

To the Department of Industry

**Submission regarding the Proposal to grant a
commercial lease for Katoomba Airfield**

Submitted by Manda Kaye

CO-FOUNDER BLUEMTNSPEACEKEEPERS, SMALL BUSINESS OWNER AND MTNS MADE
CREATIVE

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July 26, 2019

Mr Glen Bunny
Department of Industry, Crown Lands
airfield.submissions@crowland.nsw.gov.au

Dear Mr Bunny

RE: LX 602686 – submission as an objection to proposed lease of Katoomba Airfield

I am a small business owner, a member of the growing MtNs Made creative community and one of the co-founders of Blue MtNs Peacekeepers. I'm writing to you to express my deep concern over the proposal to commercially develop Katoomba Airfield, which, if it is granted, will profit the leaseholder at an enormous cost to our local community, environment and economy.

Who are Blue MtNs Peacekeepers and what is our position?

Blue MtNs Peacekeepers was begun by a group of local citizens who are deeply concerned about the proposed commercial lease of Katoomba Airfield.

We speak for the vulnerable plant and animal species in this glorious and fragile World Heritage Area where we live. We represent the many residents and visitors who come here to experience the natural quiet of the bush.

It is the mission of the Blue MtNs Peacekeepers to protect the tranquil environment that supports the biodiversity of our beloved Blue Mountains National Park – for its own sake, but also, because this is the bedrock of our local economy.

- We object to the approval of any commercial lease on the crown land containing Katoomba Airfield.
- To protect the ecology and the economy that depends on it, this crown land should be added to the Blue Mountains National Park and World Heritage Area by which it is surrounded. We hold that the Katoomba Airfield should be maintained for emergency use only.
- This land use makes sense in the context of our duty of care and obligations to World Heritage for an area of outstanding universal value.

This submission will outline how the proposal is environmentally irresponsible, economically reckless and unsustainable, inconsistent with Australia's obligations as a State Party signatory to the World Heritage Convention, damaging to the ecology and the economy, now and in the future.



Granting a lease permitting a commercial airfield in the Blue Mountains National Park contravenes Australia's State Party obligations under the UNESCO World Heritage Convention

The Greater Blue Mountains has been granted World Heritage status because the area meets the standards outlined in Articles 1 and 2 of the World Heritage Convention, identifying the region as a place of outstanding universal value for both cultural and natural heritage. This is the Country of traditional owners, the Gundungurra and the Darug. This is a place of natural beauty with an *'outstanding diversity of habitats and plant communities that support its globally significant species and ecosystem diversity... [that] supports many plants of conservation significance including 114 endemic species and 177 threatened species...'*

Australia is a signatory and a State Party to the World Heritage Convention, which means the Department of Industries and the NSW Government have clear obligations to respect the convention through the duties outlined in Article Four, which states:

'Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.'

and Article 6.3, which states

'Each State Party to this Convention undertakes not to take any deliberate measures which might damage directly or indirectly the cultural and natural heritage referred to in Articles 1 and 2 situated on the territory of other States Parties to this Convention.'

If the NSW Government signs off on a commercial lease for Katoomba Airfield, it would be ignoring its obligations and duty of care, and rubber stamping immediate and incremental damage to an important World Heritage Area.

As a consequence, the Greater Blue Mountains would risk losing its World Heritage status, which not only protects natural and cultural heritage but makes a huge contribution to the NSW economy.



How is granting a lease permitting a commercial airfield in the Blue Mountains National Park damaging to the Blue Mountains ecology and natural heritage?

You don't need a degree in environmental science to recognise that it's completely inappropriate to allow toxic emissions of aircraft over Vulnerable Ecological Communities and heritage listed bushland. Over time those toxic emissions infiltrate the water table, vegetation, and threatened plant and animal species, risking our biodiversity and damaging the health of the National Park's ecosystem.

The noise pollution from the rotary engines is equally worrying. An increase in helicopter noise in the National Park could have an alarming impact on wildlife, including altered vocal behaviour, reduced numbers in noisy habitats, changes in vigilance and foraging behaviour, impacts on individual fitness and the structure of entire ecological communities.

I know that the Blue Mountains Conservation Society's submission goes through the projected impact on specific species and habitats, so I won't duplicate their excellent information here, but I will observe that Australia's record on protecting endangered species is one of the worst in the world, as reported in the recent Four Corners programme, *Extinction Nation*.

'By regarding heritage as both cultural and natural, the Convention reminds us of the ways in which people interact with nature, and of the fundamental need to preserve the balance between the two.'

Granting a commercial lease to operate Katoomba Airfield would clearly disrupt this delicate balance. You only need to look at the image on the cover of this submission to see how the fate of the Airfield will affect the surrounds. It is critical that the NSW Government protect this precious area of Outstanding Universal Value from the damage of toxic emissions and noise pollution that are the inevitable consequence of a commercial airfield.



Why is the issue of helicopter NOISE so important?

Helicopter traffic will most certainly damage our reputation – locally and globally, making a mockery of our World Heritage status and risking the loss of it.

The **Report to [US] Congress on Effects of Aircraft Overflights on the National Park System** (1995) is a useful document to refer to, and an important lens for thinking about the impact of the proposal regarding Katoomba Airfield. That document identifies 'natural quiet' as an intangible resource within US National Parks, defining natural quiet as 'the natural ambient sound conditions found in a park.'

Natural sounds are part of a web of resources vital to park ecosystems. From the trickle of a slender waterfall to the raucous calls of the Gang Gangs and Black Cockatoos to the quiet crackle in the braken, as a lizard takes shelter – these sounds compose immersive experiences important for wildlife, wilderness, visitors, and cultural-historic events.

Referencing a Visitor Survey, the Report to Congress confirms that, according to the majority of the 15,000 surveyed visitors, '*system-wide, enjoying natural quiet is about as important as viewing natural scenery as a reason for visiting national parks.*' (p16)

Helicopters particularly are VERY NOISY. The sound of them is magnified by the canyons in the Blue Mountains. It's not difficult to see how an enterprise that destroys one of the key reasons to visit the mountains will damage our local economy. Over 5 million people a year visit the National Park, including more than 1.25 million bushwalkers. The vast number of visitors who come to stay in my business tell me the reason they come is to enjoy the peace and tranquillity of the area. I know a huge number of businesses up here whose customers are the same.

If a lease is granted to operate the Katoomba Airfield, walkers, the birders, the people coming up from Sydney to have a few days of quiet enjoyment of the natural world - these people will have to go elsewhere, and small sustainable businesses will lose the customers they rely on.



How would the commercialisation of Katoomba Airfield be detrimental to the economy of the Blue Mountains and, by extension, to NSW?

'...the inscription of a site on the World Heritage List brings an increase in public awareness of the site and of its outstanding values, thus also increasing the tourist activities at the site. When these are well planned for and organized respecting sustainable tourism principles, they can bring important funds to the site and to the local economy.'

Tourism Planning in World Heritage Sites

Our greatest competitive advantages in the Blue Mountains lie with our World Heritage status (*How much must World Heritage status be worth in terms of the local economy?*) and the natural quiet, tranquillity, health and biodiversity of the National Park. The opportunity to walk softly in ancient forests, to breathe clean air, to hear what the natural world sounds like - these are huge assets that have made NSW's Blue Mountains one of the top tourist destinations in Australia.

By granting a lease to a commercial enterprise that will degrade the cultural and natural heritage belonging to the Blue Mountains local area and indeed, NSW, the Department of Industries would be signing off on an enterprise that would damage and erode the competitive advantages of our local region and our State.

Why would the NSW government want to support a proposal that, if granted, would serve against the interests of the State and citizens of NSW?



Why I challenge the process, which privileges the would-be leaseholder over every stakeholder or consideration - the local community, World Heritage, local small businesses, sustainability, conservation...

The process, as it seems to have unfolded, was ill-considered and frustrating.

Before anything happened at all - before there was a meeting where someone decided to call for expressions of interest to lease the Katoomba Airfield - this was the situation as any reasonable person working in the State Government would have understood it:

- Katoomba Airfield is on a parcel of crown land inside a National Park and World Heritage Area
- It is a place of where threatened and endangered species live, relying on habitat for survival
- It lies just above one of the premier walks in the Blue Mountains - The Grand Canyon Track, where visitors come for the natural quiet of the bush, fueling the local economy and making the Blue Mountains a hugely popular sustainable tourist destination
- It is located close by many residential properties where people have invested and settled for the peace and quiet
- It is located close by many small businesses that rely on the peace and quiet for their customers to choose to patronise them
- Running a commercial airfield to get a return on investment means a lot of aircraft will be taking off and landing, making a lot of noise pollution
- The noise pollution will cause damage to the fauna
- Aircraft emissions are damaging to plants and wildlife
- The Airfield is on the land of the traditional owners, the Gundungurra and the Darug, who should be consulted about cultural heritage values on Country
- Australia is a signatory to the World Heritage Convention, which comes with obligations to protect this place which has been listed as having outstanding universal value

It's difficult to understand how the situation could have been understood in any other way by the Department of Industries. It floors me that this proposal was ever entertained, a license ever granted, and this proposal ever seriously considered.



Why was an Expression of Interest sought BEFORE an Environmental Impact Statement or community consultation? The process is neither democratic nor responsible.

It's hard to work out how to read the situation without a cynical eye. To those of us who have mobilised against this threat to the health, peace and tranquility of the National Park and the economy it supports, it feels like we've been characters in a Joseph Heller novel or an episode of Working Dog's *Utopia*.

The process is so badly designed that, instead of making it the work of government departments to further the interests of the citizens and State of NSW, it puts the onus on communities to work to protect our assets from being squandered.

Because the process privileges the would-be leaseholder above every other stakeholder, to defend what we value – and what the NSW Government *claims* to value – our local community has been compelled to engage in months of exhausting campaigning. We have written countless letters, collected more than 10,000 signatures of NSW citizens for a petition to be tabled in NSW Parliament. We've built websites, posted, hashtagged, had conversations, letterboxed, postered, attended the drop-in sessions, given media interviews, held events, meditated, agitated and gone to bed exhausted. Not for our personal gain – no one on the campaign to stop the proposal from going ahead is getting rich from their activism, and in fact, we've had to put aside other work and projects to focus on preventing this threat.

It's sobering to consider the loss of productivity caused by this process.

Imagine if communities didn't have to use all their energy defending what is important from threats – threats that are, in effect, allowed to present themselves because of poorly considered, undemocratic bureaucratic processes. Imagine what good we could achieve with all that energy? Imagine what we could do with all the resources we had to use?

Conclusions

I hope that my submission has raised serious questions in your mind about the risks attached to granting this lease.

The Greater Blue Mountains World Heritage Area is under the management and protection of the NSW State Government, and subject to Australia's status and a State Party to the Convention.

It makes no sense to me that a NSW government department would seek to support a proposal that would cause damage on so many fronts: to the habitat of threatened and endangered plant and animal species, migratory paths and breeding grounds of native birds, to the peace and tranquillity of the National Park and the creative and mental health benefits this bestows, to sustainable small businesses that rely on visitors who come for the quiet, to our ability to hang on to our World Heritage status, and more.

As a member of the Blue MtNS Peacekeepers and the MTNS MADE creative community, a small business owner, and a local resident, through this submission I ask that the process be fully reviewed and redesigned, so that we do not waste resources of time and energy on debating notions that should never have been entertained in the first place.

I ask that the Katoomba Airfield be incorporated into the National Park, to protect the community and environment. And I ask that the Department of Industries and NSW Government deny the Katoomba Airfield proposal, and in so doing, affirm support for World Heritage and the benefits it brings to our ecology and economy, now and in the future.

Sincerely

Manda Kaye
Blue MtNS Peacekeepers
Rough Track Cabins



Documents and sources referenced

UNESCO's World heritage Convention

<https://whc.unesco.org/archive/convention-en.pdf>

Report to Congress on Effects of Aircraft Overflights on the National Park System (1995)

<https://archive.org/details/reportoneffectso00nati>

Operational Guidelines for the Implementation of the World Heritage Convention

<https://whc.unesco.org/en/guidelines/>

Extinction Nation on ABC's Four Corners

<https://www.abc.net.au/4corners/extinction-nation/11241318>

Crown Lands - Department of Planning, Industry and Environment
PO Box 2155
Dangar NSW 2309
3rd August 2019
airfield.submissions@crowmland.nsw.gov.au

LX 602686 - Proposed Lease of Katoomba Airfield

I am writing to you today to OBJECT in the strongest possible terms to this proposed development for the following reasons:

LOSS OF AMENITY

My family and I, like most Sydneysiders, have had a strong association with the Blue Mountains. As kids and then with our own families, it has always been our 'go to place' to get away from the stresses of city life. Making regular weekend mini-breaks of bushwalking, eating, shopping and just chilling out. We moved up to the Blue Mountains permanently some 13 years ago. A decision that we hope we will not regret. That of course will depend on your decision about this proposal.

LOSS OF PRIVACY AND PEACE – PERSONAL AND PUBLIC

Tourists flying over and near our property or our child's school, taking photographs without permission. I personally will not want to go outside my house. We live on 1.2 acres of land, which we enjoy so much. In fact we spend most of our time outside. Likewise thousands of tourists bushwalking at any given time with tourists in helicopters taking photos from above and destroying the natural quiet of the environment. The noise of helicopters is so invasive and quite distressing. The very reason people choose to live here and holiday here is to experience the peace and tranquillity of this unique environment.

DAMAGE TO OUR LIFESTYLE

We keep chooks and grow vegies and fruit. I have also become a beekeeper and a bird watcher. We garden and go on bushwalks.

With Helicopters flying overhead we will not want to go outside – defeating the purpose of living here.

A Helicopter Pilot told me on an online discussion about airspace in relation to this proposal that 'you don't own the airspace above your property so suck it up Princess and get used to it'. I'm happy to send you the screenshot of the conversation should you like.

Despite any 'best intentions' from Flyblue P/L, pilots are allowed to fly wherever they want and no one can force them to stick to a flight path.

My husband, like a lot of families up here, drives to Sydney very early in the morning every day for work. But he is happy to make this sacrifice because of the serenity and peace he can enjoy on the weekends. Well that will be a thing of the past if you approve this proposal. He lives for his weekends of quiet and pottering around the property. Of course the weekends would be the noisiest, smelliest and most invasive level of helicopter activity of the whole week!

There is no way we could stay in the mountains under those circumstances. If we're going to be bombarded with noise, pollution etc we would be forced back to the city and our Lifestyle is destroyed and we will need to find a new home.

Our child will need a new school and new friends. A huge disruption to our lives that would not be in our future if this development did not proceed. Unfortunately, now that we've left the Sydney housing market, our housing choices will be very limited in Sydney.

FINANCIAL LOSS

If this development proceeds, the flight paths would go over our property! A property that we spent a great deal of money on will lose substantial value should you approve this proposal. This fact has been confirmed by several Real Estate Valuers. Will the Dept. be compensating our family and all other residents if you decide to approve this proposal?

It needs to be noted that whilst Flyblue P/L have stated that they have planned the flight paths to avoid residential areas, they haven't! Everyone on the north side of the highway and some on the south side around Katoomba will be devastated by Helicopter noise pollution, visual pollution and chemical pollution.

DAMAGE TO COMMUNITY AND ECONOMY

A noisy, polluting operation such as the one proposed has already sent rumblings throughout the community. Families are planning their exit strategy should you approve this proposal. Basically there will be a mass exodus from the Blue Mountains.

As a direct result small businesses will suffer.

I personally know how hard this will hit the community as I opened and ran a café in Katoomba for 5 years. Businesses in the mountains need every single local and tourist on the ground for it to survive. Tourism has its peaks and troughs and a strong local consumer base is needed to keep these businesses going in the down season.

Should the natural quiet of the Blue Mountains be compromised by the Boom, Boom, Boom of helicopters overhead, the tourists seeking the peace and tranquillity of the Blue Mountains will go elsewhere and many businesses will suffer. The Eco businesses will not be able to survive. Jobs will be lost. How can an operation such as the one proposed be of any financial benefit to the region aside from the Licensees themselves?

PETITIONS – THE PEOPLE HAVE SPOKEN – A RESOUNDING NO!

Over 12,000 physical signatures were handed to Trish Doyle MP, our local member and the issue was discussed in NSW Parliament this Thursday 1/8/19. Many residents made the effort to attend this discussion and both Trish Doyle MP and Kate Washington MP spoke eloquently on the matter and strongly opposed the proposal. The appropriate Government Ministers did not bother to attend the discussion, which gives a very strong impression that they do not want to associate themselves with this matter publicly. Their lack of interest appears extremely suspicious to the public and smacks of a decision that has already been made at a higher level. Please prove me wrong on this point.

Another 2 online Petitions were started around the same time on change.org.

As at today the Petition results are: For 29 and Against 5916.

Again, a RESOUNDING NO by the community! Links follow....

* SAY NO TO THE COMMERCIALISATION OF THE KATOOMBA AIRFIELD - 5850
<https://www.change.org/p/department-of-industry-crown-lands-and-water-save-our-skies-no-commercialisation-of-katoomba-airfield>

* SUPPORT THE REDEVELOPMENT OF THE KATOOMBA AIRFIELD – 29
<https://www.change.org/p/i-support-katoomba-airfield-re-development-by-flyblue>

CONCERNS ABOUT SAFETY ON THE GROUND AT AND APPROACHING THE HELIPAD/AIRFIELD AND THE SUITABILITY OF THE LICENSEE OPERATION

Trucks carrying Helicopter Fuel, a most toxic substance, would be transported along a long, windy and narrow road with poor visibility in places. There are no footpaths or lighting along what is now a quiet country road. Residents currently walk their dogs, cycle, run along that road with safety as it is very quiet. But add these trucks and tourists coaches transferring tourists to and from the airfield, the possibility of accidents will increase greatly. It would become unsafe for residents to go about their daily lives as they currently do.

The airfield is located in a High Bush Fire Zone. There is no town water at the site. Helicopter fuel would need to be stored onsite. This makes the operation of a commercial helicopter and fixed wing tourism business too high risk.

The Crowns Land Act 2016 states that it aims:

1.3 (d) “to provide for the consistent, efficient, fair and transparent management of Crown Land for the benefit of the people of New South Wales.”

Handing over the responsibility of this site to a private, commercial, high polluting, potentially dangerous enterprise is counter to the aims of the Crown Land Act 2016.

MANAGEMENT OF THIS SITE RIGHTLY BELONGS WITH THE NATIONAL PARKS AND WILDLIFE SERVICE

In truth, there should never have been a commercial airfield in operation at this site, located within the Blue Mountains World Heritage National Park.

The Department needs to correct this error and transfer the site into the management of the National Parks and Wildlife Service as has been recommended for many years now.

I offer a quote from the Blue Mountains World Heritage Institute (BMWHI) Executive Director Dr. John Merson, stating...

"It is our view that a commercial operation such as the one proposed for the Airfield would have a negative impact on the tourist industry it's designed to support, and on the environment of the World Heritage area which visitors come to experience.

Regular aircraft traffic and the noise associated with it would have an adverse impact on wildlife in the area, particularly nesting and migratory birds. Such noise would not only negatively impact wildlife, but also the experience of visitors coming to the Blue Mountain World Heritage Area for its natural beauty, peace and quiet. The noise of aircraft, like helicopters, arriving and taking off on a regular basis, would seriously undermine the amenity and recreation value of this unique region.

The Upper Blue Mountains accommodates around 4.5 million visitors annually within

a relatively small area. The noise impact on the visitor experience could potentially degrade the reputation of the Upper Blue Mountains as a landmark natural tourism destination. This is without taking into account the impact on the residents who live and work in the area."

I implore you; please do not make the mistake of allowing one private business to put so much else at risk. This would not be a wise decision. Should a disaster occur as a direct result of this type of business operating in such a sensitive area, the fault will be 100% yours. This proposal would be an inappropriate and dangerous use of this land.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

NB:

My Permission is given to publish the contents of my submission only but not my name, address or personal information.

[REDACTED]
[REDACTED]
4 August, 2019

Department of Industry, Crown Lands

P.O. Box 2155

DANGAR NSW 2309

RE: Blue Mountains Airfield Submission

Ref # LX 602686

Dear Sir / Madam

I am writing to make a submission regarding proposals for the future use of Katoomba Airfield situated at Medlow Bath. These are my views on this matter:

1. I strongly oppose any proposal to use Crown Land for private or commercial use. This airfield is on PUBLIC land, and any consideration of its use should demonstrate how the general public will benefit, not restricted commercial interests.
2. I understand there has been discussion regarding use of the airfield for recreational flights, such as helicopter and light aircraft use over the Blue Mountains National Park. I strongly oppose this proposal. We have a wonderful asset here, with this National Park, and while it may be argued that recreational flights open up access to some, these flights will themselves detract significantly from the peace and beauty of this area.
3. I oppose these flights from two viewpoints: (1) preserving the beauty and tranquillity of the National Park and (2) as a local resident, who lives here because of the peacefulness and quiet of the area. The noise, the impact on birds and other wildlife – it is not what we want for our very special place.
4. Lessons learnt from other places: I have been to Mitchell Falls, in the Kimberley area of Western Australia where there are helicopter rides, and while the landscape is stunning, having constant noise from helicopters detracts significantly from the incredible beauty of the place. Please do not subject us to this.
5. In conclusion, I request that the airfield should be handed over to the Blue Mountains National Park, to be incorporated as an emergency airfield. It should not be used for commercial purposes, either as freehold or on a lease basis.

Thank you for your consideration of my submission.

[REDACTED]
[REDACTED]

To: NSW Department of Industry

Re: Proposed Commercial Lease for Katoomba Airfield (Medlow Bath) LX602686

I am writing to object to the proposed granting of a long-term commercial lease for Katoomba Airfield at Medlow Bath in the Blue Mountains.

My desired outcomes following the recent community consultation period and the review of public submissions are that:

- 1. No commercial lease is granted for the airfield**
- 2. The airfield be incorporated into the World Heritage Blue Mountains National Park for it to be maintained by NPWS as an emergency airfield only.**

I am a resident of [REDACTED], in the upper Blue Mountains and have lived here for the past 19 years. I write not just because I live close to the airfield but because I believe that the proposed commercial lease will negatively impact on the environment, the local economy and tourism industry as well as the amenity and lifestyle enjoyed by the 15000 people who live in the upper Blue Mountains.

The Crowns Land Act 2016 states that it aims:

1.3 (d) "to provide for the consistent, efficient, fair and transparent management of Crown Land for the benefit of the people of New South Wales."

The granting of a long-term commercial lease (50 years has been reported), in my opinion, is inconsistent with this objective.

Crown Lands, by their status, belong to all people, yet the granting of a lease will not benefit the vast majority of the people of NSW, nor will it benefit our environment, the local economy, the tourism industry, the lifestyle and amenity enjoyed by residents and the Blue Mountains "brand" as a quiet, serene destination and its status as a World Heritage Area. Further, the processes undertaken by the Department of Industry in its actions in granting the current license to the proponents in and the processes involved in their current lease application cannot be seen as being transparent.

I acknowledge that Katoomba Airfield has been in existence for over 50 years and in that time has had a series of commercial leases. However, there is a real question as to the change in the scale of operations with the current proposal. In the past, the use of the airfield had been "low-key", as typified by the previous lessee, Rod Hay, operating a small flying school. I live just over one kilometre from the airfield's boundary and previous operations, such as Mr. Hay's, amounted to a small number of light planes (say, half a dozen) using the airfield on a weekly basis. The current proposal, whilst the proponents and DoI have not been forthcoming with details to the community, looks at being a dawn to dusk operation, 365 days a year with aircraft (both fixed-wing and helicopter) arriving and departing to and from Sydney and the central west of NSW with the inclusion (and intrusion) of "scenic helicopter tours" ("joy flights" in other words) throughout the upper Blue Mountains and the wilderness of the Greater Blue Mountains World Heritage Area.

The proposal offers little benefit, if in fact any, to a great many but much to a very few and it will potentially come at great costs, outlined as follows:

Environmental Concerns

- Within the GBMWhA exists a number of endangered and threatened fauna including the Regent Honeyeater, the Glossy Black Cockatoo (threatened species and which is known to inhabit and nest in the Medlow Bath area), amongst numerous others and the area contains the migratory paths of other birds. Studies have shown the impact of helicopters on wildlife and they identify bird strikes, disruption to breeding and feeding areas as well as adverse impacts on movement and activity patterns. The area is also home to the Spotted-tail Quoll (threatened species), Blue Mountains Water Skink and the Giant Dragonfly (both endangered species).
- Helicopters are notably inefficient users of fuel, especially when taking off, and excess fuel “blown off” and other pollutants will settle on surrounding vegetation and potentially impact ecosystems such as hanging swamps and ground dwelling fauna.
- Further, residents living in parts of the Blue Mountains near the airfield are not connected to towns water and rely on rainwater tanks for all of their water needs. There is a risk of contamination here affecting people’s health.
- The proposed flightpaths provided by the proponents at the community consultation sessions indicate that both fixed-wing aircraft and helicopters will fly over water catchment and wilderness areas. While there are currently flights and scenic tours over the Blue Mountains operating out of Sydney and places beyond the Blue Mountains, none on these take off and land within a World Heritage Area. With the current proposal doing this, the environmental risks, especially in the event of an accident, are heightened significantly.
- The movement of aviation fuel through parts of the GBMWhA to the airfield and its storage within the WHA pose concerns.
- The proponents have developed a website dedicated to advocating the “virtues” of their plans and the “benefits” to be gained by the proposed commercial lease which can only be described as “greenwashing”. These include the establishment of bushwalking opportunities on rehabilitated parts of the airfield (WalkBlue !!) and the planting of a tree for every single flight (which can be mathematically shown to be woefully inadequate recompense for the emissions produced by flights).

Detrimental Effects to the Local Tourism Industry and Economy

- The “brand” of the Blue Mountains is peace, quiet and serenity. People visit here to escape to a place where they can find the space and time to reflect, enjoy and appreciate what nature has to offer. Many people visit from interstate and overseas to experience this World Heritage Area and to engage with the beauty and tranquility of it. Over 4.5 million people visit annually and over 1 million undertake some form of wilderness experience such as bushwalking and camping. The intrusion of helicopters and other aircraft may very well damage this Blue Mountains brand and potentially with significant impacts.
- Intrusive noise and visual pollution caused by scenic helitours and other aircraft activity will detract from the experience for the sightseers, bushwalkers and those who wish to experience the wilderness areas of the mountains. The reverberation of helicopter noise throughout the canyons and the persistent noise of take offs and landings at the airfield situated adjacent to one of the premier attractions of the Blue Mountains, the Grand Canyon, will diminish tourists’ experience and enjoyment of this most beautiful place.

- If only a small proportion of these tourists then choose to not return for future visits the impact on the local economy will be significant. Local businesses, the cafes and restaurants will find it increasingly difficult to continue to operate. This was experienced following the 2013 Winmalee/Yellow Rock bushfires when, while the upper mountains were essentially untouched, tourist numbers dropped significantly, many believing that there was nothing to see. And the local economy struggled.
- The “benefits” to the local economy of the lease proponents will not be felt in the main street. The “high-end” tourists spoken about by the proponents engaging in scenic helitours will predominantly be undertaking pre-organised and prepaid tours with perhaps some of the local prominent businesses such as Scenic World, the Carrington and Hydro Majestic hotels and resorts such as Lillianfells and the Fairmont benefiting. However, the negative impacts of the activities that these people undertake may well drive away the more everyday “on the ground” visitors to the mountains.
- The proposal for Katoomba Airfield is a potential threat to the World Heritage status of the GBMWA. It adds to that recently been identified by UNESCO concerning the NSW government’s plan to raise the wall of Warragamba Dam by 14 metres, leading in times of extreme rain events, to the inundation of thousands of hectares of world heritage area and obliterating Aboriginal sacred sites. If World Heritage status is lost, then the damage to the Blue Mountains in terms of tourism and the economy will be enormous.
- The expected lack of economic benefit to the local community is a view also held by members of such groups as the Blue Mountains World Heritage Institute. A recent quote from Dr. John Merson, Executive Director of the BMWHI – “It is our view that a commercial operation such as the one proposed for the airfield would have a negative impact on the tourist industry it’s designed to support and on the environment of the World Heritage area visitors come to experience. Regular aircraft traffic and the noise associated with it would have an adverse impact on wildlife in the area, particularly nesting and migratory birds. Such noise would not only negatively impact wildlife, but also the experience of visitors coming to the Blue Mountain World Heritage Area for its natural beauty, peace and quiet. The noise of aircraft, like helicopters, arriving and taking off on a regular basis, would seriously undermine the amenity and recreation value of this unique region. The Upper Blue Mountains accommodates around 4.5 million visitors annually within a relatively small area. The noise impact on the visitor experience could potentially degrade the reputation of the Upper Blue Mountains as a landmark natural tourism destination. This is without taking into account the impact on the residents who live and work in the area”.

Impacts on Amenity and Lifestyle

- The proposal for a commercial lease will impact on the lives and amenity of the 15000-odd people who call the upper Blue Mountains home.
- Helicopter noise travels very long distances and the landscapes and landforms of the mountains are acoustically sensitive. The noise, as stated earlier, will be ongoing with the proponents indicating that operations at the airfield being conducted 365 days a year from 0700 to 30 minutes prior dusk (Monday to Saturday) and 0800 to 30 minutes prior to dusk on Sundays. The proponents have stated that their “noise abatement” practice will consist of no night flights. No indication has been

forthcoming from either the proponents or DoI as to the number of flights anticipated to operate.

