floyd Larsen mentioned FlyBlue had been approached by a business in the valley. I would hope limits could be placed on any commercial flights to the Megalong Valley. It is also important to note that the flight paths to the Central West will also affect those not included in the consultation process such as residents in the Lithgow Council area and those further west.

Unknown scope and limitations of the FlyBlue business proposal:

Curfews and flight directions for the runway have been released, but it is unclear how this pertains to helicopter traffic. I assume they will not be using runways 24 and 06 as mentioned in the curfew details. A clarification of helicopter movements, helipads, helicopter access and use by other pilots is not clear in the Fly Neighbourly Policy. The general curfew seems to be first light to half an hour before last light. I am also concerned about the focus on runways rather than helipads. I question the investment on paving the runway when fixed wing aircraft are not mentioned in the FlyBlue proposal.

One obvious lack of clarity of the proposal is the number of flights per day. I feel with the Fly Blue proposal's high costs of upgrading the airfield for all users, it is more reason for FlyBlue to recoup their investment. No indication has been given by FlyBlue as to the number of flights or scope of the business. Once a commercial helicopter business is in place, my fear is the possibility of push for a change of conditions and expansion of the business. If a lease is granted I hope it would be possible to limit the number of flights per day and have these enforceable. A limit of possibly 3 or 4 flights a day would be a compromise, but still in my mind too many, and probably untenable as a business model. In my experience, developers

generally want to make more profit which would lead to expansion and pressure to change any limits. I would also hope the lease terms would be reviewed regularly with some input from the community (eg every 5 years) to ensure leaseholders are meeting their obligations.

https://www.industry.nsw.gov.au/_data/assets/pdf_file/0011/██████████katoomba-airport-proposed-lease-faqs.pdf page 9: *How many helicopter flights per day does FlyBlue propose in its lease application? FlyBlue has not specified a minimum or maximum number of daily helicopter flights. It has advised the department that, because the proposal is for a start-up business that could be impacted by any number of scenarios such as weather and tourism growth, any number provided could be perceived as misleading.*

The inability to predict the number of flights per day is of great concern. It would imply that the impact of the FlyBlue commercial development to the community would be dependent on the success and expansion of their business, with the statement above indicating no limits to daily flight numbers into the future.

Cruising flight paths over unpopulated areas of 500 feet would be allowed over Megalong Valley and possibly Shipley Plateau as these areas are not National Park or considered as populated areas. Sensitive and populated areas as mentioned on the FlyBlue website are not defined. Fly Neighbourly agreements are also a voluntary code and difficult to manage, so a mandatory Fly Neighbourly Policy would need to be part of the lease agreement. Realistically, this could only be monitored by residents and visitors. As well as consideration of township residents and the National Park, considerations need to be in place for rural areas – impact on personal space, lifestyle, people engaged in outdoor work and recreation, and horses and livestock. The impact is not just noise, but also the loss of a sense of serenity and privacy. The sky is a shared space where the human impact needs to be considered.

As a commercial venture, we need to know the details of the proposed Development Application before a lease is granted. 'Commercial In Confidence' does not promote community trust. I also question at what stage of the consultation process are Blue Mountains Council asked to contribute to the stakeholder process. If a lease is granted I am concerned a Development Application from FlyBlue to the Blue Mountains Council could be overridden by the State Government.

Potential for expansion of the business:

If the commercial lease is granted and infrastructure built, the commercial precedent will be set, and infrastructure available to justify further applications for expansion or revision of the business model. Regulations, developments, and commercial propositions change with the changing needs of business, tourism and governments. Once approved there will difficulty reinstating the airfield as a public facility, or managing the scale of the business. If it is not possible to limit the terms of the lease in relation to number of flights, flight paths, and infrastructure, there will be ongoing impact on the local community in terms of monitoring the development and responding to change. If the lease is granted and terms are breached, removal of

commercial infrastructure from the airfield needs to be included in the lease agreement / DA to reduce the options for subsequent requests to commercialise the airfield. As mentioned at the meetings, the Blue Mountains community felt they had assurance from the Department of Crown Lands that since the helitourism operation from 1992 – 1995, no further proposals for commercial helitourism from the airfield would be considered.

Impact on the Blue mountains National Park as a World heritage Area

The BMCC document (link below) particularly pages 4, 6, 8 and 12 outline the issues of aircraft over the National Park, although this study was commissioned in relation to Badgerys Creek Airport.

<https://www.bmcc.nsw.gov.au/sites/default/files/docs/GuidelinesForMinimisingAircraftOverflightImpacts.pdf>

‘The literature review clearly establishes the importance of preserving natural soundscapes in high value wilderness settings, such as would be expected in the GBMWA. Importantly, the potential significance of impacts that can occur as a result of relatively low levels of noise intrusion in wilderness areas is evident.

GUIDELINES FOR MINIMISING AIRCRAFT OVERFLIGHT IMPACTS

Rp 001 20170310 | 21 July 2017

Reference F03800-17/46669

Prepared for: **Blue Mountains City Council**

2 Civic Place

Katoomba NSW 2780

By **Mr Tony Middleton**

My objection to the proposal is that we are in a World Heritage National Park. The commercial development is not in keeping with the attributes of the National Park or a World Heritage area. There is also concern for birds and other wildlife, and no environmental impact study has been done. Aircraft noise can be particularly invasive in canyons and near cliffs, and sound can reverberate off cliffs and be amplified in mountainous areas. Consider the effect of a person calling to generate just a simple echo across the canyons of the Blue Mountains, and how this illustrates how the sound of a helicopter can travel. I feel particularly concerned for those living on, or directly under the escarpment as the impact for them will be great as the flights take off and land at the airfield. I have travelled to areas such as the Fox and Franz Josef Glacier in New Zealand; Watarrka (Kings Canyon) National Park, Mataranka, Katherine Gorge, Kakadu, Yulara and Uluru in the Northern Territory and found the flights of helicopters overhead to be very invasive and to ruin the experience of spending time in an area of natural beauty. The impact of helicopter tourism influences any thoughts of revisiting these areas and any recommendations to others include mention of the helicopters nearby.

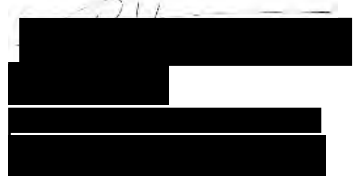
Need for transparency:

If a lease was to be negotiated with FlyBlue, I believe the terms would need to be brought back to the community for review, (including BMCC and our State Government representative), to ensure the consultation process is complete before the lease is signed off.

I appreciate the diplomatic way DOI staff have approached this process and enabled all stakeholders to feel valued and heard, and hope the BMCC, NSW National Parks and State and Federal representatives for the Blue Mountains are engaged in the process.

Thank you for your consideration of my concerns.

with kind regards,

A block of text is completely redacted with black boxes, covering the signature and contact information of the sender.

Dear Sir/Madam

PROPOSED LEASE OF KATOOMBA AIRPORT: Reference 602686

We oppose the granting of the proposed lease of Katoomba airport to FlyBlue Management Pty Limited, for two reasons:

First, a lease of Crown land should not be granted where the permitted use of the land, under the lease, would be significantly detrimental to the interests of the community (residents and current tourists) who will be adversely affected by that use.

Secondly, to grant such a lease would be an incorrect and inappropriate exercise of discretionary government power in the circumstances.

These reasons are related and are informed by the following matters.

There has been an obvious and significant lack of transparency on the part of the lease applicant with respect to the extent of its proposed use of the airport for “scenic heli-charters” (a euphemism for helicopter sight-seeing tours). The applicant has said that it will not specify the proposed number of daily helicopter flights from the airport because the information it can provide could be “perceived to be misleading”. This explanation should not be accepted. It is a facile excuse for not divulging the most important piece of information about how the proposed use of the land will affect the community.

The applicant obviously knows the number of daily flights it must operate to recoup its proposed capital expenditure and to generate sufficient revenue to make its operations profitable. The only conclusion that can be reached is that it chooses not to disclose the information on the proposed number of flights because it fears that this information will provoke adverse community reaction. Thus, what is “misleading” is the applicant’s deliberately-chosen silence on a fundamental piece of information.

Without this information being disclosed, the community is being denied the opportunity to provide a meaningful response to the proposal. And without the community being given the opportunity to provide a meaningful response to the proposal, the government cannot be taken as giving realistic consideration to the community’s interest. Indeed, for the government to proceed in such circumstances would be to effectively ignore the community’s interest.

What can be gleaned (from what has not been revealed) is that, if the lease is granted, the applicant will (not unnaturally) endeavour to maximise the profitability of its investment by offering as many tourist flights, per day, as it can. Presumably, the only limitation on its proposed activities will be the daylight hours, not the number of flights or the number of aircraft permitted to operate from the airfield. Therefore, it can be expected that the applicant will operate the airport to enable as many flights as possible to be squeezed into those daylight hours to suit its own commercial ends. This is plainly not in the community’s interest.

The applicant has said that it will not operate helicopter tourist services in certain areas. Rationally, this means that it will seek to offer tourist helicopter services in other areas. Inevitably, this means the Megalong Valley and the Kanimbla Valley. If this were to occur (as seems likely because, pointedly, the applicant has not said otherwise), such use will have a devastating impact on the residents of the two valleys, and is likely to have a substantially negative impact on current tourism. This is because both the residents and the tourists who go there are attracted by the natural beauty and serenity of the valleys. These unique advantages would be put in jeopardy (if not entirely lost) by the applicant's proposed activities. One could hardly think of a more destructive form of tourism in such tranquil surroundings.

The benefits of the proposed activity asserted by the applicant are illusory. What is their true value? Nobody knows. No value has been suggested. How can it seriously be suggested that "environmental restoration and rejuvenation" at the airport can stand as recompense for the significantly greater detriments that will likely be visited on the environment and the community if the proposal is granted? Why should these asserted benefits put at risk an already viable tourism model that depends on the valleys maintaining their peace and tranquillity? If the applicant's proposal to donate, as a carbon offset, "the value of one tree planting for every flight in and out of the airport" is meaningful, then surely this gives some true insight into the magnitude of the applicant's operational intentions: will it be a garden bed or a forest? If the former, the proposal is trivial. If the latter, then the true dimensions of the problem are exposed.

The responsibility for this matter starts and ends with the New South Wales government as the intending lessor of the land. It is the government, as intending lessor, who can determine how, and to what extent and for what purposes, the land can be used. Indeed, the government can determine not to grant a lease. As things presently stand, the granting of the proposed lease will put at nought the interests of the two key stakeholders—the residents and current tourists.

The community appreciates the benefit of a functioning airport for State and emergency services. But those benefits need not come, and should not come, at the heavy price of the proposed lease, which will permit a singularly commercial operation to destroy the broader community interest that the government should be protecting. There are alternatives which would enable the airport to be used for State and emergency services.

The New South Wales government should only pursue a proposal that serves the community's interest. FlyBlue Management's proposal does not serve that interest. The government should be robust in rejecting it.

Yours faithfully

A large black rectangular redaction box covers the signature and name of the sender. A small handwritten mark is visible to the left of the box.



25 July 2019

The Department of Planning, Industry & Environment

BY EMAIL: airfield.submissions@crowland.nsw.gov.au

Dear Sirs

Reference No. 6020686

I am very concerned about the Department's proposal to lease the Katoomba Airfield, which is Crown land, to a private operator, Flyblue, which plans to run joy flights and helicopter tours over the wilderness of the Blue Mountains National Park.

This proposal is objectionable for at least 4 reasons:

1. It represents a change of use of the public land in question. This land would currently be part of the National Park if it had not been developed (in the public interest) as an emergency landing strip for the local community. What the department now proposes is that the use of the land move entirely from the public to the private sphere. There is no justification for this change. Given the location of the land and the likely impact of the private use, any revenue that would be earned from the change of use would be far outweighed by the damage and disturbance that it would cause.
2. No assessment has been undertaken of the environmental impact of this change of use, ie the impact that the activities of Flyblue would have on wildlife in the Blue Mountains National Park. Criterion (x) supporting the inclusion of the Greater Blue Mountains Area in the list of UNESCO's World Heritage Sites states:

"The site includes an outstanding diversity of habitats and plant communities that support its globally significant species and ecosystem diversity (152 plant families, 484 genera and c.1,500 species) ... The diverse plant communities and habitats support more than 40 vertebrate taxa (of which 40 are threatened), comprising some 50 mammal, 63 reptile, over 30 frog and about one third (265 species) of Australia's bird species. Charismatic vertebrates such as the platypus and echidna occur in the area. Although invertebrates are still poorly known, the area supports an estimated 120 butterfly and 4,000 moth species, and a rich cave invertebrate fauna (67 taxa)."

The Department can have no idea of how this wildlife will be affected by helicopter/plane noise, which it would be impliedly approving if it were to approve Flyblue's proposal.

3. Once the lease is granted to Flyblue, there is no way of controlling the flight path or the frequency of its flights. In other words, these helicopter/plane joy rides could range over the entire Blue Mountains National Park and probably will. Although there is a restriction on how close to the ground the

plane/helicopter may fly, this regulation does nothing to address the amount of noise that they will produce. This noise may well have an impact on both plant and animal life in the National Park; certainly it will disturb the quiet enjoyment of the National Park by bush walkers and other users. It will significantly compromise the enormous value and amenity that this pristine wilderness offers.

4. The benefits that Flyblue claim would flow from their proposed redevelopment have very little substance. Flyblue "believes the lease will provide opportunities to 'open up' substantial parts of the site for bushwalking and other community activities". The site they refer to is presumably DP751627 550. That small parcel of land would be opened up for bushwalking by an activity that would effectively destroy for all other bushwalkers the amenity for a considerable proportion of the entire National Park.

Whatever the other "community activities" might be, they are not sufficient to persuade the Blue Mountains City Council to change its opposition to this development and its support for the integration of the airfield site into the National Park. This is obviously the appropriate course to take.

In short, what the Department is proposing to do, in permitting the helicopter/plane flights over the entire Blue Mountains National Park, is not very different from mining the sand on Bondi Beach and selling it to Singapore. It is dramatically comprising an important part of the natural heritage of every Australian. And this is happening for a negligible short term benefit.

I ask the Department to support the return of the Katoomba Airstrip to the Blue Mountains National Park.

Yours sincerely

[Redacted signature]

[Redacted contact information]

31 July 2019

Minister Pavey
Minister for Crown Lands
Level 17 -52
Martin Place SYDNEY 200

Re: Reference number 602686

Dear Minister Pavey,

I am an infrequent letter writer. This is, I think, only the second letter I have ever written on a political matter. I am not a professional protestor.

I am writing to implore you **not** to approve a commercial lease for the old Katoomba airfield at Medlow Bath.

Approval of a commercial lease would result in an increase in the number of flights over areas of outstanding natural beauty where people go to experience the serenity of the unspoiled natural world. Additional flights would disturb the peaceful pastime of many to benefit few.

I have read the proposal produced by FlyBlue Management. Their claims that an airport would be good for the local community is absurd - ***the local community is vehemently opposed to the proposal. The claim that the building of a functioning airport is good for the environment is Orwellian double-speak.***

The economy of the Blue Mountains, especially the area around Katoomba, depends heavily on tourism. Tourists visit the Blue Mountains to experience serenity. Although I am from the inner city (a plains dweller) I visited the Blue Mountains over 30 times last year. Each time I visited, I spent money at petrol stations and cafes and shops in the Blue Mountains. If the peace of the Blue Mountains is disturbed by helicopters and light aircraft I will choose to go North or South to find unspoiled nature. If I want to listen to aircraft noise, I can do that from home. ***I suspect many others will feel the same way. In the long run, a commercial airport in the upper Blue Mountains will harm the economy, not benefit it.***

The Katoomba airfield should be incorporated into the Blue Mountains National Park and used only for firefighting and, possibly, emergency aircraft landings.

The approval of a commercial lease for the old Katoomba airfield at Medlow Bath is bad policy. Do not allow this to be your legacy. Please reject the application.

Sincerely,

██████████

Crown Lands

NSW Department of Industry

airfield.submissions@crowland.nsw.gov.au

21 July 2019

Megalong Valley Community Submission

The undersigned members of the Megalong Valley community object to the proposed lease of Katoomba Airfield to a commercial enterprise.

We believe that the Katoomba Airfield is a public asset that should be maintained for non-profit and emergency use only.

We propose that the lease application of Derek and Floyd Larsen and Flyblue be rejected and that the airfield be transferred, as previously proposed, to be incorporated into the Blue Mountains National Park, and further that the airfield be maintained with Federal and or NSW funding such as under the Natural Disaster Resilience Program or Bush Fire Risk Mitigation and Resilience Funding Brigade Mitigation Support Programme.

We object to the commercialisation of the Katoomba Airfield as we believe it will support significantly increased and effectively unlimited helicopter traffic over our community. We believe the nature of a commercial operation is such that it would be economically incentivised to increase helicopter traffic. This would have detrimental impact on our community in the following ways:

- * Noise pollution would despoil the quiet rural environment that has attracted people to our valley for generations.
- * Noise pollution would create safety concerns for community members such as horse riders, working with animals in our valley.