- Helicopter noise will significantly affect people who reside in Medlow Bath, Blackheath, and much of Katoomba, Leura and Wentworth Falls. These areas fall within 3 nautical miles (approximately 5.5km) of the airfield. This is within what is referred to as the “flight circuit”. Within this area there is no enforceable restriction on the height at which a helicopter can fly when approaching the airfield.
- The proponents for the lease make a point of promoting Fly Neighbourly Agreements with those who use the airfield. FNA’s are unenforceable. The proponents say that they will not allow further use of the airfield to those who infringe upon these – the question then arises that “if” they hold to this stance, what happens when the lease is unsold? Neither proponent will outlive the 50-year lease they are seeking and subsequent operators may not enforce infringements. Nevertheless, the responsibility of following FNA’s is left to the pilot and instances reported from other places where FNA’s operate cite the regular and repeated breaking of these due to claims of “adverse weather” or other reasons. On 3rd February this year, twelve helicopters landed at the airfield. Sound levels were recorded over 70 decibels over one kilometre from the airfield.
- As mentioned earlier, I live in Medlow Bath not far from the airfield. People regularly walk on roads around the village and those leading to the airfield, not just out of need to get from one place to another, but also as a way to experience the surrounds we live in. I regularly walk this route to get exercise in my retirement and to enjoy the surrounds. My daughter and 2-year old grandson (in stroller) regularly walk with me. We meet other walkers, runners and bike riders. Like many townships and villages of the Blue Mountains, the roads in Medlow Bath are very basic. They are narrow, have no curb and gutter and do not provide footpaths for pedestrians. They were built for local traffic. I am concerned about the increased traffic in the form of aviation fuel tankers, tourist coaches, smaller buses and other vehicles being driven on the village roads by people unfamiliar with them. This increased traffic presents danger to residents.
- The route from the Great Western Highway to the Katoomba Airfield is approximately 4.6 km following Railway Parade, Rutland Road and Grand Canyon Road. The road infrastructure of Medlow Bath and the approach to Katoomba Airfield was never been designed for significant heavy vehicle traffic which would eventuate should a commercial lease for the airfield be granted. The roads are narrow in many places and contain the following hazards:
 - 4 pinch-points where the road narrows to just over 4 metres and two vehicles cannot safely pass each other
 - One right-angled turn without good visibility of oncoming traffic where larger vehicles must cross to the wrong side of the road to negotiate.
 - Two sharp bends without view of oncoming traffic
 - Two blind crests
 - The final 800m (approx.) from the border of the National Park to the airfield is unsealed and often in poor to very poor condition.
 - The route has very large trees along its length which overhang it and which force larger vehicles to drive over the centre of the road for a large part of it.
 - Significant lengths of Grand Canyon Road have no runoff area beside the roadway for cars to avoid each other.
 - No footpaths exist for over 90% of the route and pedestrians must walk on the road.

- At the small group consultation meeting with DoI during the community consultation period I expressed my apprehension that the nature of the road and large vehicles using it is very likely to lead to accidents involving injury to persons or worse. Should an accident involve a fuel tanker then the impact on the water catchment areas which line both sides of Grand Canyon Road the environment is also at risk.
- At an information session held at the airfield by the proponents in early February this year, when asked about the roads leading to the airfield, the response was that these were not their concerns. The responsibility for these, they said, lay with the local council and NPWS and were essentially “not our problem”. If this is the case, and the roads need to be upgraded to meet the demands of the airfield, then the question is about where the funds will come from – if from the council then other services provided to all Blue Mountains residents would be compromised and, if work needs to be done by an already under-staffed and financially starved NPWS for that section of road within the national park, where will these funds be diverted from?

Transparency and Concerns about the Process

- Throughout its history, there have been numerous government reports recommending that the airfield should be incorporated in the national park. It appears that this was not considered when DoI decided to seek expressions of interest in 2017. The question about why the use of such a sensitive area, given its location within the GBMWSHA, not being raised with the local community at this time should be addressed. In fact, most residents of Medlow Bath were not aware of any of the developments at the airfield until January this year and this information was not provided by government. Rather, the potential development of the airfield was discovered in an “accidental” encounter by a local resident while walking her dogs in a chance meeting with the proponents.
- Community Consultation regarding the proposed lease was undertaken by DoI with a community which had been kept uninformed. Despite efforts to address this, when requested for details of the operation, DoI would refer people to the proponents who refused to provide any information citing “commercial in-confidence”. Proposed flight paths were only presented at CC sessions without providing much opportunity for community members to consider their implications. These flightpaths were only for the local area surrounding the airfield. Given that the proponents wish to operate a “hub and spoke” model for the airfield, then flight paths beyond the immediate vicinity to the central west of NSW and beyond should have been provided. Information regarding hours of operation and the so-called “noise abatement” measures were only released around this time.
- The community has felt “behind the 8-ball” throughout this process, trying to catchup with the lease process and raise awareness of the Blue Mountains and wider community but only through the actions of locals, resident groups and petitioners. The process appears designed, even though it may meet legislative requirements, to hide the processes being undertaken by an agency of our government from the very people who will be most affected.

I trust the time will be taken to consider this submission along with the many others that I expect that you will receive opposing the granting of a commercial lease.

I have no issue with my submission being published by DoI with my name and suburb being shown.

I do NOT wish my street address to be published.

In conclusion, I reiterate the key points of my submission – that NO commercial lease is granted and that the airfield is incorporated into the national park for use as an emergency airfield only under the control of NPWS. It will then be in the hands of a group which understands the environment and is proactive in terms of its appropriate management “for the benefit of the people of New South Wales” as set out in Crown Lands Act.

Noel CATER



Medlow Bath

NSW 2780

To the Department of Industry

I am writing to you to object to the granting of a commercial lease for Katoomba Airfield.

I have lived in the upper Blue Mountains for most of my life.

I know that the airfield has been operating for over 50 years and has had commercial leases operating over that period.

However, the current application for a commercial lease by FlyBlue presents a significant increase in the scale of operations compared to those of the past. I fear that this will have large adverse impacts upon the environment and community.

From your review of the submissions being made to you at this time, the overwhelming opposition to the granting of a commercial lease expressed by locals at the community consultation sessions held in Katoomba and the opposition expressed by over 12000 NSW citizens in the petition presented in the NSW parliament on 1st August, I believe the following outcomes must result:

- 1. NO commercial lease should be granted for the airfield**
- 2. The airfield land be incorporated into in surrounding Blue Mountains National Park**
- 3. The airfield be maintained for emergency use only and managed by NPWS with appropriate funding being provided for its upkeep.**

The reasons for my opposition to the granting of a commercial lease follow:

1. TOURISM AND NEGATIVE IMPACTS

The Blue Mountains is known for being a quiet, peaceful place, where millions of tourists flock each year. The noise impact generated by helicopters and other aircraft will reduce the enjoyment for hikers, climbers and canyoners. Many may not revisit the mountains for this reason.

Tourists who arrive or depart by helicopter or undertake pre-paid scenic helicopter tours (Joy flights) are likely to rely upon just a few operators for transport and accommodation. This will concentrate tourist dollars into a few hands and this will mean less money goes to the local economy, such as cafes, pubs, shops, and retail outlets.

2. ENVIRONMENTAL CONCERNS

Katoomba Airfield is completely surrounded by the Greater Blue Mountains World Heritage Area. Thousands of native species including endangered and threatened species live within this area. Flight paths and nesting areas of many birds including migratory birds will be disrupted by the impact of flights by helicopters and small planes taking place.

Damage to the surrounding rare hanging swamps can result from run-off and erosion caused by increased traffic on Grand Canyon road (especially the unsealed section leading to the airfield) as well as the proposed tarmacing of the runway.

Threats to the environment are posed by the transport of aviation fuel through parts of the GBMWA and its storage at the airfield, where no town water supplies are present in case of emergency such as fire.

The GBMWA's World Heritage status is up for review later this year, this may be affected by the granting of a lease which will allow significant air traffic operating from within the WHA and adds to that risk sur to the proposed changes to Warragamba Dam.

3. LIFESTYLE AND AMENITY

Many residents of the Blue Mountains will be impacted by the noise of helicopters and small planes landing and taking off from Katoomba Airfield. While there are already some joy-flights over the area conducted by other operators which present some issues, this will greatly increase with flights taking off and landing within the WHA. Helicopter noise can travel long distances through the mountains which is dominated by cliffs and canyons and will affect many people in Wentworth Falls, Leura, Katoomba, North Katoomba, Medlow Bath and Blackheath.

Fly Neighbourly Advices (FNA's) is self-regulated. Breaches of an FNA are completely unenforceable and open to abuse.

Increased traffic on the roads leading to the airfield pose a risk and will diminish the amenity of people living in the upper Blue Mountains and in particular Medlow Bath. The roads are narrow, have blind corners and crests, pinch points where vehicles cannot safely pass each other and there are no footpaths for pedestrians and bushwalkers. There is an increased risk of accidents causing injury or worse when these roads are used by large fuel tankers, tourist coaches and other vehicles driven by people who are unfamiliar with the area.

4. LACK OF TRANSPERANCY

The problem that I see with the proposed lease is that my community knows almost nothing about the number of flights that are being proposed and that the flight paths planned will take place over and operate from within the Greater Blue Mountains World Heritage Area and water catchment areas. We do not know anything about the scale of operations that are planned and what the future intentions of the applicants are given that I believe that they have requested a 50 year lease.

The local community has not been informed of the scale of the proposed operations. The lease applicants and the DoI have refused to release any information about this. How can people properly engage in community consultation when they have no information?

Flight paths were only displayed at "drop-in sessions" at Hotel Blue but do not extend beyond the immediate vicinity of the airfield. The Lease Applicants have proposed that the airfield will act as a "hub and spoke" model leading to the central west of NSW but no information was presented about these flight paths.

In the past there have been numerous recommendations that the airfield be incorporated into the surrounding National Park when leases have expired. This does not look like it was even considered as an option when the DoI first put out a call for expressions of interest in 2017.

Why was the community not consulted about the appropriate use of such a sensitive site before they released a tender for a license by direct negotiation with a helicopter tourism business?

I consider that I have been fortunate to live in an area noted for its peace, tranquility and amazing natural beauty. I have a two-year old son and wish very much for him to be able to appreciate the unspoiled beauty of this unique area, its flora and fauna and to not be witness to an area which has been damaged and diminished by development, such as the current lease application, which has gone too far and which benefits a very small few at the expense of so many others.

For these reasons, I believe you must reach the outcomes I noted at the beginning of this submission. The non-approval of the application and the airfield's incorporation into the GBMWHA under the management of NPWS will see our sensitive and beautiful environment

protected that all may experience its natural beauty and wonder, both now and into the future.

I hope you consider my submission carefully.

I have no issues with my submission being published but do not wish my address to be included.

Sincerely

A black rectangular redaction box covers the signature and contact information of the sender. The redaction consists of two overlapping blocks: a larger one on top and a smaller one below it, both obscuring the text underneath.

Your reference: DOC19/

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

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

Dear Mr Bunny

Thank you for your letter dated 25 March providing advice on the community engagement process for the proposed commercial lease of Katoomba Airfield.

Members of the Blue Mountains NPWS Regional Advisory Committee attended the briefing session and the committee makes this submission in response.

The Blue Mountains Regional Advisory Committee does not support the conversion of the current short-term commercial lease to a long-term commercial lease. The volume of air traffic needed to make the airfield commercially viable would be totally incompatible with the values of the surrounding area.

The airfield site is within the listed area of the Greater Blue Mountains World Heritage Area and is adjacent to the Grose Valley which is covered by both Wild Rivers and Wilderness Declarations.

The high levels of visitation to the surrounding areas, both passive tourism accessing world famous sites such as Govetts Leap, Evans Lookout and Perrys Lookdown, and the more active pursuits of bushwalking and remote camping within the valley would be severely compromised by the intrusion of aircraft noise. There is also a considerable body of evidence on the detrimental effect of aircraft noise on animal behaviour and migration, which would greatly diminish the conservation value of the reserve.

The Blue Mountains Regional Advisory Committee recommends

1. That the current lease should not be converted to a long-term commercial lease for aviation
2. That the airfield site be incorporated into the Blue Mountains National Park
3. That the current unimproved airstrip be retained for use by emergency services.

Yours faithfully,



BILL DIXON
CHAIR
Blue Mountains Regional Advisory Committee

PO Box 552, Katoomba NSW 2780
Level 1, 39 Whitton Street Katoomba NSW
Tel: (02) 4784 7300 Fax: (02) 4782 6199
ABN 30 841 387 271



[REDACTED]

24 July 2019

To Whom It May Concern

I am a resident in Springwood NSW. I am also an academic who looks to bring economic sustainability and jobs to the Blue Mountains through the encouragement of tourism and use of facilities for conferences, meetings and writing retreats. I will be speaking at one such conference in Katoomba on Friday 8 August.

I'm writing to you to express my opposition to the proposal to commercially develop Katoomba Airfield. In my view the proposed development will have a substantial negative economic impact on many business in the region.

The Blue Mountains brand is entirely based on the value of the natural landscape, very much including its quiet and the capacity to enjoy its natural soundscape. Quiet and natural sound is being increasingly valued in wellness retreats and in health circles. Tens of thousands of visitors to the Blue Mountains come for the peace and tranquillity.

The noise and sensory impact of helicopter and sightseeing flights are unfortunately antithetical to the brand values that draws tourists. The flight paths that have been revealed are serious incursions on some of the best loved walks in the upper mountains. Helicopters would cut across Govetts Gorge before heading up the Grose Valley, ruining the natural quiet and tranquillity at Fortress Creek Canyon, the Blue Gum Forest, Pulpit Rock, Perrys Lookdown and Hanging Rock. I have three international colleagues visiting these exact places this very weekend, bringing, as so many visitors do, money for local accommodation, National Parks, and local shops and food outlets. This would stop if they were instead to be subjected to the noise of the rotary engines, which we already know get amplified in canyons to a serious degree!

I know this proposal already influences my colleagues in health – one of the largest academic and industry sectors with considerable economic power where choice of conference facilities are concerned. It is all too easy to prefer conference venues to the Southern Highlands because tranquillity is so important, particularly as active walking and bush activities come to be seen as an important part of what a health conference should offer.

This proposal will seriously and negatively impact on my amenity as a resident and active bushwalker in the Blue Mountains. We already experience too much noise as a result of scenic flights over the area conducted by other operators. However, those helicopters do not land in or take off from within the World Heritage Area.

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

[REDACTED]



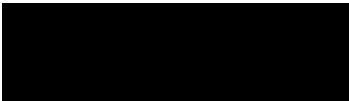
THE UNIVERSITY OF
SYDNEY

would include many arrivals. This is an insufficient guarantee of amenity for me, and in any case, any increase in noise at all has a negative impact to enjoy quiet and natural sound in the bush.

Additionally, increased traffic along the route to the airfield (including fuel tankers and airport runway building equipment) on a narrow local road and walking path is both a noise pollution and an environmental sustainability issue. The road is not designed for large vehicles (Station Street, Rutland Road and Grand Canyon Road). There is potential to damage our rare hanging swamp habitat caused by runoff and erosion from increased traffic on the unsealed section of Grand Canyon Road and from the tarmacing of the runway.

I categorically state that the Katoomba airfield proposal is one that will have a total negative impact on our region as well as on our collective amenity. Numerous government reports have recommended or anticipated the site should be returned to the National Park. I ask that this occur immediately.

Regards



BLUE MOUNTAINS HANG GLIDING CLUB INCORPORATED

SUBMISSION TO:

CROWN LANDS NEW SOUTH WALES

**REFERENCE 602686
PROPOSED LEASE OF KATOOMBA AIRFIELD**

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

1. The Blue Mountains Hanggliding Club Incorporated is placing this submission dated 3 August 2019 with Crown lands NSW in relation to **Reference 602686** being the **Proposed Lease of Katoomba Airfield.**
2. The Blue Mountains Hanggliding Club Inc. (BMHGC) is affiliated with the Sports Aviation Federation of Australia and operates primarily from the official launch site at Mount Blackheath (Shiplely Plateau). Members of the BMHGC have historically and recently represented Australia in international Paragliding World Cup competitions and major air sports events.
3. As an indication of the scale of operations conducted by the Blue Mountains Hang Gliding Club Inc., it is not uncommon to see weekend movements in the order of 40 to 50 flights conducted by 20 pilots within the vicinity of the Mount Blackheath launch site alone. The official landing zone for the Mount Blackheath launch site is in the Kanimbla Valley. Midweek operations usually see less activity, though between 10 to 15 movements are common on any given day (weather dependent).
4. Other aviators are often surprised by the capabilities and popularity of aircraft types administered by the Sport Aviation Federation of Australia (SAFA), the body authorised by Civil Aviation Safety Authority (CASA) to self-administer Hang gliding and Paragliding within Australia.
5. The Blue Mountains is one of the best recreational paragliding and hang gliding flying sites in south-east Australia, especially during the winter half of the year.
6. The flying site at Mt Blackheath receives numerous visiting pilots from all over the country as well as internationally. The Blue Mountains City Council, BMHGC and SAFA have recently co-funded renovations and expansion of the Mt Blackheath launch. Due to land manager requirements, SAFA pilots are currently unable to launch from other locations in the Blue Mountains region
7. Operations are conducted year-round during day light hours in any wind direction when light. A higher number of operations occur in predominantly westerly winds. Flying operations tend to cease beyond wind speeds of 20 knots.

8. The highest number of Hang-gliding and Paragliding flights originating from Mt Blackheath occur in the Kanimbla and Megalong valleys and the western escarpment of the Blue Mountains.
9. Cross country flying is more prevalent from the Mount Blackheath launch in spring and summer months towards Katoomba and Wentworth Falls, Lithgow/Mudgee, and Hampton/Oberon. The easterly flights over the plateau are less common though do occur with landings in open public spaces within Blue Mountains city council areas. On occasion pilots have flown from the Mount Blackheath launch for distances in excess of 200km in a south west through north west direction.
10. Hang-gliding and Paragliding flights from Mt Blackheath regularly reach altitudes of 8000 ft asl, with appropriately licenced pilots flying to 10,000ft asl in the immediate vicinity of the proposed flight paths.
11. Though BMHGC operations typically occur in Class-G airspace, CAR/CAO exemptions afford SAFA aircraft Class-E airspace access in excess of 10,000 feet with VHF radio and O2 use.
12. When operating cross country in the vicinity of registered airfields, SAFA pilots do conduct VHF CTAF calls. However, as a majority of hanglider and paraglider pilots choose never to fly in the vicinity of these airfields, they do not carry VHF radios for class-G monitoring. Due to the VHF CTAF frequency change for the respective zones that occurs in the vicinity of Blackheath and Katoomba the challenge of monitoring multiple frequencies in this specific location while flying is problematic. Reliance is placed heavily in un-alerted see and avoid practices.
13. It should therefore be noted hang glider and paraglider operations in the vicinity of YKAT will generally not be monitoring the YKAT VHF frequency nor area frequency. Standard SAFA hang glider and paraglider aircraft-to-aircraft communications are via UHF CB.
14. The proposed western aircraft and helicopter routes from the airfield are almost directly over the launch site for sports aviation activities at Mt Blackheath, the Shipley plateau and Kanimbla Valley.
15. BMHGC is concerned that through the currently proposed airfield lease flight path charts that the proposed leaseholder is disregarding the presence of air sports aviation in the local area.
16. Helicopter generated air turbulence is a significant danger to paraglider aircraft and pilots, particularly close to launch sites or when close to terrain.
17. BMHGC is concerned on indications that the proposed Katoomba Airfield lease will lead to an increase in local General Aviation and commercial air traffic. The proposed sealing of the airstrip would also likely result in increased general aviation light aircraft traffic.
18. Increased air traffic in the vicinity of the Shipley Plateau, Kanimbla Valley clearly raises the risk to pilots undertaking paragliding and hang gliding flights in the upper Blue Mountains.

19. BMHGC does not support the issuing of a licence or lease for Katoomba Airfield for the operations of a commercial airfield.
20. BMHGC does not support the current flight paths for the Katoomba Airfield lease proposal which will significantly restrict existing paragliding and hang gliding flying activity due to the increased safety risk to SAFA pilots.
21. BMHGC does not support proposals for the surface sealing of the Katoomba Airfield air strip due to the resulting increase in General Aviation light aircraft use. An increase in GA traffic will significantly restrict existing paragliding and hang gliding flying activity due to increased safety risk to SAFA pilots.
22. BMHGC submits that if a lease is determined to be granted for Katoomba Airfield that no change to the airfield certification is permitted and that it remains classified as an 'Aircraft Landing Area' only.
23. BMHGC supports the incorporation of the Katoomba Airfield lease area into the existing Blue Mountains National Park.
24. The Blue Mountains Hang Gliding Club Inc. requests the opportunity to be heard in support of this submission.
25. The Blue Mountains Hang Gliding Club Inc. ca [REDACTED]
[REDACTED]

President
Blue Mountains Hang Gliding Club Inc.

To the Department of Industry

I am writing to you to object to the granting of a commercial lease for Katoomba Airfield.

I live in Medlow Bath and have done so since I was a young child.

I know that the airfield has been operating for over 50 years and has been used for flight training and by local pilots during that time for recreational purposes.

The problem that I see with the proposed lease is that my community knows almost nothing about the number of flights that are being proposed, that the flight paths planned will take place over and operate from within the Greater Blue Mountains World Heritage Area and water catchment areas. We do not know anything about the scale of operations that are planned and what the future intentions of the applicants are given that I believe that they have requested a 50 year lease.

From your review of the submissions being made to you at this time, the overwhelming opposition to the granting of a commercial lease expressed by locals at the community consultation sessions held in Katoomba and the opposition expressed by over 12000 NSW citizens in the petition presented in the NSW parliament on 1st August, I believe the following outcomes should result:

- 1. NO commercial lease should be granted for the airfield**
- 2. The airfield land be incorporated into in surrounding Blue Mountains National Park**
- 3. The airfield be maintained for emergency use only and managed by NPWS with appropriate funding being provided for its upkeep.**

The reasons for my opposition, as well as those stated above, follow:

1. TOURISM AND NEGATIVE IMPACTS

The Blue Mountains is known for being a quiet, peaceful place, where millions of tourists flock each year. The noise impact generated by helicopters and other aircraft will reduce the enjoyment for hikers, climbers and canyons. Many may not revisit the mountains for this reason.

Tourists who arrive or depart by helicopter or undertake pre-paid scenic helicopter tours (Joy flights) are likely to rely upon just a few operators for transport and accommodation. This will concentrate tourist dollars into a few hands and this will mean less money goes to the local economy, such as cafes, pubs, shops, and retail outlets.

2. ENVIRONMENTAL CONCERNS

Katoomba Airfield is completely surrounded by the Greater Blue Mountains World Heritage Area. Thousands of native species including endangered and threatened species live within this area. Flight paths and nesting areas of many birds including migratory birds will be disrupted by the impact of flights by helicopters and small planes taking place.

Damage to the surrounding rare hanging swamps can result from run-off and erosion caused by increased traffic on Grand Canyon road (especially the unsealed section leading to the airfield) as well as the proposed tarmacing of the runway.

Threats to the environment are posed by the transport of aviation fuel through parts of the GBMWhA and its storage at the airfield, where no town water supplies are present in case of emergency such as fire.

The GBMWhA's World Heritage status is up for review later this year, this may be affected by the granting of a lease which will allow significant air traffic operating from within the WHA and adds to that risk sur to the proposed changes to Warragamba Dam.

3. LIFESTYLE AND AMENITY

Many residents of the Blue Mountains will be impacted by the noise of helicopters and small planes landing and taking off from Katoomba Airfield. While there are already some joy-flights over the area conducted by other operators which present some issues, this will greatly increase with flights taking off and landing within the WHA. Helicopter noise can travel long distances through the mountains which is dominated by cliffs and canyons and will affect many people in Wentworth Falls, Leura, Katoomba, North Katoomba, Medlow Bath and Blackheath.

Fly Neighbourly Advice (FNA) is self-regulated. Breaches of a FNA are completely unenforceable and open to abuse.

Increased traffic on the roads leading to the airfield pose a risk and will diminish the amenity of people living in the upper Blue Mountains and in particular Medlow Bath. The roads are narrow, have blind corners and crests, pinch points where vehicles cannot safely pass each other and there are no footpaths for pedestrians and bushwalkers. There is an increased risk of accidents causing injury or worse when these roads are used by large fuel tankers, tourist coaches and other vehicles driven by people who are unfamiliar with the area.

4. LACK OF TRANSPERANCY OF THE PROCESS

The local community has not been informed of the scale of the proposed operations. The lease applicants and the DoI have refused to release any information about this. How can people properly engage in community consultation when they have no information?

Flight paths were only displayed at "drop-in sessions" at Hotel Blue but do not extend beyond the immediate vicinity of the airfield. The Lease Applicants have proposed that the airfield will act as a "hub and spoke" model leading to the central west of NSW but no information was presented about these flight paths.

In the past there have been numerous recommendations that the airfield be incorporated into the surrounding National Park when leases have expired. This does not look like it was even considered as an option when the DoI first put out a call for expressions of interest in 2017.

Why was the community not consulted about the appropriate use of such a sensitive site before they released a tender for a license by direct negotiation with a helicopter tourism business?

For these reasons, I believe you must reach the outcomes I noted at the beginning of this submission.

I hope you consider my submission carefully.

I have no issues with my submission being published but do not wish my address to be included.

Sincerely

[Redacted signature]

[REDACTED]
[REDACTED]
[REDACTED] eMail [REDACTED]

2 August 2019

To: Mr Glen Bunny

Department of Industry – Crown Lands

PO Box 2155

Dangar. NSW 2309

Airfield.submissions@crowland.nsw.gov.au

Dear Sir,

KATOOMBA AIRFIELD LEASE PROPOSAL – SUBMISSION REF NO: LX 602686

A Submission objecting to the commercial lease of Katoomba Airfield, Lot 550 in Deposited Plan 751627.

Each month or so I stay for several days in the Megalong Valley. I enjoy the beauty, peace and quiet of the area away from city noise and pollution. I am totally opposed to the Crown Lands Department giving approval to the Blue Mountains City Council to grant a lease to any entity to reopen and use the Katoomba airfield for commercial helicopters.

Regarding the FlyBlue application, I comment as follows:-

- FlyBlue have not publicly released their estimated number of daily landings and take-offs.
- The heliport would be a helicopter refuelling base set within the Blue Mountains Heritage area, on a very windy site only about two kilometres from Katoomba town. Helicopter fuel is highly volatile. Should an accident occur causing **fire**, the result could be catastrophic in terms of lives and property.
- Helicopters are required to fly above 1,000 ft over residential areas and 500ft over other areas. Yet helicopters are able to fly at any height and will be forced to fly at low altitudes due the frequent bad weather and low cloud over the mountains. The effect of low altitude helicopter noise and air vibrations must be thoroughly examined before any lease is considered.
- The Tasmanian Wilderness World Heritage Area (TWWHA) Management Plan 1999, expressly states that “access by aircraft to remote areas is incompatible with the recreational experiences sought by on ground visitors.

<http://www.edotas.org.au/wp-content/uploads/2018/05/Helicopters-huts-and-having-your-say-briefing-note.pdf>

The management objectives for national parks include:

- Protecting bio diversity and geodiversity
- Conserving cultural heritage (Aboriginal and European)
- Providing opportunities for education and research

- Managing threats (such as pests, weeds, fire, and the impacts of climate change)
- Encouraging tourism, recreational use and enjoyment “consistent with the conservation of the national park’s natural and cultural values”
- Preserving the “natural, primitive and remote character of wilderness areas”

These objectives recognise that tourism and recreational uses are appropriate in national parks, provided they are consistent with natural and cultural values. Management plans are intended to regulate uses within the park to make sure that impacts on natural and cultural values are minimised.

- The main legal mechanisms for satisfying Australia’s obligations are set out under the Environment Protection and Biodiversity Conservation Act 1999(EPBC Act). The Commonwealth Government must “use its best endeavours” to ensure that a management plan for a World Heritage Property within a State is consistent with the World Heritage Management Principles:-

defines ecologically sustainable use. The plan to fly helicopters in and out of the Blue Mountains Heritage area is NOT sustainable ecologically.

defines *environment* to include (c) *the qualities and characteristics of locations, places and areas*. Helicopters are NOT part of the Heritage area qualities and characteristics.

defines *heritage value of a place includes the places natural and cultural environment having aesthetic, historic ... for current and future generations of Australians*. Helicopters buzzing around the mountains cannot fit this definition.

The Crown Lands Department must delay any decision on the Katoomba airfield decision until appropriate review by all stakeholders, and that includes the Commonwealth Government.

- UNESCO REQUIREMENTS OF A PLACE LISTED AS A WORLD HERITAGE SITE – SELECTION CRITERIOR

NATURAL -

vii."contains superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance"

viii."is an outstanding example representing major stages of Earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features"

ix."is an outstanding example representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems, and communities of plants and animals"

x."contains the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation"

The proposed helicopter airfield would jeopardise many of these critical requirements for World Heritage listing.

UNESCO's designation of the Blue Mountains Heritage area as a World Heritage Site is prima facie evidence that such culturally sensitive sites are legally protected. A site may be added to the List of World Heritage in Danger if there are conditions that threaten the characteristics for which the landmark or area was inscribed on the World Heritage List. Such problems may involve pollution, or uncontrolled urbanization or human development. This danger list is intended to increase international awareness of the threats and to encourage counteractive measures. Threats to a site can be either proven imminent threats or potential dangers that could have adverse effects on a site.

- ENVIRONMENTAL IMPACT STATEMENT (EIS) –
FlyBlue have not published an EIS. I am advised that the Crown Lands Department do not require an EIS until after the Blue Mountains City Council have granted a lease. FlyBlue have applied for a 50 year lease. If the Council grants a lease for 50 years, the authority of an EIS subsequently prepared to expose the dangers to the Blue Mountains Heritage area will be totally emasculated.

The Crown Lands Department **MUST DEMAND AN EIS BEFORE CONSIDERING ANY APPLICATION FOR A LEASE.**

The Blue Mountains Heritage Area is all about the sights and sounds and smells of the natural environment. The ever-increasing industrial sounds and vibrations of increasing numbers of commercial helicopters would risk the destruction of the reasons that 4 million people visit every year

- Over 1.25 million people bush walk in the mountain every year. People come to the mountains for peace and tranquillity, not loud low flying helicopter noise
- Over 4 million people from Australia and overseas visit the Blue Mountains to see the sights. Helicopter noise and air vibrations would jeopardise that high-volume tourism. If the Crown Lands Department approves the granting of the lease that is like *shooting the goose that laid the golden egg.*

Research has shown that bush walkers and tourists are annoyed when native beauty and solitude is destroyed by noisy helicopters. Tourist numbers would surely fall.

- Hang Gliders lives would be at risk from nearby helicopter flights
- Rock climber's lives would be at risk from nearby helicopter flights
- Balloonist's lives would be at risk from nearby helicopter flights
- Millions of people relocate to the Blue Mountains for the beauty and quiet of the region. The noise and air vibrations from low flying helicopter will damage this attraction and thus the value of property would fall.

The Crown Lands Department must:-

- reject the application for lease of the Katoomba Airfield,
or at the very least –
- Delay any decision until the following has occurred -

(a) The Greater Blue Mountains World Heritage Area is managed and protected by both Commonwealth and State legislation. The NSW Office of Environment and Heritage manages the area and the Department has

stated that it will seek input from this agency prior to any decision regarding the lease application. This application must be publicly available and open to public submission

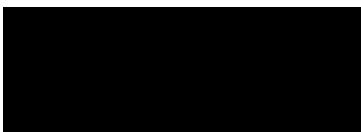
- (b) You have stated that there is an Aboriginal land claim over the Katoomba Airfield and that claim (ALC 49068) was registered over Lot 550 DP 751627 (Katoomba Airfield) on 1 July 2019 by Deerubbin Local Aboriginal Land Council. Before any decision on the airfield lease is made, the Crown Lands Department must complete their examination of the claim, and publicly release all documents before making any recommendation to the minister to either grant the claim or refuse it. I note that you stated that a previous claim was made in 2009 and was not granted as the airfield was leased and being actively used. The previous airport lease has expired and the airport is now not being actively used or at least only subject to a short term licence. That licence could be subject to legal challenge and in any case expires in about two years. That indicates that the Aboriginal land claim should now be allowed. You **MUST** delay any decision on the current lease application until the currently renewed Aboriginal land claim has been resolved.
- (c) Before any lease is granted, FlyBlue must prepare a comprehensive Environmental Impact Statement. The Statement must be reviewed by an appropriately qualified scientific and environmentalist panel, and must allow for further submissions by the public to the panel before final determination. If the preparation of an EIS before the lease is granted is not procedurally possible, then the Crown Lands Department must require that any lease issued must have a clause that states that the lease is null and void if the review panel rejects the conclusion of the EIS for any reason.
- (d) No proper decision should be made by you until FlyBlue have supplied (to you and the public) their range of estimate of the number of take-offs and landings each day

You must not forget that this area is a **World** Heritage listed national park. What we do with it is a matter of world wide concern. The stakeholders in this matter are:-

- tourists from around the world
- our traditional owners, the indigenous people
- the 4 million tourists, including bush walkers, hang gliders, balloonists, and rock climbers who visit the area each year
- the flora and fauna of the Blue Mountain National Park
- the residents of Katoomba, Leura, Medlow Bath, Blackheath and surrounding affected suburban areas and
- the local landholders, both farmers and tourist enterprises in semi rural areas under or near the flight paths.

The benefits of a heliport to a few rich passengers flying into high end resorts are completely insignificant compared with the interest of the above stakeholders.

Yours faithfully



PLEASE KEEP MY CONTACT DETAILS IN THIS SUBMISSION **CONFIDENTIAL**

Preferred option for
Lot 550, DP 751627
Address: 178-180 Grand Canyon Road MEDLOW BATH
Known as: Katoomba Airfield

Reference number LX 602686

Thank you for the opportunity to make a submission re the proposed leasing of Lot 550, DP 751627, Address: 178-180 Grand Canyon Road, Medlow Bath and known as Katoomba Airfield. In my opinion the past use of this parcel of land as an airfield is now a legacy issue which is out of step with the NSW Government State-wide Destination Management Plan 2019 and the Blue Mountains Destination Management Plan 2018, for the on-going development of the Blue Mountains. The lease should not be granted and the parcel of land should be incorporated into the Blue Mountains National Park which now forms part of Greater Blue Mountains World Heritage Area (GBMWhA).

The proposed lease raises a number of issues which are addressed below.

Breach of Trust

The Deposited Plan for Lot 550, DP 751627 was issued on 23rd Jan 1897, but the parcel of land remained in the Crown Estate. It was surrounded by Crown Land which was dedicated on 9th March 1917 as Public Recreation and Access.

On 25th September 1959 an initial 155 000 acres of land was proclaimed as the Blue Mountains National Park (NSW Government Gazette No 108, p 2957, 25th September, 1959). At that time this did not include Lot 550, DP 751627 or the immediate surroundings which remained Crown Land, Public Recreation and Access.

In 1966 the then Department of Lands received an application from a Mr B.J. Shaw for a Special Lease for the erection of hangers and aerodrome on Lot 550, DP 751627. Special Lease 1966/14 Penrith, was granted for the parcel of land on 1st August 1968 for a 20-year term starting on 1st Dec 1969 and to finish on 31st Dec 1988 (NSW Government Gazette No 16, p 417, 6th Feb 1970).

In 1968 the NSW National Parks and Wild Life Service requested the parcel of land be added to the estate of the Blue Mountains National Park. However, since the Special Lease had already been granted, it was agreed between the NSW National Parks and Wild Life Service and the Department of Lands that the lease would run its course, and the land would be incorporated into the Blue Mountains National Park on termination of the lease in 1988. (Assessment of Crown Land at Medlow Bath (Katoomba Airfield) — Draft Document, Department of Land & Water Conservation, Land Assessment Number: MN99/252, File Reference Number: MN99H252, Issue 2 March 2000, page 45).

This agreement was formalised when notice was given on 12 December 1969 that portion 550 was withdrawn from future sale or lease, (NSW Government Gazette No 144, p 5119, 12th Dec 1969). While this notice did not affect the existing lease, it would apply to any renewal of lease. *Copy of gazette attached as a jpeg at end of submission.*

The intent of the agreement was strengthened on the 24th December 1970 when the Crown Lands surrounding Lot 550, DP 751627 were incorporated into the Blue Mountains National Park, (NSW Government Gazette No 163, p 5185, 24th Dec 1970).

In 1986 the lease was on-sold to Mr R Hay. In spite of the revocation from sale or lease for the land, the new lessee lodged a request to change the lease from Special Lease to Conditional Purchase. The request was refused and on 18th Nov 1988, the Minister for Natural Resources, Mr I.R. Causley, announced that the parcel of land Lot 550, DP 751627 was withdrawn from sale, (NSW Government Gazette No 172, p 6030, 18th Nov 1988). *Copy of gazette attached as a jpeg at end of submission.*

However, because of a perceived importance of the airfield, following termination of the lease on 31st Dec 1988, the previous agreement between the National Parks and Wild Life Service and Department of Lands for incorporation of the land into the Blue Mountains National Park was over-ruled and the lessee was granted a further 20-year lease to terminate on the 31st December 2008.

In 1992 a helicopter company started operating out of the Katoomba Airfield but without a license from the Environmental Protection Agency and was in breach of the Noise Pollution Control Act 1975. On the 1st February 1993 an Aerospatiale helicopter crashed on take-off and was destroyed by fire. In October 1994 the lease was transferred to the helicopter company and the company was licensed by the EPA to operate under a series of short-term licences. These operations generated extensive community complaints over noise and intrusion. The licence to operate was withdrawn on 30th May 1996 and all operations from the helipad ceased. The lease reverted to the previous owner who was the mortgagee to the helicopter company. The EPA advised that due to the high number of complaints, it was doubtful that a new license would be issued. Following termination of the lease in 2008, the lessee subsequently occupied the land on a monthly turn-over until his death in 2016.

This complex history reflects the changes over the past 60 years for the most appropriate use for the land and changes in stakeholder in-put. By 2000 the Department of Land and Water Conservation was of the opinion that the most appropriate course of action would be for the addition of the parcel of land to the Blue Mountains National Park. This had always been the intent at the time of granting the initial lease, (Assessment of Crown Land at Medlow Bath (Katoomba Airfield) — Draft Document, Department of Land & Water Conservation, Land Assessment Number: MN99/252, File Reference Number: MN99H252, Issue 2 March 2000, page 47).

This was also the opinion of the Department of Industry – Lands in 2017.

“The site of Katoomba Airfield was excised from the surrounding Blue Mountains National Park in the 1960s, on the basis the land would be returned to the Park when the original lease expired in 1988.”

(Letter from the NSW Department of Industry (Lands) to the NSW RAPAC, DOC17/028257, File: 08/1364-03, attached to the 2017-2 minutes of the NSW RAPAC). www.casa.gov.au/file/184486/download?token=cE7WD8JX.

Since 1917, the intent has always been that this parcel of land would be Public Recreation & Access. This was codified over the years through the formation of the National Parks and Wild Life Service and various acts and notices of the NSW Parliament. Seeking an

Expression of Interest for issuing a new lease and granting a licence for access represents a change of intent and change of use. The failure to present this proposed change for consideration to the Sydney Western City Planning Panel is a failure of process. The importance of due process is demonstrated by the rejection of the Frog Hollow Flying School proposal by the Southern Joint Regional Panel, a proposal not too dissimilar to the FlyBlue proposal.

In summary: Since 1917 the intent has always been for this parcel of land to be Public Recreation & Access. A temporary lease was granted in 1968 for the use of the land as an airfield. An agreement was made in 1968 between agencies that following termination of the lease, the land would be absorbed into the Blue Mountains National Park. The original intent and the agency agreement have not been extinguished, and they have remained in place, as responsibility for the parcel of land has travelled between government departments and agencies. The intent and agreement were formalised with government notices advising that the land was longer available for lease or sale.

The proposed new lease represents a *Breach of Trust* between the current, responsible government department and the Blue Mountains community. Over-ruling gazetted NSW Government notices, breaking of agreements and failure of due process represents a loss of trust between the general public and the NSW government, its departments and agencies. Continued erosion of trust is not in the long-term public interest. It should not be necessary to remind a government department that social cohesion requires citizens and agencies to 'Keep thy Word'.

Impact on the local economy

The granting of a lease will have a negative impact on the economy of the Blue Mountains LGA. At the time the original lease was granted, the Blue Mountains was in a state of economic decline. A previous major economy, mining, ceased in 1945 with the closure of the last customer - the Katoomba Power Station. The neighbouring city of Lithgow is now going through a similar decline. Tourism had yet to recover from the downturn during and following the 2nd World War. The development of an airfield would have been seen as an exciting new beginning. The fact that the development under three commercial operators failed to meet expectations, leading to final termination of the lease in 2008 should be viewed as a strong indicator that the concept is flawed and the site is unsuitable as a commercial airfield.

Post the 1970's the Blue Mountains economy has steadily improved. The latest reported Gross Regional Product is \$3.233 billion. The principal driver for this significant GRP is tourism. In terms of output, tourism is the third largest sector in the Blue Mountains economy and accounts for \$342 million in output. The sector accounts for 7.8% of total economic output in the LGA, compared with a State average of 3.2%. If the "Ownership of Dwellings" is removed from the output assessment, tourism ranks 2nd and contributes 14% of total output. The Blue Mountains LGA is reliant on tourism as the major economic generator. More than 4 million people visit the Blue Mountains annually with tourism generating over \$400 million per year.

www.economyprofile.com.au/bluemountains

Underpinning this development was the gazetting by UNESCO in 2000 of the Greater Blue Mountains as a World Heritage Area. The gazetted area of 1.03 million ha includes the Blue Mountains National Park, the Nattai National Park, the Gardens of Stone National Park,

Thirlmere Lakes National Park, the Jenolan Karst Conservation reserve, Wollemi National Park, the Kanangra-Boyd National park and Yengo National Park. In 2014–15, the GBMWA Advisory Committee and the NSW Government recommended that the National Heritage List include 25 additional lands which are contiguous with or close to the GBMWA and act as buffers to the GBMWA. In-holdings within the National Park areas would be extinguished as leases came to the end of their term and the parcels of land would be returned to the National Park estate. The City of the Blue Mountains is the only city in the world to be located in a World Heritage Area. whc.unesco.org/en/list/917

The GBMWA is now the chief driver of the economy of the Blue Mountains LGA. Over 4 million people come to see a Wilderness Area. If they wanted to see a National Park they would go to the Royal National Park. The Royal is Australia's oldest National Park but it is not a designated Wilderness Area. Wilderness areas are exactly that, they are wildernesses, they are free of urban infrastructure and modern technology, and are required to remain so in order to keep their World Heritage status. They are not theme parks.

The GBMWA attracts and inspires visitors through adventure, landscape and vistas, and the aboriginal and European cultural heritage. It provides a cultural haven for the arts in a unique, breathtaking environment. This is not just empty verbiage. Last year I took an American visitor around the Jamison escarpment via the Over-cliff/Under-cliff walk at Wentworth Falls. He walked in Darwin's footsteps. He was so wrapped in the experience that this year and on his recommendation, I took his mother and sister on the same walk, they cannot stop talking about it. The Jamison valley is but one of many valleys of the GBMWA. As a group they are quite unique in geology, geography, landscape, flora, fauna and history. It is the landscape that inspired Charles Darwin to write the Origin of the Species. Together with the total absence of infrastructure it is true wilderness. That is why 4+ million visitors go there.

Management of this environmental and economic resource formed the substance of the following studies and reports:

- Greater Blue Mountains World Heritage Area Strategic Plan 2009
www.environment.nsw.gov.au/research-and-publications/publications-search/greater-blue-mountains-world-heritage-area-strategic-plan
- Greater Blue Mountains World Heritage Area Strategic Plan Addendum 2016
www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Types-of-protected-areas/greater-blue-mountains-world-heritage-area-strategic-plan-addendum-2016-180173.pdf?la=en&hash=6202D26A57F04F976EBF38452467A868C562CAD2
- Blue Mountains City Council Local Environmental Plan 2015
www.bmcc.nsw.gov.au/planning-rules/development-controls-for-land-zoned-under-lep-2015
- The Blue Mountains Destination Management Plan 2018
www.bmcc.nsw.gov.au/documents/destination-management-plan
- Blue Mountains Economic Enterprise Economy Profile
www.economyprofile.com.au/bluemountains

The Blue Mountains Destination Management Plan 2018, page 158-160, identifies over 100 activities which would come within the active recreation sector. This includes adventure

sports (abseiling, canyoning, rock-climbing), bushwalking, and cycling tours, together with visits to scenic attractions and garden tours. The report also identifies those areas that could be further developed to the benefit of the Blue Mountains LGA economy and as a means of controlling the ever-increasing number of visitors without detriment to the environment or visitor experience. The activities identified in the Blue Mountains Destination Management Plan 2018 are echoed on pages 46 and 47 of the NSW Government State-wide Destination Management Plan 2019, the Blue Mountains being identified as a 'Hero' destination. www.dssn.com.au/app/uploads/2019/02/NSW-Government-Statewide-Destination-Management-Plan-04-02-2019-FINAL.pdf

There is no demonstration that the FlyBlue operations would benefit the Blue Mountains economy. The proposed helicopter scenic tours within the GBMWhA would be a significant intrusion into the wilderness nature of the GBMWhA. It smacks of voyeurism by an economically privileged few to the detriment of many. It conflicts with the etiquette of the bush – 'Go lightly, leave the bush for the enjoyment of others'. A commercial helicopter licence conflicts with the requirements for World Heritage status and could contribute to Australia losing the World Heritage status.

Tourism is a very fickle, fragile industry. In addition to the normal economic pressures it is also susceptible to the perception and controls of social media. Following the disastrous bush fires in October 2013 there was a significant down-turn for the local tourism industry. Within a month tourism operators were reporting a loss of nearly \$30 million from cancellations and visitors avoiding the area. This represents over \$300 million a year. Hotel occupancy rates were down by as much as 80 per cent. Some small bed and breakfast operators had zero customers and zero revenue. There was also a flow-on effect within the industry that employs more than 5,000 people. www.abc.net.au/news/2013-11-14/tourism-losses-hit-2430m-after-blue-mountains-bushfires/5090840

The insidious impact of noise from helicopters on tourism would not be dissimilar to the impact from the aftermath of a major bush fire, except it would be continuous. The intrusive nature of helicopter noise was a past, and remains a present major concern for the Blue Mountains City Council and community. Helicopter noise conflicts with the Blue Mountains experience for the visiting tourist and the community. It poses a serious threat to the tourist economy of the Blue Mountains LGA. The FlyBlue brochure notes that the height restrictions for civil aircraft is 1000 ft above urban areas and 500 ft for wilderness areas. In modern units this is 300 m above urban areas and only 150 m above non-urban areas. However, the civil aviation regulations fail to take into account the geography of the Blue Mountains. The valley floors are up to 600 m below the escarpments, the helicopters could fly at or below the escarpments and still be well within civil aviation regulation. In practice conversation becomes difficult with helicopters operating within 500 m. Valleys act as natural amplifiers so the noise levels would be totally unacceptable to visitors at any of the scenic spots such as The Three Sisters, Govetts Leap, Wentworth Falls or on the popular escarpment walks of the Jamison, Kedumba or Grose valleys. The FlyBlue 'Fly Neighbourly' policy is not a legal requirement. As a policy it would not necessarily transfer should the lease be on-sold. The previous lease was on sold three times. As a policy it only applies to the FlyBlue pilots, it does not apply to other operators who could use the airfield. The FlyBlue brochure indicates that some of its business would be flights to beyond the Blue

Mountains, as such it would be providing nett zero benefit to the economy of the Blue Mountains LGA.

There is no demonstration that the FlyBlue operations would benefit the Blue Mountains economy and there is a serious risk that the operations would be detrimental.

Employment

The Blue Mountains is home to 79,812 residents (as at 2015). It is estimated that 19 513 people work in Blue Mountains while currently 56% of the working population travel outside the LGA for employment. Tourism now accounts for 10.7% of all jobs and ranks fourth in terms of job creation after health care and social assistance, retail trade and education and training. This figure of 10.7% should be treated as a conservative figure because a major component of the retail trade is servicing tourism; the Leura campus of Torrens university (part of the education and training sector) is specifically focussed on the hospitality industry and a major component of the Blue Mountains TAFE at Katoomba and Wentworth Falls is directed towards the tourism/National Parks sector.

www.torrens.edu.au/studying-with-us/campuses/leura

www.tafensw.edu.au/locations/western-sydney/blue-mountains.

The FlyBlue proposal will have no positive impact on the employment levels within the Blue Mountains LGA. The pilots, (2?), will come from outside the LGA. Maintenance of helicopters for commercial operations have to meet stringent CASA regulatory standards. These standards are onerous and maintaining facilities at Katoomba for one operator would not be economically justified. Maintenance other than daily routine checks would have to be carried out at Bankstown Airport or at equivalent sites outside the LGA. The operations will require one clerical assistant.

It is extremely doubtful that FlyBlue will create any jobs within the LGA, and if its operations have a negative effect on the tourism industry there will be a nett job loss.

Safety

Lot 550, DP 751627 is an isolated block of land approximately 4.5 km from the Great Western Highway. It is surrounded by bush which forms part of the Blue Mountains National Park. There is only one road in and one road out. The last 0.5 km is poorly graded dirt. As a former member of the Rural Fire Service and having attended a bush fire in the Royal National Park after a full crew lost their lives, I consider the site indefensible from a bush fire point of view. The situation would be exacerbated by the storage of aviation fuel in quantities to support commercial operations.

The Bush Fire Hazard was assessed on page 25 of the 'Assessment of Crown Land at Medlow Bath (Katoomba Airfield) — Draft Document, Department of Land & Water Conservation, Land Assessment Number: MN99/252, File Reference Number: MN99H252, Issue 2 March 2000'. Mapping Area 4, which is the majority of the site, was assessed as presenting a high relative bush fire hazard, which in turn posed a medium to high threat to the other mapping areas and assets. While the site could be used by emergency services as a forward command and assembly point for fighting bush fires, this would have to be on the proviso that the fire front was somewhat distant from the site and would not pose a threat to those at the assembly point.

The FlyBlue brochure suggests that the airfield represents:

‘an asset of strategic value for training & real-life emergencies,
mass casualty events, natural disasters, acts of terrorism & the like’

This is extreme hyperbole. The site is more likely to be the cause a real life emergency than have any value for handling one; it would certainly not be used as a mass casualty assembly point, it is 4 km from the urban environment; it is more likely to be the site of a natural

disaster (bush fire) than being used for handling a natural disaster, and it is difficult to conceive of an act of terrorism 4 km into the bush.

Seven reports have been issued by the Air Transport Safety Bureau for incidents at Katoomba Airfield.

- 198502577 Cessna P 206, VH-MYD, Medlow Bath NSW, 29 December 1985
- 198602324 Cessna P206 B, VH-RDR, Medlow Bath NSW, 12 May 1986
- 198802416 Grumman, VH-IFA, Near Medlow Bath Airstrip NSW, 25 December 1988
- 199300126 Aerospatiale SA.365C, VH-LSR, 2km E Blackheath NSW, 1 February 1993
- 199601262 Collision on ground involving an American Aircraft Corp AA-5B, VH-IGH, Katoomba, (ALA), NSW on 20 April 1996
- 200402685 Cessna Aircraft Company U206C, VH-DSP20 Jul 2004
- AE-2016-018 Technical assistance to Recreational Aviation Australia in the examination of the engine and damaged GPS from the collision with terrain involving a Jabiru aircraft, 55-3692, at Medlow Bath, NSW on 27 Feb 2016

www.atsb.gov.au/publications/safety-investigation-reports.aspx?mode=Aviation&sort=OccurrenceReleaseDate&sortAscending=ascending&printAll=true

Six of the incidents involved fixed wing and one involved a helicopter. There has been one fatality. The majority of the incidents can be attributed to either wind gusts experienced at the site due to its high elevation, the high elevation lowering air density and restricting climb rate, ruts in the side of the runway and pilots who were inexperienced or unfamiliar with the terrain and hazards associated with the site. There is a high voltage transmission line 300 m east of runway 06/24 and a 66 kV transmission line 100 m west of runway 06/24. The 66 kV line is equipped with red hazard balls, the high voltage transmission line, installed before the airfield, does not. *Photographs are attached as jpegs at the end of the submission.*

The number of incidents is high considering the frequency of use. The cause of the fatality associated with report AE-2016-018 was not identified in the report other than it was not mechanical. Professional pilots have strong reservations about using the airfield. The high elevation (950 m) significantly lowers the air density. This presents problems for heavier aircraft when fully laden. Pilots report that the airfield is a small clearing within the bush surrounded by hazards such as trees and power lines. The chief pilot of Curtis Aviation (one of Sydney's leading flying schools operating out of Camden) does not recommend use of the airfield, that a number of aircraft have had difficulties there and Curtis Aviation policy is that one may not fly in there without an instructor on board.

www.pprune.org/pacific-general-aviation-questions/237311-katoomba-ykat.html

The FlyBlue brochure states that it will 'repair and upgrade runway YKAT 06/24 for fixed wing aircraft to land at their own risk', this presents options for future aircraft use, if not by the current lease holder, and it remains an option/attraction to on-sold lease holders. The Rural Fire Service and National Park fire units do not need a runway and they certainly do not need a runway with high voltage transmission lines at either end. They normally operate the forward command and assembly points in large clearings such as parks and sports ovals. The NSW Environmental Protection Agency noted in the report Assessment of Crown Land at Medlow Bath (Katoomba Airfield) — Draft Document, Department of Land & Water Conservation, Land Assessment Number: MN99/252, File Reference Number: MN99H252, Issue 2 March 2000, that any upgrading of the airfield could be used to justify further aircraft

use. In August 1995 the EPA strongly recommended that an Environmental Study be undertaken within the recommendations of the Blue Mountains Aircraft Working Party for the Minister for the Environment. No such study has been undertaken.

Operation of the airfield as a helicopter base with an upgraded runway would encourage unsafe use of the airfield by inexperienced pilots. In the event of an incident, emergency services would find the site remote and challenging. The incident leading to the death of Mr Rod Hay, a very experienced flight instructor, occurred on Saturday 27 Feb 2016. An ambulance helicopter eventually found the wreckage of the aircraft about 200 metres from the airstrip the following day. Blue Mountains Police Inspector Peter Balatincz said the aircraft had suffered significant damage and was found in an area that was difficult to get to. www.dailytelegraph.com.au/news/nsw/veteran-instructor-rod-hay-killed-in-air-crash-near-katoomba-airfield/news-story/54d41ff22531d6c9446b35bf6e4bf440
www.abc.net.au/news/2016-02-28/pilot-of-missing-light-plane-found-dead-in-blue-mountains/7205766.

The site is unsafe from a fire prospective, an aviation perspective and emergency services recovery perspective.

Rehabilitation

The scope of the bush regeneration suggested by FlyBlue appears to be somewhat naive. For any effective rehabilitation it is important that the work avoids creating a flora monoculture. Simply planting the odd native species is not rehabilitation. The rehabilitation should reflect the surrounding landscape in terms of range of species, both in the upper storey and understorey, whether it will be self-sustaining and what fauna it will support. The site will be surrounded by a 2 m high security fence capped with barbed wire. While it will be pervious to the smaller animals it will prevent larger animals from entering the site. The picture of the security fence in the FlyBlue brochure conflicts with the picture of bush walkers walking through open wilderness. The carbon-offset program is to be sub-contracted out. How successful this would be has not been properly quantified. Continued commercial operation of the site will continue to present potential weed, nutrient and sediment issues that will impact on the National Park and the Grose River.

Successful rehabilitation of the area requires complete removal of all infrastructure and a bush regeneration program carried out with local expertise.

Groundwater

The Sinclair Knight Merz report 'Groundwater sustainability, A Management Plan for the Blue Mountains/Richmond Region, Land and Water Conservation, April 1999' identified storage of aviation and other fuels as a potential source of hydrocarbon contamination of the groundwater. The plan noted the dependence of a range of eco-systems such as the hanging swamps and upland wetlands, on the quality of the groundwater. The FlyBlue brochure identifies these wetlands as 'Temperate Highland Peat Swamps' and they are both on the parcel of land and surround it.

The continued operation of the Katoomba Airfield as a commercial airfield poses a risk not only to the quality of the groundwaters, but also to the local wetland ecosystems in and surrounding the site.

Urban Runoff

The Blue Mountains City Council has noted that the commercial use of the parcel of land conflicts with the Council LEP. It is a degraded area and generates issues within the Blue Mountains Urban Control Run-off Program.

Urban runoff will remain an issue until commercial operations cease and the area is returned to the National Parks for bush regeneration.

Inappropriate use of the land

In February 2019 the NSW Department of Industry granted a license to FlyBlue for the purposes of management of the site while lease negotiations progressed. (NSW Department of Industry Proposed Crown land lease Medlow Bath Fact Sheet (NSW Department of Industry DOC 19/088418)). This would appear to be somewhat cavalier, unnecessary and premature. The Department is capable of operating airports, for example it is the operator for Tibooburra airport. Dubbo airport is managed by the local council. The National Parks and Wildlife Service manage a number of airfields within the National Parks. It was unnecessary to grant a licence to FlyBlue for maintenance purposes. At the moment maintenance issues for the site are minimal and could have been sub-contracted locally as the issues arose. Granting of a licence for access and maintenance suggests a *fait accompli*. Government policy has been for in-holdings within National Parks to be returned to the estate of the National Park and Wild Life service. All past government and agency reports for the Katoomba Airfield site recommend the return of the land to the National Park following termination of the lease. The granting of a licence appears to be pre-emptive and in conflict with the economic direction of the Blue Mountains LGA, the environmental imperatives of the Greater Blue Mountains World Heritage Area and NSW government policy.

The use of the parcel of land as a commercial airfield is inappropriate,

FlyBlue.