**Proposed Lease
of Katoomba Airfield**

2 of 56

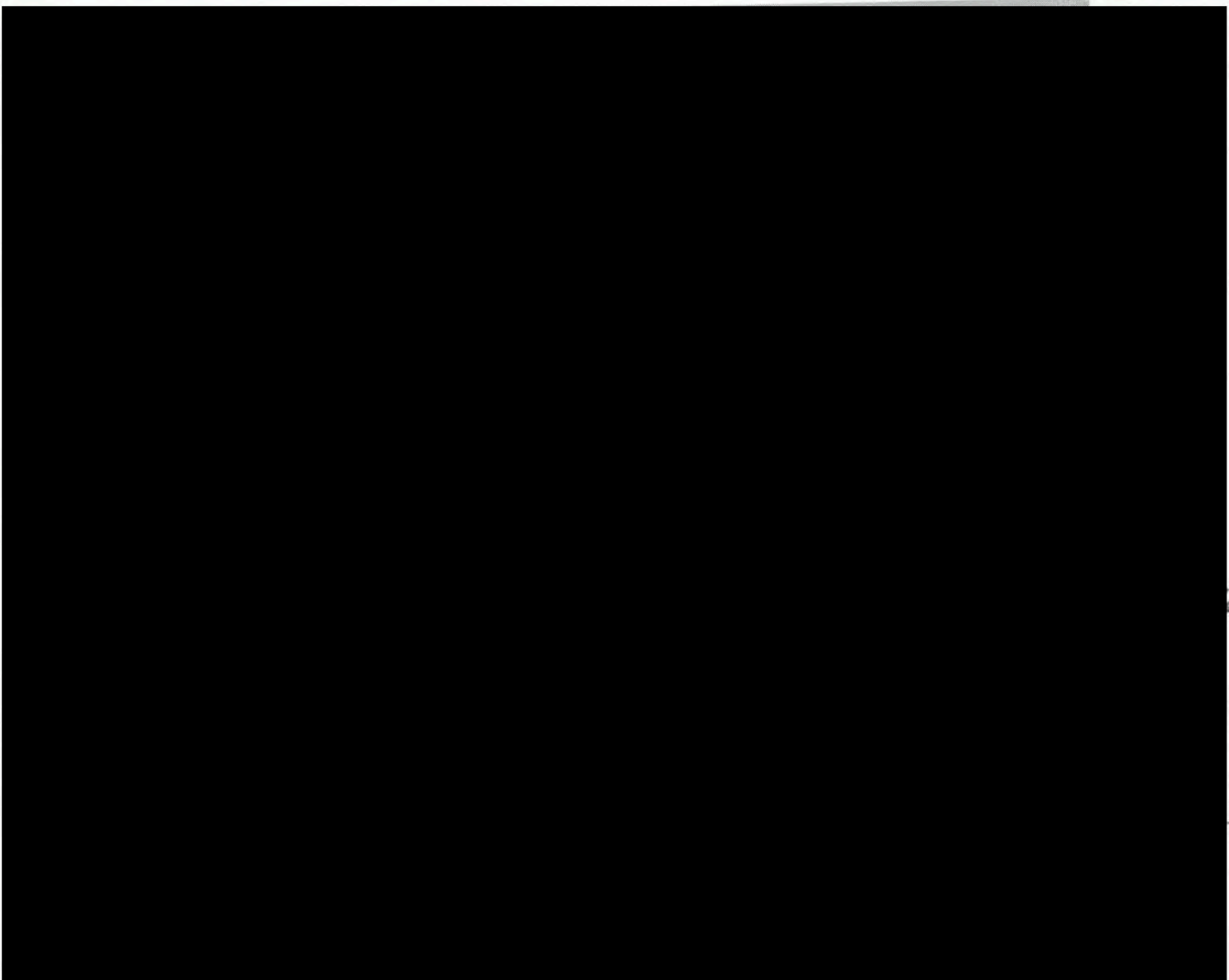
Reference 602686

* Increased air traffic in our valley would undermine our natural privacy.

* Increased air traffic will undermine property values and the local economy

by countering the very reasons that attract people to our valley to live or to visit either as tourists or for other activities such as horse riding.

We believe that if a lease is granted on the Katoomba Airfield for a commercial operation, there will be limited to no recourse for the community to prevent a future escalation of Katoomba Airfield related aircraft traffic.



[REDACTED]

As owners of a tourism enterprise that commenced in 1986 in the Megalong Valley, we hereby object to issuing of a 50 year lease to FLYBLUE Management Pty Ltd.

We operate a popular tourism venue that features vast tracts of pristine wooded zones as well as open pasture land and promote our activities is that of quiet appreciation of nature and its surroundings. People from all over the world comment on the quiet and relaxing environment. Any increase in the use of the airspace surrounding our property would be detrimental to the general enjoyment for those visitors.

The reasons for such objection is as stated below.

Thanking You,

[REDACTED]

OBJECTION TO 50 YEAR LEASE TO FLYBLUE

There has been an ever increasing and substantial opposition to the granting of the long term commercial lease to FlyBlue Aviation to operate their business from an airfield at Medlow Bath.

It is inconceivable that a Government of any persuasion would devalue its natural asset that is responsible for bringing in millions of dollars to the nations economy.

FLYBLUE Management Pty Ltd was awarded a three-year commercial license over Katoomba Airfield by the Department of Industry /Crown Land and Water in February 2018.

To propose to now issue a 50 year lease to a singular company is so irresponsible that defies any logical explanation.

The current proposal to issue such 50 year lease to Derek and Floyd Larsen smacks of hypocrisy for what the area stands for. Their company FlyBlue is a fully commercial enterprise that would require extensive income to justify the capital outlay.

The impact of constant noise from aircraft would put at risk the future growth of any enterprise relying on the peace and quiet of the region.

Helicopters for sightseeing over National Parks should have no place in our society. The novelty of the occasional chopper would soon be replaced by the overpowering nuisance impacting every single person in the Blue Mountains.

The emerging film industry would be stifled as you simply cannot film with helicopters disrupting the silence.

In the past there have been various campaigns to keep the region in a pristine state for the whole world to enjoy.

Between 1993 and 1994 Blue Mountains Council objected to the NSW Government and stated that they did not consider helicopter joy flights are appropriate to the environment of the Blue Mountains and the natural environmental attraction to tourists” . Joy flights discontinued in Dec 1995

The Blue Mountains has a hearty and committed plethora of population that sees its mantra as preservation at all costs. Even McDonalds could not get a foothold into the area.

In 2003 Blue Mountains Council undertook a dramatic stand within its local environment plan and banned large takeaway food chains like McDonalds from setting up outside the Katoomba and Springwood shopping centres. The Mountains Against McDonald's group protested that “Over the years thousands of ordinary mountain people have said they want this region protected against any more fast food chains," Ms Elliott said. "There is a mandate for prohibition [and] our mountains deserve better." The Blue Mountains move is believed to be the first time an Australian local government has tried to prevent the growth of fast food chains on planning grounds.

Then a Supreme Court Judge enforced their commitment....

In 2004 conservationists argued that the filming of the SCI FI movie Stealth was inconsistent with the purposes and objectives of a wilderness area. Justice David Lloyd agreed and set aside the state's approval of the film project, ruling that declared wilderness areas were "sacrosanct."

He issued a restraining order against Environment Minister Bob Debus, who also serves as director-general of the National Parks and Wildlife Service from granting any further licenses to film in the sensitive areas.

10 years ago the Conservation Society raised their objection to the Katoomba Airstrip

In March 2008 the Society, aware of the upcoming expiry of Special Lease 1966/14 assigned to Katoomba Airfield Pty Ltd, made representation to the NSW Department of Lands in the following terms:

“We are strongly opposed to the sale or the renewal of the lease on this site. Our preferred option is for the incorporation of Lot 550 DP 751627 into the Blue Mountains National Park. the only appropriate continued use of the site as an airfield is occasionally when it is required for public emergencies and then only for use by helicopters.

So in 2019 there has been nothing that would change the parameters for those opposed to the previous deleterious impacts, to now allow a commercial operator conducting a high impact business from this airfield.

The operator in their Facebook page, highlights the future of aviation that would arise from the development of Katoomba Airfield.

“There is no constraint as to the degree of tourism development. FlyBlue proposes leasing the airport for 50 years and revitalizing it for recreational aviation and opening up non-aviation precincts for environmental protection and bushwalking.”

(The provision of “non aviation precincts for environmental protection” I believe has been included as an patronizing gesture just to offset environmental requirements)

Mrs Larsen stated that she expected the airfield upgrades to help lure more tourism and overnight stays to the Blue Mountains including private plane owners who would stay in local hotels and B&Bs at least one night, visit attractions, dine in restaurants and shop – in line with Blue Mountains Council’s original intent for the airfield.

Other future plans included the installation of new hangars (subject to approval), community charity events, public aviation viewing areas and dedicating half the airfield to non-aviation uses such as bushwalking, a radio club, star gazers and RAAF cadet and school bivouacs.

THE OPERATOR

The operator Derek Larsen has been able to capitalize on a perceived untapped opportunity at the expense of not only the immediate residents and the region, but of the region as a whole as designated as a wilderness area of international importance.

He has a track record of involvement with major investments. In 2007 Sydney Airport Corporation Ltd appointed Derek Larsen as General Manager of its Retail Division.

“His role will include overseeing the retail precincts of the T1 international and T2 domestic terminals as well as the delivery of the retail component for the new T1 departures project. He has over 16 years experience in all aspects of retail, commercial and residential property in Australia and Asia. His roles have included both centre and portfolio management roles within Australia as well as key strategic development roles in Asia. He most recently worked for Colonial First State Property Management as the QLD and NSW Portfolio Manager.

“At Sydney Airport, particularly in the international terminal, some 70% of the customers are infrequent visitors who are there for the purposes of holidaying or business travel and there is a vastly different cultural and demographic variation.

“This to me is in some ways a new frontier in retail with unexplored opportunities and I’m ready for the challenges the role will bring. We are at the beginning of a new dynamic era in international travel with the arrival of the new A380 aircraft carrying in excess of 500 pax and Sydney Airport will certainly be rising to the challenge.”

In Oct 2017 the successful tender for the airfield was Derek & Floyd Larsen of Blackbird Aviation

However the list of business names registered by Derek Larsen gives an insight into what was behind the initial lease application..

Blue Mountains Airfield	24 Oct 2017	31 Mar 2019
Blue Mountains Heliport	24 Oct 2017	31 Mar 2019
Blue Mountains Airport	14 Oct 2017	31 Mar 2019
Blue Mountains Aviation	14 Oct 2017	31 Mar 2019
Blue Mountains Heliflight	14 Oct 2017	31 Mar 2019

Such business names were replaced /added by the following

Flyblue Helicopters	27 Jul 2018	31 Mar 2019
Flyblue Aviation	27 Jul 2018	10 Nov 2018
Flyblue	25 Nov 2017	31 Mar 2019

Other business names gives further insight:

Online Dutyfree	13 May 2013	22 Sep 2016
BLACKBIRD AVIATION	07 May 2010	31 Mar 2019
HELIKING AVIATION	18 Mar 2010	03 Feb 2016

On the Facebook page of Katoomba Airfield on 13th June 2019 the comments reflects what is really the future of this airfield which is currently the property of the crown, ie the public.

Katoomba Airfield 13 June

Here is the real reason the Blue Mountains MUST CONTINUE to have and UPGRADE the FULLY FUNCTIONAL, PRIVATELY CONSTRUCTED AND FUNDED AIRFIELD approved for ALL aviation operations that it has had since 1968.

Quiet, electric aircraft are on the doorstep. If the negative vocal minority in our community continue to oppose and constrain aviation in the Mountains, the region will be left behind the rest of the world! That means lost opportunities in business, employment, education, healthcare and strategic resilience!

HAVE YOUR SAY! CLICK THE LINK AND PROACTIVELY SUPPORT YOUR COMMUNITY:

<https://www.industry.nsw.gov.au/.../proposed-lease-of-katoomb...>

AND ... please click the share button!

<https://smallcaps.com.au/uber-ridesharing-air-taxi-trial-m.../>



Possible Flight Scenarios:

Typical helicopter speed - 130 mph 35km in 10 minutes \$60 -\$100 for 15 min being the best return 15 mins flights ph per helicopter.

Hence there will be a dramatic impact on the serenity of the region.

1. There would be no constraint from other multiple helicopter companies from establishing a hanger at the airfield and providing commuter services to the airfield.
2. There is no provision to limit the number of flights taken from the airfield. This will impact severely on properties within the take off and return flight paths.
3. There has been no community consultation for this airfield, but a lease was issued to a private operator with no business plan provided for public scrutiny
4. There has been no environmental impact studies undertaken prior to the 3 year lease, nor for a 50 year lease.
5. It is concluded that only a small number of persons would benefit from any increases in tourism or commuter activities whereas a substantial number of persons would be adversely affected.
6. As there is no legislation, policies or guidelines in NSW that specifically set out obligations for the control of aircraft noise in national parks, or for the preservation of natural soundscapes, it would be considered that the operator has an open ended lease, with no constraints.
7. Since the operational hours for Katoomba Airfield according to the Fly Neighbourly Advice are as follows:
 - Night flights prohibited except in emergencies
 - Mon-Fri Departures from 7am
 - Sat & Sun Departures from 8am
 - Mon-Sun Departures (from) first light
 - Mon-Sun Arrival 30 minutes before last light, then the operating hours are deemed to be quite extensive.
8. It is clear that the operator cannot provide any worthwhile guarantees that can satisfy the preservation of our natural soundscapes in such a high value wilderness setting.

Reference: 602686 - Proposed lease of Katoomba Airfield

As Blackheath residents, we are very concerned by, and object to, the proposal to grant a long-term commercial lease over Katoomba airfield, especially for the operation of scenic helicopter flights.

1. Lack of Community Consultation:

- a) We object to the prior granting of a licence for an 'aerodrome and land-management', without any community consultation
- b) We object to the apparent lack of natural justice in the current process of community consultation, which is taking place after the prospect of Fly Blue entering into long-term commercial lease to operate scenic flights was revealed shortly after the licence was granted

2. Impact on Native Fauna and Flora:

The current licence holder's stated intention is to run 'high-end heli-tours to Mudgee, Rylstone, Orange and other wineries and tourism venues' and their hope to have fixed wing aircraft landing at the airfield within two years:

Ref: <https://www.bluemountainsgazette.com.au/story/5810825/katoomba-airfield-licensees-meet-with-medlow-bathers/>

We are very concerned about the impact on native fauna through the noise, and also to native flora from the pollutants created by increased air traffic. Our property faces east, near the edge of the protected Grose Wilderness, and borders a 9 acre property under a Conservation Agreement with the NSW Biodiversity Conservation Trust, the majority of which comprises diverse endemic ecologies and habitat, including threatened hanging swamps.

Fly Blue couches its environmental impact in positive terms, referencing the mooted bush regeneration of a portion of the old airfield site, and its carbon emission offset Greenfleet commitment to plant one tree for every flight (which actually does not offset the effects of a flight).

Fly Blue also categorically states that their planned 'activities do not represent a biodiversity or biosecurity threat to the World Heritage National Park'. Without an environmental impact study, this assertion is baseless. And they do not address the more obvious issue of the fuel residue pollution impact to fauna and flora under the flightpaths, or the potential threat to fauna species through displacement/dispersal from the noise. They only reference data on bird strikes.

[ref: <https://flyblue.com.au/> - environment tab]

3. Loss of amenity for residents and impact on tourism:

Community resistance

We note the strong resistance from the broader community (residents and visitors), to the proposal to grant a commercial lease with over 12,000 signatures received on a petition tabled 1 August 2019 in the State Parliament (see links below).

<https://www.parliament.nsw.gov.au/la/petitions/Pages/taled-paper-details.aspx?pk=75919>

<https://www.bluemountainsgazette.com.au/story/6117795/petition-against-commercial-airport-plans-in-medlow-bath-tops-12000/>

Note: Blackheath population at 2016 census was 4,396 (see link below).

https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/SSC10393

Impact on tourism

According to published data, the Blue Mountains National Park has the highest visitation of any National Park in Australia, more than 4 million visitors per annum, due to its accessibility and impressive natural features.

(Source: National Parks Wildlife Service statistics published in *Blue Mountains Tourism Industry Profile*, Issue 1: 2014/2015, p. 3]).

According to the same report, an estimated 1.25 million visitors per annum (Tourism Research Australia statistics) physically undertake a bushwalk. The majority of recreational visitors are day trip visitors and the most popular activities are dining, bushwalking, abseiling and canyoning.

(Source: Blue Mountains Lithgow Oberon Tourism Destination Management Plan, 2013).

We are very concerned about the loss of amenity to residents and the likely impact on eco-tourism through increased air traffic. The serenity of the bush, and the attractive amenity of bushwalking amid birdsong will be impacted, and will drive bushwalkers to other areas.

I recently toured the Great Ocean Road (GOR) in Victoria, after having done so 30 years prior. I was horrified by the helicopter presence at the Twelve Apostles, which totally ruined the atmosphere. I will no longer recommend that particular lookout stop on the GOR and I would hate to see the same happen at Govett's Leap and Evans Lookout.

On this note, and in reference to point 5 below, I can vouch that on 23 June 2019, I was at Govett's Leap with visitors and was aghast to witness a helicopter circling the valley near Pulpit Rock.

4. Pre-existing Fly Neighbourly honour arrangements being exploited/ignored:

We are very concerned about the stated intention of the newly appointed licence holders precisely because pre-existing honour arrangements under the Blue Mountains Fly Neighbourly Agreement (BMFNA) for flight path controls are already being abused by joy flight operators and other pilots diverting from official flightpaths.

The Fly Blue licence holders have indicated they will require their pilots to adhere to the mooted 'improved' Katoomba Airfield Fly Neighbourly Policy, via acknowledgment of the 'conditions of use'.

They have also stated, however, that they will allow other aircraft originating from other airports to use the airfield for a fee, and that they will have no control over the flightpaths or actions of these pilots.

Rather disingenuously, they refer the public to Airservices Australia for more information regarding 'who is responsible for what'.

Airservices Australia makes it clear that no clearance (or supervision by air traffic control) is required to operate in uncontrolled airspace, and that 'the large majority of light aircraft and helicopters operate outside or underneath controlled airspace, for example, including aircraft that operate at low levels over Sydney Harbour.' This also applies to the many heli-tour operators advertising joy flights to the Blue Mountains.

<http://www.airservicesaustralia.com/aircraftnoise/aircraft-operations/how-airspace-works/>

Fly Blue's information pack documents many of these operators and tours on five pages of their information pack, available on their website:

<https://flyblue.com.au/> - Download Information Pack tab, PDF, pp 25-29.

Fly Blue's operational guidelines indicate the airfield will be in use from first light to last light, seven days a week, with minor variances.

Considering they intend to allow other operators to use the airfield without being able to enforce adherence to the BMFNA, this has the potential to completely destroy the peaceful amenity of the area around Blackheath.

We can personally attest to witnessing days-on-end over the 2018-2019 spring and summer when helicopters could be seen – and not just heard – traversing this airspace many times throughout each day, and at low levels, when there was no official or community record of bushfires, back-burning operations, rescues or other possible reason for aircraft to be in that airspace.