The FlyBlue information pack is a marketing brochure, at the moment the FlyBlue bid is 'blue-sky' entrepreneurship, there is no Business Plan to justify the development. This is understandable since it did not have to quote against a specification, it simply had to lodge an Expression of Interest. The failure of three parties to run a successful commercial operation at the site, and the current lack of use of the site, demonstrates the reduced importance of the airfield to the local area. File records within the Department of Land & Water Conservation question the viability of operations at the airfield and the ability of a commercial operator to make enough return to cover the rent. The FlyBlue brochure indicates that a number of helicopter tour companies are already advertising tours to the Blue Mountains out of Sydney at a cost of \$1000 a day, very few such tours take place. FlyBlue would be competing against these operators but with a much smaller demographic. It is doubtful whether any new business of this nature at Katoomba airfield would be commercially viable. There is no data to support the suggestion that helicopter tours will attract visitors to the Blue Mountains. It certainly will not attract the organised coach tours – it takes up too much time, it will not attract the Sydney day trippers – it will have a significant cost.

The proposed FlyBlue operations will reduce the attractiveness of visiting the Blue Mountains for 4+ million people while pampering to a few.

Summary

Continuing use of this parcel of land as an airfield,

- conflicts with recognition of the Blue Mountains as a World Heritage Area,
- conflicts with the Blue Mountains experience for the 4+ million visiting tourists and the community,
- conflicts with local council and state management plans,
- conflicts with the developing economy of the Blue Mountain LGA,
- conflicts with the withdrawal from sale or lease of the land by the NSW government,
- will not generate local employment,
- is unsafe from a fire prospective, an aviation perspective and emergency services recovery perspective,
- has significant environmental risks,
- is a Breach of Trust with the local community.

The use of this parcel of land as an airfield is totally out of date and belongs to another era. On the 12th Dec 1969 the land was gazetted as unavailable for purchase or lease. The license should be terminated and the offer of a lease cancelled. The parcel of land should be incorporated into the Blue Mountains National Park which forms part of the Greater Blue Mountains World Heritage Area.

(6619)

Sydney, 12th December, 1969.

REVOCATION OF RESERVES FROM SALE, LEASE, Etc.

IT is hereby notified that under the provisions of section 30 of the Crown Lands Consolidation Act, 1913, the reserves from sale, lease, etc., hereunder described, are hereby revoked.

T. L. LEWIS, Minister for Lands.

Land District	Reserve No.	Purpose	Date of Notification	Parish	County	Shire, etc.	Area	Part Revoked	Papers No.
Braidwood ..	74395	From sale generally ..	10 Aug., 1951	Budawang	St Vincent ..	Tallaganda	ac. r. p. 320 2 20	Portion 199. V. 3531-2013.	T. 69-6627
Do ..	74396	do do ..	10 Aug., 1951	Jerricknarra	do ..	do ..	2,065 0 0	Portion 33. V. 3679-2013 R.	T. 69-6641
Metropolitan	59220	For public recreation ..	15 Oct., 1926	Sutherland	Cumberland	Sutherland	2 3 37	Portion 1159. Plan C. 9923-2030.	T. 69-2329
Penrith ..	25438	For water	23 Jan., 1897	Blackheath	Cook ..	City of Blue Mountains.	20 0 0	That part within portion 550. Plan C. 3030-1507.	T. 68-4114
Do ..	52061	For public recreation ..	9 Mar., 1917	do ..	do ..	do ..	37 0 0	do do do	do
Picton ..	261	For access to water ..	16 Jan., 1886	Couridjah ..	Camden ..	Wollondilly	14 3 0	Portion 380. Plan C. 3653-3041.	P. 69-3269
Tamworth ..	32181	For police purposes ..	23 Feb., 1901	Nundle ..	Parry ..	Nundle ..	0 0 2½	Part being allotment 7. section 21. N. 56-1510 R.	L.R. 67-413 T. 68-5139
Tare ..	56146	From sale or lease generally.	11 May, 1923	Tuncurry ..	Gloucester..	Manning ..	0 0 7	Part within portion 145. Plan G. 6311-1497.	T. 67-7380
Do ..	69455	From sale for wharf and access.	16 Aug., 1940	do ..	do ..	do ..	0 0 10	Part within portions 145 and 270. Plan G. 6311-1497.	do
Do ..	69457	From sale for access ..	16 Aug., 1940	do ..	do ..	do ..	0 0 6	Part within portion 270. Plan G. 6311-1497.	do

Revocation from sale, lease, etc, of portion 550, Plan C3030-1507
NSW Government Gazette, No 144, page 5119, 12th Dec 1969

RESERVE FROM SALE

IN pursuance of the provisions of section 28, Crown Lands Consolidation Act 1913, I declare that the Crown land described hereunder shall be reserved from sale for the public purpose specified and such land is reserved accordingly.

I. R. CAUSLEY, Minister for Natural Resources.

Sydney, 18th November, 1988.

FUTURE PUBLIC REQUIREMENTS

Land District—Penrith; City—Blue Mountains

No. 100156. Parish Blackheath, County Cook, 35.71 hectares, being lot 550, D.P. 751627. MN87 H 25.

Reserve from sale, Lot 550, DP 751627
NSW Government Gazette, No 172, page 6030, 18th Nov 1988



High voltage transmission line 300 m east of runway YKAT 06/24



66 kV transmission line 100 m west of runway YKAT 06/24

[REDACTED]
[REDACTED]
[REDACTED] eMail: [REDACTED]
2 August 2019

To: Mr Glen Bunny

Department of Industry – Crown Lands

PO Box 2155

Dangar. NSW 2309

Airfield.submissions@crowland.nsw.gov.au

Dear Sir,

KATOOMBA AIRFIELD LEASE PROPOSAL – SUBMISSION REF NO: LX 602686

A Submission objecting to the commercial lease of Katoomba Airfield, Lot 550 in Deposited Plan 751627.

Each month or so I stay for several days in the Megalong Valley. I enjoy the beauty, peace and quiet of the area away from city noise and pollution. I am totally opposed to the Crown Lands Department giving approval to the Blue Mountains City Council to grant a lease to any entity to reopen and use the Katoomba airfield for commercial helicopters.

Regarding the FlyBlue application, I comment as follows:-

- FlyBlue have not publicly released their estimated number of daily landings and take-offs.
- The heliport would be a helicopter refuelling base set within the Blue Mountains Heritage area, on a very windy site only about two kilometres from Katoomba town. Helicopter fuel is highly volatile. Should an accident occur causing **fire**, the result could be catastrophic in terms of lives and property.
- Helicopters are required to fly above 1,000 ft over residential areas and 500ft over other areas. Yet helicopters are able to fly at any height and will be forced to fly at low altitudes due the frequent bad weather and low cloud over the mountains. The effect of low altitude helicopter noise and air vibrations must be thoroughly examined before any lease is considered.
- The Tasmanian Wilderness World Heritage Area (TWWHA) Management Plan 1999, expressly states that “access by aircraft to remote areas is incompatible with the recreational experiences sought by on ground visitors.

<http://www.edotas.org.au/wp-content/uploads/2018/05/Helicopters-huts-and-having-your-say-briefing-note.pdf>

The management objectives for national parks include:

- Protecting bio diversity and geodiversity
- Conserving cultural heritage (Aboriginal and European)
- Providing opportunities for education and research

- Managing threats (such as pests, weeds, fire, and the impacts of climate change)
- Encouraging tourism, recreational use and enjoyment “consistent with the conservation of the national park’s natural and cultural values”
- Preserving the “natural, primitive and remote character of wilderness areas”

These objectives recognise that tourism and recreational uses are appropriate in national parks, provided they are consistent with natural and cultural values. Management plans are intended to regulate uses within the park to make sure that impacts on natural and cultural values are minimised.

- The main legal mechanisms for satisfying Australia’s obligations are set out under the Environment Protection and Biodiversity Conservation Act 1999(EPBC Act). The Commonwealth Government must “use its best endeavours” to ensure that a management plan for a World Heritage Property within a State is consistent with the World Heritage Management Principles:-

defines ecologically sustainable use. The plan to fly helicopters in and out of the Blue Mountains Heritage area is NOT sustainable ecologically.

defines *environment* to include (c) *the qualities and characteristics of locations, places and areas*. Helicopters are NOT part of the Heritage area qualities and characteristics.

defines *heritage value of a place includes the places natural and cultural environment having aesthetic, historic ... for current and future generations of Australians*. Helicopters buzzing around the mountains cannot fit this definition.

The Crown Lands Department must delay any decision on the Katoomba airfield decision until appropriate review by all stakeholders, and that includes the Commonwealth Government.

- UNESCO REQUIREMENTS OF A PLACE LISTED AS A WORLD HERITAGE SITE – SELECTION CRITERIOR

NATURAL -

vii."contains superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance"

viii."is an outstanding example representing major stages of Earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features"

ix."is an outstanding example representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems, and communities of plants and animals"

x."contains the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation"

The proposed helicopter airfield would jeopardise many of these critical requirements for World Heritage listing.

UNESCO's designation of the Blue Mountains Heritage area as a World Heritage Site is prima facie evidence that such culturally sensitive sites are legally protected. A site may be added to the List of World Heritage in Danger if there are conditions that threaten the characteristics for which the landmark or area was inscribed on the World Heritage List. Such problems may involve pollution, or uncontrolled urbanization or human development. This danger list is intended to increase international awareness of the threats and to encourage counteractive measures. Threats to a site can be either proven imminent threats or potential dangers that could have adverse effects on a site.

- ENVIRONMENTAL IMPACT STATEMENT (EIS) –
FlyBlue have not published an EIS. I am advised that the Crown Lands Department do not require an EIS until after the Blue Mountains City Council have granted a lease. FlyBlue have applied for a 50 year lease. If the Council grants a lease for 50 years, the authority of an EIS subsequently prepared to expose the dangers to the Blue Mountains Heritage area will be totally emasculated.

The Crown Lands Department **MUST DEMAND AN EIS BEFORE CONSIDERING ANY APPLICATION FOR A LEASE.**

The Blue Mountains Heritage Area is all about the sights and sounds and smells of the natural environment. The ever-increasing industrial sounds and vibrations of increasing numbers of commercial helicopters would risk the destruction of the reasons that 4 million people visit every year

- Over 1.25 million people bush walk in the mountain every year. People come to the mountains for peace and tranquillity, not loud low flying helicopter noise
- Over 4 million people from Australia and overseas visit the Blue Mountains to see the sights. Helicopter noise and air vibrations would jeopardise that high-volume tourism. If the Crown Lands Department approves the granting of the lease that is like *shooting the goose that laid the golden egg.*

Research has shown that bush walkers and tourists are annoyed when native beauty and solitude is destroyed by noisy helicopters. Tourist numbers would surely fall.

- Hang Gliders lives would be at risk from nearby helicopter flights
- Rock climber's lives would be at risk from nearby helicopter flights
- Balloonist's lives would be at risk from nearby helicopter flights
- Millions of people relocate to the Blue Mountains for the beauty and quiet of the region. The noise and air vibrations from low flying helicopter will damage this attraction and thus the value of property would fall.

The Crown Lands Department must:-

- reject the application for lease of the Katoomba Airfield,
or at the very least –
- Delay any decision until the following has occurred -

(a) The Greater Blue Mountains World Heritage Area is managed and protected by both Commonwealth and State legislation. The NSW Office of Environment and Heritage manages the area and the Department has

stated that it will seek input from this agency prior to any decision regarding the lease application. This application must be publicly available and open to public submission

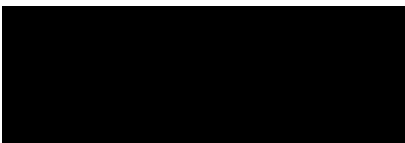
- (b) You have stated that there is an Aboriginal land claim over the Katoomba Airfield and that claim (ALC 49068) was registered over Lot 550 DP 751627 (Katoomba Airfield) on 1 July 2019 by Deerubbin Local Aboriginal Land Council. Before any decision on the airfield lease is made, the Crown Lands Department must complete their examination of the claim, and publicly release all documents before making any recommendation to the minister to either grant the claim or refuse it. I note that you stated that a previous claim was made in 2009 and was not granted as the airfield was leased and being actively used. The previous airport lease has expired and the airport is now not being actively used or at least only subject to a short term licence. That licence could be subject to legal challenge and in any case expires in about two years. That indicates that the Aboriginal land claim should now be allowed. You **MUST** delay any decision on the current lease application until the currently renewed Aboriginal land claim has been resolved.
- (c) Before any lease is granted, FlyBlue must prepare a comprehensive Environmental Impact Statement. The Statement must be reviewed by an appropriately qualified scientific and environmentalist panel, and must allow for further submissions by the public to the panel before final determination. If the preparation of an EIS before the lease is granted is not procedurally possible, then the Crown Lands Department must require that any lease issued must have a clause that states that the lease is null and void if the review panel rejects the conclusion of the EIS for any reason.
- (d) No proper decision should be made by you until FlyBlue have supplied (to you and the public) their range of estimate of the number of take-offs and landings each day

You must not forget that this area is a **World** Heritage listed national park. What we do with it is a matter of world wide concern. The stakeholders in this matter are:-

- tourists from around the world
- our traditional owners, the indigenous people
- the 4 million tourists, including bush walkers, hang gliders, balloonists, and rock climbers who visit the area each year
- the flora and fauna of the Blue Mountain National Park
- the residents of Katoomba, Leura, Medlow Bath, Blackheath and surrounding affected suburban areas and
- the local landholders, both farmers and tourist enterprises in semi rural areas under or near the flight paths.

The benefits of a heliport to a few rich passengers flying into high end resorts are completely insignificant compared with the interest of the above stakeholders.

Yours faithfully



PLEASE KEEP MY CONTACT DETAILS IN THIS SUBMISSION **CONFIDENTIAL**

30th July 2019

RE: Future Katoomba Airfield

Thank you for this opportunity to have a say and I celebrate that we have Government Departments who value the input of the local community.

I am not anti-development but I am writing today to express my absolute disappointment that the Dept of Industry would consider such a development in the middle of our beautiful National Park. This land should be returned to the National Park and public access granted for the local community. Excuse my ignorance but why would Crown Land, surrounded by National Park even be considered for a commercial lease for, of all things A COMMERCIAL AIRFIELD? I can't understand what NEED is being fulfilled here and why Crown Land would be considered to be utilized this way and how does it benefit the community? Crown Land I always thought was Public Land. In this very unique case, this development doesn't serve the community it flies over.

Employment opportunity and Tourism growth is not guaranteed with such a development and could be argued it very well likely to have an adverse impact on local tourism due to the noise. The beauty of our accessible National Park is enjoyed by thousands of International tourists and Inter State and Sydney families each weekend. It actually is a family outing that doesn't cost a lot of money. The economic conditions that families are currently experiencing and the unique opportunity to spend time with your family instead of our kids spending time in front of a console/ computer screen that engages our kids in our beautiful, tranquil bush with maintained safe walking tracks, will be diminished if your experience now comes with the thump, thump of helicopter propellers bouncing off the valley walls travelling along the valleys for many kilometers. What madness! For the very FEW tourists that could actually AFFORD this type of tourism and the many that bear the negative impact of this form of tourism, surely common sense must rule the day.

The impact on our native wildlife and the excess fuel which will be dumped over the bush does not translate to WORLD HERITAGE LISTING treatment. The local home owners that purchased properties knowing the National Park would never have to contend with a Commercial Airfield of all things. The local community are gob smacked that it all nearly happened without any community awareness till the end game. I would however like to thank the Department for having our community meetings for the Q and A sessions, sadly lots of questions but representatives had few answers but as I haven't participated in such a session before maybe my expectations was unrealistic.

I like many in the community believe, the only noise that should be heard in a World Heritage Listed Park should be our world famous waterfalls and our unique Bird Song. This place is so special, please, please, please don't let the commercialization of a patch of ground that could still be utilized for emergency use only and the land permanently protected by incorporating it into the National Park which surrounds it.

God forbid a helicopter comes down in inaccessible bush land and starts a catastrophic fire. These are the very genuine fears the local community are contending with because that is what we live with each Summer time being so close to the bush and with the drought, we already have a huge fuel load already to contend with, with so little rain.

The fact that the lease is 50years says clearly this business will be built up to be sold. Why 50years why not 5 yrs.'? I read in the local paper that the potential Lessee says "They will fly neighbourly" when Lessee is not a young person and will flip the business as soon as practicable for a profit. Will the next owner "Fly neighbourly" when the policy is not practically policed in anyway? Will we have given away the last day escape to escape the noise of the cities finally be lost to a tourist that doesn't actually add to our local economy and actually doesn't put their feet on the ground.

There so many places people could take advantage of a helicopter flights, yet there is so few now left untouched World Heritage Listed places that is accessible to everyone, whether your rich or poor. Please consider the loss of this experience by the many rather than for the very wealthy, influential few.

Thank you again for letting us have our say

Why Commercialism Should Cease for the Katoomba Airfield

It has come to my attention that Katoomba and surrounding rural towns are up in arms about the potential proposal to re-establish commercialism and tourism in and around the Blue Mountains National Park, a World Heritage site. The re-activation of the Katoomba Airfield, which is completely surrounded by this renowned beauty, has sparked many concerns and worries for the local community.

Whilst I myself am **not** a local to any of the Blue Mountains rural towns, I know full well of what helicopter noise and pollution do – no-one wants to constantly deal with noise whilst out on a nature walk, do they? It is common sense! Not to mention the carbon dioxide that is emitted from the helicopters will gradually disrupt the Park's ecosystem. The park draws in droves of visitors annually, for the purpose of experiencing first-hand the serenity, grace and beauty that it has to offer. The re-establishment of the airfield also brings many unknowns and uncertainties to the Park's future. For example, the new leaseholders' intentions on what to do with the airfield, and whether its operations would further expand, putting the natural wildlife at risk.

Rather than having the airfield put into the hands of a leaseholder with unknown intentions, a wiser move would be to transfer the airfield into the National Park itself, therefore ensuring that it's history will be preserved. Also, by ensuring that a working dirt strip remains open at the airfield solely for emergency usage, not only would the safety of hikers and adventurers be ensured, it would also mean that the noise pollution emanating from helicopters would be greatly reduced.

All of the above points demonstrate just how ignorant the Department of Industry are towards the needs of the local community. It is clear as day that the most optimal option that they have is to integrate the airfield into the surrounding Park. The positives of this choice greatly outweigh the positives should the strip be turned over to a new leaseholder. It is the only option to take.

A KACG Supporter,



To whom it may concern

I live in Katoomba not far from the local airport and am in the flight path of small aeroplanes and helicopters from this airport and the local park which sometimes has helicopters landing there.

The noise of the helicopters is particularly loud and inescapable as it vibrates my whole house inside, and outside the steep hills and valleys act like giant megaphones,

Sometimes entire weekends are filled with nonstop aeroplanes and helicopter noise when there is a fire emergency on or a search for a missing person. I do not begrudge these necessary activities and know that they will come to an end before long.

However people taking joyrides in helicopters is another matter as my place being so close to the airport will be inundated with noise seven days a week. These joyriders have no thought that they are invading peoples' home with continual noise pollution, using massive amounts of fuel and creating more carbon pollution by insisting on coming by helicopter just because they are too impatient to come by train or car like anyone else.

The Blue Mountains will become far too noisy for anyone to come and walk in the bush seeking solace as all peace will be shattered by the helicopters roaring by at any moment. They will also scare off the birds and other wildlife thus destroying the delicate environmental balance of the bush which will set off a gradual process of degradation.

Why must we suffer this so that a small group of people can make heaps of money jamming people into helicopters at the expense of everyone who lives here in the Blue Mountains and anyone visiting the area?

Let the crown land be put back into the national park as promised years ago and the airport left open for emergency services onl [REDACTED]

[REDACTED]

Bushwalking NSW

Bushwalking NSW Inc.

W: bushwalkingnsw.org.au

Level 14, 338 Pitt Street, Sydney NSW 2000

 [bushwalkingnsw](https://www.facebook.com/bushwalkingnsw)

 [@BushwalkingNSW](https://twitter.com/BushwalkingNSW)

E: admin@bushwalkingnsw.org.au

P: (02)8003 5545

Bushwalking NSW Inc
Level 14, 338 Pitt Street,
Sydney NSW 2000

28 July 2019

Crown Lands NSW

PO Box 2155

DANGAR NSW 2309

Dear Sir/Madam

Proposed Lease of Katoomba Airfield – Your reference no. 602686

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from 68 bushwalking clubs throughout the State, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

Every year, 1.2 million bushwalkers come to the Blue Mountains to walk, varying from short strolls around the clifftops to overnight forays into the valleys. The Grose Valley is a favourite walking area and is the location of the iconic Blue Gum Forest, the birthplace of bushwalking in Australia. Every weekend and most weekdays members of clubs affiliated with Bushwalking NSW walk the clifftops, ridges and valleys of the World Heritage-listed Greater Blue Mountains. They have learned to appreciate its serenity and beauty.

Bushwalking NSW is opposed to the granting of a lease for the resumption of commercial flights from Katoomba Airfield. As bushwalkers our concerns are:

1. Noise from Frequent Helicopter Flights

The clattering of helicopter noise reverberating off cliff walls prevents walkers from enjoying the sounds of nature and serenity of a bush experience. This is what attracts most walkers to the Blue Mountains. Whatever 'routes' are flown, those landing and taking off in the middle of the National Park, will be flying over at least some of the national park, and the declared Grose Wilderness area.

2. Take-off and Landing Noise

The noise from both helicopters and light planes taking off or landing is very intense for walkers on the Grand Canyon Track. It will also spoil appreciation of the inspirational views from the many wonderful lookouts nearby, in particular from Point Pilcher, Evans Lookout and those above Minnehaha Falls.

3. Sealing of Runway & Fixed Wing traffic

If the runway is sealed, there will be benefit in controlling erosion. However, it will enable light planes to use the airfield. Light planes flying over the valleys of the Blue Mountains create significant noise which endures for a considerable time. Having a commercial airfield adjoining

Bushwalking NSW Inc.

the National Park will enable an increase in the number of landings and take-offs by small planes and hence flights over the Grose Valley area including the declared Wilderness Area.

4. Scenic Flight Noise extending over Southern Blue Mountains and beyond

The applicant's proposal being promoted by the Department revealed a route map at the community consultation meetings in Katoomba. These flight paths extended as far as the wind turbine at Hampton which of course means that the Megalong Valley will also get considerable noise and inevitably this will include the Three Sisters and waterfalls between Katoomba and Wentworth Falls as part of the scenic flights. The DOI cannot guarantee that this will not occur by the conditions of a lease. It has no capacity to monitor or enforce any such conditions, now or in the long-term.

Our members have extensive experience of the impact of scenic flights over natural areas which have then become places to avoid, e.g. the 12 Apostles in Victoria. As usual these places started off low-key and then expanded.

Because of the size and location of the airfield runways, even with frequent flights, there will only ever be a small number of privileged people who will enjoy the benefits of flying in and out, whilst the majority on the ground will suffer - day visitors at lookouts, serious walkers in the valleys and residents.

Bushwalkers remember the intrusion of helicopters into the National Park when joy flights operated from 1992 to 1995. We do not wish to see this intrusion recommence.

Bushwalking NSW's preferred position is for Katoomba Airfield to be incorporated into the adjoining Blue Mountains National Park and use of the airfield restricted to emergency flights and firefighting aircraft.

Yours sincerely,



David Bell

Conservation Officer

Bushwalking NSW Inc. - The peak body for bushwalkers in NSW & ACT
Keep exploring, be amazed!

Katoomba Helicopter Flights

Submission by Bhav Datt
53 Kingsland Road, STRATHFIELD, NSW 2135

Have been a regular visitor to the Blue Mountains since 1985 and the charm and beauty of the Blue Mountains don't seem to diminish with every visit. It is rather unfortunate that there is now a proposal to permit regular helicopter flights in this pristine environment.

As I understand, it was decided in the past by relevant authorities to not to use helicopter site for commercial flights and that the site was to become part of the Blue Mountains National Park after its lease expiry in 2008. That would have been the best outcome had it not been for the decision to grant commercial license to Flyblue to fly over Blue Mountains.

OBJECTIONS

- When various government organisations, notably NSW State Department of Land & Water Conservation, Blue Mountains City Council, National Parks and Wildlife Service etc, at various stages have opined that the land should be returned to the National Park and that no commercial flights be allowed in the Blue Mountains. **Then, why is it that all the studies and consultation work of the past are being swept aside without any consultation and without any valid grounds?**
- The Blue Mountains was granted a UNESCO World Heritage status based on some criteria, which the Blue Mountains satisfied at the time of assessment. **Not sure if the site will comply with the UNESCO World Heritage site criteria if the proposed commercial flights in this pristine environment are permitted.**
- The sight of flying helicopters will not enhance the beauty and aesthetic value for a visitor. **In fact, the flights will be a distraction and diminish the experience of enjoying the nature at its pristine best.**
- A full Environmental Impact Study has not been done to study the impact on natural habitats of wild birds and animals. **Noise from regular helicopter flights will be a nuisance, not only to the wildlife but also to the residents living in the area.**
- One can enjoy the full beauty of the Mountains, including the panoramic view, by using the existing rides and infrastructure. **Helicopter flights are not going to enhance the experience of enjoying the beauty of the mountains.**
- Meditation retreat Dhamma Bhumi has been operating for decades in the Blue Mountains and has helped thousands of people in improving their health, both physical and mental in the quite environment provided by the Mountains. **The patrons of the retreat will be badly affected by the constant noise of helicopters and will not benefit fully from the experience in the retreat.**
- What is shocking is that the flying license is devoid of any details in regards to the frequency and duration of flights. **It looks like there's no formal regulation either to cover these flights and only an unenforceable voluntary agreement.**
- The airfield property is zoned E3 (under the Blue Mountains Local Environment Plan) and an aerodrome is not a permitted use. **Why is it that the proposed use of the land is being modified and its use as a commercial aerodrome will violate the existing planning norms?**
- **It would seem that the helicopter flights are more about filling the coffers of the Government rather than anything else.**

CONCLUSION

As had been proposed in the past after various studies that The Katoomba Airfield should be merged with National Park. It should have happened in 2008 itself!

August 3, 2019

Submission re Proposed Lease of Katoomba Airfield (ref 602686)

We are writing to comment on the proposal to “revitalise [the Katoomba Airfield] as a hub for recreational aviation ...”. We have learned that the proposed lessees of the Katoomba Airfield plan to limit flights over built up areas, which means that these flights will be over the valleys, presumably the Grose, Megalong and Jamieson, and perhaps even further afield in the Wolgan area.

Although we live in Glebe, we have a home in Lawson and since retirement spend 3 – 4 days a week hiking in these remote and beautiful valleys. In recent years we have noted a huge increase in tourists and others making use of the network of paths around the cliff tops and deep into the valleys. Everyone we chat to comments on the peace and beauty of this wonderful world heritage area. We cannot believe that helicopters are going to be allowed to fly regularly over the valleys. When rescue or other legitimate helicopters are in the area the noise is deafening, and one can only imagine what it would be like if regular flights leave from the Katoomba Airfield.

Preserving the peace in these wonderful valleys is of critical importance to the World Heritage listing and to the increasing number of local people and tourists who hike and engage in other outdoor activities. For the sake of future generations please protect these treasured valleys from noisy helicopter activity associated with sightseeing. There are many other options available for sightseeing which are much more appropriate for a World Heritage area.





25 July 2019

Mark Maloney,
Projects Manager, Regional Projects
Commercial Services, Estate Management
NSW Department of Industry – Crown Lands and Water

Re. LX602686, Katoomba Airfield - proposed lease.

Dear Sir,

I am writing to express my strong opposition to the granting of a 50-year lease, or any commercial lease of any duration, for commercial operation and development of the Katoomba airfield at Medlow Bath in the Blue Mountains. I support the incorporation of the land into Blue Mountains National Park through boundary rationalization, for use as an emergency airfield only. Such use would not require upgrading or sealing runways. My opposition is based on the following:

1. The land in question is surrounded by Blue Mountains National Park, part of the Greater Blue Mountains World Heritage Area (GBMWhA). The incorporation of this land into the National Park would remove the inholding nature of the property and allow it to be managed as part of the Park system, thus minimizing ongoing adverse environmental impacts associated with edge effects.
2. The GBMWhA Strategic Plan, the overarching management document for all agencies, prepared to assist in meeting Australia's responsibilities under the World Heritage Convention, notes 'potential threats to the appreciation of the area's aesthetic values include inappropriate lighting as well as overflights by helicopters, low-flying jets and other aircraft.'
3. Specific threats to the World Heritage values include:
 - (a) Disturbance of wildlife as a result of aircraft noise and rapid movements, particularly from helicopters. Anthropogenic noise and rapid movement can alter the temporal movement patterns, foraging activity or other behaviours of wildlife; and interfere with communications in relation to territories, mating and maintenance of pair bonds for fauna species which use vocalizations, including birds, mammals and frogs. The upper Blue Mountains is an important and well known north-south migration route for various birds, especially honeyeaters, with thousands of individual migrating birds recorded passing specific locations on an hourly basis. The GBMWhA was declared an Important Bird and Biodiversity Area by Birdlife International in 2017, with this migration identified as a triggering criterion. Frequent low flying aircraft, especially helicopters, may potentially negatively impact this migration through impact mortalities, disturbance leading to alteration of flight paths, and reduction in necessary foraging activity along the migration route in this area. In addition to the other bushland areas where birds stop to forage on nectar-rich plants during their migration through the area, e.g. along Narrow Neck, the bushland surrounding Katoomba airfield itself includes substantial areas of nectar-rich heathlands and eucalypt woodlands which sustain migrating and resident honeyeaters;
 - (b) Negative impacts on the wilderness values of the adjoining Grose Wilderness area as a result of recreational/tourist aircraft noise and visual disturbance. The topography of the landscape, with its deeply incised gorges and canyons, is such that helicopter noise carries

for kilometres, detrimentally affecting visitor experience and appreciation of these wilderness values;

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

The GBMWhA Strategic Plan states:

- (a) *Any adverse impacts on the natural beauty and aesthetic values are prevented, eliminated, or at least minimised. Recreational and tourist overflights do not interfere with the natural quiet, biodiversity and GBMWhA aesthetic values.*
- (b) *Continue to work with the relevant agencies, aviation industry and military to implement and monitor the existing Fly Neighbourly program to ensure that any impact of aircraft on the GBMWhA (especially wilderness areas), park visitors and neighbouring communities is minimised.*
- (c) *Seek the establishment of a Restricted Area under the Air Services Regulations to provide statutory restrictions on tourist flights over the GBMWhA.*

4. The NSW National Parks and Wildlife Regulation 2009 states:

“13 Offensive conduct

(1) A person must not in a park:

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

5. The granting of a commercial lease, while it may provide financial benefit to the proponent and a small number of other individuals, would do so at the great expense of the broader community, both upper Blue Mountains residents and visitors/tourists to the region. The intrusive nature of low flying aircraft, particularly helicopters, would adversely impact residents' lives and amenity, and visitors through significant noise pollution and visual disturbance. This effect can be expected to adversely affect tourism in the upper Blue Mountains, particularly visitations to prominent tourist lookouts, and thus negatively affect the local economy, contrary to claims of the proponent.

6. The proponents offer to establish/upgrade walking tracks on the property is transparently meaningless. Why would anyone want to go walking on an airfield or around its margins when they already have ready access to many established walking tracks in the National Park?

Thank you for the opportunity to comment on this proposal. It is strongly opposed by the vast majority of upper Blue Mountains residents, bushwalkers and nature lovers. It is also strongly opposed by the Greater Blue Mountains World Heritage Area Advisory Committee.

Yours sincerely,





30 July 2019

BY EMAIL:

Airfieldsubmission@crowland.nsw.gov.au

YOUR REFERENCE: 602686

PROPOSED LEASE OF KATOOMBA AIRFIELD

I am a resident of Blackheath, NSW. I oppose the granting of any lease or other instrument that would allow the Katoomba Airfield site to operate as a commercial or recreational aerodrome.

I support the continued operation of the Airfield for emergency purposes and as currently used by the armed forces.

My opposition to the current FLYBLUE Management Pty Ltd proposition is because:

1. Their lease represents a serious fire hazard. The airfield is within a designated Bushfire Attack Level: Flame Zone rating. It is located down a (mainly) dirt road, it sits on top of a steep cliff and is surrounded by eucalypt forest. FLYBLUE will have to store aviation fuel. How is it safe or logical to protect aviation fuel at an indefensible airfield, with only one narrow dirt road in or out, in the event of bushfire? Also, the logistics of cleaning up a fuel spill in the depths of our National Park would be incredibly expensive, if not impossible.
2. Their lease will pollute Warragamba Dam and our local water supply. FlyBlue is positioned 1.5km from drinking water storage. The proposed flight paths take off and land at low levels directly over the water catchment and storage dams. Local resident's rainwater supplies might also be contaminated. Toxic fire retardants, aircraft fuel, and increased levels of airborne pollutants will damage local biodiversity and the pollute the catchment. Surely, protecting everyone's drinking water in the Warragamba Dam is critically important.
3. Their lease will increase the number of helicopter and other aircraft flying over our World Heritage National Park, which will mean increased disturbances to our unique fauna. Our sensitive Australian environment must be protected – this, after all, is why the residents live here and why the millions of tourists visit.
4. Their investment will damage tourism and will not benefit the local economy. There is no logical consequence that FlyBlue's customers will benefit the local community when they fly in and out over the Blue Mountains and its villages. Local businesses will not necessarily see an increase in customers. Instead, they might have fewer customers

because the increased air traffic and subsequent pollution will spoil the “Blue Mountains” as a quiet and peaceful World Heritage area.

5. Their lease will dramatically increase noise disturbance for everyone. And, as referenced in the Guidelines for Minimising Aircraft Overflight Impacts (Blue Mountains City Council by Marshall Day Acousticsⁱ), not just locals, but visitors to national parks are aggravated by noise – particularly air tour operations - more so in areas that are remote and generally not accessible by vehicle (see Appendix C2).
6. There are already many alternate operators offering scenic flights over the Blue Mountains area. (such as www.unitedaero.com.au). Currently, there are relatively few flights, perhaps due to the lack of a well-maintained landing/take-off hub, but this increased access to landing/take off will be available under the proposed lessee.
7. The petition, with 12,000 signatures opposing the lease and presented to parliament by Trish Doyle, suggests there is significant opposition to the lease by FlyBlue.


If the Department proceeds with the lease, then please

1. Restrict the lease term to 2 years instead of 50.
2. Release the draft, and final form, of the lease on the Department’s website so all interested people can read it.
3. The lease should include:
 - a. limits on the number of helicopters and fixed wing aircraft (currently there are no limits).
 - b. strict hours of operation (currently there are no hours of operation).
 - c. Minimum altitude levels, landing and departure flight paths and scenic routes with the lessee to bear responsibility for adherence by users.
 - d. The lessee to bear the responsibility of cleaning up fuel spills and fire-retardant spills.
4. There should be no provision for the lease to be on-sold to another entity



ⁱ i.

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



9 July 2019

BY EMAIL:

Airfield.submissions@crowland.nsw.gov.au

YOUR REFERENCE: 602686

PROPOSED LEASE OF KATOOMBA AIRFIELD

We are residents in Medlow Bath who oppose the granting of any lease or other instrument that would allow the Katoomba Airfield site to operate as a commercial or recreational aerodrome. We support the continued operation of the Airfield for emergency purposes and as currently used by the armed forces.

Our opposition to the current FLYBLUE Management Pty Ltd proposition is based on our concern about increased helicopter and other aircraft activity over the Blue Mountains National Park and the Greater Blue Mountains World Heritage Area generally. Increased air activity will bring noise, loss of privacy and disturbances to the serenity of the unique wilderness area in which we live. Our pristine and sensitive environment must be protected –after all, this is why the residents live here and why the millions of tourists visit.

Residents, bushwalkers and other tourists have no wish to be “hovered over”.

At the request of Blue Mountains City Council, Marshall Day Acoustics conducted a study in relation to low noise level aircraft operations on wilderness areas. While the Guidelines for Minimising Aircraft Overflight Impacts¹ do not focus on recreational flying operations, Marshall Day Acoustics did review literature that is relevant. Studies, both Australian and overseas, have found that visitors to national parks are aggravated by noise – particularly air tour operations - more so in areas that are remote and generally not accessible by vehicle. We draw your attention, in particular, to the Study of Visitor Responses and Air Tour and Other Aircraft Noise in National Parks² that is cited in Appendix C2 of the linked Guidelines. In response to Question 10B in that Study, 45% of survey respondents said that aircraft noise interfered with their “appreciation of natural quiet and the sounds of nature” between “moderately” and “extremely”.

The Blue Mountains have suffered from excessive scenic flights in the past. Between 1993 and 1995, intense lobbying and complaints from residents and community groups about helicopter flights over the Three Sisters and Echo Point led to the EPA imposing licence restrictions on one operator, on the basis

¹ <https://www.bmcc.nsw.gov.au/sites/default/files/docs/GuidelinesForMinimisingAircraftOverflightImpacts.pdf>

² <https://rosap.ntl.bts.gov/view/dot/9813>

that flights in this area had a visual and audible impact (see press release from the Hon Bob Debus MP, then Member for the Blue Mountains, 1 December 1995 attached).

There are many operators offering scenic flights over the Blue Mountains area. While helicopters are a great disturbance, there are currently relatively few flights, perhaps due to the lack of a well-maintained landing/take-off hub. This will change under the proposed lessee. We do not want the Katoomba Airfield to become known as the hub that allowed a Blue Mountains “Helicopter Alley” to be established – scroll down the attached National Geographic article to see Pete McBride’s helicopter merge photograph taken in the Grand

Canyon <https://www.nationalgeographic.com/adventure/2018/10/grand-canyon-hike-conservation-pete-mcbride-book/>

If the Airfield proposal proceeds, economic benefits may flow to some tourism operators. These benefits will be more than negated for residents and visitors by the spoiling of the “Blue Mountains” brand as a quiet and peaceful World Heritage area.

Apart from noise and visual pollution, there are other reasons to be concerned about increased use and development of the Airfield. For example,

- The Airfield is located in a Bushfire Attack Level –Flame Zone area and there is great concern about the dangers inherent in storing fuel and hazardous chemicals.
- The Airfield is located within the Blue Mountains Water Catchment Special Area, and adjacent to areas that have No Entry Restrictions. Again, there are concerns about fuel or chemical leakage in this area.

In the event that the lease to FLYBLUE proceeds, the Department should have regard to the following issues:

- FLYBLUE is seeking a lease term of 50 years. Given the level of community concern, the initial term of the lease should be limited to 2 years, with a formal review and public consultation taking place during the last 6 months of the lease.
- In the interests of transparency, the draft lease should be displayed on the Department’s website with a period allowed for community consultation. The lease in its final form should similarly be posted on the Department’s website.
- The following should be essential terms of the lease:
 - As there are no controls as to flight numbers of helicopters or small fixed wing aircraft by CASA, the lease should set limits on the number of incoming and outgoing flights and hours of operation.
 - The lease should specify minimum altitude levels, landing and departure flight paths and scenic routes, with the lessee to bear responsibility for adherence by users. While the intention may be to develop a Fly Neighbourly agreement (for example, see the Fly

Neighbourly Advice 7 Tasmanian World Heritage Area and Mt Field National Parks)³, such agreements are not enforceable either by 'neighbours' against the Airfield operator or by the Airfield operator against users.

- There should be no provision for the lease to be on-sold to another entity.

Yours sincerely

BOB DEBUS MP
MEMBER FOR BLUE MOUNTAINS

MEDIA RELEASE

CONTACT: Lenore Craven 018 400 247

DATE: 1 December, 1995

RESIDENTS WIN IN HELICOPTER BAN

Residents near Echo Point and the Three Sisters in the Blue Mountains have won peace and quiet with the banning of helicopter joy flights in the area.

State MP for the Blue Mountains, Bob Debus, said the licence for Blue Mountain Helicopter Charter Services had been amended to stop helicopter flights over the popular landmarks.

"Residents have made many complaints to my office, to the NSW Environment Protection Authority (EPA) and to Blue Mountains City Council about helicopter noise," Mr Debus said.

"After considering legal advice, the EPA has restricted the licence of Blue Mountain Helicopter Charter Services.

"This licence used to permit the company to use Katoomba Airfield for helicopter joy flights on two designated trial flight paths.

"The new licence means helicopters can no longer fly along one of the routes which took in the Jamison Valley and the Three Sisters in the Blue Mountains National Park.

"The company can still operate on the route over the Grossa Valley and Mount Stead area.

"Echo Point and the Three Sisters are a popular tourist destination and it seemed a shame that the route was now people in a helicopter should inessir the experience of the majority.

"It was determined that this route did in fact have a visual and audible impact on the Jamison Valley.

"There was also the need to give some peace and quiet to residents of Pulpit Hill who already receive thousands of visitors annually to their backyard," Mr Debus said.

Mr Debus, who is also the Minister for Corrective Services and the Minister for Emergency Services, said this work had been done in consultation with the National Parks and Wildlife Service and the Blue Mountains City Council.

³ <https://www.parks.tas.gov.au/index.aspx?base=7181>

5 July 2019

YOUR REFERENCE: 602686

PROPOSED LEASE OF KATOOMBA AIRFIELD

I am a keen hiker who regularly visits the Blue Mountains and who opposes the granting of any lease or other instrument that would allow the Katoomba Airfield site to operate as a commercial or recreational aerodrome.

My opposition to the current FLYBLUE Management Pty Ltd proposition is based on my concern about increased helicopter and other aircraft activity over the Blue Mountains National Park and the Greater Blue Mountains World Heritage Area generally. Plus noise and disturbances to the serenity of the unique wilderness area. Our pristine and sensitive environment must be protected. After all, this is why millions of tourists visit.

Residents, bushwalkers and other tourists have no wish to be “hovered over”.

As cited in the Guidelines for Minimising Aircraft Overflight Impacts prepared for Blue Mountains City Council by Marshall Day Acoustics¹, overseas studies have found that visitors to national parks are aggravated by noise – particularly air tour operations - more so in areas that are remote and generally not accessible by vehicle (see Appendix C2). I totally agree with this.

There are many operators offering scenic flights over the Blue Mountains area. While helicopters are a great disturbance, there are currently relatively few flights, perhaps due to the lack of a well-maintained landing/take-off hub. This will change under the proposed lessee.

Any economic benefits that may flow to some tourism operators will be more than negated for the community and visitors by the spoiling of the “Blue Mountains” brand as a quiet and peaceful World Heritage area. I and many others will re-evaluate where we go.

In the event that the lease to FLYBLUE proceeds, the Department should have regard to the following issues:

- In the interests of transparency, the draft lease should be displayed on the Department's website with a period allowed for consultation. The lease in its final form should similarly be posted on the Department's website.
- The following should be essential terms of the lease:
 - As there are no controls as to flight numbers of helicopters or short fixed wing aircraft by CASA, the lease should set limits on the number of incoming and outgoing flights and hours of operation.
 - Minimum altitude levels (for example, see the Fly Neighbourly Advice 7 Tasmanian World Heritage Area and Mt Field National Parksⁱⁱ which suggests a general minimum overfly altitude of 4000 feet), landing and departure flight paths and scenic routes should be specified, with the lessee to bear responsibility for adherence by users.
- There should be no provision for the lease to be on-sold to another entity.
- The Airfield is located in a BAL-FZ area and there is great concern about the dangers inherent in storing fuel and hazardous chemicals.
- The Airfield is located within the Blue Mountains Water Catchment Special Area, with its attendant no entry restrictions.

Yours sincerely

██████████



24 July 2019

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

Re: Proposed lease of Katoomba Airfield
Your ref: 602686

1. Thank you for the opportunity to submit on the proposed commercial lease of Katoomba Airfield (“KA”). My submission is based on the information published on the Department’s website, including the supporting documents - “Katoomba Airport proposed lease - fact sheet” and “Katoomba Airport proposed lease -frequently asked questions” (the “**Department’s FAQ**”), and the information published on the website of the proposed lessee (“**Flyblue**”) including the documents described as “Info Pack”, “The Proposed Plans for the future of Katoomba Airfield” including frequently asked questions (“**Flyblue’s FAQ**”) and “Components of Fly Neighbourly Policy” including proposed flight procedures (“**Flyblue’s FNP**”). I have also read the document “Fly Neighborly Guide” (the “**FN Guide**”) published by the Helicopter Association International which underlies Flyblue’s FNP. Finally, I also attended two sessions of the Department’s drop-in information sessions at Katoomba in June.

Summary

2. My principal submission is that the Department should NOT grant a commercial lease to Flyblue in relation to KA. Rather the site of the KA should be retained for use by emergency services only. The reasons for my submission are contained in the narrative which follows, but very briefly may be summarised as follows:

- KA is not an appropriate site for a commercially operated airfield given its proximity to nearby residential areas and the fact that it is surrounded by the Greater Blue Mountains World Heritage Area (“**GMBWHA**”).
- The proposed lease would result in a significant loss of amenity for Blue Mountains residents, particularly though excessive noise.
- Equally the proposed lease would result in significant detriment to the adjoining GBMWHA both in relation to its biodiversity and its enjoyment by the public, particularly through noise and loss of visual amenity.
- The detriment to iconic walking areas- the Grand Canyon track and wilderness walks on the Mount Hay Range, is likely to be particularly severe.

- Whilst the proposed lease may provide short term economic benefits to a limited number of tourist operators, in the medium to long term it is far more likely to have an overall negative impact on tourism in the area. Noise and loss of visual amenity from aircraft is likely to significantly degrade the experience for tourists, ultimately making the Blue Mountains a less attractive place to visit.
- It is very likely that the grant of a commercial lease over KA would be in breach of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (“EPBC Act”).

Preliminary Matter – Public consultation has not been adequate

3. In my view public consultation on the granting of the proposed lease, and its potential impacts, has not been adequate. Whilst the drop-in sessions were helpful for those who were aware of them and could attend, there is still a lack of adequate understanding of the proposal in the community. Many people are either simply unaware, or are confused as to the details of the proposal.

4. In relation to the latter, there have been various public comments by Flyblue and (inadvertently) by the Department itself which are either incorrect or misleading. For example, Flyblue has publicly (and frequently) stated that there will be no helicopter “joy flights” from KA whereas in fact Flyblue is proposing regular “scenic heli-charters”. The Department’s FAQ explains that the difference is that “joy” flights are return to base flights of 15 minutes duration whereas “scenic” flights are of 30 minutes duration. With great respect, this distinction is semantic and most people simply would not understand that there is a difference. As a consequence there is still a widespread belief in the community that scenic flights will not be permitted under the lease (whether of 15 minutes or 30 minutes duration). This false impression greatly impacts on the community’s perception of the likely impacts of the proposed lease. In my experience, when the reality of the proposal is explained to people, they feel deceived and angry.

5. Another misconception relates to public statements by Flyblue that helicopters and planes will not be permitted to fly over residential or other sensitive areas including the Grose Valley. The Department’s FAQ repeats these statements twice (on pages 9 and 10). The reality is that these statements are incorrect. Flyblue’s proposed flight paths clearly show both incoming and outgoing planes and helicopters flying directly over the Blue Gum Forest (one of GBMWhA’s most iconic places) in the Grose Valley and continuing over the northern part of the Grose Valley. Furthermore, the proposed flight paths to the south are also clearly over sensitive wilderness areas and in some cases a relatively short distance from the northern parts of the residential areas of Katoomba and Wentworth Falls. So again, the community has been misled, and misled in a manner which suggests the impacts of the proposed lease will be much less serious than will be the case.

6. Finally on this point, there are no publicly available details of the number of proposed flights into and out of KA, nor is Flyblue’s business plan publicly available. I appreciate that some of this information may be commercially sensitive, and that Flyblue may not be in a position to precisely predict the number of flights in a start-up phase. But for the venture to be commercially viable there must at least be an indicative number or range of proposed flights

which could and should be shared with the public. The fact that this information is being withheld, with the apparent agreement of the Department, raises public suspicion and for some may even give the impression that the Department is complicit with the proposed lessee. This is unfortunate.

7. In my view, if the Department is seriously considering granting a lease of KA (and I think it should not) then it should extend the period for public submissions and engage in another and more effective round of consultation.

The impact of noise arising from the proposed lease of KA

8. Airfields are by their very nature noisy and this impacts on their surrounds. The KA is in a unique location, close to residential areas and surrounded by the GBMWA. Its surrounds are therefore sensitive areas where noise impacts are likely to be more acute.

9. It is widely accepted that noise can have a detrimental impact on human health. The American website "Hearing Health & Technology Matters" states:

"Excessive and annoying noise goes beyond aesthetics and may be detrimental to public health....Noise exposure causes behavioural changes and irritation...can affect mental health and has been implicated in producing stress related health effects..."

10. The website goes on to say:

"Helicopters rank especially high in causing undesirable noise. Eight different studies have found that the annoyance created by a helicopter does not correlate with the decibels it registers. The helicopter's unique sound, created by blade vortex interaction, causes people to rate its sound level as much as 10 dB's higher than it actually registers, doubling the noise impact."

11. The concept of perceived noise is important because, as the website explains, it better reflects the impact of noise on humans than the simple decibel register. The concept is akin to modern weather forecasting which often expresses temperature along the lines of "the temperature will be x degrees but it will feel like (x-6) degrees due to wind chill". The "feels like" temperature is a much better measure of the impact on humans.

12. Noise can also have a detrimental impact on wildlife. This is important because biodiversity of fauna is a fundamental world heritage value of the GBMWA surrounding KA. In this respect, the Western Sydney Airport -Environmental Impact Statement 2016 ("**WSA-EIS**") states:

"Noise has been shown to have a variety of impacts on fauna, including changing foraging behaviour, impacting breeding success and changing species occurrence. Very low flying aircraft can cause flight response in some species, causing them to abandon nests. Other species are known to avoid... areas where noise levels are higher, potentially resulting in fragmentation of habitat.... Most of these impacts occur when noise levels are greater than 65dB."

13. Both the Department's and Flyblue's websites are virtually silent on the issue of noise at KA, other than referring to Flyblue's FNP and "Conditions of Use".

14. Whilst I have no professional knowledge of acoustics, the FN Guide and various websites provide some helpful information, which I have attempted to summarise as follows.

15. The most common measure of noise is decibels or dB. Because of the logarithmic scale of decibels an increase of 10 dB is equivalent to a doubling in loudness. In measuring the impacts of noise, ambient noise levels are important - areas with low ambient levels (like wilderness areas) are more noise sensitive, areas with higher ambient levels (like industrial areas) are less sensitive. This is why, for example, Air Services Australia suggests helicopter routes follow areas with high ambient noise levels like highways.

16. Purdue University has published a useful illustrative table: "Noise Sources and their Effects" which includes the following noise sources:

<i>Military jet take-off from aircraft carrier at 50 ft</i>	<i>130dB</i>
<i>Turbo fan aircraft take-off at 200 ft</i>	<i>118dB</i>
<i>Helicopter at 100 ft</i>	<i>100dB (perceived noise = 110dB*)</i>
<i>Boeing 737 at 6000 ft</i>	<i>97dB</i>
<i>Propeller plane at 1000 ft</i>	<i>88dB</i>
<i>Diesel Truck at 70kph</i>	<i>84dB</i>
<i>Conversation in a restaurant or club</i>	<i>60dB</i>
<i>Normal conversation at home</i>	<i>50dB</i>
<i>Quiet rural or wilderness area</i>	<i>30dB</i>

*(*my addition)*

17. The FN Guide includes much of this table as an appendix, although curiously omits the reference to helicopter noise. However, the FN Guide states that a doubling of height or distance reduces helicopter noise by 6 to 7 dB. The FN Guide recommends that large helicopters fly at 4000 ft above ground level, at which height it states that the noise level is 65 dB, whilst the recommended height for medium helicopters is 2000 ft above ground level. At 500 ft above ground level it states that the noise level for large helicopters is around 90 dB and for medium helicopters around 83 dB. The FN Guide omits any reference to the concept of perceived noise.

18. Flyblue's FNP generally requires helicopters to fly at or above 5000 feet above sea level which, based on an average escarpment level of 3000 feet, translates to 2000 feet above ground level (although I note that the escarpment is somewhat higher around the Grose Valley being closer to 3350 feet at Govett's Leap and 3500 feet at Mt Banks). Planes will be required to fly at 4500 feet above sea level or 1500 feet above ground level. These heights are broadly in line with the FN Guide, although 2000 feet is only half the recommended height for larger helicopters.

19. At these heights, the noise from large helicopters will be 75 dB and for medium sized helicopters 65 dB (or perceived noise at 85 dB and 75 dB respectively). Even ignoring perceived noise, a large helicopter near Flat Top (or any other wilderness area at escarpment level in the GBMWHA) will generate noise which will sound around *20 times louder* than the ambient noise level. Taking into account perceived noise, the helicopter will sound more than *35 times louder* than nature for a bush walker in the area. The noise levels for a medium sized helicopter would be *10 and 20 times louder* respectively.

20. These outcomes are consistent with my own experience. Having walked extensively in wilderness areas around Australia, my experience is that you frequently hear a helicopter (which may be many kilometres away) well before you actually see it. Moreover, my experience of the Blue Mountains is that the wilderness areas are particularly sensitive to sound due to the echo effect of its many canyons.

21. These noise impacts will completely destroy the wilderness qualities of the area. Given that this will occur in the GBMWHA, and that "Wilderness" is recognised as an important quality of the GBMWHA, these outcomes should be seen as totally unacceptable.

22. In addition, these noise levels will have adverse impacts on fauna (and therefore on biodiversity in the GBMWHA) for the reasons stated in the WSA-EIS quoted at para 12 above. In this respect I note that Flyblue's FAQ states that there will be no negative impacts on biodiversity in the GBMWHA – another statement that is incorrect and misleading.

23. The noise impacts of the proposed lease of KA will be even more significant when you take into account the very reason why the lease is proposed – aircraft landing and taking off at KA. Clearly this requires aircraft to fly at much lower heights with consequent increases in noise levels.

24. At 500 feet the noise levels from helicopters landing or taking off at KA will be between 80 to 90dB, and at 100 feet the noise level will exceed 100 dB. These noise levels are *32 times louder* than the ambient level in an average home.

25. These noise levels will have a significant detrimental impact on the GBMWHA in the vicinity of KA, and in particular on the Grand Canyon (see para 32 *ff*). And they will impact on biodiversity, being more than *10 times louder* than the maximum noise levels for fauna identified in the WSA-EIS.

26. Whilst the preceding comments relate largely to the noise impacts of helicopters, this is simply because there seems to be more publicly available information on helicopter noise than light planes. Whilst the Purdue University table above would seem to indicate that propeller planes are also a significant source of noise, I have refrained from commenting in the absence of more information being available to me. But in my view the Department needs such information before it can consider the granting of a commercial lease – see my comments on the need for an Environmental Impact Statement at para 46 *ff* below.

27. The impacts outlined in the preceding comments also assume that Flyblue's FNP will be strictly enforced and that aircraft will not fly lower than the minimums specified by Flyblue. Whilst I appreciate that the Department can impose conditions in its lease the reality is that, aside perhaps from flight numbers, they will be difficult to enforce. I have flown on a number of helicopter flights and I find it difficult to see how the minimum can be enforced. The Flyblue FNP is essentially a voluntary industry code without any effective method of policing. So at least from time to time, it can be expected that the noise impacts may be even greater (possibly significantly so) than outlined above.

The impact on visual amenity

28. At a height of around 1500 feet above ground level for planes and 2000 feet for helicopters (and in some cases at a ground distance of little less than a kilometre away), aircraft approaching and leaving KA will be clearly visible from residential areas in Wentworth Falls, Leura, Katoomba, Medlow Bath and Blackheath. They will also be clearly visible from a number of vantage points in the GBMWA. In particular the proposed northern flight paths will see aircraft flying at low altitudes directly over or within a kilometre by ground distance of a number of popular tourist lookouts overlooking the Grose Valley including Pulpit Rock, Perry's Lookdown, Anvil Rock, Hanging Rock and Point Pilcher lookouts and within a few kilometres of Govett's Leap and Evans lookouts and the very popular cliff top walk from Evans Lookout to Pulpit Rock.

29. I note that the WSA-EIS specifically addressed the impact on visual amenity in relation to the Grose Valley east of Evans lookout and Govett's Leap lookout of planes flying at greater than 10,000 feet above sea level. Because such aircraft would be flying at more than 6,650 feet above ground level the WSA-EIS concluded they would not be visually intrusive. However, at the much lower heights proposed in relation to KA the conclusion must be that aircraft approaching and leaving KA would be very visually intrusive.

30. My comments at para 27 in relation to policing minimum flying heights apply equally to potential impacts on visual amenity.

31. In short, frequent flights into and out of KA are likely to significantly degrade the views from some of the Blue Mountains most iconic lookouts. And combined with associated noise levels, they would significantly degrade the entire tourist experience.

The impact on the Grand Canyon

32. The Grand Canyon is less than one kilometre from KA and is the site of a heritage walking track which is over 100 years old. It is described by the National Parks and Wildlife Service ("**NPWS**") as "*an iconic walking track*", by Best Sydney Walks as "*the most impressive walking trail in the Blue Mountains*" and by the Londoner in Sydney website as "*the top of most lists... if you're looking to find one of the best hikes in Sydney*". It has a 5 star rating on Trip Advisor where 92% rate the tourist experience of the walk as excellent. A review of other travel websites gives similar results.

33. The significance of the Grand Canyon walking track is illustrated by the fact that in 2017 NPWS completed a 9 year restoration project of the track costing \$4.8million. The project was jointly funded by the Federal Department of Environment & Heritage (\$1.37m) and the NSW Office of Environment and Heritage (\$3.43m) and received a National Trust Heritage award. The restored track was officially opened in late 2017 by Shayne Mallard MP who was quoted at the time in the Blue Mountains Gazette ("**BMG**") as saying:

"With 90,000 visitors annually the track is a key eco tourism destination and an anchor for future local and international tourism to the World Heritage listed Blue Mountains National Parks."

34. The BMG also reported that the number of visitors using the track had trebled in the past 10 years and that it was expected that more than one million visitors would walk the track before 2030.

35. In short, the Grand Canyon is one of the most significant tourist experiences in the Blue Mountains. That tourist experience would simply be destroyed by noise from aircraft regularly taking off and landing at the KA less than one kilometre away and by helicopters flying within a few hundred metres of the Grand Canyon on the westerly flight path proposed by Flyblue.