There are three areas of helicopter activity that we believe are already contravening logged flightpaths and ignoring the BMFNA:

- Joy flights from Sydney – are not meant to traverse this airspace, but head along the Jamieson River instead; there is no public record of their flightpaths and therefore no means to track the actual path taken.
- Helicopters operated by the 5-Star Wolgan Valley Resort that ferry wealthy guests to back and forth.
- Electricity providers: there has been community conjecture that some helicopters exhibiting this behaviour may have been hired by electricity providers, to monitor tree canopy near power lines in built-up areas, in which case the cowboy pilots are drifting off course for a scenic tour on purpose and certainly without regard to the BMFNA; it is doubtful they would even know of its existence.

5. Flight-paths, noise and prevailing winds:

Fly Blue has stated that there will be no short-cycle/short duration joy flights (10-15 minutes that generally fly up and around and then descend to the ground at the point of departure), but that it will provide destination ‘scenic heli-charters’ that will be a minimum of 30 minutes duration.

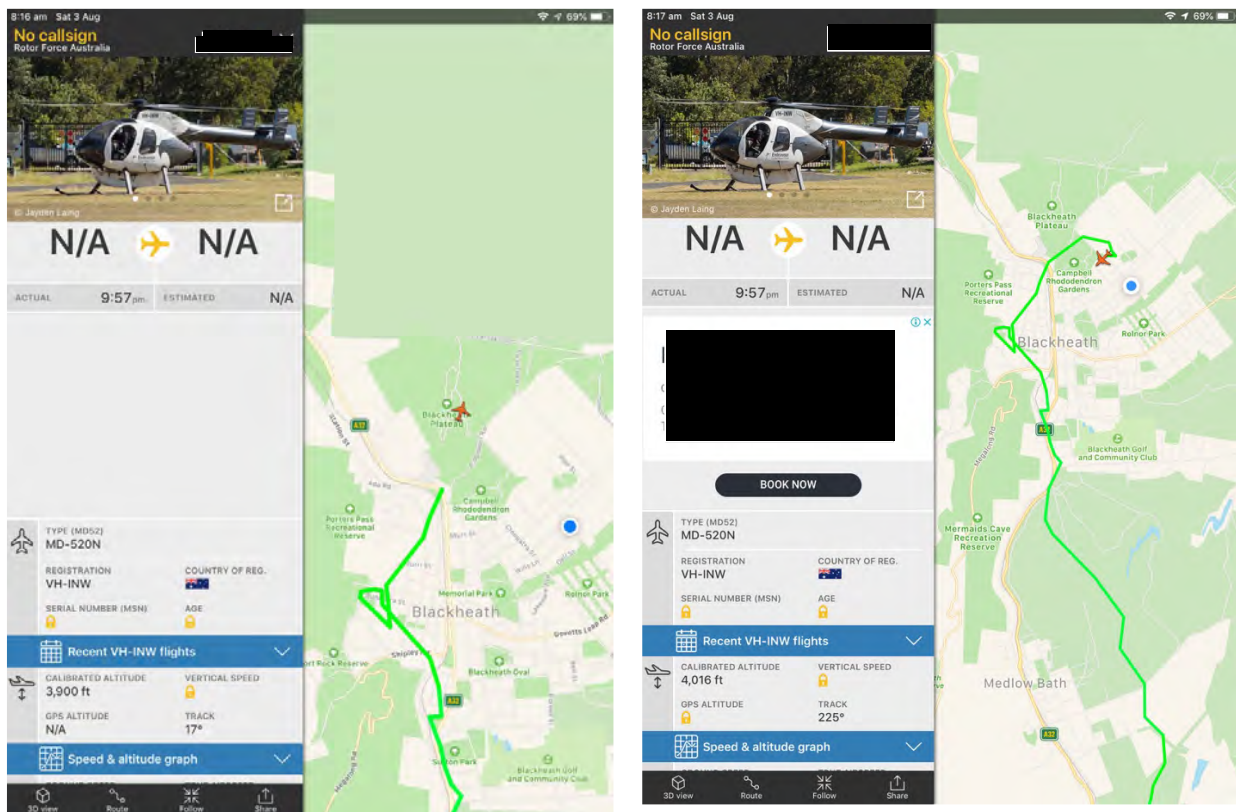
As stated in point 4, Fly Blue’s operational guidelines indicate the airfield will be in use from first light to last light, seven days a week, with minor variances. The prospect of helicopters arriving/departing every 30 minutes across a 12 hour period is therefore a possibility, and would be a horrible disturbance for residents, and a major disappointment for the bulk of visitors to the area (refer point 3), not to mention the native fauna. Birds, in particular, are obviously disturbed by passing air traffic.

As Fly Blue has stated (refer point 4) that they will open the airfield to aircraft originating from other airfields, there will be no real control over 3rd party aircraft activities, and we have already witnessed multitudes of aircraft contravening the BMFNA.

In addition to the helicopters that we can see, we already hear many more aircraft (fixed wing and helicopters) due to prevailing winds, which are from the west and the south-east*.

[*ref: Blue Mountains Local Emergency Management Plan, 2016, pp. 6-7
https://www.bmcc.nsw.gov.au/sites/default/files/document/files/BM_LEMP_September2016.pdf]

This morning (3 August 2019) I captured data on a helicopter flying passes over Blackheath, originating from the south, flying around 4,000 feet, which was clearly audible, and sent the birds in our garden shrieking away.



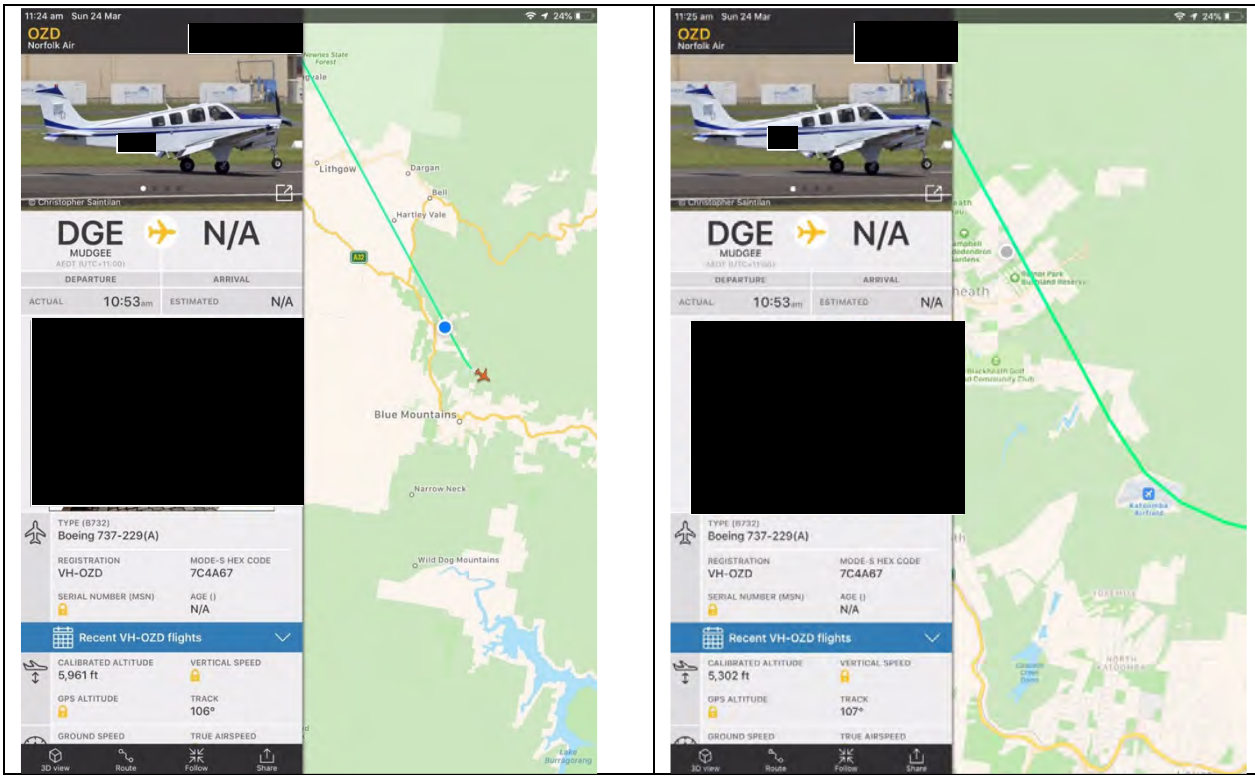
South-east winds -

The airfield is located south-east from our residence, and so any flight activity will likely be heard across the edge of the Grose Wilderness, and most definitely around the highly popular Pope's Glen track to Govett's Leap Lookout, which starts within the town's boundary, borders our neighbour's property [REDACTED] and extends through the National Park.

West winds -

Flights from Mudgee are regularly heard approaching from the west. The screenshots below document one such example. The blue dot is [REDACTED] in Blackheath, on the edge of the Grose Wilderness.

Fly Blue referred to the use of the Katoomba Airfield by aviators looking for a waypoint as a 'plus'. In the image below, right, one can see the aircraft's flightpath over Blackheath and the plane using the Katoomba Airfield as a waypoint.



The particular plane documented above was flying well above 5,000 feet when first detected (5,961 feet) and was clearly audible.

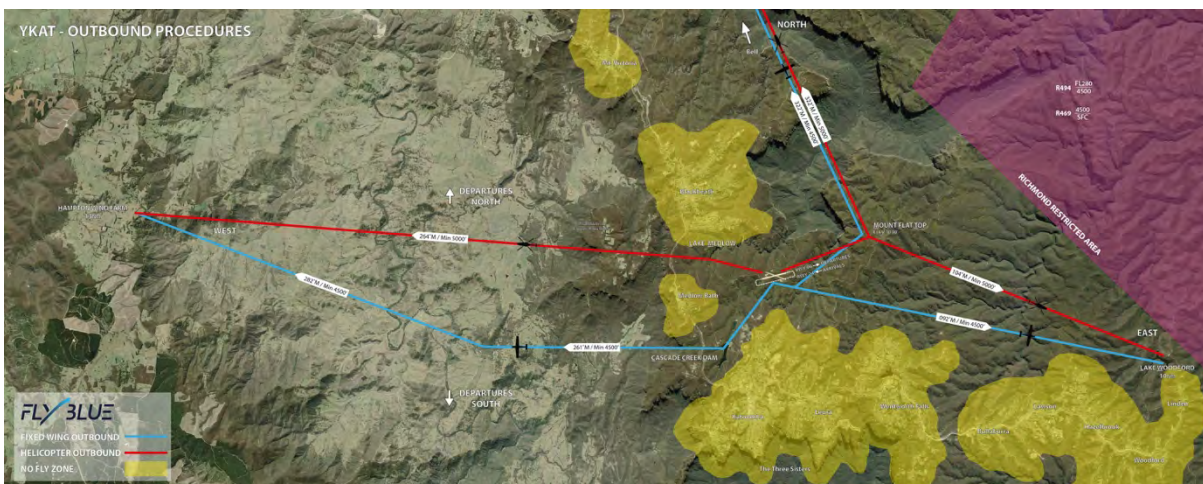
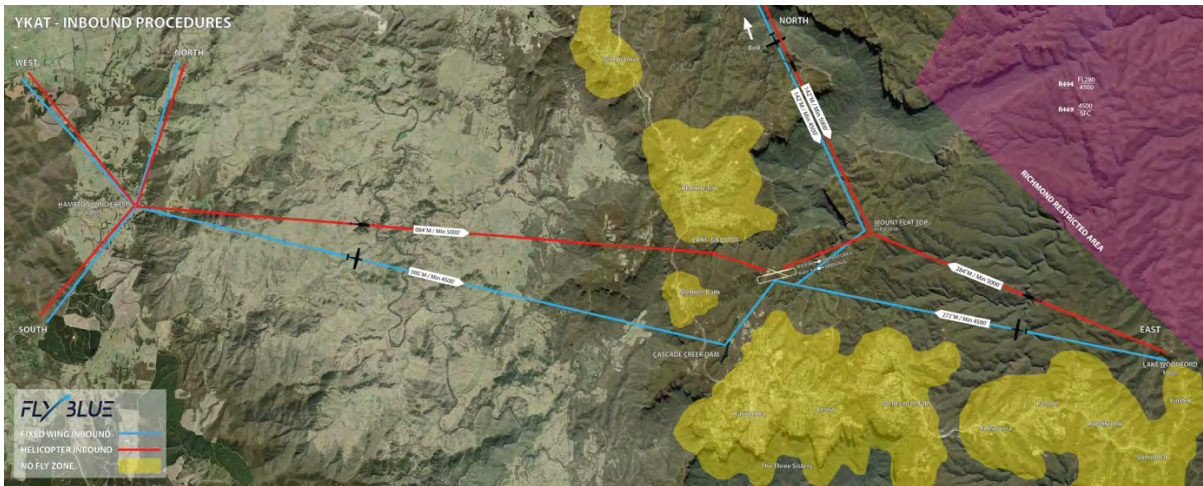
Fly Blue's draft conditions of use instruct pilots not to fly below 4,500 feet for fixed-wing aircraft and 5,000 feet for helicopters (inbound and outbound), which means they will all be clearly audible on both landing approaches and take-off paths from sun up to sun down.

And as they intend to open the airfield to aircraft originating from other airfields, there will be no real control over 3rd party aircraft, many of which are already contravening the BMFNA, especially helicopters.

Fly Blue Flightpaths

Fly Blue's published flightpath directions have aircraft approaching from the north flying south-southeast from Bell across the Grose Wilderness to Mount Flat Top, then turning west to the airfield. The pattern is repeated in the other direction for departures. This is clearly visible in the images below, available on their website.

[ref: <https://flyblue.com.au/> - Fly Neighbourly tab; Proposed Flight procedures PDF]



These flight paths traverse the Grose Wilderness, to the west of restricted airspace.

In Fly Blue's FAQs, they specifically state that they will not be 'undertaking joy flights over Echo Point, the Three Sisters, **Grose Valley**, up the Grand Canyon and all residential areas within the Blue Mountains.' [emphasis added]

If by 'joy flights' they mean shorter flights of 10-15 minutes duration, this is disingenuous. Longer scenic flights (30 mins and longer) are clearly intended to traverse the airspace over the Grose Valley.

Due to the prevailing south-east winds, all aircraft traversing this space flying at 4,500 and 5,000 feet will be audible to residents and fauna on the eastern edge of Blackheath bordering the Grose Wilderness.

6. Voluntary Nature of the Blue Mountains Fly Neighbourly Agreement:

With respect to all aircraft operating in the region, we are very concerned about the ineffectiveness of the *voluntary nature* of the current Blue Mountains Fly Neighbourly Agreement (BMFNA), and believe that any extant or proposed

commercial lease arrangement must be subject to enforceable controls by government or statutory bodies, not just a code of conduct managed by the commercial lessee.

Background:

- In response to community concerns, the Blue Mountains Fly Neighbourly Agreement (BMFNA) agreement was developed in 1994 between aircraft operators and the community to reduce the disturbance caused by aircraft, particularly joy flights, within the Blue Mountains.
- Under the BMFNA, aircraft operators agree to operate in a certain manner, which includes limits on operating heights in areas identified as environmentally sensitive, as well as the frequency of operations.
- As it is a *voluntary agreement*, there is no compliance monitoring or enforcement, and no avenues for residents to pursue when breaches occur. As a consequence, the BMFNA is totally ineffective in managing the impacts of commercial joy flights within the Blue Mountains.

7. Dubious claims of ‘community and economic benefits’

[ref: <https://flyblue.com.au/> - community and economic tabs]

Fly Blue has stated that 50% of the current site will be dedicated for community use and recreation, such as bushwalking, as well as delivery of tourism and employment opportunities.

While this is admirable in theory, the idea that anyone would voluntarily spend time bushwalking in and around the corridors adjacent to an airfield operating from dawn to dusk is ludicrous (refer yellow area in image below).



Fly Blue also state that they will promote ‘an overnight stay’ en route to the central west wineries etc.

Noting that their intended clients will be ‘high yield’ individuals, it is more than likely that they will stay overnight in the nearby 5 star Hydro Majestic (located Medlow Bath), or one of the other luxury hotels in Blackheath or Katoomba, all operated by the privately owned Escarpment Group, which was recently investigated for exploiting migrant workers.

<https://www.smh.com.au/business/workplace/luxury-blue-mountains-hotel-group-clawing-back-wages-from-migrant-workers-20190703-p523od.html>

Regardless, these ‘high yield’ individuals will not likely spend time, or money, outside of their hotels, and their form of tourism will assuredly not benefit the Blackheath community.

8. Alternative Proposal

We support the popular view (refer point 2) that Katoomba Airfield should be incorporated into the Blue Mountains National Park, to be managed as an emergency airfield, with specific funding provided to the National Parks and Wildlife Service for management from existing government programs/budgets, such as the Bushfire Risk Mitigation and Resilience Program managed by NSW Treasury.

This incorporation proposal by was mooted by the Department of Crown Lands in 2000, and again in 2008.

9. Recommended actions, should the lease be granted to Fly Blue

Contrary to broad community sentiment documented in point 3 above, should the government decide to grant a commercial lease on Katoomba Airfield to Fly Blue, we would urge the government to:

- a) If not already categorised so, amend the BMFNA to declare the area of the Blue Mountains Grose Valley Wilderness closest to Blackheath a Sensitive Environmental Area (SEA) under CASA’s Fly Neighbourly Agreement policy (section 3.7.5 Sensitive Environmental Areas), which states:

‘The FNA should identify any natural environment areas or National Park areas which are considered particularly sensitive, for example due to concerns over disturbance of the environment because of vibration or noise.

Any (scenic) flight penetration into these zones would be subject to agreement with the relevant National Parks and Wildlife Service.

Avoidance of SEAs, or a minimum overflight altitude above ground or water that might apply. The determination of the overflight altitude would be developed by the stakeholders.'

[ref: CASA, Airspace Risk and Safety Management Manual, September 2016, p. 41, <https://www.casa.gov.au/publications-and-resources/publication/airspace-risk-and-safety-management-manual>]

- b) In addition, and in the interim, we urge the government to immediately take action to ensure that all other commercial operators of scenic flights to the upper Blue Mountains adopt the same Fly Neighbourly policy as that proposed by Fly Blue, or, at a minimum:
 - o are made aware of the BMFNA (in current or revised form)
 - o are required to log intended flights paths and record the GPS of actual paths taken
- c) We would also urge the government to create measures enabling the community to enforce the above, including undertaking random traffic count and noise measurement audits via the auspices of the Civil Aviation Safety Authority (CASA) and Airservices Australia.