36. It is inconceivable to me that the State and Federal governments could have invested so much money in the restoration of the Grand Canyon track as “an anchor for future tourism” in the GBMWhA only for the Department to completely devalue that investment less than 2 years later by granting a commercial lease over KA.

The impact on wilderness walks on Mount Hay Range

37. The Greater Blue Mountains World Heritage Area Strategic Plan 2009 (the “**Strategic Plan**”) sets out key management objectives for the GBMWhA. The Strategic Plan identifies a number of important values protection of which is considered integral in managing the WHA. One of those values is “*Wilderness*” in relation to which the Strategic Plan says:

*“The high wilderness quality of much of the GBMWhA constitutes a vital and highly significant contribution to its World Heritage values and has ensured the integrity of its ecosystems and the retention and protection of its heritage value. The wild and rugged landscapes, diverse flora and fauna, and **opportunities for solitude, self-reliant recreation and reflection are attributes that promote inspiration, serenity and rejuvenation of the human mind and spirit. Such experiences are valued by individuals and society.**”* (my emphasis)

38. The Mount Hay Range which is accessed via Mt Hay Road in Leura provides people with rare access to wilderness landscape within a relatively short distance of residential areas. The principal walk in the area is the Lockley Track which begins off Mt Hay Road near Flat Top and The Pinnacles and then heads north to Lockley Pylon and then descends into the Blue Gum Forest in the Grose Valley. Like the Grand Canyon this is truly an iconic walk which, on approaching Lockley Pylon (after a walk of about an hour) provides breathtaking views of the wild and rugged escarpment and the majestic Grose Valley below. The almost overwhelming feeling at this point is an eerie sense of absolute silence, solitude and serenity. After more than 50 years walking in the Blue Mountains I know of no other place that so precisely falls within the words of the Strategic Plan emphasised above.

39. If the commercial lease for KA is granted this wilderness value identified in the Strategic Plan will be destroyed. Flyblue’s proposed flight paths for both planes and helicopters arriving and departing to the north are to fly directly over Flat Top at the start of the Lockley Track then fly north to cross the Grose Valley between Fortress Hill and Lockley Pylon, in other words almost directly over the track. Furthermore helicopters arriving and departing to the east will also fly over Flat Top. Flyblue’s FNP indicates that these flights should be at a height of 2000 feet above ground level for helicopters and 1500 feet above ground level for planes but as explained at para 19 above, even at this height the noise, particularly from helicopters, will be around 20 times

louder than nature and, together with the loss of visual amenity, will be completely incompatible with the serenity and other wilderness values of the area.

40. Flyblue may well argue that there are other wilderness areas in the GBMWhA and the loss of one wilderness area on the Mount Hay Range is a small impact on the overall GBMWhA. But in my experience this area is quite unique, both in its impact on the human mind and spirit and because it is so close to and therefore so easily accessed from Leura. One would normally expect to walk for days to achieve such an experience.

The economic impacts of the proposed lease

41. Flyblue has argued that the proposed lease will support tourism and benefit the local economy. I think it is likely that the lease will benefit Flyblue and a limited number of tour operators and accommodation providers. So in the short term there could be some benefits to the local economy.

42. But in the longer term I think the proposed lease is more likely to result in net detriment to the local economy.

43. The Blue Mountains' single most significant asset (or brand) is its stunning scenery, now embodied in the GBMWhA. It is the original reason why towns like Katoomba and Blackheath were founded and it is still the main reason why people visit the area. It is the very foundation of tourism in the area.

44. In the past decade bushwalking and other outdoor recreation activities in the GBMWhA have become increasingly popular, evidenced by the increased numbers walking the Grand Canyon. Whilst not all tourists go bushwalking, most at least visit a lookout to admire the spectacular views and experience the majesty and serenity of the landscape.

45. As discussed above, frequent flights into and out of KA would significantly degrade the tourist experience, both for tourists simply looking at the views from lookouts over the Grose Valley and for those engaging in more active recreational activities in the GBMWhA. This has the real potential to degrade the Blue Mountains "brand" and thereby damage the local economy in the medium to longer term.

The granting of the proposed lease may be in breach of the EPBC Act

46. The Department's FAQ states that the Department is not proposing to complete an Environmental Impact Statement ("EIS") in relation to the granting of the proposed commercial lease of KA, and that an EIS is not required as a lease application is not a development application.

47. I am very surprised by this comment, and wonder if the Department has fully considered the requirements of, and its obligations under the EPBC Act.

48. World Heritage properties such as the GBMWhA are protected by the EPBC Act and are considered to be matters of national environmental significance. Chapter 2 of the EPBC Act deals with protecting the environment, and Part 3 requires approval for all activities with a significant impact on the world heritage values of the property. Specifically section 12 provides that "a

person must not take an action that...is likely to have a significant impact on the world heritage values of a declared World Heritage property” unless, broadly, the Federal Minister for Environment has given approval under formal approval procedures in Part 9 of the Act or unless the action is approved under an accredited management or authorisation process under a bilateral arrangement between the Federal and State Governments under Part 4. There are both civil and criminal penalties for a person who breaches section 12, including 7 years imprisonment.

49. The granting of a commercial lease would constitute the “taking of an action” under section 12 of the EPBC Act.

50. Although KA is not part of the National Park it is surrounded by the GBMWhA and the taking of an action in KA could potentially have significant impacts on the GBMWhA. It was for this reason, for example, that approval of the Minister was required in terms of section 12 for the Western Sydney Airport which is located some 7 kilometres to the east of the eastern boundary of GBMWhA and why the WSA-EIS dealt with potential impacts on the GBMWhA.

51. The approval processes in Part 9 and Part 4 effectively require consideration of the impacts of a proposed action on the World Heritage values of the GBMWhA. This requires consideration of the criteria for natural values of outstanding universal value recognised by the World Heritage Committee and the other important values which complement and interact with those values.

52. Under Part 9 the Minister is not permitted to approve an action if it would be inconsistent with Australia’s obligations under the World Heritage Convention, the Australian World Heritage management principles, or a plan of management prepared for the management of a world heritage property. As mentioned at para 37, there is a Strategic Plan for the management of the GBMWhA which requires protection of a number of listed values including “Geodiversity & Biodiversity”, “Indigenous Heritage Values”, “Wilderness”, “Scenic & Aesthetic” and “Bequest, Inspiration, Spirituality & Existence”.

53. For the reasons discussed in this submission I believe the granting of a commercial lease over KA would be likely to have a significant adverse impact on a number of these values, and would therefore be an action in breach of section 12 of the EPBC Act. The Department’s FAQ and website generally make no reference to any of the procedures and approvals required under either Part 9 or Part 4, and since the preparation of a full EIS is normally a requirement for such an approval to be granted, I have assumed these procedures have not been followed to date. If so, this would appear to be a potentially serious oversight by the Department.

54. Of course, if the Department decides that a commercial lease should not be granted for KA (which I believe would be the correct decision) this would not be an action falling within section 12.

Concluding Comments

55. The original lease of KA was granted in a different era under a different legislative regime, before the Blue Mountains was granted World Heritage status and when society in general had a different, perhaps even naive attitude to the environment. The Department’s decision making now in relation to the proposed lease needs to reflect the current time.

56. I have tried to consider whether any of the adverse impacts discussed in my submission could be mitigated, for example by changing the proposed flight paths or restricting helicopter flights, so that a lease could be granted now. However the fundamental problem is that I think that a commercial lease is simply incompatible with the location of KA.

57. The adverse impacts may be reduced (but not eliminated) if, for example, all arrivals and departures were restricted to the west only – this would mitigate the impacts on the Grose Valley and wilderness areas of the Mount Hay Range but not the impacts on the Grand Canyon. The impacts may be further reduced if the number of flights into and out of the airport was very limited, say 10 flights in total per week, but this would make the airfield not commercially viable.

58. In light of this I think that the only sensible and viable use of the KA site as an airfield is for emergency services only.

Yours sincerely,

[Redacted signature]

**About the writer*

[Redacted text block]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
1/8/19

Katoomba Airfield Submissions
Department of Crown Lands NSW
airfieldsubmissions@crowland.nsw.gov.au

RE: Katoomba Airfield Submission LX 602686

Dear Madame/Sir

I'm writing to you about my concern and objection to the proposed lease of Crown land at Medlow Bath for use as a commercial airfield. My objections cover a number of areas which are as follows:

This parcel of land is situated within the National Park and there should not be any commercial leases located within National Parks. Allowing this to happen would degrade the park on many levels.

Maintenance of the airfield for emergency use could be achieved by an arrangement with National Parks or by a community and local business collaboration which was talked about at an information session at Hotel Blue.

Frequent tourist helicopter flights over the National Park would have a detrimental effect on wildlife. These kinds of negative effects are detailed in following documents.

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 <https://www.doc.govt.nz/documents/science-and-technical/sfc314entire.pdf> JJ Ryan Consulting Pty Ltd [n.d]

Helicopter Rotor Downwash –Excessive wind, FOD and brownouts, what are the risks? <https://jjryan.com.au/index.php/helicopter-rotor-downwash-excessive-wind-fod-and-brownouts-what-are-the-risks/>

Frequent helicopter flights over residential areas in Katoomba and Medlow Bath would have considerable negative effects on local residents. People move to the mountains to get away from loud noise and invasion of their privacy. The excessive frequent noise and low altitudes which helicopters fly at would be destructive to our Blue Mountains lifestyle. Many residents and animals may find it distressing with negative impacts to their health.

Just because it's there, we can, and it would be profitable, are not good enough reasons to allow this to go ahead. There needs to be ethical thinking and consideration involved in decision making on this matter.

[REDACTED]
[REDACTED]



30 July 2019

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

Re: Proposed lease of Katoomba Airfield
Your ref: 602686

1. Thank you for the opportunity to submit on the proposed commercial lease of Katoomba Airfield (“KA”). My submission is based on the information published on the Department’s website, including the supporting documents - “Katoomba Airport proposed lease - fact sheet” and “Katoomba Airport proposed lease -frequently asked questions” (the “**Department’s FAQ**”), and the information published on the website of the proposed lessee (“**Flyblue**”) including the documents described as “Info Pack”, “The Proposed Plans for the future of Katoomba Airfield” including frequently asked questions (“**Flyblue’s FAQ**”) and “Components of Fly Neighbourly Policy” including proposed flight procedures (“**Flyblue’s FNP**”). I have also read the document “Fly Neighborly Guide” (the “**FN Guide**”) published by the Helicopter Association International which underlies Flyblue’s FNP. Finally, I also attended two sessions of the Department’s drop-in information sessions at Katoomba in June.

2. My submission is that the Department should NOT grant a commercial lease to Flyblue in relation to KA. Rather the site of the KA should be retained for use by emergency services only. KA is not an appropriate site for a commercially operated airfield given its proximity to nearby residential areas and the fact that it is surrounded by the Greater Blue Mountains World Heritage Area (“**GMBWHA**”).

- The proposed lease would result in a significant loss of amenity for Blue Mountains residents, particularly though excessive noise.
- Equally the proposed lease would result in significant detriment to the adjoining GBMWH A both in relation to its biodiversity and its enjoyment by the public, particularly through noise and loss of visual amenity.
- The detriment to iconic walking areas- the Grand Canyon track and wilderness walks on the Mount Hay Range, is likely to be particularly severe.
- Whilst the proposed lease may provide short term economic benefits to a limited number of tourist operators, in the medium to long term it is far more likely to have an overall negative impact on tourism in the area. Noise and loss of visual amenity from aircraft is likely to significantly degrade the experience for tourists, ultimately making the Blue Mountains a less attractive place to visit.

- It is very likely that the grant of a commercial lease over KA would be in breach of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) ("**EPBC Act**").

[REDACTED]
[REDACTED]
1/08/19
[REDACTED]

NSW Department of Industry, Crown Lands.

Submission on the Proposed Granting of a Commercial Lease over Katoomba Airfield.

Reference No 602686

To Whom It May Concern:

I am a long-term resident of Hazelbrook in the Blue Mountains. I am also a financial member of the Blue Mountains Conservation Society. (CONSOC)

I would like to add my voice to support the opposition (by both residents and the organised environment movement) to the proposed granting of a commercial lease over Katoomba Airfield at Medlow Bath.

In my opinion this plan for a commercial airfield at Medlow Bath will be deleterious to the quality of life currently enjoyed by the local community, and, perhaps most importantly, have a negative, disturbing effect on the surrounding National Park with its precious cargo of vulnerable and endangered flora and fauna. Migrating birds are particularly at risk, as are native animals which rely on hearing for finding a mate, feeding and caring for young. (I have deliberately used the word “vulnerable” as in my opinion all native species are at risk from our growth-obsessed society.)

AN AVIATION HUB?

1. In their proposal, the applicants state that they intent to “revitalise the site to create a hub for recreational aviation” by providing “new and upgraded facilities.” I interpret this to mean an active airfield, with increased air traffic including regular helicopter traffic, as well as tourist flights over the scenic attractions of the Blue Mountains and surrounding World Heritage Area, including wilderness areas to the north and south of the main Great Western Highway ridge. In addition, the surrounding areas of national park bushland will suffer from the activities of building, visiting, arriving and departure (tourist buses?) of the tourist and construction traffic.

SUPPORTING TOURISM?

2. The applicants imply that these changes will “support tourism.” I do not see how the imposition of increased air traffic, with its noise and diesel air pollution, can enhance current tourist activities in the mountains. At present these have been largely designed and controlled to have minimal impact on the area’s natural values and involve the visitor immersing themselves in and enjoying

the peace and quiet of the bush and the scenic surrounds. Bushwalking, viewing and enjoying the escarpments from the lookouts at Wentworth Falls, Katoomba and Blackheath, are part of the “Blue Mountains experience” which attracts international tourists, as well as day-trippers and travellers from Sydney and other parts of Australia.

Several years ago I visited the Flinders Ranges and from our campsite could hear the ongoing drone of the light planes ferrying tourists to local sites and as far afield as Lake Eyre (I believe). This was an intrusive experience and remains in my mind whenever I think of the trip. I believe that increased air traffic and “helicopter tourism” by an affluent few could easily destroy and degrade this our beautiful Blue Mountains tourist resource.

HELIPORT?

3. Local residents believe that amongst the touted “enhanced facilities” is a covert plan to convert the airport into a heliport with tourist flights arriving from Sydney itself. This means that not only is the upper mountains to be disrupted, but the mid and lower mountains as well.

Where I live at Hazelbrook, on the northern side of the Highway, we are well aware whenever a helicopter flies over, which, luckily, at present may only be several times a week, if that often. They are very noisy and fly very low, so that we usually go outside to look up and see who it is. It may presage a major car accident, bushfire or some emergency which causes police or media to take to the air. During Blue Mountains bushfires helicopter take-offs and landings can be traumatic and disruptive for local residents. I do not want to have to experience this on a daily ongoing basis.

SELLING-OFF?

4. I would like to know how it has come about that every piece of land and facility within our state has now become a resource which has to be sold off or leased on a commercial basis. Why is it not possible for the airfield to remain an emergency airfield administered by the National Parks authority? It is surrounded by National Park and the World Heritage area. Why is the NSW National Parks and Wildlife Service not given the resources to maintain the airport, which should be incorporated into the Blue Mountains National Park?

The financial position of our state is now relatively sound. Surely as an affluent and developed nation we have the financial capacity to run such emergency services, particularly in an area so prone to bushfires and other emergencies as the Blue Mountains. I would like to know why we cannot, when so much money is wasted on activities that do not seem to be so important, such as \$2 billion for knocking down and (supposedly) re-building football stadiums.

INSURANCE RISK?

5. And, additionally, has anyone thought to look into the insurance risk with an airfield such as the applicants are proposing, surrounded by eucalypts and dense vegetation? Presumably the helicopters and aeroplanes will be housed at the air/heliport? What insurance premiums will be charged? Will the lessees try to reclaim these costs from the state government and local community or Council? Will this build up the pressure to increase the air traffic and use of the facility? Will there be increased pressure for hazard reduction on a wider scale surrounding the place?

In short, I support Blue Mountains CONSOC by calling for:

* The airport to be restored to the National Park and managed by the NSW NPWS

* Protection to be given to the World Heritage Area and Blue Mountains National Park from commercial exploitation and incursion

* Native plants and animals to be protected from the noise and air pollution caused by frequent air traffic and helicopters, to say nothing of increased vehicular and human traffic.

In particular I would like to see the NSW National Parks and Wildlife Service have its budget and proper staffing levels restored so that it can do its job adequately in protecting our natural inheritance.



[REDACTED]
[REDACTED]
31 July 2019

BY EMAIL:

Airfield.submissions@crowland.nsw.gov.au

YOUR REFERENCE: 602686

OBJECTION TO PROPOSED LEASE

Dear Sir/Madam,

I wish to lodge a formal objection to the proposed lease of the Katoomba airfield at Medlow Bath to the company known as FLYBLUE Management Pty Ltd. In my opinion, the airfield should only be available for emergency use by the appropriate services.

To allow commercial operations from this site will inevitably result in increased noise and inconvenience, not only to local residents but also to others who prefer the relative quiet of the local bush land setting and the adjacent National Park. Whether transiting an area or hovering, helicopters generate more noise than comparable fixed wing aircraft and are therefore considerably more intrusive.

More importantly, at the moment there are comparatively few helicopter flights over the area, because most flights have to depart from the Sydney basin as there are no authorised landing sites and refuelling facilities in the Blue Mountains. However, if Katoomba airfield is open to commercial flights it will become a local hub for greatly increased operations, apart from those provided by the proponent of the lease. Such an increase in noise potential may well result in further complaints to the EPA, which was forced to issue restrictions on flight paths in the mid-1990s.

I am further concerned that it appears that FLYBLUE does not currently hold an Aircraft Operator Certificate (AOC). If this is the case, the company will need to contract with another organisation which holds such a certificate. This would result in FLYBLUE having less control over aircraft operations, by virtue of being essentially at arm's length from the actual operator.

In any case, the stated aim of being required to "Fly Neighbourly", while being admirable, is hard to police. There are no enforceable rules for this procedure, other than those which apply to all aircraft operations with regard to height above terrain etc. It is very easy for pilots to flaunt the Fly Neighbourly ideals and principles, and to do so with impunity.

I am unclear as to whether your organisation can regulate the number of movements allowed by virtue of a lease, or whether this is the preserve of the Civil Aviation Safety Authority (CASA). You might care to advise whether CASA will need to be consulted regarding this issue.

Should the decision be taken to grant a lease, it is strongly recommended that this should be initially issued for a strictly limited time, to allow a review and further consultation before any long term lease is contemplated. In addition, the lease should be non-transferable.

However, I remain opposed to the granting of any commercial lease at the Katoomba airfield, and believe that the airfield should be reserved purely for emergency use.

Yours sincerely,

A black rectangular redaction box covering the signature area.

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

Katoomba Airfield

I object to any commercial lease for this public land, now or at any time in the future. The airfield site is enclosed by National Park and the land should become part of the National Park and Managed by The NSW National Parks and Wildlife Service as an emergency-only facility.

Commercial aircraft operation within the Park is incompatible with the many of the reasons for having a National Park – intrusive noise both within The Park and for nearby residents, disturbance of wildlife, and an increase of traffic (humans and vehicles) in a concentrated area.

Our current Government seems to have a total fear of any natural environment in the State and does everything it can to degrade it (eg feral horses being maintained, koala habitats destroyed, rampant land-clearing promoted, destruction of our river systems promoted). It is about time that it is realised that our natural areas are extremely valuable in themselves and will become even more so as climate change effects become more devastating and human populations increase.

Your sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

TO WHOM IT MAY CONCERN:

RE: Granting of long-term commercial lease for Katoomba Airfield.

As a long-term resident of Medlow Bath [REDACTED], I am writing to voice my objection to the granting of a long-term commercial lease for Katoomba Airfield.

Currently the airfield is used for emergency purposes only by the National Parks and Wildlife Service (NPWS). I believe that the granting of a commercial lease over this airfield is inimical to the safety of the residents and bushland that is currently protected in bushfire and other emergencies by NPWS. Potential for the conflicting uses of the airfield to obstruct and interfere with emergency operations could lead to disastrous consequences.

For the airfield to be brought to a standard for commercial operation including 'joyflights' would require a massive upgrade, involving large increases in traffic flow and building works in the area. For commercial flights to be operating in this area, the amenity of local residents and tourists who currently enjoy the World Heritage National Park surrounding the airfield would be severely compromised.

Visitors to a 'wilderness' area do not expect that their walk or view be interrupted by the irritating drone of helicopter flights. Local residents, already familiar with the level of noise involved in emergency operations would be subjected to a more or less constant level of noise pollution unacceptable except in the case of an emergency.

The bushland area surrounding the airfield is home to several hanging swamps, that provide habitat to the endangered Giant Dragonfly (*Petalura gigantea*) and the Blue Mountains Water Skink (*Eulamprus leuraensis*). The groundwater feeding these swamps is extremely vulnerable to polluted run-off from construction sites, and to chemical contamination from fuel spills.

Over several years a survey of the birds resident in the area surrounding the airfield has revealed that it is providing a refuge for two species of robin which are increasingly affected by climate change. Both the Flame Robin (*Petroica phoenicea*) and the Red-

capped Robin (*Petroica goodenovii*) have been observed breeding in this area. It has to be assumed that disturbance to the environment and, in particular, to the airspace in which these birds live, will present a threat to them.

I strongly object to the Government having proceeded to the choosing of a potential recipient of a long-term lease over such a critical piece of community infrastructure without any consultation with the local community.

I therefore request that the government reconsider its decision and place the airfield under the aegis of NPWS with suitable funding to allow optimal function as an emergency airfield.

I also request that I be considered a key stakeholder in any community consultation process henceforth.

Thank you

[Redacted signature block]



re: Katoomba Airfield

Good morning,


I am writing as a concerned resident of North Katoomba about the proposed use of crown land in Medlow Bath being upgraded and used as a site for aviation tourism.

This is not appropriate use of this land. It is situated within the Blue Mountains World Heritage listed National Park and I contend that the land should be transferred to the national park and the lease not granted to the applicant.

It would be appropriate to keep a dirt strip at the airfield, in working order, for emergency use. Otherwise, aviation tourism in the Blue Mountains erodes the value and experience of the national park significantly and should not go ahead.

Additionally, it is highly concerning that no formal community consultation has taken place since the current license was issued in February 2018. This is not the due process that should occur.

Along with thousands of other Blue Mountains residents, and the many visitors to this majestic region, I urge the Department of Industry to transfer this land to National Parks and not to progress the lease application any further.



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

2. 8. 2019

To: The Minister

NSW Department of Primary Industry, Crown Lands

Ref: No. 602686

This is a submission to voice my strong opposition to the proposed commercial redevelopment of Katoomba Airfield in Medlow Bath, and to the granting of a Lease for this land to the Applicants, Fly Blue.

I and my family have been residents of the upper Blue Mountains since 2002, and I personally have been bushwalking in these unique and beautiful Mountains since a teenager, which is now some 40 years+. As an avid trekker and mountaineer, I have also been on many overseas trips to the Himalaya, the Andes, Japanese Alps and New Zealand. Stunning as all those other places are, I do believe the Blue Mountains has its own unique and special beauty, and thoroughly deserves its place on the UNESCO World Heritage Site register. It is an ancient, tranquil, peaceful and quiet place – and I want it to stay that way.

Our family owns and runs a long standing and well-respected [REDACTED] [REDACTED]. All of our work is local, between Springwood and Mt Victoria. I am a degree qualified Architect and Builder. I know something about running a business, and successfully developing property.

I believe that commercial developments should:

- a. be actually needed in the first place
- b. follow economically sound principles.

For me, the Katoomba Airfield commercial development proposal is much too open-ended. It is not needed here, and lacks economic substance .

If a Lease up to 50- years long is granted to the Applicant, Fly Blue can basically do as they wish there without any further input from , or consultation with, the local community – those most greatly and directly affected by its future activities.

I can see the first thing Fly Blue doing, if granted such a lease, apart from sealing and upgrading the main runway, is to apply to Blue Mountains City Council to build significant airport infrastructure buildings to support the large volumes of passengers which will be arriving and departing. Fly Blue appear to be organizing and rallying a consortium of other (unknown) investors to fund this.

In short, they will want to build a regional airport which will need a control tower, radar facilities, a passenger terminal, aircraft hangars, storage sheds and workshops, etc. etc. For the safety of passengers, and to recoup their investment costs, nothing less will be viable.

Blue Mountains Council cannot be trusted with the responsibility of approving and managing the building and development applications for infrastructure of this magnitude and complexity.

They know nothing about airports.

On long-term record, Blue Mountains Council is incapable of making any good decisions, they are financially and morally bankrupt. Consider how they make ugly, over-engineered, monumental toilet blocks the central feature of beautiful parks such as Wentworth Falls Lake and Lawson Town Centre, for just one example of their absurd rationales. FlyBlue refer to B M Council's 'adopted Destination Management Plan'. Well, I can tell you right now, this Council has no idea and no plan. Private enterprise and community have driven tourism forward in this region, not the Council.

It will be a complete disaster.

Western Sydney Airport at Badgerys Creek IS overdue and desperately needed to alleviate the decades of appalling congestion, overloading, shutdowns and operational time curfews at Kingsford Smith Airport. The benefits will be enormous to 5 million people in the Sydney Basin, and to Blue Mountains residents who will no longer have to travel all the way to the Eastern Suburbs to catch a jet flight.

Katoomba Airport will be of benefit only to a tiny number of elite, those wealthy enough to by-pass the (now very reasonable and not unpleasant) two-hour drive here from Sydney, and arrive by helicopter.

There is no need for a commercial heli-port in the Blue Mountains.

Tourism here is currently booming, and has already reached a sustainable saturation point for the infrastructure available: the National Park, bushwalking trails, accommodation, food outlets and streets. There is no need to 'grow the visitor economy in a sustainable manner' as Fly Blue put it, by bringing in extra tourists by air, be they 'high yield' or otherwise.

Tourism is doing just fine as it is. We are receiving more than enough tourists.

Fly Blue say on their website that 'Heli-charters from the airport will be of at least 30 minutes duration.' Well, 30 minutes is not very long! Sounds like joy-flights to me.

And 'Creation and use of Fly and Drive Neighbourly policies'? What on earth does this really mean? And who the hell is going to police this? This is just mindless corporate drivel.

The Carbon Offset plan of 'planting one tree per flight' is perhaps THE biggest load of environmental apologist whitewash bollocks I have ever heard. It simply will not make one iota of difference. I could easily plant my own tree if I thought it did, I don't need to go on a plane ride to make that happen.

Finally, Fly Blue purport to leave 50% of Katoomba Airfield 'dedicated to non-aviation use'. That's great, but who actually wants to go there? It's a barren wasteland. I can think of a hundred places I'd rather be. Nobody in their right mind goes bushwalking there, we are spoilt for choice with much better options. Real stargazers go to Linden Observatory, or Coonabarabran.

And RAAF cadet bivouacs? Don't make me laugh! These cadets fly around in giant Hercules aircraft, or Caribou. Are these behemoths really going to be landing at Katoomba? They will literally shake the ground apart.

The bottom line is, granting this lease to Fly Blue will unleash a chain reaction of unstoppable future events and consequences which are largely unknown. Once started, there will be no going back. This is an unacceptable risk.

Intrinsic to this development are large, unprecedented numbers of low-flying, noisy light aircraft destroying the natural tranquillity of our beloved Blue Mountains. Which is why all of us visit here, or live here in the first place!

No, this narrow-minded, ill-thought-out proposal must not go ahead.

You have the power to stop it.

Please act.

Yours,

[Redacted signature]

[Redacted address]

Dear Department of Industry and Crown Lands

I am writing to express my opposition to the lease application for Katoomba Airfield as a commercial operation. I feel it would be far better if it were incorporated into the care of National Parks and wildlife, as it is in a national park, full of invaluable wildlife and vegetation, which would be put at risk by the constant daily noise of the helicopters and planes. This is a World Heritage listed area, and should be protected from greedy, noisy commercial operations. We have so few areas like this, and they are too precious to be violated by this invasive proposal.

In fact the proposal contravenes the Environmental Protection and Biodiversity Conservation Act 1999 guidelines and the Greater Blue Mountains World Heritage Area Strategic Plan. This is an environmentally sensitive area and must be protected.

There is only one road in and out which would be subjected to overwhelming traffic. We also have been given no information regarding the long term objectives and plans of the lease applicant.

I was appalled by the behaviour of the lease applicant at the community discussion and walkthrough meeting at the airstrip on February the 2nd. I asked a very reasonable question about his plans for the number and frequency of flights he had planned, given that he told us he would be spending millions on infrastructure and equipment, and helicopters. I suggested he must be planning a very large scale operation to make a profit after costs. He came and stood over me in a very threatening and aggressive way and snarled that of course he wanted a return on his money, but that his plans were in confidence. The next day several helicopters flew into the airstrip, and my partner and I went for a drive down to the airstrip to have a look. On the way out Floyd Larson took out her phone and filmed us, indicating a very negative and intrusive attitude towards anyone questioning their

The Blue Mountains is valued for its peace and quiet. The constant loud noise of helicopters would make it sound like Apocalypse Now, and would destroy the peace that locals and tourists treasure, not to mention the unique wildlife. This presents a serious threat to tourism in the area. It is gross and ugly.