[REDACTED] as the crow flies from Katoomba airfield

1/8/2019

To whom it may concern,

Re: Katoomba Airfield; Ref No 602686

We wish to object to the granting of a lease to the Katoomba airfield on the following basis.

- the airfield is Crown Land: a portion of it should be retained for emergency uses, and any land excess (beyond what is required for emergency services) should be incorporated into the Blue Mountains National Park – this allows for the greatest public benefit
- noise pollution from helicopters intrudes upon community use and enjoyment – thousands of visitors to this world heritage area seek its serenity, and only a portion would be interested in commercial joy rides
- it is inequitable to favour the needs of a single business over the needs of other businesses that cater to a broad range of uses – accommodation, cafes, horse riding, bush walking, rock climbing and other businesses that would be impacted by the noise of helicopter joy rides
- there is no information on the conditions and restrictions upon the lease that may be imposed by the Commissioner of Lands to secure the amenity and quiet enjoyment by the surrounding residents and visitors, beyond the non-binding, vague and inadequate undertakings by the proponent: this is an abrogation of **government's responsibility to fully consider the social, environmental and economic implications of the decisions they make particularly where there is in all likelihood only a relatively minor economic dividend from the lease**
- the nearby Cascade Creek Dam is an important water source, and intensifying airfield operations places it at potential risk of aircraft accidents and water contamination

As the owners of a homestay business in the Megalong Valley we have made a significant investment in a building a business that employs two people, utilises local contractors and services and hosts around 2500 visitors a year. The key reason people come to our place is for peace and quiet in a majestic natural setting - away from highways and the bustle of the increasingly urbanised villages that make up the Blue Mountains.

The leasing of the airfield to a helicopter operator with no limitations on the extent of potentially very high impact operations will imperil the very foundation of our business and also the quiet immersion in nature that numerous bush walkers, climbers and sightseers have been coming to the upper Blue Mountains for over 100 years to experience.

To put it simply these two types of experience are incompatible and the vast majority of visitors to, and residents of, the Valley and upper mountains will never take a helicopter flight yet will find their experience of the place inordinately impacted by an activity that benefits only a few.

We would draw the decision maker's attention to the situation at the 12 Apostles Visitors centre, in Victoria, where helicopter flights have ruined the experience of this unique area for vast majority of the 2,000,000 visitors who chose not to view the area from the air.

As Sydney grows under NSW Government plans to a city of 7-8 million people, areas such as the upper Blue Mountains as a quiet and readily accessible place where large numbers of people can connect with nature and decompress away from the noise and bustle of the city will become an increasingly important asset that cannot be placed at risk.

A recognised trend in contemporary tourism is a desire to make deeper connections with places and immersive experiences. This represents the future of large scale visitation not joy flights and helicopter rides.

We ask you to not grant this lease and put this future at risk, it will have a direct economic impact on our business, it will ruin the amenity of our home - it is the wrong direction for tourism which is the only growth industry within the Blue Mountains.

Yours sincerely,

[Redacted signature block]

[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]

19 July 2019

Ref No: 602686

Re: Submission Concerning the Proposed Lease of Katoomba Airfield, Medlow Bath for Commercial Purposes

I understand that the Department of Industry is considering a proposal for the long-term lease of the Katoomba Airfield, Medlow Bath, to commercial operators for the purpose of helicopter tourism (scenic flights/joy flights).

I strongly oppose commercial use of this site.

I moved to Katoomba to escape from the air and noise pollution and the stresses of city life, to live in a serene, peaceful and quiet natural environment where I can connect closely with the natural world. It is not only the residents of Katoomba and surrounding villages who value this environment. Domestic and international visitors come here to enjoy the bushland, the spectacular views and the opportunity to get away to a remote and serene place. It is also a haven for many bird and animal species.

The Katoomba Airfield which is completely surrounded by the World Heritage listed Blue Mountains National Park should be incorporated into the Blue Mountains National Park.

The Katoomba Airfield should be used for emergency services only.

1. The Blue Mountains National Park – a national treasure

The Blue Mountains National Park has been a World Heritage listed site since 2000. The World Heritage listing recognises that it is an area of significant natural values. It possesses unique plant and animal species. 'The site provides significant representation of Australia's bio-diversity with ten percent of the vascular flora as well as significant number of rare and threatened species...' (Unesco World Heritage Committee). The listing criteria recognise ecosystem interaction values. Any major disruption to any element will impact on the whole and is likely ultimately to have negative impacts on the sustainability of small to large parts of the World Heritage Property. **For this reason, any proposal for the use of the Katoomba Airfield that would result in the disruption to the plant, bird and animal life of the area, should not be approved.**

2. The Katoomba Airfield site should be incorporated into the Blue Mountains National Park, not leased out for commercial purposes.

Previous assessments of the long-term future of the site (2000 and 2008 by the then Department of Lands and Water Conservation) were undertaken and included community consultations. The Department concluded that the land should not be commercially leased and the site should be incorporated into the Blue Mountains National Park and used for emergency and bushfire air operations only. This conclusion was supported by the Blue Mountains City Council and the National Parks and Wildlife Service as well as the broader community.

It is clear from these past consultations and from meetings held by the Department of Lands in June this year with the local community, that there is wide-spread support in the community for the incorporation of the Katoomba Airfield into the National Park and wide-spread opposition to any commercial leasing of the site. The petition signed by some 12000 individuals and presented to Parliament earlier this year is evidence of how broadly held this view is in the community.

The National Park is a national treasure and every effort should be made to preserve it. **Leasing the site of the Katoomba Airfield for commercial operations will be to the detriment of the environment including plants, birds, animals and humans.**

3. The proposal for a long-term commercial lease of the Airfield

The proposal submitted to the Department of Lands by the current licence holder, Flyblue, indicates that: 'The applicant proposes to revitalise the site as a hub for recreational aviation and promote sustainable management of the site.'

The applicant believes the lease will provide opportunities to 'open up' substantial parts of the site for bushwalking and other community activities.

The applicant also mentions environmental benefits ('a biodiversity agreement that will result in substantial planting of new trees) and economic benefits ('support tourism and benefit the local economy')

The current licensee also 'proposes to allow recreational, fixed wing aircraft to use the airfield and also intends to operated scenic helicopter flights from Sydney'.

4. Will a commercial helicopter tourism operation benefit the environment and the community?

Environmental benefits?

The community has not been given information about the number of flights proposed by FlyBlue. However, commercial helicopter tourism, if it is to bring the desired return on investment, must involve frequent helicopter flights over bushland and residential areas.

Instead of environmental benefits there will be detrimental impacts on the environment.

Environmental impacts of helicopter flights

Given the location of the Airfield site on the edge of the Grose Valley, it is unavoidable that helicopter flights will occur over hikers, houses or both. It should be noted that whereas helicopters should fly no lower than 1000 feet over residential areas and 500 feet over other areas, they can fly at any height when approaching or leaving an airfield and at any height or direction because of stress of weather or other causes which might include reasons of safety.

Impacts on wild-life

World-wide research on the impact of helicopter and other aircraft on wildlife in bushland has identified a number of negative consequences. These include:

- severe injury and /or death resulting from physical contact with birds and bats in the air and animals on the runway
- effects of chronic noise exposure on animals and humans in the area - as noise has no boundaries, there is no refuge from its effects
- noise and rapid movement result in physiological stress responses ('fight or flight') mediated by the release of stress hormones.
- Constant exposure to stressors such as noise and rapid movement results in chronic stress and long term detriment to the health of living creatures including humans. Health impacts include suppressed immune function making animals more susceptible to infection and parasites, altering growth and slowing recovery from food shortages. Birds show a similar range of responses to mammals.
- high velocity wind vortices generated by helicopter blades when the helicopter is hovering above a runway or bushland produce smothering blankets of airborne dust particles, reduce habitat values and expose vegetation and wildlife to lethal wind velocities
- changes in the acoustic environment impact severely on animals that rely on their hearing to receive information about their surroundings, or use vocalisations to coordinate activities such as feeding, mating and courtship as well as for group cohesiveness and danger warnings

Behavioural and physiological changes such as those outlined above can result in the loss not only of individuals (through collisions with aircraft) but even species, as sections of long-term habitat become displaced with loss of food resources, roosting branches and nesting hollows. The 'substantial planting of new trees' proposed by the current licensee and applicant for a long term lease of the Airfield shows a lack of understanding of eco-systems and the ecology and cannot replace lost habitat.

Australia was recently named as the fourth worst country for animal extinctions by the International Union for Conservation of Nature. The latest update of the Red List of Threatened Species published recently lists 106 species as critically endangered in Australia. **We should be doing all we can to protect our native species, not supporting activities which put our plants, birds and animals at risk.**

Impacts on residents

From 1992 -1995, joyflights were run out of the Katoomba Airfield. Despite regulations about operating heights and flight paths there was substantial disturbance to the residential community especially from helicopter 'joy flights'. Residents of Medlow Bath, North Katoomba and areas adjacent to the scenic lookouts in Leura, Katoomba and Wentworth Falls were particularly impacted by low flying aircraft. Walkers and park users also complained of low flying aircraft, including in remote areas.

In response to community concerns, the Blue Mountains Fly Neighbourly Agreement (BMFNA) was developed between aircraft operators and the community to reduce disturbance caused by aircraft. However, the BMFNA is a voluntary agreement and there is no compliance and monitoring or enforcement and no avenues for residents to pursue when breaches occur. Consequently, the BMFNA has proven

totally ineffective in managing the impacts of commercial joy flights or other low-flying intrusive flights within the Blue Mountains. Strong community opposition to the noise and other disturbance caused by helicopter flights ultimately resulted in the operation ceasing.

Noise, air pollution and other disturbance from helicopter 'scenic' flights, as residents know from past experience, will interfere with the quiet enjoyment of our, the residents', homes as well as intrusions on privacy by low-flying aircraft.

In summary, commercial helicopter tourism will have no benefits to the environment. It will, however, have many detrimental effects for plants, birds, animals and people.

Will the proposed operation support tourism and the local economy?

The current licensee and applicant for a long-term lease claims that the commercial operation of the Katoomba Airfield will support tourism and the local economy.

Tourists are drawn to the Blue Mountains because of the peace and serenity of the natural environment. The National Park provides an escape from the crowds, noise and pollution of cities. Opportunities for remote camping, bushwalking and mountain biking on secluded tracks, world-class views and the cultural heritage of this area attract domestic and international. Tourism is an important contributor to the Blue Mountains economy generating \$4 million annually. The Blue Mountains Economic Enterprise website indicates that 2,539 of the 19,513 jobs in the Blue Mountains are supported by tourism.

The noise of scenic helicopter flights, which can be as low as 500 feet over remote areas, will not contribute to the tourism industry in the Blue Mountains. Scenic helicopter flights will bring a small number of wealthy sight-seers who will fly over the scenic and remote areas of the National Park and then return to the city. They are not likely, unlike 'ground' tourists to stay in local accommodation or visit local shops and restaurants. They will not be spending money at local businesses in the way that 'ground' tourists do.

The noise disturbance of helicopter flights is likely to discourage 'ground' visitors who are looking to experience the peace and serenity of the natural bush environment. **Rather than supporting tourism and the local economy, a helicopter tourism operation which serves a wealthy few is likely to make the Blue Mountains a less attractive tourist destination for the many.**

I request that you give serious consideration to the many negative consequences of a commercial operation of the Katoomba Airfield. The granting of a commercial lease, whether long or short term, will benefit a minority viz the commercial operators of the lease. The detrimental effects will impact the great majority including native birds and animals, residents, local business people, domestic and international visitors and the tourist economy.

Sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 July 2019

To whom it may concern:

RE: Your reference: 602686 PROPOSED LEASE OF KATOOMBA AIRFIELD.

I write in opposition to the above proposal. It has been difficult to lodge a submission when information on websites are scarce, forever changing and ambiguous. I object to NSW Department of Planning, Industry & Environment deciding in favour of a lease that proposes to carry out a long-term commercial aviation operation for which it cannot fully govern and would be self-regulating by the lessees. Contrary to what the lessee, Fly Blue Management Ltd advertises, this proposal negatively impacts our communities.

On Fly Blue's website it states that they assure the community that the flight paths in and out of Katoomba Airfield, for both fixed-wing and helicopters, will NOT be over residential and built up areas and in Floyd's own words in an article I read, 'Fly Neighbourly policy categorically bans flights over populated areas'. This is not true of the helicopter flight path from runway 06 and I believe this assurance is false and misleading. The helicopter flight path, which were not made available by Fly Blue until the beginning of July, **flies over our home on Shipley Plateau** (Shipley) in Blackheath. On the photo of the proposed flight paths residential areas are identified in light green EXCEPT for the residential homes on Shipley. This flight path is over the populated areas on Shipley, unlike the fixed wing flight path, which avoids these residences. This helicopter flight path could put in jeopardy the safety of the numerous para/hang gliders who fly regularly above Shipley. 20 years ago, had there been a flight path above this property, we would not have purchased it. We are relying on the sale of our home to fund our retirement, if this proposal is granted, the price of our property will be impacted and we would face a future of reduced income, all for the personal gain of Floyd & Derek Larsen.

We reside at 3543.3FT AMSL (1080m) as do most of our 18 neighbours, who are within a kilometre radius of our home. There's another 40 plus residents residing at similar heights who will also be impacted when the helicopter takes off, heads for Shipley and flies not far above our homes. In Fly Blue's draft flight procedures, the helicopters will fly at 5000FT AMSL (1524m), the noise from aircraft this close to our neighbourhood dwellings will negatively impact our amenity, especially when Civil Aviation Regulations allow for helicopters to fly as low as 500-1000FT AGL (152m-304m above the ground). This regulation does not apply during taking off, landing and through stress of weather or any other unavoidable cause. We, along with several neighbours, have stock animals, they frighten

easily by low flying aircraft, running into fences injuring themselves. An example is Endeavour Energy, who use helicopters to survey power lines. After complaining about the impact these flights were having on our pigs, Evdeavour Energy now call in advance so we can manage them.

The first flight into Sydney Airport is 6.00am, we hear the first plane of the day. We also hear the last at 11.00pm. The topography of Shipley magnifies aircraft noise, it seems to bounce off the escarpments. Sydney's second airport, at Badgerys Creek, 8km from the World Heritage Blue Mountains, will operate 24 hours a day and will negatively impact all Blue Mountains residents and now we're confronted by this private operation, which will further reduce the quality of our lives for the financial gain of two people. I contacted Fly Blue via their website, Floyd phoned me and I asked her how many flights there would be per day and what are the hours of operations. Floyd didn't answer my questions, she referred me to Fly Blue's Fly Neighbourly Policy, Noise Abatement Procedures. From this document, the hours of operation heading towards Shipley are from first light to 30 minutes before last light Monday to Sunday. Floyd advised they would conduct 30-minute helicopter flights, so there is a potential for a helicopter passing forward/backwards over our home, each 15 minutes, during day light hours, seven days a week. How do I manage stock animals with this duration? This is not acceptable, why isn't it proposed that the helicopters follow the same path as fixed wings from runway 06, as they do from runway 24, away from the residents? **This is no exaggeration**, in the article I read, Floyd 'expected the airfield upgrades to help lure more tourism and overnight stays to the Blue Mountains including private plane and helicopter owners' and on the public record an ABN of Derek Larsen shows his intent with the various business names he has registered:



Historical details for ABN 97 498 231 736

Entity name	From	To
LARSEN, DEREK	25 Aug 2010	(current)
Business name	From	To
Flyblue Helicopters	27 Jul 2018	31 Mar 2019
Flyblue Aviation	27 Jul 2018	10 Nov 2018
Flyblue	25 Nov 2017	31 Mar 2019
Blue Mountains Airfield	24 Oct 2017	31 Mar 2019
Blue Mountains Heliport	24 Oct 2017	31 Mar 2019
Blue Mountains Airport	14 Oct 2017	31 Mar 2019
Blue Mountains Aviation	14 Oct 2017	31 Mar 2019
Blue Mountains Heliflight	14 Oct 2017	31 Mar 2019

I don't believe this proposal will benefit tourism, the benefits Fly Blue offer are not supported by evidence. I will argue the proposal will have the opposite effect and drive

tourism away. I have two examples to support my claim. I've been a tourist at Purnululu National Park in Western Australia and Kings Canyon National Park in the Northern Territories. At Purnululu, we went on a 4 day walk, having walked into a remote location, the next day we were abruptly woken, at first light, by a helicopter charter. We heard the helicopter approach from kilometres away as the noise reverberated on the canyon walls. When we reported our safe return to the ranger, she asked how our trip was and was upset to hear that we would warn others of the impact the helicopters had on our enjoyment in this national park. We went to Kings Canyon to do another long walk but when we arrived and heard helicopter after helicopter, we left the area, having not spent a cent. This was over 10 years ago and we tell anyone travelling to the area to avoid it.

I believe the negative impacts from this proposal outweighs any community/environmental benefit. I can't reconcile how a commercial aviation operation can responsibly manage all aspects of the environment, which the lease expects from them. Aviation's impact on the environment is one of the worst-case scenarios there is and well documented. I'm concerned rate payers will be forced to support the Larsen's private enterprise in the form of road upgrades to the site, only benefiting those who can afford a helicopter charter. I don't believe the Larsen's have lived in our community or contributed to it, considering Fly Blue's main business location is listed as NSW 2849 on the same government website as above, this is Bathurst Local Government Area. It appears their proposal to be a hub for the west benefits these communities to the detriment of Blue Mountains ones.

On the NSW Rural Fire Service website, it states that the Blue Mountains is one of the most bush fire prone areas in the world. No one will forget when over 200 homes were lost in 2013 and many more over the years. We have suffered several droughts lasting many years with ever drying conditions, this proposal increases the potential to produce a catastrophic fire storm, with more aviation fuel stored on site the risk of an aircraft crash, as it happened to the previous lesser.

I believe Crown Lands undertook assessments and community consultations in both 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. Yet your department once again, after the granting of a licence, are purportedly engaging the community via a new Community Engagement Strategy, which in my view hasn't been successful and from Fly Blue's website, it granting of a lease appears a done deal. I spoke with Steve Keszler, Senior Property Officer, Blue Mountains City Council, who is putting in a submission on behalf of council asking that Katoomba Airfield remain for emergencies only, as per the above findings. Steve said he had asked your department for an extension to the submission dates because lower mountains residents have not been informed of the proposal, who will be affected in the same way as the upper mountains residents and he wants to give them an opportunity to submit objections. Communities from Lawson to Hawksbury Heights will be impacted by the flight paths. They're already impacted by flights avoiding Richmond Air Base No Fly Zone. I spoke with several people in the lower mountains, in several locations

and none of them had any idea this proposal existed. Of the community meetings thus far, all reports are that they have been conducted in a haphazard way and were not informative.

I am of the understanding that Crown Lands manage other airstrip and that the cost in repairing the airstrip is approx. \$100,000.00 and \$5000.00 annually. This should be the preferred option with the Airfield being reserved for emergency use only. A land care group would easily be formed to manage the vegetation surrounding the airstrip and fundraising could cover the costs. This is the only true way the community benefits from this parcel of crown land.

Finally, are we to lose World Heritage listing? It's under threat by a new Sydney Airport, the proposed raising of Warragamba Dam, expansion of mining activities on its fringes and now this proposal. UNESCO is questioning why this area should be kept on the list and I think it would be devastating if it was taken off. Please reject this proposal.

Regards,

A solid black rectangular box used to redact the signature of the sender.

Mark Maloney
Projects Manager,
NSW Department of Industry – Crown Lands and Water
PO Box 2155, Dangar, NSW 2309
email: airfield.submissions@crowmland.nsw.gov.au

01 August 2019

Reference: **602686**

*The wild and rugged landscapes, diverse flora and fauna, and opportunities for **solitude and quiet reflection** are attributes that promote inspiration, serenity and rejuvenation of the human mind and spirit. **Such feelings are valued by individuals and society**, and lead to contributions in the fields of philosophy, painting, literature, music and photography. The GBMWhA has inspired such contributions and these have promoted a sense of place for all Australians who then want such places protected. Existence values derive from the community's pleasure from simply knowing that places such as the GBMWhA exist and are protected, even though they may never visit them".*

Excerpt from the *Greater Blue Mountains World Heritage Area - Strategic Plan* - January 2009. NSW Department of Environment and Climate Change and Department of the Environment, Water, Heritage and the Arts, Australian Government.

These are fine, well-expressed sentiments. Now it is time for the NSW government to live up to them.

As a Blue Mountains resident and bushwalker, I am opposed to the proposal to grant a lease for the commercial operation and development of the Katoomba airfield, on land which is within and used to be part of the Blue Mountains National Park.

My concerns are listed below.

1. Airport commercial operations with negative environmental impacts on public land in a World Heritage Site

The land was excised from the Blue Mountains National Park in the 1960's on the basis that it would be returned to the National Park when the original lease expired in 1988.

Since the original intention was to return the land to the National Park, which later was declared a **World Heritage site**, it is wrong to develop this public land as a for-profit commercial operation. Especially when the commercial operations will have significant negative environmental impacts on the Blue Mountains National Park: noise pollution, exhaust gases pollution, visual pollution, increased bushfire risk, impact on the wildlife, etc.

The Greater Blue Mountains Area is protected and managed under legislation of both the Commonwealth of Australia (Department of the Environment and Energy) and the state of New South Wales (Office of Environment and Heritage).

"If you are proposing to take an action that will have, or is likely to have a significant impact on the national heritage values of a national heritage place and/or any other nationally protected matter, you must refer that action to the Australian environment minister."

Source: National Heritage Laws webpage, Australia Government – Department of the Environment and Energy.

There indicates a failure of due process associated with this proposal. Stated policies of both State and Federal governments specify a process that appears to have been ignored in the present case.

2. Acoustic pollution (noise)

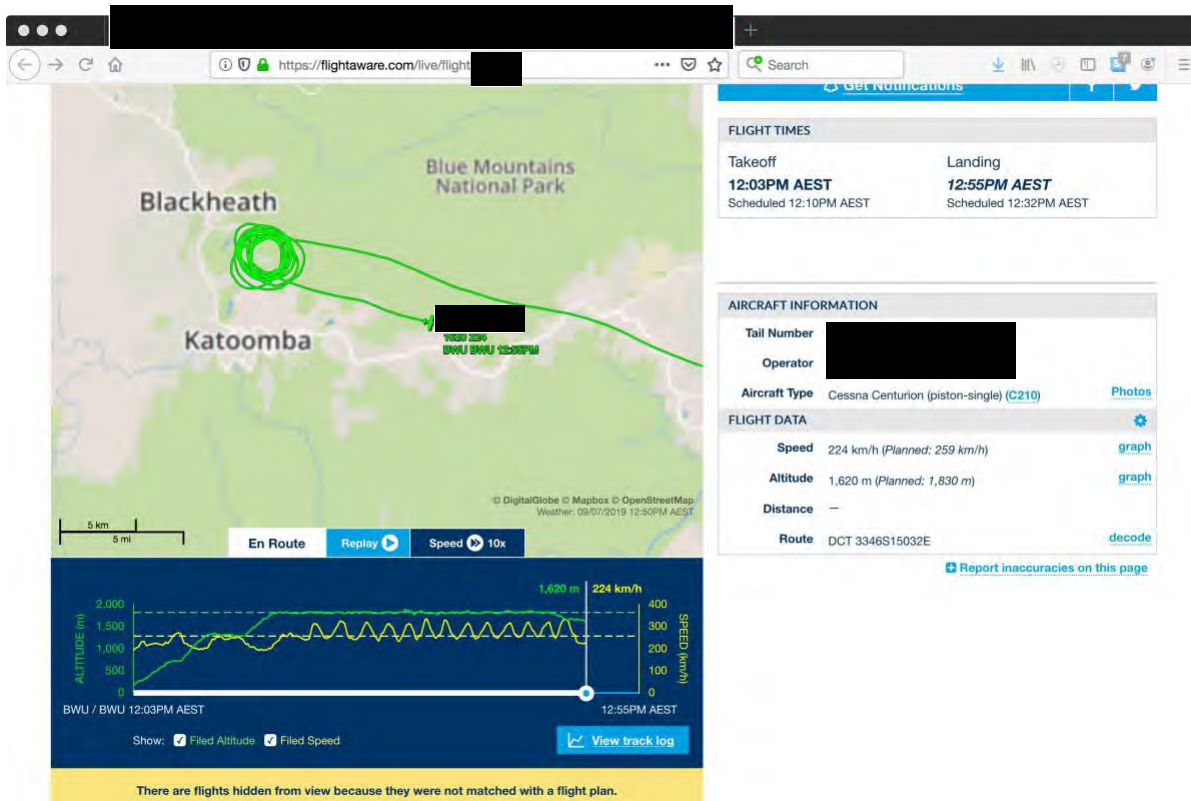
State and Federal government stated in the *2009 Strategic Plan for Greater Blue Mountains World Heritage Area* that:

*"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**. A Fly Neighbourly program has previously been established in the Blue Mountains National Park to minimise impacts of aircraft but this needs to be reviewed and stronger and **more extensive controls applied**."*

Excerpt from the *Greater Blue Mountains World Heritage Area - Strategic Plan* - January 2009 – page 33. NSW Department of Environment and Climate Change and Department of the Environment, Water, Heritage and the Arts, Australian Government.

Many residents moved here for the quiet and the beauty of the Blue Mountains. Having planes and helicopters landing, taking off and flying 1000 m from the townships (as per proposed flightpaths) is going to impact my life, my neighbours' life and thousands of other people as well as the bushwalkers, climbers and canyoners who frequent the area.

We can already hear helicopters taking off and landing more than 4 km away from the airport as well as light airplanes circling the airfield. A recent flight path (taken from FlightAware) is shown below. Over 30 minutes, [REDACTED] flew **13 times around the Katoomba airfield**. The noise could be heard from indoors. Is this sort of unregulated activity to be our future life here in the World Heritage Area?



[REDACTED] circling 13 times the Katoomba airfield (flightaware).

Tourism and visitors to the Blue Mountain and tourism are a basic component of the Blue Mountains local economy. The risk to the local economy is that people will avoid visiting the WHA with commercial flights overhead.

Blue Mountains City Council commissioned a report from Marshall Day Acoustics in July 2017 titled “*guidelines for minimising aircraft overflight impacts*”. This report bears on the noise that will be associated with Badgerys Creek’s airport, however it has a good review on the impact of low-flying aircraft noise in National Parks in Europe, USA and New Zealand.

It is amazing that this proposal does not even include a noise impact assessment on the National Park and the Blue Mountains residents. In light of these prior studies and reports, this indicates a **failure of due process**.

3. Increased risk of air crash and bushfire

More airplanes and helicopters increase the risk of a crash in the Blue Mountains. This in turn increases the risk of bushfire for the residents and the Park, depending on the season.

A search on the Australian Transport Safety Bureau (ATSB) website shows the following incident reports for Bathurst and Orange airports:

Bathurst: 37 investigations from 1974 to 2018; including 9 investigations in the last 10 years (2009-2018).

Orange: 19 investigations from 1971 to 2018; including 6 investigations in the last 10 years (2009-2018).

In the last 45 years, there were on average 0.82 investigated incident per annum in the Bathurst area. In the last 10 years, this number has increased to 0.9 investigated incident per annum.

In the last 48 years, there were on average 0.34 investigated incident per annum in the Orange area. In the last 10 years, this number has increased to 0.6 investigated incident per annum.

These incidents were formally investigated by ATSB. Not all incidents involving aircraft whether a fatality occurs or not are investigated. The number of incidents is under-reported.

This suggests that increased aircraft movement at the more difficult Katoomba airfield (turbulence and wind shear are common, presence of power lines) could lead to **at least one incident in the Blue Mountains once every 12 to 18 months**.

Inevitably one such crash will start a bushfire in remote rugged bushland. That would bring a very large cost to the local community and emergency services, and to the State government.

In the event of such a fire, consider the following impacts of the October 2013 Blue Mountains bushfires:

“*The Insurance Council of Australia estimates claims will top \$94 million.*” Damien Murphy “Lucky Country”, Sydney Morning Herald – 26 October 2013.

“Tourism operators in the Blue Mountains estimate they have now lost nearly \$30 million from cancellations and visitors avoiding the area after the recent bushfires.” Sarah Hawke “Tourism losses hit \$30m after Blue Mountains bushfires” – ABC 14 November 2013.

“October 2013 Fires in Blue Mountains, Port Stephens, Lake Munmorah, Hunter, Hawkesbury, Central Coast & Southern Highlands:

*Deaths/injured: 2 deaths. Area/property damage: 118,000 ha. 222houses destroyed. 168 houses damaged
Normalised cost (\$2011 AUD): \$183.4m (early figures)” Issues Backgrounder (NSW Parliament) Number 6/
June 2014*

Such costs exceed the net value of the land (\$435,000) and any revenue that the State government will raise from the airport lease. Furthermore, the State Government will be exposed to liabilities for losses from such a bushfire.

4. Increased risk of aviation chemical and fuels pollution (transport and storage)

As a hub to central west NSW, transiting aircraft will require refuelling. Thus, the Katoomba airport operations will require large fuel tankers to operate at the airfield and travel through neighbouring streets in Medlow Bath. There is a risk of fuel spills, of fugitive vapour emissions into the atmosphere. Any incident will require a full HazMat response. The large HazMat crews and equipment are located at St Marys, more than an hour away; and Lithgow, 40 minutes away.

Such accidents do happen – in the last six months **two major incidents** involving fuel tankers occurred in nearby regions. On 3 January 2019, a fuel tanker burst into flames near Wollongong, requiring 100 FRNSW firefighters to control the blaze. On 19 February 2019, a petrol tanker burst into flames between Bathurst and Orange.

The road to the airfield is narrow and unsealed. Regular traffic of heavy fuel vehicles will require the road to be upgraded. The Blue Mountains Council will have to pay for the maintenance and resurfacing of the road that leads to the entrance of the National Park. People flying in or out will also need to be driven to and from the airport putting stress on the local roads. Conservatively this could cost ratepayers and taxpayers in excess of \$100,000. There is no mention in the Info Pack that FlyBlue will share this cost.

Airplanes and helicopters use chemicals including avgas which contains lead and jet fuel. Fuel and chemical spills will diffuse into the neighbouring hanging swamps and find their way in the catchment of Katoomba and Greaves creeks and into the Blue Mountains National Park. These chemical risks are inconsistent with the status of the nearby World Heritage area.

The proposal does not include a **risk analysis and management plan** (standard for any project) and environmental impact assessment on the National Park and the Blue Mountains residents. In light of these prior studies and reports, this indicates **failure of due process**.

5. Economic Costs: Decrease in House values:

People do not want to live near airports and under flightpaths, primary because of the noise and air pollution. Houses that are near the airfield and proposed flightpaths will lose value. For nearby Blackheath the median house price is \$577,500. A conservative estimate of the loss in value due to airport operations would be a 10% decrease in value, or \$57,750. That would be multiplied by many hundreds of houses affected. Such losses exceed any revenue that the State government will raise from the airport lease.

6. Economic Costs: Loss of revenue for businesses and residents who offer tourist accommodation and outdoors activities

Would you holiday in a place where airplanes and helicopters fly from first light to sunset (the proposed hours of operations)? People come to the Blue Mountains for the natural beauty, peace and quiet.

Tourism is one of the main economic activities in this region. Any decrease in visits will have a widespread impact on local businesses and employment.

There will be loss of revenue for businesses and residents who offer tourist accommodation and outdoors activities. Once again, such losses exceed any revenue that the State government will raise from the airport lease.

7. Lack of Transparency of the Process from Crown Land

Some of the key findings from Performance Audit “*Sale and lease of Crown land*” by the New South Wales Auditor-General’s Report (8 September 2006) are published below:

- *Limited oversight of leasing and sale decisions and tenant compliance*
- *Opportunities for community involvement in Crown land decisions are limited*
- *Decision-making about Crown land is not transparent*
- *Strategy for Crown land could be better balanced*
However, economic and financial outcomes are more prominent than social and environmental outcomes in the Department’s business plan.

The process regarding the License and the Lease of the airfield has been opaque. The State Government chose to contact a range of parties in 2017 to formulate options for the future of this land but did not consult the public or local residents.

Winning the tender in 2017 allowed the licensees (formerly known as Blackbird Aviation, currently trading as FlyBlue Management) to submit a proposal to run a commercial airport on public land **without any competitive process**. The only document we, the public, have is a pdf of PowerPoint presentation from FlyBlue Management and a FAQ from the Department of Industry. There is no environmental impact statement, no noise assessment, nor risk assessment for the airfield and its operations.

The Department of Industry – Crown Land - has not made public the terms of the current license, and the annual license fee. It did not make public the three other non-commercial, but unsuccessful, proposals. Finally, one of the Director of Blackbird Aviation and FlyBlue Management, Derek Larsen, was previously employed by the NSW government as the General Manager of South East Local Land Services, constituting **a conflict of interest**. All of this does not reflect well on the NSW State Government and may be brought to bear in subsequent actions.

We are now in a consultation phase for a proposal with no documents to assess, with the exception of a marketing document and a FAQ. Building a house in the Blue Mountains (or elsewhere) requires more paperwork, that has to be made available for public response, than developing an airport located on public land surrounded by a World Heritage site.

8. FlyBlue proposed plans: a poor, misleading document

No substantive proposal has been made available to the residents of the Blue Mountains. All that has been made available is a PowerPoint presentation, essentially a marketing document. To their credit FlyBlue did at least make this publicly available.

I trust that FlyBlue Management produced a professional proposal to the NSW Department of Industry because the Info Pack is not professional and is misleading.

- page 13 features three uncredited photographs of the **2018 California wildfires** taken by Noah Berger, Ringo Chiu, two finalists in the Breaking News photo category for the 2019 Pulitzer Prize and, Mike Eliason, who did not know that the photograph was used in the FlyBlue Info pack.
- page 15 shows photographs of RFS and Parks personnel (NSW government employees) who have not given consent to be featured in a commercial website and proposal.
- page 16 features the photograph of a chain-link fence (including dust specks on the lens) from Cactus Fence and Construction in Houston Texas. It seems that FlyBlue could not take a photograph of the Katoomba airport fence. Instead they took a poor-quality photograph from another website.
- page 17 shows a photograph of bushwalkers taken the NSW Parks website without attribution to NSW National Parks;
- page 25 is directly copied from the **Lake Macquarie Airport Operating Procedures** without crediting Lake Macquarie Airport. FlyBlue could not be bothered to customise the Macquarie Lake operating procedures to Katoomba airport.
- page 26: *“Formation of a Stakeholder Group to provide input into new “Fly Neighbourly” policy & “General Conditions of Use” for all aircraft using Katoomba Airfield, addressing flight paths, curfews etc.”*. FlyBlue has already proposed flight paths and airport hours of operations, curfews etc without consulting the Blue Mountains community.
- pages 27 to 32 list ten so-called *“heli-charter operators”* suggesting that there are many. In fact, red balloon, viator, everything Australia, Experience Oz, get your guide, tours to go, helicopters tours, cloud 9 are not heli-charter operators: they do not have a fleet of aircraft. These companies are online experience gift retailer, that is middlemen who on-sell tickets via their websites, just like Airbnb. FlyBlue Management is inflating the number of charter operators when a quick search shows that there are only a few in Sydney: Sydney Helitours, Blue Sky Helicopters, Sydney Helicopters, Helix Tours.
- pages 11 and 12: *“introduction of a responsible & ongoing carbon offset program”* and *“FLYBLUE has committed to donate one native tree for every flight into and out of Katoomba Airfield. This will contribute to offsetting the carbon emissions associated with each flight and will directly support native reforestation projects across Australia”*.

Planting one tree per landing or take off, independent of aircraft size or distance travelled does not reflect the carbon footprint of the aircraft activity. This is a trivial gesture and suggests that the proponents are not serious about protecting the environment. Even worse they do not propose to do this themselves: they will “partner” with a charity “Greenfleet” to do it. Note also that such gifts will be tax deductible to FlyBlue.

- page 18 quotes the *Blue Mountains Destination Management Plan* (page 6): “...grow the visitor economy in a sustainable manner, focusing on growing visitor yield rather than visitor numbers...”.

This quote is **taken out of context** and does not relate to Katoomba airfield: it refers to 42 opportunities identified by Council, of which the Katoomba airfield is not one.

However, on page 3, silence is listed as a local quality that attracts and inspires visitors.