The Fly Neighbourly proposal is a piece of useless tokenism, which is completely unenforceable. Within the 5.5km flight circuit aircraft can fly at any height in any direction!

Many small businesses, residents and other people are deeply concerned about the negative impacts of this proposal:

<https://www.katoombaairfieldcommunitygroup.org/real-voices-real-people>

In 1992-1995 helicopter joyflights were shut down. Why is an even bigger proposal even being considered?

Why are we being kept in the dark regarding the number and frequency of helicopter movements? Why is an EPA license required? We are being deliberately kept in the dark regarding the scale of this proposal. Are there going to be more than 30 flights a week? We are not being informed.

In the **Protection Of Environment Operations (POEO) Act Schedule** it states:

Helicopter-related activities

(1) This clause applies to a helicopter-related activity, meaning the landing, taking-off or parking of helicopters (including the use of terminals and the use of buildings for the parking, servicing or maintenance of helicopters), being an activity:

(a) that has an intended use of more than 30 flight movements per week (where take-off and landing are separate flight movements), and

(b) that is conducted within 1 kilometre of a dwelling not associated with the landing, taking-off or parking of helicopters,

but not including an activity that is carried out exclusively for the purposes of emergency aeromedical evacuation, retrieval or rescue.

(2) The activity to which this clause applies is declared to be a scheduled activity

There are homes within 1km of the airfield and more properties within this area about to build residences.

On February 3, 2019 12 helicopters landed and passengers that were then taken by bus to the Fairmont and the helicopters departed. This was 24 movements in only one day! The proposal is for a 7 day week, so it does not take much to add up the minimum number of noisy, disruptive flights.

Will home owners receive any compensation for this intrusive and constant noise pollution?

The NSW government does not have the right to contravene World Heritage values. The EPBC Act, any action that will have a negative impact on World Heritage values may be taken only if the action is approved by the Australian Government Environment Minister or is taken in accordance with a management plan accredited by the Australian Government Environment Minister.

The OEH offers protection for native fauna, who will be adversely effected by noise, disrupting their foraging and breeding. The public bushwalking and camping will also be disrupted.

The Environment Protection and Biodiversity Conservation Act 1999 states that any action that is likely to have a significant impact on World Heritage values may be taken only if it is approved by the Australian Government Environment Minister, either directly or via an approved plan of management.

The Fly Neighbourly program has been put in place by the Blue Mountains National Park to minimise impacts, but this needs to be reviewed and stronger and more extensive controls applied.

The Department of Industry Crown Lands do not have the expertise to manage a Lease for an Aerodrome.

The department itself stated previously that the land should have been returned to the National Parks and Wildlife Service in 1988 when the original lease expired.

Fly Blue Management Pty Ltd when it does not even have an ABN in its own right & is not registered for GST, so why is it being considered?

It seems the lease applicant is a Discretionary Trust with a Company Trustee. The Trustee Company is owned by another Company that would appear to be Trustee of another trust or holds its shareholding in Flyblue Management P/L on behalf of unknown persons or corporations.

There is no transparency here. Ownership of the lease could be transferred without anyone knowing.

The Department needs to examine the lease applicant. There needs to be a police check and references from his neighbours near the airfield and residence.

It is very disturbing that the lease applicant worked for the Department of Industry in a senior role while the future of the airfield was being discussed, this is proven by the same letter dated 23-February 2017. Only six months later the applicant was granted the tender of the Katoomba Airfield Expression of Interest.

A letter to the editor published in the Blue Mountains Gazette noting that the Deputy Chairman of the Board of Directors for Destination NSW was the boss of the lease applicant for five years the leasee worked there.

How is the community expected to comment on the proposal when we have been given no information of what the complete plans are? The community cannot comment on a lease without knowing what the full details are of the lease applicants long term plans. We are not privy to the business plan.

We do know that the applicants has the following disturbing plans:

1. Tarmacking the runway
2. Two new hangars
3. Invitations to every pilot up and down the east coast of Australia to utilise the airfield
4. Blue Sky Aviation is already using the airfield
5. On February 3, 2019 12 helicopters landed and took off dropping off people who were then bused to the Fairmont thereby proving this is not just about joy flights
6. Proposed flight paths fly over the Grose Valley
7. One pilot indicated that the airfield would have 30 helipads

Even conservative estimates would be that for every \$1 million spent \$20,000 per month would need to be made just to break even. At \$35 to land at the airfield that would 571 flights per month just to break even. This will be a very serious business project with a massive number of landings and flights from a World Heritage area. This is an atrocity.

The people have a right to know about the full extent of the leasee's plans. This information is being kept from us. Thousands of flights will be coming and going every month. It will be an unmitigated disaster for our beautiful, peaceful national park.

On February 3, 2019 the current licensee had 12 helicopters to fly in. The decibel readings for over 1km broke 70db. This will cause our wildlife to leave. Having a commercial airfield a World Heritage Area is a crime against nature.

Within the 5.5km area and listed on the EPBC Act of 1999 as critically endangered are the Regent Honeyeater and the Monkey Gum/Mountain grey gum. Listed as endangered are the Eastern Bristlebird, Spotted-tailed quoll, the Blue Mountains Swamp-Skink, *Epacris hamiltonii*, *Eucalyptus copulans*, Dwarf Mountain Pine and *Leionema lachnaeoides*. Listed as vulnerable are the Broad-Headed Snake, *Zieria involucrate*, Flockton Wattle, *Acrophyllum austral*, *Acacia bynoeana*, *Euphrasia bowdeniae* and *Diuris aequalis*.

Listed on the NSW Threatened Species Conservation Act 1995 as critically endangered Regent Honeyeater and Slaty Leek Orchid. Listed as an endangered ecological community is the Monkey Gum/Mountain grey gum. Listed as endangered are the Eastern Bristlebird, Giant Dragonfly, Blue Mountains.

There is a total lack of transparency regarding the social, economic and tourist impacts of this proposal. There has been no formal investigation into what the actual proposal and the impacts on the environment, the tourists, the glocal small businesses, the wildlife and flora, and the effect of the emissions on residents, animals and visitors bushwalking and sight seeing.

The airfield must be returned to the national park and used only for emergency services. This gross and extensive commercial proposal is a travesty and a crime against nature and people.

Yours faithfully

[Redacted]

[Redacted]

[Redacted]

[Redacted]

V A R U N A , T H E N A T I O N A L W R I T E R S ' H O U S E

4 August, 2019

To the NSW Department of Industry,

We are writing to express strong objections to the proposed commercial leasing of Katoomba Airfield.

Located in Katoomba, Varuna the National Writers' House is one of Australia's leading literary institutions, attracting writers from around Australia - and increasingly internationally - who wish to experience the unique and quiet environment which we are able to offer in Katoomba.

The proposed leaseholder's intention to 'revitalise the (airfield) site as a hub for recreational aviation' is a direct threat to the tranquility of the mountains and of Varuna, as presumably the leaseholders would be seeking to increase aircraft movements in and out of the airfield to make it commercially viable. This is not an acceptable use of this site.

Varuna believes it is absolutely imperative for our creative and economic success as a region that we do all we can to protect our World Heritage Area, including our airspace. Our natural environment is our greatest asset. The level of potential noise pollution from this proposed development would damage the natural heritage of the Blue Mountains, could potentially threaten our World Heritage status, and would most definitely impact the value of the experience that we offer to many of Australia's leading writers all year round. We object to public land being used for commercial purposes in this manner, in a way that benefits so few people to the detriment of so many.

Varuna agrees with the proposal of the Blue Mountains Conservation Society that this land be added to the Blue Mountains National Park, which surrounds it on all sides, and hence be incorporated into the Greater Blue Mountains World Heritage Area. The airfield should be limited to emergency use only.

Thank you for your consideration of our objections to this proposal.

Yours sincerely,



Veechi Stuart, Executive Director & Amy Sambrooke, Creative Director
Varuna, the National Writers' House and the Blue Mountains Writers' Festival

Reference: LX 602686

This submission argues against the current proposal for a commercial operator to run scenic helicopter flights from Katoomba Airstrip.

As a world heritage listed area the Greater Blue Mountains is protected by both Commonwealth and State legislation. This legislation reflects Australia's obligations under the World Heritage Convention (whc.unesco.org). The commercial use of Katoomba airstrip for scenic flights is inconsistent with the management plans which flow from this legislation.

The current area management plan identifies 'inappropriate recreation and tourism activities' as a major challenge (environment.gov.au). 'Joy flights' are a clear example of inappropriate tourist activity, which will interfere with the quiet enjoyment by the majority residents and tourists of a tranquil world heritage area.


The use of tourist helicopters within the national park will also threaten the world heritage values of the Blue Mountains and negatively impact local fauna. Scientific literature review shows considerable evidence that human generated noise is detrimental to both wildlife and natural ecosystems (wildliferesearch.co.uk).

'Protecting and enhancing Crown land is essential for business, tourism, recreation, well-being and the biodiversity of the state' (industry.nsw.gov.au).

A private scenic flight operation is inconsistent with these stated values.

'Noise within the national park system often interferes with the very reason visitors go to the national park - for peace and quiet' ([environmentalimplicationsguidelines: casa.gov.au](http://environmentalimplicationsguidelines.casa.gov.au)).

In order to protect both the public and the environment Katoomba Airfield should remain an 'emergency only' facility.

 *July, 2019*

Department of Industry – Crown Lands
PO Box 2155
Dangar NSW 2309
airfield.submissions@crowland.nsw.gov.au

25th July 2019

Re : Ref No LX602686

Proposed Commercial Lease of Katoomba Airfield,
Medlow Bath, Blue Mountains, NSW

I am writing to strongly oppose the granting of a commercial lease for the use of publicly owned Katoomba Airfield at Medlow Bath by a private aviation business. I have written previously to the former Project Officer Mr Mark Maloney on this subject (email correspondence dated 04-03-19, 07-05-19, 22-05-19).

I am a [REDACTED] resident of 30 years this year, having moved up from the inner west of Sydney to escape urban living and immerse myself in the outstanding environment of the Blue Mountains National Park. I am so lucky to have easy access to such stunning scenery literally on my doorstep. And as an avid

bushwalker, birdwatcher and bushcarer, I take full advantage of my luck and the “natural quiet” of the surrounding landscape.

The “Blueys” have always been my childhood backyard. It’s been that way for so many families for decades. An escape into a magical world for a child that stays with you forever, where a connection to nature is forged that is not easily broken. A necessary escape from a man-made world that reminds us how interconnected we all are to our environment.

Since I moved up to Katoomba, the outstanding biodiversity of the Greater Blue Mountains, including the Blue Mountains National Park, has been recognized by its inclusion on the UNESCO World Heritage Register in 2000. The parcel of land comprising the airstrip and its associated buildings now sits adjacent to the Greater Blue Mountains World Heritage Area (GBMWA).

I vividly recall the noise pollution in the mid 1990s created by helicopter tourist flights into and out of the airfield. Such was the impact on residents that we lobbied the BMCC and our State and Federal politicians of the time and were successful in putting stringent noise abatement conditions on the EPA licence governing the airfield activity. Such activity subsequently stopped.

There have also been recommendations around this time to incorporate the airfield into the surrounding national park by

both Blue Mountains City Council (BMCC) and Crown Lands when the lease expired or was up for renewal.

I didn't think, given the history I mention above, that the community would be fighting again to protect such an obvious asset to both local residents and the citizens of Australia. But yet again, our environment is under siege from human greed and interference!

I list below my concerns around this proposal in support of my opposition.

Failure of the Lease Process to date to adequately inform/consult the Public

- The Expression of Interest (EOI) for a license advertised by the Department of Industry – Crown Lands (the department) was **not** preceded by public consultation. Given the history and the fact that this is public land, this would have been the more appropriate approach.
- The license granted following the EOI allows for the licensee to prepare a lease application and business case exclusively, ie. by direct negotiation, for a long term lease. So a single option only for a long term lease was thereby initiated.
- The department's Community Consultation Strategy (CES) from the 9th June to the 4th August 2019, provided no information pertinent to the public, such as intended

activity at the airfield, apart from constant references to the lease proponent's website for relevant information. Such information is not to be found on said site! It also indicates a complete dependence on the lease applicant to inform – completely inappropriate!

- No Impact Statements, either environmental, cultural or economic have been provided to the public to date. The department has admitted at the recent public forums that they have not commissioned such studies as yet! Surely these are considered by the department to be relevant documents to inform themselves and the public fully of the proposal under consultation.
- Inability of the department's officers to answer the majority of questions put to them by the public at the public forums, apart from advising how to make a submission, further reinforces the view that the DOI is ill-informed about the proposal detail or indicates their unwillingness to go public with it.
- The format and venue of the face to face public sessions with the department officers was ill-conceived, considering the extent of community attendance. Given the number of emails the department has been receiving on this matter, it should have been apparent that the turnout would be high and a more appropriate facility chosen.
- Conflicting or no correspondence from the department to those who wrote to the department officers over the matter asking to be considered key stakeholders, particularly in regard to details of the CES.

The result of all of the above is that the public to this day remains largely in the dark as to the extent of the proposal, despite some 18 months having elapsed since the EOI was advertised and several "drop-in" "information" sessions conducted recently and locally by the department. I consider this disrespectful of the community who will bear the brunt of the outcome and a complete waste of taxpayers' money.

The order of the process and the lack of documents available to the public also suggests that the department knows no more than the public about the potential impacts of their lease proposal.

Possible Conflict of Interest/Lack of Transparency

- Who is the lessee and how were they chosen?

The lease proponent can be shown to have been in the employ of the Department of Industry (Local Lands South) when discussion over the future use of the Crown Lands airfield commenced. Only a short time after leaving that employ, they were the successful EOI applicant!

The lease proponent has also had employment links to the current Deputy Chairman of Destination NSW and the current Secretary of the NSW Department of Industry

Board of Infrastructure in their previous roles in the aviation industry.

In what seems to date to be a flawed and opaque process, these connections raise more questions than they otherwise would.

- Why is the lease application in the business name of a company without an ABN and unregistered for GST?

The business appears to be the trustee for a discretionary trust. This set up does not allow for transparency with regard to the beneficiaries of said trust and thereby also the beneficiaries of the lease.

Department officers at the public forums admitted that they were unaware of this arrangement and its consequence – that the true lessees could change at any time due to a change of business ownership and the department may be unaware of such a change.

- Is a police check and financial references provided by the lease applicant sufficient to satisfy the concerns of the public as to the “fitness and propriety” of the lease applicant?

There is no mention made of a character reference being necessary to satisfy the "fit and proper" criteria for consideration for a lease application under Policy IND-O-253, Leasing of Crown Land. This would seem to be a serious omission.

- Under Section 5 – Lease by Direct Negotiation in the department's Lease Application Form, the DOI states that :

“As a general principle, the Department will use competitive processes for the lease of Crown land.”

and then asks the applicant to :

“Please provide a statement and advise how you believe this application meets the circumstances under which direct negotiations are considered.”

I do not understand how the department has determined that this lease application meets the criteria for direct negotiation of a lease, which effectively makes the entire process non-competitive.

It would again appear that in many respects, the public have made themselves better informed than the department!

Impact on the surrounding World Heritage National Park

- Conflict of use with the adjacent GBMWA.

Upon reading the objectives of the GBMWA Strategic Plan 2009 (GBMWHASP), it is difficult to reconcile the Crown Lands lease proposal with these objectives, particularly with regard to :

“A process for investigating the addition of local government and Crown reserves within the City of Blue Mountains to the Blue Mountains National Park is already well advanced.” Page 25 of the GBMWHASP

“Adjoining land uses are compatible with the conservation and presentation of World Heritage values.” Page 26 of GBMWHASP

“Developments and activities with an unknown but potentially significant impact on the World Heritage and other values of the GBMWA are either modified to minimise the risk of impact on those values or do not proceed.

Page 28 of GBMWHASP

- Impact on Flora and Fauna

Noise, dust, physical impact, groundwater contamination and fuel/fire threats are all potentially devastating impacts on wildlife, particularly birds, and on the surrounding vegetation , including the threatened hanging swamp communities endemic to the mountains.

The flow on effect to the GBMWA has not been determined and cannot be underestimated. This could make management of the surrounding national park more difficult and the maintenance of the integrity of the World Heritage area challenging and costly.

- Possible contravention of the Environmental Protection and Biodiversity Conservation Act 1999

The location of the airfield within a World Heritage listed area makes it inappropriate that the NSW State Government are proposing to grant a long term lease for the airfield without reference to the Environment Protection and Biodiversity Conservation Act 1999 (EPBCA) and consequently the Federal Government.

The act states that :

“A person must not take an action that:

- a) has or will have a significant impact on the world heritage values of a declared World Heritage property; or
- b) is likely to have a significant impact on the world heritage values of a declared World Heritage property.”

Given there have been no environmental impact assessments done to date, the likelihood of contravention by such an apparently conflicting use may exist.

Impact on Community and Visitor Amenity

The potential for this proposal to impact on the Blue Mountains experience for visitors and the lifestyle of residents is huge, due to disturbance of the aesthetic values and “natural soundscape” of the area.

Who wants to go walking in a relatively remote destination after travelling some distance to get there to enjoy the peace and quiet that the remoteness affords, to listen to the sound of rotary thump thumpers and fixed-wing "mosquitoes" buzzing around overhead?

Certainly not the national and international visitors who come in their millions every year to experience something other than the man-made, which they can have any day of their ordinary lives!

Nor the residents, who've chosen to live and work in the Blue Mountains communities because they value and are inspired by the diversity and natural beauty they live within.

It's the wilderness value of solitude with only the sights and sounds of nature around us that is a large part of the allure.

Economic Impact on Business/Community

Businesses directly and indirectly dependent on tourism should be concerned about any proposal with the potential to decrease visitor numbers.

This proposal, with the increased visual and noise disturbance it promises, will have a negative flow-on to such businesses and in turn to the wider community, when it inevitably results in a

reduction in visitation by tourists, who come here because they value the “quiet brand” of the Blue Mountains.

I am very concerned about the longer term impact to the viability and vibrancy of our communities by the granting of this lease.

In Conclusion

To quote the Crown Lands Management Act 2016 (CLMA) :

“1.3 Objects of Act

The objects of this Act are:

- (c) to require environmental, social, cultural heritage and economic considerations to be taken into account in decision-making about Crown land, and
- (d) to provide for the consistent, efficient, fair and transparent management of Crown land for the benefit of the people of New South Wales

1.4 Principles of Crown land management

For the purposes of this Act, the *principles of Crown land management* are:

- (a) that environmental protection principles be observed in relation to the management and administration of Crown land, and
- (b) that the natural resources of Crown land (including water, soil, flora, fauna and scenic quality) be conserved wherever possible, and

(f) that Crown land be occupied, used, sold, leased, licensed or otherwise dealt with in the best interests of the State consistent with the above principles.”

I have grave concerns that the objects and principles of the CLMA as quoted above, have not been duly considered in the case of the Crown Lands lease proposal for Katoomba Airfield, Lot 550 DP 751657, Grand Canyon Road, Medlow Bath.

As a custodian of our environment, as are we all, I feel a responsibility to protect and preserve it for our community, visitors and future generations, and most importantly just for itself!

Therefore, I oppose the negotiation and granting of a commercial lease for Katoomba Airfield, I support it's inclusion in the surrounding Blue Mountains National Park and I support it's maintenance for emergency purposes only.

I'm happy to have my submission made public but please withhold my name and suburb.

Yours sincerely

[REDACTED]
[REDACTED]

cc : Ms Trish Doyle, Member for Blue Mountains

Mayor Mark Greenhill, Blue Mountains City Council

Ms Susan Templeman, Member for Macquarie



[REDACTED]
[REDACTED]
[REDACTED]
Phone: [REDACTED]
Email: [REDACTED]

Department of Industry, Crown Lands

Re: LX602686 Submission regarding Proposed Crown Land lease at Katoomba Airfield

This is a submission regarding the proposed leasing of Crown Land at Medlow Bath occupied by Katoomba Airfield.

We wish to object to this proposed lease and we believe that as recommended previously the land and airfield should be transferred to the control of the National Parks for emergency use only.

The proposed lease for commercial use is likely to result in greatly increased flight activity. This will impact the local environment both natural and human and is inappropriate in a World Heritage Area. While the greatest effects will be local, noise and visual effects will be spread over a wide area of the Upper Blue Mountains and will impact not only local residents but visitors who come to the mountains to enjoy its scenic and wilderness qualities,

We do not accept assurances that short joy flights will not be permitted as it seems unlikely that the proposed lessee would have committed the time and money he has without assurances to the contrary. The commercial viability of this operation would surely require frequent flights of one sort or another.

We greatly value the local environment. We both volunteer with the Blue Mountains World Heritage Institute Ecomonitoring program and Keith works in 4 local bushcare groups, other bushcare including in Katoomba Creek adjacent to the airfield and at the local native plant nursery.

[REDACTED]

[REDACTED]

NSW Department of Industry

Crown Lands

By email: airfield.submissions@crownland.nsw.gov.au

Dear Sirs

Proposed Lease of Airfield at Medlow Bath

- 1. I am a resident of the Megalong Valley, having owned my property since 1986, and having started bushwalking in the area and adjoining wilderness in 1962.**
- 2. I object strongly to the proposed private commercial lease of the Medlow Bath Airfield.**
- 3. The Community consultation process has been woefully managed by the Department and shambolic in its implementation. I attended the Session at Hotel Blue on June 25 at 11 am and this was clear. The initial format of separate sessions was unclear and inadequate for all concerned. It was overcrowded, noisy and confusing. Notwithstanding, the behaviour of those community members attending was respectful. Fortunately, as a result of the efforts of some of those community members present, it was converted to an overcrowded town hall style meeting. However, there was still no sense of order or recording of the process; importantly there is no assurance that the concerns expressed by those present would be taken into consideration and given due weight, giving the impression that these sessions were simply organised in order to “tick the box” that proper process has been followed. My impression and it seemed to me of those community members attending was the concerns that were expressed would not be taken into consideration and given proper, or for that matter, any weight.**
- 4. Such a perfunctory attempt to comply with statutory requirements suggest that any decision ultimately taken will be done so for the wrong reasons and will be required to be undertaken again.**
- 5. I am aware of the submission dated 24th July 2019, from the Katoomba Airfield Community Group on this aspect and endorse the position therein expressed.**
- 6. It follows that the whole process can be challenged as being inadequate compliance with the statutory requirements as to process and lacking procedural fairness, with the consequence that any decision ultimately taken will be exposed to challenge under administrative law principles. This failure of process should be acknowledged, and a proper process undertaken.**
- 7. I would further submit that procedural fairness requires that the decision to be made by the Department, and its reasons, should be further made public with adequate time for review by the community before any final decision is made, and an opportunity for further submissions. This would ensure that the Minister or his delegate would only be taking into account relevant considerations and acting reasonably.**
- 8. Given the significance of the adjoining wilderness area and that the Megalong Valley is the only “rural area” within the Blue Mountains City, which is populated by residential farms, and an increasingly important tourist asset both within the Valley and from the perspective of the ridge, I would suggest that before any**

decision can be made an Environmental Impact Statement and Economic Impact (both micro and macro) Statement should be prepared by appropriate professionals and available for public scrutiny. Without that I would again submit that the process is flawed and open to challenge. More importantly any conclusions will necessarily be ad hoc and subjective.

9. It has at the very least been put forward that the use of the Airfield will be for “heli-tourism” (whatever that will mean in substance as there is no business or management plan yet in place), and in this context the impact on the Megalong Valley will be immediate and substantial.
10. Of serious concern to me is that the Department is undertaking this process without a full and public understanding of the business plan and flight projections that will be undertaken by the proposed leaseholder. As a consequence, the community is being asked to consider the proposal without adequate information, again suggesting a flawed process. But more importantly a proper management plan must be incorporated into the lease to provide a mechanism for the authorities to ensure appropriate compliance and made public. Even more worryingly, the process suggests that if one is to be incorporated it will be incorporated “behind closed doors” without public scrutiny. There must be an enforceable management plan put in place to address privacy and noise concerns.
11. However, the proposed flight path has been released and from the maps shown during the process, the flight path is proposed to be directly over our property. There are already many airports within flying distance of our property (Bankstown, Campbelltown, Richmond, Bathurst and other regional airports, and of course the new Badgerys Creek Airport, to name a few) with the consequence that we are already subjected to aircraft overflight, both fixed wing and helicopters. As a consequence, we are already aware of the adverse impact such activity has on our amenity. Permitting any increase in that activity, particularly if it is uncontrolled, will compound that adverse impact, and worryingly from our perspective, substantially, given the proposed flight path and nearness of the airport. The spoke and wheel model proposed to be adopted will necessarily concentrate the impacts compared to the flights from surrounding airfields.
12. The adverse noise and privacy impacts are already a serious concern. As stated, if this proposal proceeds those impacts will be substantially compounded and without assurance that they can be properly managed.
13. Of most concern is the topography of the Megalong Valley. It is a basin surrounded by Narrow Neck Peninsula and the Ridge to the east and north. My farm is on Pinnacle Ridge, the highest point in the Valley. This will amplify any noise, particularly as helicopters can fly as low as 500 feet and of course can and do land. Helicopter noise is substantial.
14. Our farm adjoins the commercial vineyards in the Megalong Valley so we could expect that much of the helicopter noise will focus on our amenity and area, thereby making the potential impact far greater on ourselves than most places elsewhere in the Valley.
15. The very popular Six Foot Track passes through the Vineyards on the way from where it crosses the Megalong Road, where many walkers park their cars, through to the Cox River. Intrusive helicopter activity in this locality will certainly adversely impact the quite enjoyment the walkers seek.
16. Importantly, its unnecessary.

- 17. It is spurious to say that management of the site from the perspective weeds, fire and the like requires the proposed transaction. As is apparent from many of the submissions, there are many organisations and funds available for such purpose to adequately maintain the site for fire protection and other emergencies, which I wholehearted support. Moreover, I am sure private community funding could be obtained for this, which was supported at the community meeting I attended.**
- 18. I am fearful that the proposal if implemented, through its noise, privacy and intrusive impacts, will adversely affect property prices, including our own, requiring compensation.**
- 19. As stated above, we have been in the Megalong Valley for over 30 years, and during this time we have seen this area become an immensely popular destination for bushwalkers and campers using the Six Foot Track, the rockclimbing areas throughout the top of the Valley, the Narrow Neck Peninsular and the gateway to the Wild Dog Mountains and beyond at the end of Megalong Road. It is clear that the appeal of these activities lies in the opportunity to enjoy the tranquil bushland enviroment, away from the noise and traffic (whether on the ground or in the air) of urban areas. A commercial airport and heli-tourism located right in the centre of this area will be highly detrimental, if not destructive, of the natural environmental attractions of the Megalong, its economy and our own amenity.**

[REDACTED]

[REDACTED]

[REDACTED]

28 July 2019

Crown Land at Medlow Bath known Katoomba Airfield -LX 602686

My Objection to grant a commercial lease of Katoomba airfield

I migrated from New Zealand to Blue Mountains because of its peaceful environment. I recently build my home in the town [REDACTED]. I believe the tranquillity, peace and beauty here in the mountains is unique. One day while walking on a Bush track near Evans Lookout, I witness two Helicopters arriving there. The noise and echo of the noise was very loud and unbearable. There was immediate panic for the group of Kakadu birds we were watching. They flew away in panic in all directions. How are we going to preserve the right balance of beautiful birds and our peaceful life amongst such a commercial project which cares only for the profits.

Noise can have a detrimental effect on animals, increasing the risk of death by changing the delicate balance in predator or prey detection and avoidance, and interfering with the use of the sounds in communication, especially in relation to reproduction and in navigation. These effects then may alter more interactions within a community through indirect (“domino”) effects.

Higher ambient noise levels also cause animals to vocalize more loudly, which is called the Lombard effect. Researchers have found that humpback whales' song lengths were longer when low-frequency sonar was active nearby.

Please understand, if we lose the tranquility & create imbalance in nature, no amount of money & effort be able to restore it. We have destroyed enough. I urge with great humility that this commercial helicopter project should immediately be suspended and our Crown Land should be restored through the National Park, as intended.

[REDACTED]

Dear Sir/Madam

(LX 602686) OBJECTION TO COMMERCIAL LEASE OF KATOOMBA AIRFIELD

I object the proposed lease of Katoomba Airfield to a commercial helicopter tour operator, and seek to have the land incorporated into the national park for emergency and community use only.

I live in Medlow Bath. My grounds for objection are as follows:

1. DETRIMENTAL EFFECT ON LOCAL AMMENITY

1.1 NOISE

- Flight paths: Regardless of plotted flight paths, noise will be an issue for residents and visitors alike due the acoustically-sensitive escarpments, valleys and canyons which will reverberate the highly-stressful sounds of rotary aircraft across recreational and residential areas.

There has been no study on acoustic on households, wildlife or visitor experience

- Hikers, local: Regarded by some as the premier walk in the Blue Mountains, the Grand Canyon Walking Track is (at its closest point) 700 metres from the airfield, and below it in an acoustically-sensitive canyon. Walkers do hear helicopters now from this airfield and report a poor experience.