*“The Blue Mountains continues to attract and inspire visitors through food, art, adventure, landscape, street life, vistas, atmosphere, fresh air, and **silence**, giving expression to our identity as a “cultural haven in a breathtaking landscape*

This Destination Management Plan supports and guides the development of offerings which reflect this identity, and capture and embody what we value as a community, and share with the world”.

Excerpt from *Blue Mountains Destination Management Plan* (August 2017).

- page 34: another vague statement: “*New Fly Neighbourly Agreements and airfield conditions of use protocols will be enforced*”. Who will enforce them? Already there are uncontrolled operations above Katoomba airport, as shown above. How will they be enforced? How is FlyBlue Management proposing to police the skies?
- Page 34 states: “*Provides an air “Safety Ramp” for General Aviation*”. In case of an emergency any flat treeless land will do: a field in Megalong Valley, or a golf course as mentioned by a pilot at one the consultation meetings. There are many golf courses in the upper mountains.....
- Page 34 states: “*FlyBlue Operations Does (sic) not represent biodiversity or biosecurity threat to the World Heritage National Park*”.

There is no World Heritage National Park: there is however a Blue Mountains National Park which is part of the Greater Blue Mountains World Heritage Area.

CASA is more nuanced in their view of the effects of aircraft operations on the wildlife.

*“Impacts on bird populations may occur, for example, when aircraft operations interfere with their habitats, breeding cycles, migratory patterns or feeding patterns. These impacts are most likely to occur in the vicinity of an active airport or where **low level operations** disturb nesting or roosting birds. Sightseeing and training operations in the vicinity of nature reserves and in coastal areas are of concern to conservation authorities. There is also concern that **increased noise levels could interfere with echolocation of bats and marine mammals. This would interfere with their ability to navigate, communicate, breed and locate food.**”*

Excerpt from CASA - Office of Airspace Regulation *Environmental implications guidelines form 1289 Draft 1.0 page 5.*

The Blue Mountains is home to many bird and bat species. 21 bat species are found within the Greater Blue Mountains. Two vulnerable species of birds –glossy black cockatoo and the Gang-gang cockatoo are present in the areas near the flightpaths.

As far as the biosecurity threat is concerned, it would be a major disaster if a species (plants, animals, diseases) was imported inside the National Park and the Greater Blue Mountains World Heritage Site. Conversely farmers probably do not want pests and diseases in the Central West NSW. Again, no risk analysis and management plan.

- Proposed flightpaths: Air Services Australia is responsible for airspace management and flightpaths. In unrestricted airspace (class G), there are no specified or enforced flightpaths, only altitude restrictions: aircraft can fly anywhere. It beggars belief that FlyBlue Management can influence the airspace management and introduce flightpaths or decide where general aviation can fly.
- page 14: “.....an asset of strategic value for training & real-life emergencies, mass casualty events, natural disasters, acts of terrorism & the like...”. Emergency services – RFS, Police, etc – do not require the existence of Katoomba airfield as evidenced by this statement from the Dept of Industry, Crown Land.

*“DoI Lands have been advised that the site is **not required for support of emergency services training and operations.**”*

Correspondence from Jeremy Corke, Dept of Industry, Crown Land to the Regional Airspace and Procedures Advisory Committee (RAPAC) – Office of Airspace Regulation (23 February 2017).

Do we really need Katoomba airfield?

In 2017, Crown Land was considering transferring the land back to National Parks and Wildlife Service.

“transfer of the land to the present day NSW Office of Environment and Heritage (National Parks and Wildlife Service) remains an option under consideration.”

Correspondence from Jeremy Corke, Dept of Industry, Crown Land to the Regional Airspace and Procedures Advisory Committee (RAPAC) – Office of Airspace Regulation (23 February 2017).

Over the last decades the airfield has fallen into disuse and disrepair and there has been little commercial operation from the airfield for many years. The local pilot community seems to have done little to maintain the airfield over the last decades. The emergency services do not require the airfield.

Maintaining the operation of the existing airfield was not a priority, as stated in the Department's *Katoomba Airfield Call for Expressions of Interest* (17-0569).

*“The Department proposes to offer tenure to the property by lease or licence. The invitation to participate in this EOI is extended to all individuals and organisations with a bona fide interest in making use of the subject Crown land, **regardless of whether this includes maintenance and operation of the existing Airfield.**”*

There is no need for this airfield. The profit motive of two individuals is not sufficient justification.

Please return the land to the Blue Mountains National Park as was originally planned.

Sincerely

A black rectangular redaction box covering the signature area.

[REDACTED]
[REDACTED]
4th August 2019

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

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

Your Reference: LX 602686

Submission Opposing a Commercial Lease over Katoomba Airfield

I write specifically as a volunteer bush regenerator with 20 years experience over multiple sites in the upper Blue Mountains. In addition to on-ground work, my volunteer duties include the role of Convenor of the Blue Mountains Bushcare Network and inspections of locations of particular interest that are not specific Bushcare sites.

One such site is the Endangered Ecological Community that is the Blue Mountains Upland Swamp near (below) the airfield site. This swamp is a unique ecosystem that supports numerous flora and fauna species. Fauna recorded here include Blue Mountains Water Skink and the Giant Dragon Fly.



Figure 1: *Eulamprus leuraensis* (Blue Mountains Water Skink) coming out of burrow, Medlow Bath Swamp January 2017
(photo Paul Vale)



Figure 2: *Eulamprus leuraensis* (Blue Mountains Water Skink) basking in coral fern, Medlow Bath Swamp January 2017 (photo Paul Vale)

Such swamps are generally in decline, even with significant maintenance and remediation works by both Blue Mountains City Council and National Parks & Wildlife Service. The swamp system in the National Park around the airfield site is generally in good condition (see Figure 3 below).



Figure 3: Medlow Bath Swamp (section) viewed from Grand Canyon Road, January 2017 (photo Paul Vale)

This site can only be closely inspected with permission of NPWS; a great privilege, engendering a sense of awe & wonder at the hidden treasures such as the Fringe Lily.



Figure 4: The tiny Fringe Lily, emerging to find the sun through half a metre of coral fern. Medlow Bath Swamp January 2017. (photo Paul Vale)

My opposition to any commercial use of the airfield site is based on the general concerns relating to noise and other contamination of the World Heritage Listed National Park system immediately neighbouring the airfield site and further afield, especially in the valleys nearby.

However, I believe the site should NOT be used as a commercial venture for any reason, particularly as a heliport or for fixed wing flights.

It should be returned to the National Park estate as previously promised and properly maintained as a resource for emergency and bushfire control.

There are multiple academic studies showing detriment to natural ecosystems from persistent noise, ground vibration and air disturbance (including helicopter rotor downwash). There is little to nil chance of mitigating such detrimental effects on the surrounding National Park, so the introduction of such should not be allowed as would be the case in a commercial venture on site.

Some specific problems follow that would diminish the amenity of living, working and enjoying the natural environment in the area nearby (Blackheath is within 30 seconds by helicopter or fixed-wing aircraft).

Lifestyle and Amenity

1. An increase in helicopter numbers and their **associated noise, vibration and air disturbance** at low levels within the National Park.
2. Helicopter noise can travel long distances in an acoustically-sensitive environment dominated by cliffs and canyons, potentially affecting parts of North Katoomba, Medlow Bath and Blackheath and other areas in earshot of the likely flight paths.
3. Any Fly Neighbourly Policy is self-regulated. The policy does not, at the admission of the lease applicant, include aircraft that do not originate from Katoomba Airfield, so that would include many additional arrivals and departures.
4. Increased traffic along the route to the airfield (including fuel tankers and airport runway building equipment) on a narrow local road and walking path. The road is not designed for large vehicles (Station Street, Rutland Road and Grand Canyon Road). View [Route to YKAT \(PDF\)](#) for details (supplied by a local resident).

Environmental Factors some of which have been detailed on pages 1 to 3.

Damage to the Local Smaller-Scale Tourism Industry.

How was the process allowed to get to this stage of development, after numerous previous reports and promises recommending return of the land to Nation Park?

There are numerous additional reasons to reject the idea of a full-time airport and associated infrastructure at this location, listed by peak bodies.

I support the submissions lodged by Blue Mountains Conservation Society and Blue Mountains Bird Observers and call on the Department to:

- **Reject the application for a commercial lease, and**
- **Return the airfield land to the NSW National Park Estate for emergency use only.**

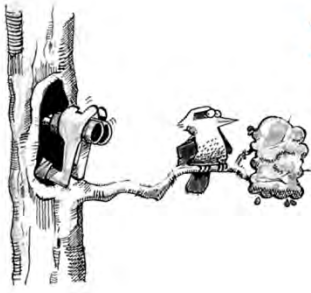
Thank you for the opportunity to comment.

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED]



Blue Mountains Bird Observers Inc.

48 Perry Avenue
Springwood NSW 2777
Web: www.bmbo.org.au
Email: info@bmbo.org.au

30th July 2019

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

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

Your Reference: LX 602686

Submission Opposing a Commercial Lease over Katoomba Airfield

Blue Mountains Bird Observers Inc (BMBO) is a community-based association whose main objectives are to encourage birdwatching, knowledge about and appreciation of birds, and to promote the conservation and protection of native birds and their habitat. The club has over 200 members between Penrith and Lithgow including a number of leading members of the Australian birding community. Our activities include collecting and collating data on bird species found in the mountains. We are affiliated with BirdLife Australia and maintain close links with a large number of birding and field naturalist groups in New South Wales through the Bird Interest Group Network.

This submission focuses on the impact of noise on migrating and breeding bird species; this is not the only concern but is one example of the unknowns involved in building large and noisy infrastructure totally within the boundaries of our National Park.

The proposed commercial aircraft base at Medlow Bath is of significant concern to BMBO members and others in the Blue Mountains birding community because of its potential to impact the annual migration of honeyeater and other species.

One important role of BMBO is the annual count of migrating honeyeaters as they pass through the mountains. Every March to May, hundreds of thousands, possibly millions, of Yellow-faced and White-naped Honeyeaters, Red Wattlebirds and other species such as Silvereye and Pardalote, migrate from cooler southern climes to northern NSW and Queensland. It is one of the great, but little-known natural phenomena of the Australian East Coast. This phenomenon was one of the criteria in the Greater Blue Mountains being

listed as a **Key Biodiversity Area** (KBA) by IUCN¹, via BirdLife International and BirdLife Australia recommendation.

Key Biodiversity Areas (KBA) are 'sites contributing significantly to the global persistence of biodiversity', in terrestrial, freshwater and marine ecosystems'. (see www.keybiodiversityareas.org for more information on KBAs and IUCN).

Every year since 2012, trained club observers and volunteers from the wider community in Greater Sydney count birds during the migration period. Observation sites include the plateaux of Shipley at Blackheath and Narrow Neck at Katoomba; at both these locations the birds are constrained and directed by the topography into relatively narrow streams.

In 2019 during the migration period, observers counted nearly fifty thousand birds passing through during periods of *only twenty minutes per day*, for a period of approximately 7 weeks. This survey period purposely includes individual days and shoulder periods when migration is likely to be low. Based on data collected since 2012 (see Figure 1), 2019 was an "average" year. Sites at Shipley and Narrow Neck recorded by far the greatest numbers. These figures are indicative of the large numbers of birds passing over the mountain barrier for hours every day.

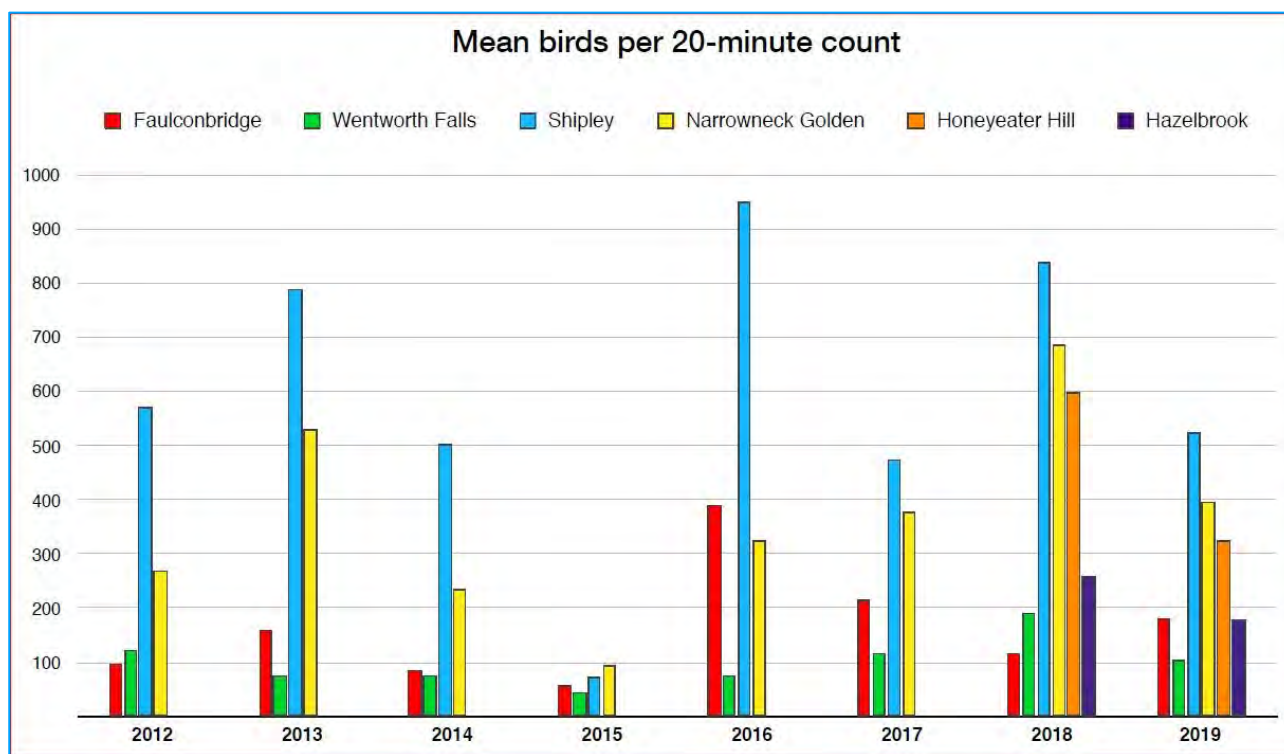


Figure 1: Mean (average) bird count for one 20-minute survey at each site from 2012 to 2019 (latest)

The importance of these migrating birds in nature is enormous. Honeyeaters are: major pollinators of some Eucalypts and many other native plants; important controllers of many insects in the bush; and are important prey species for smaller raptors en-route and at their destinations.

¹ International Union for Conservation of Nature; IUCN is the global authority on the status of the natural world and the measures needed to safeguard it. The Red List is produced by IUCN.

A significant number of predator species such as falcons and sparrowhawks are associated with the migration. This means that in addition to streams of birds moving generally at very low level above and through the tree canopy, other birds are watching and hunting them from higher altitudes.

Very little is known about the movement of birds past the established monitoring points. It is thought that having attained the plateau top, they either travel north across the tops to the valley of the Grose River or descend more quickly into gullies on that side. They aren't counted again until they reach the Hunter Valley.

Large numbers of birds would be expected to be in movement through the key areaⁱ between Katoomba (Narrow Neck) and Medlow Bath, with possible additions from the Blackheath² (Shipley) flocks during the migration period. It's important to note that they return south in August-October, but are not currently rigorously surveyed during that time. It is not unreasonable to expect that their path would be the reverse of the autumn migration; this is supported by anecdotal evidence. So, there are two major flows of birds for 2-3 months at a time, or more than a third of the year.

Migrating birds have been observed to react strongly to loud noise and sudden movement. Observation sites at Faulconbridge and Hazelbrook have each witnessed "turn-arounds" of large groups of birds that balk at trains and loud motor vehicles. Although it is expected that the birds might re-present and cross later; there is no evidence to say that individual birds do or don't.

The construction and operation of a commercial helicopter airport at Medlow Bath has the potential due to noiseⁱⁱ, rotor downwashⁱⁱⁱ and direct contact, to disrupt this migration, by injuring, stressing or diverting migrating birds.

Birds are in constant contact as they fly and must be able to hear each other in order to progress. Birds move throughout the day and some (Silvereyes) at night, maintaining contact through sight and sound. In windy and noisy conditions, or in rain/mist (low visibility), the birds generally stop moving. Persistent high-level noise caused by airport operations has potential to ground the birds^{iv}.

The impact on resident birds in the affected area cannot be ignored.

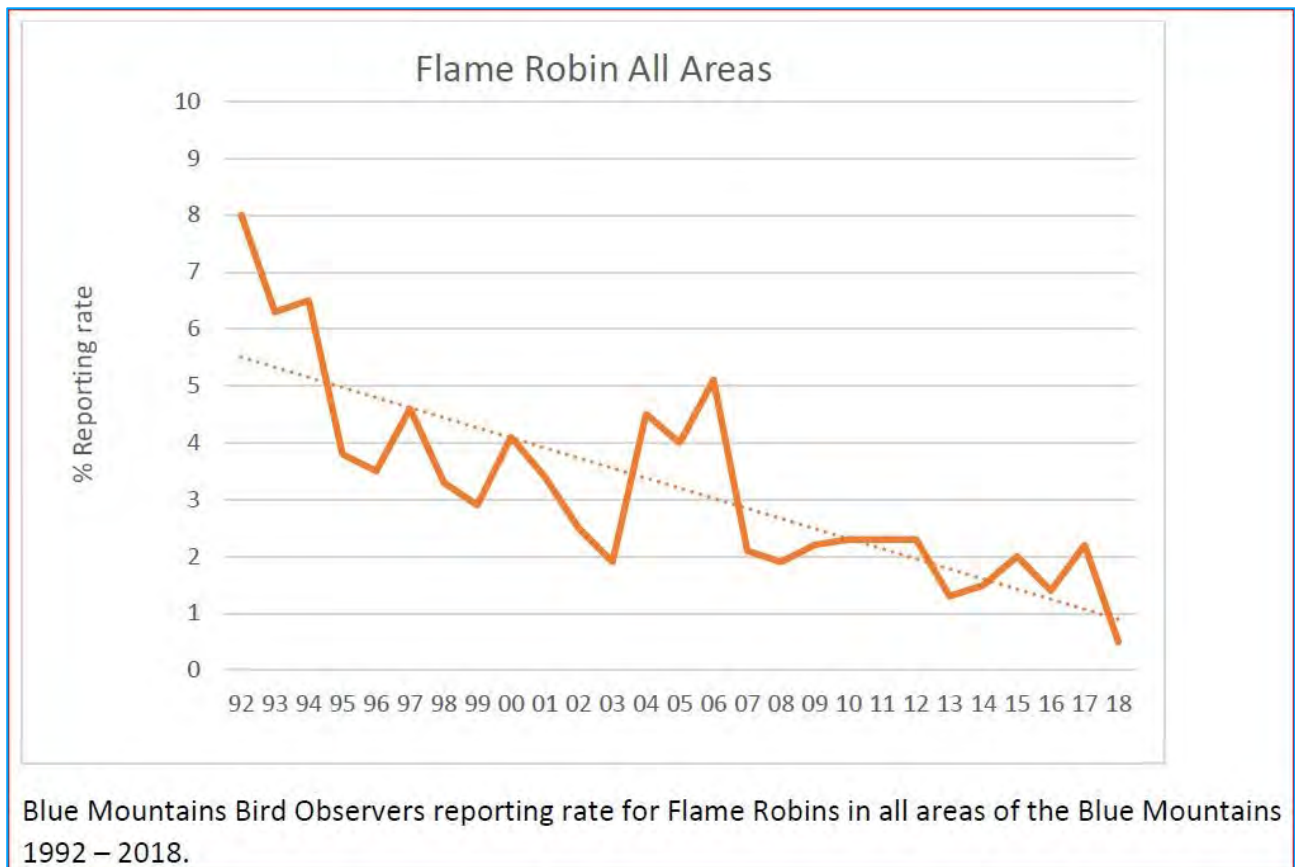
The Scarlet Robin (*Petroica boodang*) and Flame Robin (*Petroica phoenicea*), are both likely to breed in the vicinity and are listed as **Vulnerable** under the *NSW Biodiversity Conservation Act 2016*. The Flame Robin is described as an 'altitudinal migrant'; "*In NSW, it breeds in upland areas and in winter, many birds move to the inland slopes and plains ...*" (NSW Office of Environment & Heritage profile). This bird will most likely be in some part of its breeding cycle when in the subject area. Likewise the Scarlet Robin "*After breeding, some Scarlet Robins disperse to the lower valleys and plains of the tablelands*

² Flight paths have been observed and described from the Shipley survey location, crossing the main transport corridor (Highway & railway) from West to East, at the township.

and slopes" and "Scarlet Robin pairs defend a breeding territory and mainly breed between the months of July and January" (OH&S profile).

BMBO holds records of sightings and some breeding instances.

This graph shows the decline in Flame Robin reporting rate across the Blue Mountains LGA since 1992 follows. The trend over 26 years demonstrates the clear vulnerability of this species in our area of interest.



Other Threatened Species are recorded in the area, including Gang-gang Cockatoo, Powerful Owl and Glossy Black-Cockatoo, all listed as **Vulnerable** under the Act.

More information on bird species known to occur in the vicinity of the airfield can be read in the enclosed document "Birds and the Katoomba Airfield (M. J. Baker 2019)".

Birds call in order to attract mates and defend territory. A British study of the impact of noise on robins^v found that their ability to do both was compromised by man-made noise, adding to other man-made impacts on their survival.

The movement of masses of birds is part of a natural process (one of the major migrations in Australia) through a World Heritage listed estate and should be considered a thing of awe and wonder; to be appreciated, celebrated and indeed facilitated by the mountains community and shared with domestic and international tourists.

The potential disruption to the honeyeater migration and to resident mountains birds by the establishment of an airport across their migration route, for the benefit of a select few,

seems hard to justify. These birds face significant challenges before and after they cross the Blue Mountains and it would be too ironic if they were to fail in the midst of a great park system with World Heritage status.

Whilst the scenery of the Blue Mountains is a major draw card, it can be enjoyed in many ways without corrupting the values inherent in its status. Here is a thought from the United States National Parks Service:

"Grand Canyon is known for breathtaking vistas, geologic landscapes, the Colorado River, a rich history, adventurous trails, wildlife, solitude – and natural quiet", stated Palma Wilson, Acting Park Superintendent. "In the litany of the park's attributes, natural quiet is perhaps one of the most important. Without its natural soundscape – a canyon wren's descending trill, wind rustling through the pines, the roar of the Colorado River, and *silence* – Grand Canyon would still be amazing to look at, but it would lack something essential and vital to its remote and wild character."^{vi}

The tourist amenity that hopes to cash in on our world class scenery may well do so at the expense of the birds in the bush it is flying over. Many birds flying north along other flight paths can expect to be impacted by the operation of the proposed Western Sydney Airport. High aerial noise levels later in their journey could further imperil their progress.

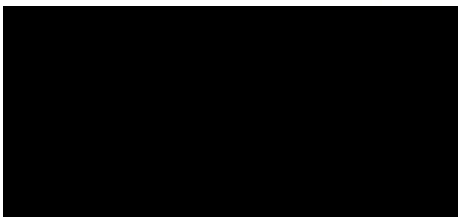
Without more knowledge of the impact on migrating and resident birds at Medlow Bath, the **Precautionary Approach** should be adopted and **no approval** should be granted for a Commercial lease on the subject land, especially for an Airfield "Heliopolis".

Recommendations:

- **Return the area of the airfield (Council DP 751627 550) to control of National Parks & Wildlife Service;**
- **Provide funds to make the facility serviceable and to maintain the facility for Emergency Services use only.**

Thank you for the opportunity to comment.





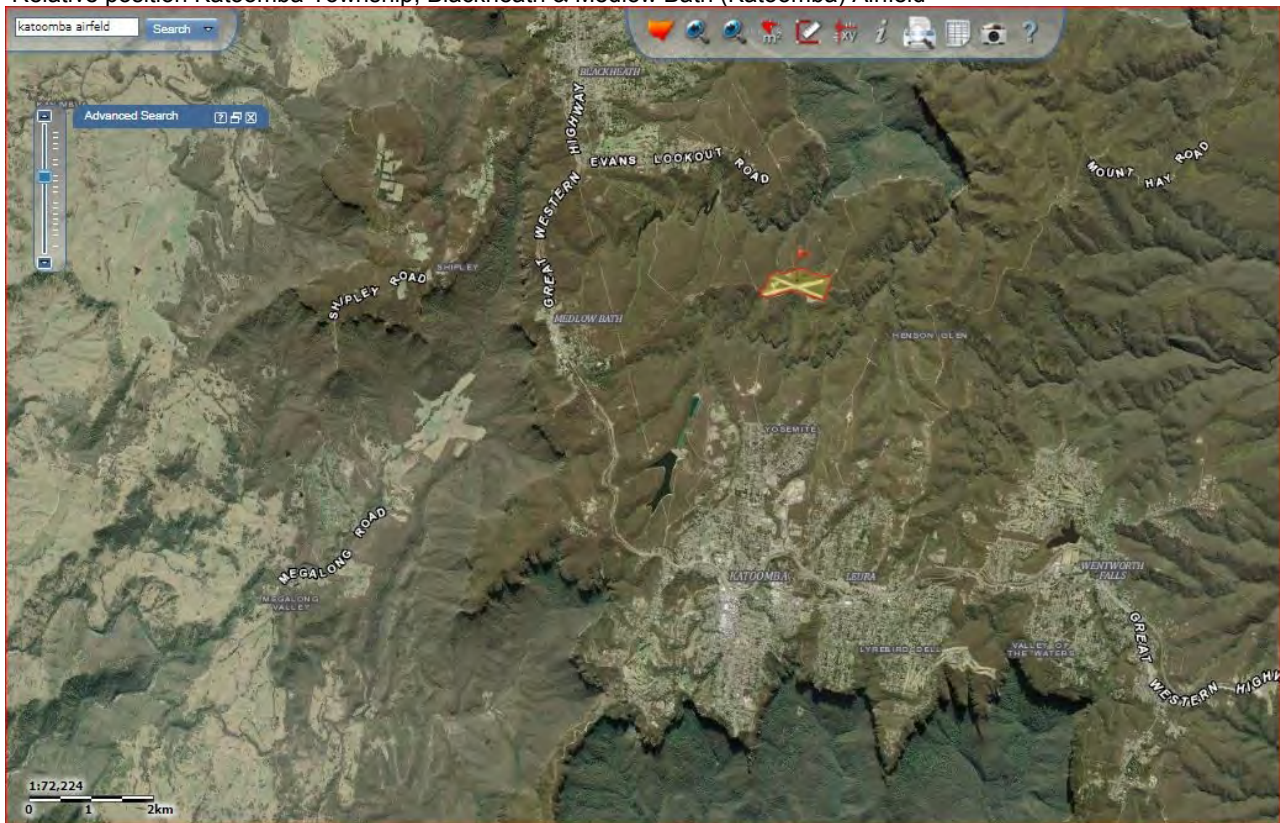
President

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Encl: "Birds and the Katoomba Airfield (M. J. Baker 2019)".

End Notes

ⁱ Relative position Katoomba Township, Blackheath & Medlow Bath (Katoomba) Airfield



References:

- ⁱⁱ Harbrow, M.A., Cessford, G.R. and Kazmierow, B.J. (eds) 2011, The impact of noise on recreationists and wildlife in New Zealand's natural areas, Science for Conservation 314, NZ Department of Conservation www.doc.govt.nz/documents/science-andtechnical/sfc314entire.pdf
Jeff Wells "Silence Is Golden for Birds of the Boreal Forest" <https://www.pewtrusts.org/en/research-and-analysis/articles/2016/01/19/silence-is-golden-for-birds-of-the-boreal-forest>
McClure et al 2013 "An experimental investigation into the effects of traffic noise on distributions of birds: avoiding the phantom road" <https://royalsocietypublishing.org/doi/10.1098/rspb.2013.2290>
Potvin, Dominique A. "Geographically pervasive effects of urban noise on frequency and syllable rate of songs and calls in silvereyes (*Zosterops lateralis*)" <https://royalsocietypublishing.org/doi/10.1098/rspb.2010.2296>
- ⁱⁱⁱ JJ Ryan Consulting Pty Ltd [n.d] Helicopter Rotor Downwash – Excessive wind, FOD and brownouts, what are the risks? jryan.com.au/index.php/helicopter-rotor-downwash-excessive-wind-fod-and-brownouts-what-are-the-risks/
- ^{iv} William F. Laurance - "Wildlife Struggle in an Increasingly Noisy World" <https://www.pnas.org/content/112/39/11995>
- ^v Kareklas, Kyriacos et al "Signal complexity communicates aggressive intent during contests, but the process is disrupted by noise" <https://royalsocietypublishing.org/doi/10.1098/rsbl.2018.0841>
- ^{vi} <https://parkplanning.nps.gov/document.cfm?parkID=65&projectID=28052&documentID=40021>

To the Department of Planning, Industry and Environment

Submission related to the Proposed Leasing of Crown Land at Medlow Bath occupied by Katoomba Airfield

Reference No: 602686

From: [REDACTED]

Email: [REDACTED]

As Blue Mountains residents who are very familiar with the environment of the ridge of land extending from the Great Western Highway to Point Pilcher and of its surrounding valleys and canyons, we strongly oppose the proposed lease to a commercial aviation business of the Katoomba Airfield at Medlow Bath for the following reasons:

1. The airfield is surrounded by the **Greater Blue Mountains World Heritage Area**. The operation of a commercial airfield in this location would stand in direct conflict with the considerable environmental values of the World Heritage Area that range from preservation of habitats to the expectation of opportunities for quiet (even silence) during passive recreation by visitors.
2. The airfield is currently on **Crown Land** and thus owned by the public; it should not be handed over to a private individual or organisation for their own use and profit. The land was excised from the National Park and it should be reincorporated into that system.
3. We understand the need to have an airfield for **emergency situations** including for the fighting of bushfires and accept that the facility may need to be publicly retained for that purpose only.
4. As far as we can tell there has been **no consideration of the potential damage to ecological systems** on the Airfield plateau or surrounding valleys from everything from noise to habitat clearance to contaminated runoff and clearing for fire hazard reduction. We are especially concerned that **birds will come into direct negative conflict with commercial aircraft**. Please consider the following:
 - 4.1 Nearly **100 species of native birds** have been recorded within a 1km radius of the airfield; many of these have been observed from the fence of the Crown Land to less than 150 metres away. We are particularly concerned about:
 - 4.1.1 **Endangered species** that are listed as **Vulnerable** under the *NSW Biodiversity Conservation Act 2016*; these include the **Gang-gang Cockatoo, Glossy Black-cockatoo, Powerful Owl, Flame Robin and Scarlet Robin**
 - 4.1.2 **Birds of prey** that spend much of their day circling over the surrounding valleys and that would be in direct threat of being hit by an aircraft or being displaced from preferred habitats by the airfield operation. These birds include: **Goshawks – Grey and Brown, Peregrine Falcons, Collared Sparrow-hawks and Wedge-tailed Eagles**
 - 4.1.3 **Birds of the Grand Canyon** – this very well-known and much loved bushwalking location is less than a kilometre from the airfield. Aircraft noise, particularly from helicopters would reverberate around the sandstone walls of this iconic feature, as it would from any of the narrow valleys (such as the equally popular Minnehaha Falls) and similar canyons nearby distressing at least 65 species of birds known to occur in these environments (as well as visitors to these special places).

4.2 Of great concern to us is the potential impact of increased aircraft presence on species that move en-masse through the region during the **great autumn bird migration** (aka the **Autumn Honeyeating Bird migration**) which is an event of **international significance**:

- 4.2.1 The Greater Blue Mountains World Heritage Area (GBMWA) was declared an **Important Bird and Biodiversity Area** (IBA) by BirdLife International in 2017 (the IBA has now been designated a **Key Biodiversity Area** by the International Union for the Conservation of Nature). The reason for the listing was the extraordinary **autumn migration of Yellow-faced Honeyeaters** and their congregation during this event in the higher altitudes of the Blue Mountains. With annual numbers exceeding 200,000 and **accompanied by other species**, these birds sweep up onto the Blue Mountains plateau from southern habitats, feed on heath, woodland and forest plants especially *Banksias* then continue their flight north across the Grose and beyond or disperse throughout the Mountains.
- 4.2.2 Research has clearly shown that the **annual autumn migration of birds passes over the airfield**; we have also seen the event there. The southern escarpment of the plateau (above Katoomba Creek) on which the airfield is located is of particular importance for resting and feeding birds. Many undertake temporary stopovers to feed in flowering banksias that grow abundantly around the airfield (and on the rest of the plateau). In order of numbers sighted during April and May 2019 the species include **Yellow-faced Honeyeaters, White-naped Honeyeaters, Red Wattlebirds, Silvereyes (some from as far away as Tasmania) and Spotted Pardalotes**.
- 4.2.3 The **forest and woodland habitat fringing the airfield is crucially important for all species involved in the autumn bird migration** between April and late May. The returning species will re-appear from spring to early summer. The birds will expect to find unhindered access to forage plants to sustain them on long southerly journeys. It is essential then that no disturbance of what is in fact **Critical Migrating Honeyeater Habitat** occurs in the vicinity of the airfield whether this be by clearing for extended aviation operations, fire hazard reduction or the operation of the aircraft.



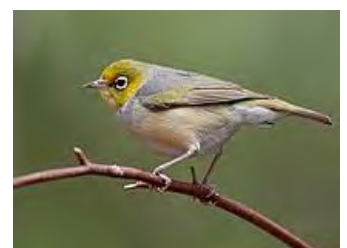
Yellow-faced
Honeyeater



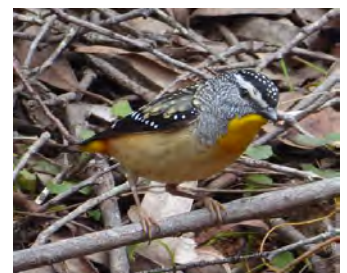
White-naped
Honeyeater



Red Wattlebird



Silvereye



Spotted Pardalote

These are five of the species of autumn migrating birds that will be negatively impacted on by the proposed lease of the Katoomba Airfield. Some, like the Silvereye come from as far away as Tasmania. At least 95 other species face an uncertain future here if commercial flights are permitted.

4.3 **Any re-activation of regular flights from the Katoomba Airfield will impact negatively on the physiology and behaviour of all of the birds** of the area. Research clearly shows that helicopter activity has the most severe physiological and behavioural impact; studies suggest that an increase in daily aircraft movements that exposes these birds to sudden and repeated physical intrusions would be detrimental in a range of ways:

- 4.3.1 **A combination of loud noise and sudden and rapid movement of helicopters causes the greatest negative effects** on wildlife. Sudden, noisy, intermittent helicopter intrusions constitute bursts of alarm-filled harassment. Noise would reverberate around the sandstone walls of nearby valleys and canyons. Birds of all sizes that are reliant on vocal communication for feeding opportunities, mating, care of young and predator avoidance would be particularly affected.
- 4.3.2 **Helicopters** are associated with **lethal rotor downwash and brownouts**: high velocity wind vortices are generated by helicopter blades when the machine is hovering above a runway or bushland. This produces smothering blankets of airborne dust particles, reduces habitat values and exposes vegetation and wildlife to lethal wind velocities. Tiny birds like the 11g Silvereye would not survive this force.
- 4.3.3 Aircraft can **collide** with any individual bird flying at the same height (with possible catastrophic results for the vehicle and its occupants), as well as with the flocks of migratory birds that are heading directly from the southern escarpment towards the airfield. **Avian consequences** will include the **death of struck birds, dislocation of flight paths, and disruption to feeding patterns resulting in decreased strength of birds engaged in a lengthy migration.**
- 4.3.4 First-hand accounts from participants in the autumn honeyeater migration counts, and from bushwalkers, indicate **behavioural impacts that occur when birds encounter machines in the Blue Mountains**. In 2018 helicopters involved in the Mt Solitary hazard reduction fire had an immediate negative impact on migrating flocks. Birds ‘disappeared from the sky’ and numbers counted dropped when helicopters flew by. Flocks of birds rising from southern Mountains valleys have also been seen to turn back when trains or heavy highway traffic created noise, and visual and air current disturbance across their flight paths; whether these birds return to continue their preferred flight path is not known. **The presence of a helicopter looming before flocks of tiny migrating birds would have the same effect.**

While walking in the vicinity of the Katoomba Airfield in June 2019 we observed a light aircraft circling the facility a number of times; the intrusive **noise drowned out the bird song**. When the aircraft left, the bushland remained quite silent and bird activity had noticeably declined. This type of impact day after day cannot do anything except have negative consequences for the birds.

Katoomba Airfield sits within the Greater Blue Mountains World Heritage Area. This does not appear to have been seriously acknowledged in the proposal to hand the facility over to a private operator, nor have natural systems impacts been assessed. Any increase in aviation activities will be detrimental to the environment especially to the many birds that depend on the bushland and on undisturbed atmospheric conditions. The autumn bird migration through the Blue Mountains is a world recognised phenomenon of great ecological significance; it must be foremost in the assessment of commercial air-based proposals in the region and should lead to a strong rejection of the proposed lease.



KATOOMBA AIRFIELD COMMUNITY GROUP

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3rd August 2019

LX 602686 - Proposed Lease of Katoomba Airfield

The Katoomba Airfield Community Group (KACG), an alliance of residents across the Blue Mountains, strongly objects to the granting of a commercial lease to a private aviation business by the Department of Planning, Industry and Environment (the Department), over what has been for many years, a small rural dirt airfield at Medlow Bath.

The Group's objection falls under three (3) main discussion points:

1. Public land being used for commercial purposes.
2. Maintenance of the existing dirt airfield for emergency use only.
3. Incorporation of the Crown Land site into the National Park.

1. Public land being used for commercial purposes:

The site has historically been public land that has seen very limited aircraft activity, apart from the intermittent use by fire fighting and emergency services when required, a use it must be said, is appreciated and welcomed by the local community. The only previous real expansion of activity was a period between 1992-1995 when helicopter joy flights were run from the airfield, an activity that generated so much community opposition, that it was subsequently shut down. As such, KACG cannot accept the Department's position that it would even consider such an increase in activity again, in what is a pristine world heritage listed environmental area.

Despite there being a paltry level of information released by the Lease Applicants (the Applicants), under the guise of 'Commercial-in-Confidence', it is clear to anyone undertaking even a cursory review of the information available, that the commercialisation of the airfield will see a significant increase in activity, in order to achieve a return on investment.

Further, the net return from the increased activity will only benefit a few i.e. the Applicants, with no regard to the detrimental impact on the many, in this case the residents of the Blue Mountains, as well as the four million or so annual visitors.

The Greater Blue Mountains World Heritage Area (GBMWA) is not alone when it comes to facing threats from inappropriate overdevelopment. In particular, the insensitive commercialisation of Katoomba Airfield is totally incompatible with the established recreation and tourism philosophy that has been the mainstay of Blue Mountains businesses for over one hundred and fifty years. This passive and participatory engagement with the natural beauty of the Blue Mountains is what attracts residents to live here and visitors from Australia and overseas to experience. While increased visitor numbers are welcomed, the increase must be managed and nurtured sensitively and sustainably. Significant numbers of small businesses rely on and promote the silence of our vistas and valleys. The noise generated by a fully commercialised airfield with arriving and departing helicopters and fixed wing aircraft, will destroy this on the first day of operations and drive visitors to other, more amenable locations.

It matters not whether these flights are termed joy flights or high-end heli-charters, or any other name. What is certain, is dramatically increased noise pollution across an extremely wide area incorporating some of the most beautiful and tranquil scenery and locations in the world, unspoilt by man-made noise and intrusion. The Civil Aviation Safety Authority (CASA) and even the Applicants themselves, recognise that airports have noise impacts. It is for this reason that they plan to avoid populated areas for their flight paths. Indeed, publicly available information states that no flight paths will be over residential areas.¹ However, in their planning they appear to have no consideration for the noise impacts on the GBMWA, the exact environmental treasure the community is fighting to preserve.

Dismayingly, the Applicants continue to describe their airfield operations as 'light footprint tourism' and put forward the notion that their activities will have a 'light-touch' impact on the National Park environment, as opposed to the 'heavy footprint' of bushwalkers and tourists.² This ignores the fact that the ground-based visitors use the hundreds of kilometres of designated and purpose-built pathways and walking tracks provided and maintained by the NPWS and Blue Mountains City Council. It demonstrates that they have no understanding of what the core function of a National Park is, i.e. to provide a place of peaceful enjoyment for the many, not just the very few who will fly-in and fly-out in noise producing and intrusive helicopters.

¹ Applicants' presentation to the Katoomba Chamber of Commerce and Community (KCCC), Carrington Hotel, 9th May 2019, as well as their website and other publicly available FlyBlue information.

² Ibid

We are blessed in the Blue Mountains to have something that the built-up areas of the Sydney Metropolitan Area lack. A place of respite from the incessant background hum of 24/7 activity. Visitors come here to escape the hum, the pollution, the congestion. They come to rest, replenish, and revive.

With this in mind, it is important for a moment to consider ‘Sound’, or more accurately the ‘Soundscape’. It is made up of three (3) principal types. *Geophony*³ - where the sounds emanate from the earth, such as the tumbling of waterfalls, and wind rustling through trees in the forest; *Biophony*⁴ - where the sounds are made by living creatures such as birds, and mammals; and *Anthropophony*⁵ - which are sounds made by people.

This third type can be further divided into *organised* or *coherent* sound, such as the pleasing sounds of music, theatre, and language, and *disorganised*, *incoherent* or *chaotic* noise, such as that generated by electromechanical sources, e.g. helicopters, fixed wing aircraft and road traffic.

The Blue Mountains has an overwhelming abundance of the first two i.e. Geophony and Biophony, and it prides itself on being able to share that with visitors. Commercialisation of Katoomba Airfield will completely offset this wonderful balance by introducing the disorganised, incoherent and chaotic sound of helicopters and other aircraft.

A bioacoustics study commissioned by the US National Parks Service between 2001 – 2002, and published in 2004, includes some very timely references to the wonders of the soundscape. The following examples are from the study’s White Paper.

“The term soundscape for the auditory sense is analogous to the term landscape for the visual sense. The natural soundscape refers to the inherent acoustical environment of an area without the presence of human-caused sound. Similar terms include natural quiet and natural sound environment. Natural quiet does not imply silence; rather it implies that only the natural sound sources are present.

For example, the sound of wind blowing through a forest, the babble of water in a stream, the distant howl of a wolf, and the chirp of a bird may all be present in the realm of natural quiet, as would the rumble of an avalanche, the thunder and rain of a storm, the crash of ocean waves, and the deafening roar of a waterfall.”⁶

³ [Wikipedia - Geophony](#)

⁴ [Wikipedia - Biophony](#)

⁵ [Wikipedia - Anthropophony](#)

⁶ [White Paper: Obtaining Long-Term Soundscape Inventories in the U.S. National Park System, January 30, 2004](#)

“But for the time being, around my place at least, the air is untroubled, and I become aware for the first time today of the immense silence in which I am lost. Not a silence so much as a great stillness—for there are a few sounds: the creak of some bird in a juniper tree, an eddy of wind which passes and fades like a sigh, the ticking of the watch on my wrist—slight noises which break the sensation of absolute silence but at the same time exaggerate my sense of the surrounding, overwhelming peace.”
Edward Abbey (1968, p. 11) on the sounds of Arches National Monument in the late 1950s.⁷

“As early as the 1940s the issue of wilderness soundscape preservation was reflected in Executive Order 10092, ‘Establishing an Airspace Reservation Over Certain Areas of the Superior National Forest in Minnesota’, signed by President Truman on December 17, 1949..... Although the Order’s implicit intent was to eliminate commercial airborne outfitters within the wilderness boundaries, the explicit objective was to eliminate the aircraft noise.”⁸

The natural beauty, tranquility and silence of the landscape are the lifeblood of our community – economically; culturally; environmentally; and spiritually. There are multiple Retreat Centres and Health Spa’s dotted throughout the Upper Mountains that cater to those seeking peace and healing. Our natural silence is golden, and we have a priceless gem that people from all races and creeds come here to experience. Trying to block out the noise of helicopters and fixed wing aircraft flying through our valleys and over our hanging swamps, while immersing themselves in stillness and quiet contemplation, is certainly not what they come here to experience. They will simply go elsewhere and never return.

These factors and the associated detrimental impacts were a recurring theme during the Community Information Sessions held during June in Katoomba. Unfortunately, by the Department’s own admission, it cannot realistically control or manage the number or type of aircraft movements at the airfield, even where provisions to do so are included in any future lease. Such statements provide the community with no confidence whatsoever in the Department’s ability to protect our precious environment.

Adding to the community’s concerns is the Department’s acknowledgement that *“It should be noted that DoI Lands is not an aerodrome operator.”⁹* This stance and further admissions by the Applicants themselves¹⁰, that they cannot guarantee all aircraft operators will abide by their often touted ‘Fly Neighbourly Policy’, highlights to the Community that it will have no redress on the negative impacts of the airfield’s commercialisation.

⁷ *Ibid*, Page 2

⁸ *Ibid*

⁹ Department of Industry Lands DOC17/028257, File: 08/1364-03 to RAPAC – Office of Airspace Regulation, Civil Aviation Safety Authority, Signed by Jeremy Corke, Area Manager – Sydney, South Coast, 23rd February 2017

¹⁰ Applicants’ presentation to the Katoomba Chamber of Commerce and Community (KCCC), Carrington Hotel, 9th May 2019.

2. Maintenance of the existing dirt airfield for emergency use only:

It is important to note at this juncture that the community has never opposed the use of the existing dirt airfield by fire-fighting or emergency helicopters. In fact, it actively supports the continued such use of the site. However, in saying that, it does strongly object to the notion that the airfield must be commercialised and upgraded for that continued use to occur.

Despite the extremely limited information available, the Applicants appear to be planning for multiple helipads, as well as the sealing of the main runway. They have also actively fostered the view that as a result of the upgrade, the emergency services might consider the permanent stationing of a fire-fighting or emergency helicopter at the airfield¹¹.

Indeed, the Applicant's Katoomba Airfield Information Pack states that the airfield is "*...an asset of strategic value for training & real-life emergencies, mass casualty events, natural disasters, acts of terrorism & the like....*".¹² This, however, appears to be discounted from as early as 2017 by the NSW Rural Fire Service (RFS), when it confirmed that it would not be interested in establishing a permanent presence at the site¹³.

Further, at the Community Information Sessions it was acknowledged by Scott Mullen from the Department, that RFS does not see Katoomba Airfield as a critical piece of infrastructure for their helicopter operations, due to the large number of locations already available to them throughout the Mountains that can be used for landing helicopters. Additionally, in relation to large fixed wing fire-fighting aircraft, they are based at Richmond RAAF Base or other more appropriate airfields. As such, the continued ad hoc use of the existing dirt airfield by emergency services appears to be more than adequate for their needs.

Of great community concern is that when a search is conducted on the RFS website to determine the bushfire risk status of Katoomba Airfield, the result shows the entire site is designated as Bush Fire Prone Land (BFPL)¹⁴. If the Applicant's well documented intention to expand the level of helicopter and fixed wing aircraft operations at the airfield goes ahead, it will require substantial volumes of highly inflammable aviation fuel to be stored onsite. In addition, town-water supply is all but non-existent and when the emergency services do use the airfield, they must bring water in by road tanker. This represents a significant and unacceptable risk to the surrounding residential areas as well as the adjoining National Park. Consequently, it appears totally nonsensical that such a commercial venture on the scale proposed, would ever be considered for the site.

¹¹ *ibid*

¹² <https://flyblue.com.au/wp-content/uploads/2019/03/Katoomba-Airfield-Info-Pack.pdf>, page 14

¹³ Blue Mountains City Council Minutes dated October 17, 2017 Item 24, page 176

¹⁴ <https://www.rfs.nsw.gov.au/plan-and-prepare/building-in-a-bush-fire-area/planning-for-bush-fire-protection/bush-fire-prone-land/check-bfpl>

Further unnecessary risk will be foisted upon the local community as a result of the significant increase in airfield related road traffic movements along Grand Canyon Road. It is the only road access from the Great Western Highway to the site and winds its way through the residential areas of the village, intersecting with around ten (10) local streets, as well as passing the Commuter Carpark at the Medlow Bath Railway Station. Grand Canyon Road is also the only road out to Point Pilcher beyond the airfield, which is a popular National Park lookout over the Grose Valley.

The closer to the airfield, the worse the standard of the road becomes, with pronounced narrowing and blind curves, as well as significant pinch points where cars and trucks cannot pass simultaneously. The road lacks formed kerb and guttering, and overhead street lighting is especially poor. Significantly, there are no footpaths for pedestrians. The road was never designed for anything other than local traffic and any expansion of either the type of vehicles or traffic volume, increases the risk of injury, and potentially, fatalities.

Should a commercial lease be granted, increased use of the local roads by large, heavy vehicles such as aviation fuel tankers and passenger coaches going to and from the airfield is a huge concern. It represents an unacceptable risk to the well-being of the village residents, who currently utilise the road for getting into and out of the village, as well as leisure pursuits such as walking (themselves and their dogs), running and bicycle riding, to name just a few.

The airfield is also located close to the Blue Mountains water catchment and is only 1.5km from drinking water storage. The proposed flight paths as outlined by the Applicants, show aircraft taking off and landing at very low levels directly over the water catchment area, and the main storage dam at Katoomba. Additionally, many residential homes within several kilometres of the airfield use rainwater collection as their only source of potable water. Contamination of these water sources by low flying aircraft and helicopters, as well as the significant risk of contamination to groundwater through the storage of large volumes of aviation fuel on the site, is considered a real risk.

During 1999-2000 the then Department of Land and Water Conservation (DLWC) undertook a formal Land Assessment process for the site, and in the Draft Document that went on public exhibition in March-May 2000 it noted the *"The importance of groundwater contamination risks with increased use as an airfield due to fuel storage"*. It then went on to conclude that the *"... expansion of operations at the airfield is clearly inconsistent with the findings of this land assessment"*.¹⁵

¹⁵ Department of Land and Water Conservation (DLWC) March 2000

3. Incorporation of the Crown Land site into the National Park:

When the Blue Mountains National Park was proclaimed on 25th September 1959,¹⁶ it did not include the area of Crown Land described as Lot 550 in Deposited Plan 751627 that was later to become Katoomba Airfield. NPWS at the time, agreed to exclude the airfield from land to be added to the National Park, provided that the land was later incorporated into the Park upon the expiry of the lease in 1988.

When the original Special Lease was granted in the 1960's,¹⁷ the clear intention was for the land to be incorporated into the Park on expiration of the lease, a view that the then Lands Department supported.¹⁸ Indeed, the current Department states that transfer of the land to the National Parks and Wildlife Service (NPWS), remains an option under consideration.¹⁹ Notwithstanding the original intent, the transfer did not happen for reasons uncertain to KACG. Instead, the lease was renewed for a further period of twenty (20) years after which it was managed on a month-to-month holdover basis, until the granting of the current License to the Applicants. During this period, there has always been provision for the emergency services to use the site when required.

The Blue Mountains National Park is famous for its massive sandstone cliffs, clear mountain streams, waterfalls and rivers, as well as the vast native forests and the native fauna that lives here. The Park has long prided itself on sharing some of Australia's most breath-taking vistas, including along the National Pass at Wentworth Falls, the Three Sisters and Mount Solitary at Katoomba, as well as the Jamison and Megalong Valleys. The Grand Canyon at Blackheath is in close proximity to the airfield and the Grose Valley is immediately adjacent to it.

Long recognised as one of the most spectacular landscapes in NSW and as an area of State, National and International significance, the Grose valley has benefited from generations of community support that has seen it maintained in its natural state. The first protective action was taken as far back as 1875 when the decision was taken to reserve it from sale. This was followed in 1931 with a citizen campaign to protect the Blue Gum Forest within the Valley, and then its reservation within the Blue Mountains National Park in 1959.

The area's prominence at the International level was recognised with its inscription on the World Heritage List as part of the Greater Blue Mountains World Heritage Area in 2000, and finally the declaration of the Grose Wilderness in 2001.

¹⁶ NSW Government Gazette No 108, p 2957, 25th September 1959

¹⁷ Department of Industry Lands DOC17/028257, File: 08/1364-03 to RAPAC – Office of Airspace Regulation, Civil Aviation Safety Authority, Signed by Jeremy Corke, Area Manager – Sydney, South Coast, 23rd February 2017

¹⁸ Department of Land and Water Conservation *op cit.*, p45)

¹⁹ Department of Industry, *op. cit.*

Any of the Katoomba Airfield flight paths through or over the Grose Valley will have direct noise impacts on some of the most iconic and popular passive tourism locations in the Blue Mountains National Park and GBMWA, e.g. Fortress Creek Canyon, Blue Gum Forest, Pulpit Rock, Perry's Lookdown, Evans Lookout, Hanging Rock, Govett's Leap, Victoria Falls, Porter's Pass and the entire upper Grose Valley - the most visited part of the Grose Wilderness.

Unarguably, the Grose Valley and its environs, are a jewel of incalculable value to the people of NSW, and one that can be enjoyed by millions of people within a two (2) hour drive or train journey from anywhere in the Sydney Metropolitan Area. It offers the possibility of escape from the stresses of modern life by providing quiet, nature-based recreation. It allows visitors to listen to and appreciate the silence and is increasingly recognised for the health and wellbeing benefits it provides. Sydney has a significant asset that few comparable world cities have, and it should be a resource that it guards jealously from encroachment, not allowing it to be destroyed by ill thought out development plans for limited private interests.

While the Applicant's Carbon Offset program with Greenfleet,²⁰ i.e. one flight = one tree planted, has been promoted as an example of their social and environmental responsibility, it is the fundamental belief of KACG that incorporating the entire airfield site into the National Park will result in a far greater positive social and environmental outcome. A truly once in a generation opportunity.

National Parks are there for the majority to experience and enjoy. We should be adding to this amenity, not degrading it. It is now time to rectify decades of inappropriate use of the site and achieve what should have been done when the lease first expired, and that is to incorporate the airfield into the National Park and allow NPWS to manage it for future generations.

Yours faithfully,



Barry O'Sullivan
Secretary Katoomba Airfield Community Group

For and on behalf of
Katoomba Airfield Community Group

²⁰ Applicants' presentation to the Katoomba Chamber of Commerce and Community (KCCC), Carrington Hotel, 9th May 2019, as well as their website and other publicly available FlyBlue information.