"With 90,000 visitors annually the track is a key eco tourism destination and an anchor for future local and international tourism to the World Heritage listed Blue Mountains National Parks."

- [Grand Canyon Track reopens after \\$4.8 million restoration](#)

- Hikers, broad: 1.25 million people take a bushwalk each year. It's a major and the primary drawcard for tourists.

A drop in reputation or park visitor numbers will affect the local economy.

There has been no assessment on detrimental effects of helicopter noise on reputation, visitation or satisfaction

- Residents: There are many local residents and a cluster of houses within 1-1.5km from the airfield. While these residents knew of the airfield and most likely pre-dated their arrival, the airfield was considered a low-use facility, as attested by the flight school that ran there for over a decade. This dramatic change of use from low-level maintenance to commercialisation is inappropriate, and will have an impact on local resident's health, quality of life, property values and amenity of all those who live and visit the area.

There are no mitigation measures that can allay the experience of frequent noise in this region.

- Fly Neighbourly Policy: CASA concedes they have "no authority in enforcing Fly Neighbourly Agreements" and that that they are "a voluntary code of practice".

No intention, stated or mandated, will be enforceable.

1.2 RESIDENTIAL

- Local streets: There is one road—Station Street, Rutland Road and Grand Canyon Road — to the airfield, with several pinch-points requiring passing cars to put wheels into the dirt. The road is not designed for heavy traffic, let alone runway building equipment and aviation fuel tankers.

A very real potential for death and injury along a local road used as a footpath shared with heavy airport traffic

- Local foot usage: On the one road to the airfield you will find the following foot traffic forced to use road as there are no footpaths: walkers, mothers pushing prams, teenagers on horses, school groups, dog-walkers, cyclists and just people walking to and from the station. This road will be shared with heavy use vehicles

which is not compatible.

On any given day you may see a teenager on a horse (dressage centre is on Rutland Road), or a woman pushing a pram on a road that is as narrow as 14 ft.



Grand Canyon Rd, Medlow Bath



from FlyBlue website 'info pack'

2. DETRIMENTAL AFFECT TO LOCAL ECONOMY AND REPUTATION

2.1 VISITATION

- Bushwalkers: an estimated 1.25 million people take a physical bushwalk each year. If people simply want to go for a walk they could go around Centennial Park or do the Bondi-Coogee coastal walk, but they make the effort to come to the mountains because of the connection with nature and at the core of that is silence.
- Experience: This proposal risks sacrificing the very thing that makes the mountains special, the sense of escape, or peace, of immersion in natural settings and nature.
- Why people come? Lets' look at the stats from Destination NSW, Travel to Blue Mountains (2018):

Top activities in Blue Mountains (domestic overnight travel)

1. *Eat out, dine at a restaurant or cafe* (61.8%) was the most popular activity undertaken by visitors to the region, then
2. Bushwalking or rainforest walks (49.5%) and,
3. Visit national parks or state parks (46.6%).

Clearly, the experience of the natural beauty is a major drawcard. If it is buzzed over with rotary aircraft the Blue Mountains will suffer in both economy and

reputation, the major loss will be only for the benefit of a few passengers who add little of nothing to the mainstream 'bread and butter' mountains economy.

2.2 ALIGNMENT WITH STRATEGIC PLAN

The applicant's FlyBlue website would have us believe that their proposal aligns with the Blue Mountains City Councils Destination Management Plan, but nothing is further from the truth.

The proponent's website makes the following claim:

FLYBLUE's customer demographic aligns with the Blue Mountains City Council's adopted "Destination Management Plan", specifically under the goal and vision for the Blue Mountains to ... grow the visitor economy in a sustainable manner, focusing on growing visitor yield rather than visitor numbers..."

(Source: flyblue.com.au)

However, when looking specifically at the Goal and Vision in the "Destination Management Plan: (1.2.2), it reads:

"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".

(Source: BMCC Destination Management Plan

<https://www.bmcc.nsw.gov.au/documents/destination-management-plan>)

A more telling misconception peddled by the applicant, is their complete misrepresentation of this quote on their website, presented as their key economic argument:

..... grow the visitor economy in a sustainable manner, focusing on growing visitor yield rather than visitor numbers..."

This quote is in the Destination Management Plan (DMP) and found in the section Opportunities for the Blue Mountains (1.6), where it states:

As part of this DMP, 42 opportunities have been identified to offer solutions to many of the challenges which the LGA is currently facing. Additionally, they provide the potential to **grow the visitor economy in a sustainable manner, focusing on growing visitor yield rather than visitor numbers.**

These 42 opportunities (on pages 18-22 of the DMP) are in fact completely 'flight-free'. No mention of aircraft, scenic flights or any air travel at all, and instead focus on actions such as improving the amenity and experience of the mountains through upgraded walks, more cultural activities and better parking.

3. LACK OF INFORMATION AND MISINFORMATION

3.1 TRANSPARENCY AND TRUST

The applicants have gone to some lengths to withhold from the residents of the Blue Mountains any details about their business plan and have provided nothing short of 'smoke and mirrors', as evidenced by

1. No information of flight numbers or frequency
2. Production of a brochure website that only mentions the word 'noise' once and mostly talks about low action activities like bush remediation and nonsensical activities such as 'walk blue' where locals are given the opportunity to walk next to an airport.
3. A greenwash proposal of planting a tree for each flight, which arguably is a very convenient calculation
4. A Facebook page with pictures of broken-down fixed wing aircraft and a storytelling approach to highlight the 'romance of flight', apparently designed by a marketing spin agency

3.2 BACKGROUND OF APPLICANT

Like most working people, Mr Larsen has a LinkedIn profile page detailing his work history and resume. However, the very day after the Blackheath public townhall meeting (which Mr and Mrs Larsen attended but didn't answer any questions) Mr Larsen's LinkedIn profile was deleted [REDACTED] and remains so.

One of the applicants went to lengths to hide his background from the residents of the Mountains raising questions about transparency, integrity and trust.

3.2 'JOY FLIGHTS' MISINFORMATION

The prospective lessee and the Department of Industry told members of the community that "joy flights" will not occur.

In correspondences to stakeholders, Mark Maloney from DoI wrote to several citizens that 'helicopter "joy flights" over the Blue Mountains will not be permitted'

This caused some confusion as the Civil Aviation Safety Authority's (CASA) definition of "joy flight" is interchangeable with scenic flight: *A flight conducted for the purpose of viewing something from the air*

What the applicant was proposing was named something different, a 'destination flight', and seemed to be relying on a detail of the definition of a 'joy flight' as one that took off and landed from the same airfield. But from the perspective of residents and visitors the difference (in noise over hikers, households or both) was non-existent.

In either a 'joy flight' or a 'destination flight' there would be

- **'viewing from above the Blue Mountains' and**
- **two movements at Katoomba Airfield** (a movement is counted as either a take-off or landing).

The applicants went to some length to distance themselves from 'joy flights' as many residence remember them poorly (the last time a proposal like this this operated from the airfield was 1992-1995). However, what is proposed is worse in some ways as the distances travelled are further and the areas of aerial intrusion greater.

4. THE TENDER PROCESS

- No parameters: The open tender process had no limits on use of the airfield except it must be lawful. This is a major oversight for putting to tender Crown land enclosed by an UNESCO-inscribed World Heritage Area.

- No community consultation: The tender process was conducted behind closed doors and the community had no part in the preparatory stages of releasing the open tender. The community consultation should have happened prior to tender.
- No proper prior consultation with National Parks or Council: It appears there was only superficial or no communication with two key government land management stakeholder groups. Neither was alerted to the potential of a tarmacked runway and a large-scale helicopter business operating from Katoomba Airfield.
- Four applicants, three were community-based, no transparency: Of the four tender applicants only one was a commercial operator. The local aviator's club applied and was rejected (even though they were backed by Council) without explanation or reason.

This current process of seeking a suitable tenant has been tainted from its conception and can no longer work to meet the needs of all stakeholders and to protect the economy, the environment and the residents in the LGA.

5. ONLINE PETITION

As administrator of the Change.org online petition as one channel for community objection of this proposal I can report the following:

Number of signatures: **Over 5,918**

Comments: Please see over 50 pages of comments in PDF and Signatures attached

Link to petition:

<https://www.change.org/p/department-of-industry-crown-lands-and-water-save-our-skies-no-commercialisation-of-katoomba-airfield>

Yours,

[REDACTED]

[REDACTED]

[REDACTED]

ATTACHED:

CHANGEORG_petition_signatures(LX 602686).pdf

CHANGEORG_petition_comments(LX 602686).pdf

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

20 July 2019

Ref No: 602686

Proposed Lease of Katoomba Airfield, Medlow Bath for Commercial Purposes

I am th [REDACTED]
[REDACTED] I have a PhD in Engineering that focused on noise mitigation. I also have a Bachelor of Engineering with First Class Honours. I am a Fellow of Engineers Australia and a Member of the Australian Acoustical Society.

For approximately 20 years I taught the postgraduate subject Air and Noise Pollution.

I am [REDACTED] NSW Division of the Australian Acoustical Society.

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 on the basis that it will generate intrusive and annoying noise and be in violation of PEO Act 1997. I have not sighted any DUAP planning documents for this proposal. Has DUAP been notified? Has the EPA been notified? As you are aware the broad operating objectives of the EPA are to protect, restore and enhance the quality of the environment in New South Wales. In so doing, the EPA must have regard to the need to maintain ecologically sustainable development, reduce the risks to human health and prevent the degradation of the environment. Could you please arrange for the DUAP and EPA reviews to be forwarded to me.

I choose to live in Katoomba on weekends and when not teaching or attending to academic matters that require me to be on campus. I work from my Katoomba-based residence to escape the air and noise pollution and the stresses of city life, to live in a serene, peaceful and quiet natural environment where I can work productively whilst being able to connect closely with the natural world.

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 and restricted to emergency service use only.

The proposed operation will not support tourism and the local economy as claimed by the applicant. 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 visitors. 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 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.

At the same time, 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 tourists who add value to the local economy.

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.

Peer reviewed 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.

Australia was recently named as the fourth worst country for animal extinctions by the International Union for Conservation of Nature. With climate change upon us we should be doing everything we can to protect our native species, not supporting activities which put our plants, birds and animals at risk.

It is noted that between 1992 and 1995, joy flights 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.

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.

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.



Your Ref: 602686

Proposed lease of Katoomba Airfield

Public Submission: [REDACTED]

The NSW Department of Industry (DOI) is considering a proposal to lease Crown land at Medlow Bath known as Katoomba Airfield. This application, for a new lease, has been made by FlyBlue Management Pty Ltd, who were granted a licence on 1 Feb 2018 for “aerodrome and land management” after being successful in a competitive EOI process carried out by the DOI to find a new tenant for the site.

A Public Consultation meeting was held in Katoomba (Hotel Blue) at 11 am on Tuesday 25 June 2019. Attendees were informed that FlyBlue Management Pty Ltd have begun developing a business plan to support their application for a long-term lease. This will involve *commercial use* of the land as an aerodrome with upgraded facilities, and a biodiversity agreement involving some re-planting of trees on the site. One condition of the lease, accepted by FlyBlue, will be that the airfield must give unrestricted access to emergency services such as the NSW Rural Fire Service. Commercial use of the airfield will include both fixed wing aircraft (small planes) and helicopters.

The DOI representatives also stated that:

1. The lease will limit flight operation times but no details were provided
 2. DOI has received as yet no details from FlyBlue about the shape of the likely business plan, in particular the *scale* of the operation including numbers of flights.
- The only other information provided by DOI was a map of proposed flight paths for both fixed-wing and helicopter aircraft.

Our submission is that the Katoomba Airfield is NOT suitable for development as a commercial flight facility, and therefore a lease should NOT be granted by DOI for this purpose. In our view, the Crown Land currently existing as Katoomba Airfield should be incorporated, if possible, into the adjacent Blue Mountains National Park (BMNP) but, if this is not feasible, the airfield should be operated, in any case, ONLY for emergency take-off and landing of small planes and helicopters – its current use.

There are 6 reasons.

1. A crucially important use of the airfield is for take-off and landing of both fixed-wing aircraft and helicopters in EMERGENCIES such as bushfire-fighting, search and rescue of bushwalkers in the surrounding BMNP, and other emergency landing. A licenced pilot present at the Katoomba consultation pointed to the historical role of the airfield as a safe landing area in emergencies given that recreational & commercial aircraft, flying west and east, are channelled over Katoomba by CASA regulations. The DOI representatives claimed one of their goals in finding a new leaseholder for the airfield was to provide an upgraded airfield for approved commercial use, but for which these emergency uses can be safeguarded as a condition of the lease. We submit this should NOT be a prime motivation for issuing a new commercial lease for Katoomba airfield. The airfield should be *restricted* to emergency use, but funding for its redevelopment should be sought from

State Govt agencies such as NSW Rural Fire Service; National Parks and Wildlife Service, given the airfield is surrounded by BMNP; and possibly through Federal agencies as the park is also a designated World Heritage Area. As stated above, in our view one way of achieving this is by incorporating the Katoomba Airfield site into the adjacent BMNP. The National Park has long set unique management and planning challenges for the settled areas of the Blue Mountains Shire, a principal one being the susceptibility of the Shire to serious bushfire emergencies, as happened simultaneously in the Upper and Lower Blue Mountains in 2013. In addition, search and rescue operations in the surrounding National Park are not infrequent. Hence, emergency uses of Katoomba Airfield should remain *paramount* in its retention as an aerodrome.

2. There are 5 additional reasons why a lease for *commercial* development should not be considered. These are not presented in order of importance but *reinforce* one another to rule out commercial development. Use of the airfield by light fixed-wing aircraft or helicopters for commercial flights is unlikely to produce significant additional expenditure by tourists in the Upper Mountains despite the suggestions by FlyBlue to the DOI. We concur strongly that such spending by day-trippers, longer-stay visitors and passive recreationists like bushwalkers, are of particular economic significance for the towns in the Shire, especially in the Upper Blue Mountains. Day-trippers taking sight-seeing flights over the mountains are unlikely make significant *extra* expenditures at local businesses such as shops and cafes. Flights to adjacent wine, food and recreations areas, notably the NSW Central West from Orange to Mudgee, will make little or no contribution to the Blue Mountains' economy. Such flights have been suggested online by the owners of FlyBlue as one of their motivations for seeking to re-develop the airfield. It is far more likely that any significance commercial development of Katoomba airfield could simply add to the existing pressure by visitors on social and physical infrastructure of Upper Blue Mountains towns, notably: traffic congestion on the already stretched Great Western Highway at peak weekend times, and parking, both of private and commercial vehicles, particularly buses, which already cause significant safety & congestion problems in the area – all this without significant addition to the turnover of local businesses.
3. A highly significant negative impact of commercially-developing the Katoomba Airfield will be NOISE POLLUTION. This was freely acknowledged by the DOI representatives at the 25 June meeting and reinforced strongly by the licensed pilot present, especially in relation to helicopters. The flight path map provided by the DOI included helicopter traffic and fixed-wing aircraft. Helicopters are likely to be the more commonly employed in scenic flights across this unique World Heritage Area. Helicopters are undeniably noisy. The unique ridge and canyon topography of the Blue Mountains magnifies aircraft noise in general, and helicopter noise in particular, including in parts of townships nearest the Park. Noise pollution was the reason why scenic flights by helicopters using Katoomba Airfield were *banned* in the 1990s. Any new commercial development of the Airfield will have noise pollution impacts on residents of Blue Mountains townships, but also on passive recreational users of the World Heritage Park, especially along well-used iconic tracks and in

camping areas, for example in the nearby Grose Valley and its Grand Canyon. The DOI Fact sheet claims “Aircraft noise at Katoomba Airfield will be subject to controls in the lease”. Yet helicopter noise over wide areas of Blue Mountains settlements and within the park itself *cannot* be controlled through lease conditions, only by severely limiting the number of flights (or banning helicopter flights) except in emergency situations. It was noted at the 25 June meeting that proposed flight paths for both fixed-wing aircraft and helicopters go north from the airfield, *directly over the Grand Canyon*, one of the most visited areas in the Grose Valley part of the World Heritage area. Further, the licensed pilot in attendance confirmed helicopters are subject to flying-height restrictions but are *not constrained* legally to adhere to published flight paths, for example, for scenic flights. Finally, residents of the unique mountains settlements inevitably associate helicopter noise with emergency situations, notably bushfire fighting, search and rescue operations, and regular hospital flights. Residents *willingly* put up with the noise resulting from emergency situations but this is unlikely to be the case for tourism-related traffic over mountain villages.

4. Increasing use of the airspace over BMNP, and the settled areas it surrounds, will have additional *environmental impacts*, reducing the amenity of residents and passive recreationists alike. These impacts will reduce environmental values which are an intrinsic reason for the World Heritage status of BMNP. This status carries with it international responsibility for **conservation of flora, fauna, and ecosystem diversity**, to which the Australian Government is a signatory. One important illustration is bird migration patterns through and across the Blue Mountains. The migrations of yellow-faced honeyeaters, for example, are annually observed by scientists and local members of national organisations such as Birds Australia. Such migrations will be significantly disturbed by additional aircraft noise over the mountains. The planned flight paths appear to coincide exactly with significant bird migration paths, and would have an adverse effect on these migrations. There has been public consternation recently about scientific findings that Australia has recorded the highest rate of species extinction of its fauna for any developed country, much of which is related directly to habitat disturbance. Allowing additional significant disturbance of protected habitats provided by our iconic national parks simply adds insult to injury. Taken together with inevitable noise pollution (see point 3), the environmental impacts of commercial use of Katoomba Airfield will cause significant amenity loss and diminish unique environmental values in the World Heritage area. As emphasised above, diminishing environmental amenity will have a measurable negative impact on a wide range of local businesses including guest houses, cafes and shops. Any small contribution to those businesses made through introduction of commercial aerial activities are likely to be offset by these negative impacts.
5. Katoomba Airfield is close to Blue Mountains water supply structures, especially the Cascade Creek dams which are a *short distance* from the airfield. This is another reason why use of the airfield should be restricted to the all-important emergency uses. Commercial use of this airfield will inevitably add to toxic run-off which will find its way into Cascade Creek and the water catchment.

6. The pilot attending the public ‘drop-in’ consultation meeting on 25 June informed DOI officials and members of the community of his view, derived from lengthy practical experience of the airfield – his father was its founder in the 1960s – that Katoomba Airfield is a difficult place for both landing and take-off on a large number of days each year because of topographic factors and local wind conditions. Hence, the airfield remains primarily suitable for its emergency roles, *not* for commercial enterprises associated with tourism. There has already been a tragic accident adjacent to the site, as is well known.

This is not simply a NIMBY response from two residents of Wentworth Falls. As author Nikky Gemmel reminds us, preservation of such unique natural areas as the BMNP “... calms the mind, alleviates stress and generally increases well-being”. This applies to the large number of short-stay visitors from Sydney metropolitan area as well as longer-stay passive recreationists from all over Australia and overseas. They are attracted *in large numbers* to the mountains by the peace, beauty and tranquillity.

Finally, this submission concludes with a comment on processes which have been adopted by DOI in considering the application for a commercial lease. While we are grateful to the DOI officials who tried their best to organise a useful public consultation at Hotel Blue, Katoomba on 25 June in a difficult (inadequate) venue, only a small amount of information was actually provided to the public at the meeting. Very little information was given about the successful applicants to the EOI process (apart from their names), nor their new legal entity FlyBlue Management P/L. Further, there was no explanation of *why* these people were chosen as the “successful applicant” and granted a licence to manage the Airfield, which has already involved some works at the site, and develop a business plan for its re-development. The DOI officials admitted they had carried out no Risk Assessment of the concept of commercial development inherent in a “business plan”, as part of what the licensee has flagged will be an application for a 50-year lease.

The senior DOI official present at the public meeting could not even commit the Department to **requiring** a *thorough* Environmental and Social Impact Assessment *before* the decision is made to grant a lease. This, it seems, would depend on the scale of the proposed development and perhaps other factors. If this is indeed the case, this process seems *deeply flawed* for a proposal with so many unanswered – including as yet unanswerable – questions about environmental and social impacts of commercial use of the airfield, including by helicopters, over and above its emergency roles. This is ASTONISHING given that the site is surrounded by a World Heritage Area which is one of Australia’s best-known and most-visited National Parks.

Yours sincerely,

[Redacted signature block]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

24 July 2019

To whom it may concern:

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

I oppose the leasing of Katoomba Airfield to a private charter company. My wife, [REDACTED] has put my concerns in detail in her submission, sent from email [REDACTED] so I will not copy & paste here to save you reading time. However, I feel it important to write an objection of my own as we'll be impacted greatly by this proposal. So, in brief:

- Lack of information in order to object to the proposal
- No formal development application or like to see the extent of this proposal, no detail of hours of operation, flights per day, proposed infrastructure or wear and tear on public roads
- Major impacts to community from aircraft noise and movements, with the lesser being self-regulating
- False and misleading information in relation to flight paths not going over residential areas
- Our home will be negatively impacted by helicopter flights to and from runway 06, causing loss of amenity to humans/animals and decrease in value of our property
- Noise from flights over our home due to CASA height allowances are unacceptable
- Frequency of flights will create difficulties in managing stock animals
- Personal experience with helicopters spoiling remote national park experiences and the loss this cost tourism
- Negative impacts to the environment from a high polluting industry with no community benefit only personal gain to Fly Blue
- Potential fire hazard
- Why is this a proposal? Crown Land is ignoring its own departments advice from 2000 & 2008 which concluded that Katoomba Airfield should not be privately leased but be incorporated into the Blue Mountains National Park and used for emergency and bushfire air operations only
- Community Engagement Strategy not inclusive of all Blue Mountains residents who will be affected
- Crown Land has precedents where they manage airstrip and this should be the scenario at Katoomba Airfield
- World Heritage listing under threat and this proposal adds to the threat

This proposal should be rejected and the airstrip remain emergency use only.

Thank [REDACTED]

Dear Department of Primary Industries,

I am writing to express my deepest concerns and disapproval of the proposed lease of the Katoomba Airfield located in Medlow Bath.

I am wearing a lot of different hats in this matter. Firstly, I am a near-future resident of [REDACTED] and the prospect of hearing helicopters take off and land very close to the property we only just recently bought, and we will build our dream home on, is devastating on a personal level. The constant noise, the unlimited flights from dusk to dawn, the psychological and mental health impacts from the noise on us and especially our young daughter (please see Schmidt & Klokke, 2014 and Bonzaft et al, 1998 for reference and more information)¹. These are scary perspectives.

Being a resident of [REDACTED], however, sparks another deep concern and that is about what is happening on the ground. What about access to the airfield, increasing traffic, widening of the road, transportation of fuel, storage of fuel as a bushfire hazard? We recently moved to the Blue Mountains with the main objective to get away from constant traffic, to present an environment of tranquility, nature and free exploration to our daughter. The proposed lease is a major concern in whether the Blue Mountains any longer can be the place that offers these possibilities. The perspectives and uncertainties that surround all these questions are deeply worrying on a personal level.

However, considering that this affects all residents of North-Katoomba, Blackheath and Medlow Bath as well as the surrounding suburbs (so roundabout at least 13,000 people) in the same way, this quickly moves from a person concern to a resident's concern, a community concern, a health concern.

My second hat is the one of a nature lover, bushwalker and rock climber. The Blue Mountains are and always have been a get-away from the city, a space of peace and tranquility, a place to reset your overworked mind, an environment that lets you be able to really breathe again, a possibility of solitude, an area of pure nature to experiencing the great outdoors.

There is a multitude of peer-reviewed literature out there on the impact of noise and more specifically aircraft and helicopter noise, on the experience of tourists, visitors, outdoor-lovers in National Parks. The impacts range from dissatisfaction and annoyance, an experience of "decreased naturalness" to **avoidance** (please see Mace et al., 2013, Mace et al, 2004 and Bonzaft, 2002 for more information²). Komanoff and Shaw (2000)³ translated

¹ Schmidt, J.H. and Klokke, M., 2014. Health effects related to wind turbine noise exposure: a systematic review. PloS one, 9(12), p.e114183.

Bonzaft, A.L., Dee Ahern, K., McGinn, R., O'Connor, J. and Savino, B., 1998. Aircraft noise: A potential health hazard. Environment and Behavior, 30(1), pp.101-113

² Mace, B.L., Corser, G.C., Zitting, L. and Denison, J., 2013. Effects of overflights on the national park experience. Journal of Environmental Psychology, 35, pp.30-39.

Mace, B.L., Bell, P.A. and Loomis, R.J., 2004. Visibility and natural quiet in national parks and wilderness areas: Psychological considerations. Environment and Behavior, 36(1), pp.5-31.

noise of jet skies in the United States into dollars of “disamenity” and concluded that beachgoers lose about 900 million USD annually because of the associated noise. They mentioned that this did not include the “distress and suffering” experienced by visitors and the cost of health and welfare as they did not get the rest they needed and expected.

Translating the literature into the current situation: What does this mean for visitors and moreover what does this mean for the community and businesses of the Blue Mountains???

It means that we are running the risk of losing our status. Possibly the status of World Heritage Area, but even if not, we are risking the status of being a place to relax, to refresh your mind, to have a break, to be in nature with only the sounds of nature surrounding you. Further, “more than 4 million people visit the Blue Mountains annually with tourism generating over \$400m per year” (BMEE, 2019)⁴. Going ahead with the lease means that the Department is taking the informed decision to destroy the basis of income that the area relies on.

My third hat today is the one of an environmental scientist. The concerns surrounding this lease go far beyond the effects on humans. The proposed lease will extensively disturb native flora and fauna. Feeding, breeding and migration patterns of birds will be affected. Run-off and erosion from the development will affect the surrounding national park. Noise pollution and air pollution will have an impact that cannot be foreseen but it surely will be devastating.

I spoke to a resident in Katoomba who told me that there was a helicopter near her property, and it was all nice and good because it was only a one-off event, but the birds in her garden and surrounding areas stayed away for 10 days after this event. Putting this into perspective, what does this mean on the scale with unlimited flight quantity and frequency from dusk to dawn that is being proposed? It means that, like the tourists, birds and insects will stay away. The National Park and surrounding agricultural areas however rely on birds and insects for pollination purposes.

One last concern I want to mention (only because I could go on forever) is the carbon footprint of a helicopter company. A report prepared for the Dutch government in 2006 investigated how helicopters compare to other modes of transport such as cars, trains and aircrafts in terms of CO₂ and NO_x emissions. They concluded that helicopter emissions exceeded those of any other mode of transport, including aircrafts, while only being occupied by a small group of people at a time⁵. Point being, this is an unnecessary contribution to global climate change that will NOT be offset by planting one tree per flight as proposed by the licensees.

Bronzaft, A.L., 2002. Noise pollution: A hazard to physical and mental well-being. Handbook of environmental psychology, pp.499-510

³ Komanoff, C. and Shaw, H., 2000. Drowning in noise, noise costs of jet skis in America. *A report for the Noise Pollution Clearinghouse*.

⁴ BMEE, 2019. Blue Mountains Economic Enterprise. Economic Profile. Accessible at <https://www.economyprofile.com.au/bluemountains>.

⁵ Den Boer, 2006. Emissies van helikopters vergeleken met andere vervoerswijzen. Vanuit het perspectief van de zakenreiziger. Oplossingen voor milieu, economie en technologie. Delft, 2006.

Dear Department of Primary Industries, I urge you to not make an informed decision to destroy a World Heritage Area that is known for its nature, wildlife, rock climbing, walking and tranquility. With this submission I express my disapproval of going any further with this lease. The airfield is important for emergency services and we all recognize the need to maintain it to be used in an emergency. The Katoomba Airfield is surrounded by National Parks and that is where it belongs. With this submission I request the airfield to be given to National Parks and Wildlife and to make use of public funding that is available for maintenance purposes to ensure its ongoing suitability for emergency services.

Kind regards,

A solid black rectangular redaction box covering the signature area.

[REDACTED]
[REDACTED]
Email [REDACTED]

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

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

July 20, 2019

Dear Sir/Madam

REFERENCE: LX 602686
objection to proposed lease of Katoomba Airfield

I object to the proposed commercial lease of the Crown land at Medlow Bath known as Katoomba Airfield to allow commercial aviation operations.

My preferred option for the site would be incorporate the land into the National Park with additional funding provided to the National Parks and Wildlife Service to upgrade and maintain it for emergency use only.

1.0 Objection to Commercial Lease

I not only object to this proposal for a commercial lease to be granted for the Katoomba Airfield site, but to **any** commercial lease.

A commercial lease creates the potential and expectation of **frequent commercial aircraft activity** for the purpose of recreational/tourist flights by helicopters and light planes. Whilst we have been fortunate that previous lessees did not exploit this opportunity fully except during the 1992-95 period, the potential for this should be prevented in future.

Movements in and out of the airfield alone have the following listed impacts. Scenic flights over the National Park emanating from the airfield will multiply the impacts. It should be noted that low flying aircraft movements cannot be prohibited in the current regulatory framework.

1.1 Noise impacting Residents

Frequent aircraft activity from this airfield impacts heavily on me as a resident of North Katoomba. Because of the topography of this area, low flying aircraft do not have to be immediately above me for the noise to be disturbing. Whilst I am happy to cope with this noise if it is for a good reason like bushfires or emergency services, I do not believe residents should have to suffer this noise for the 'pleasure' of a privileged few.

1.2 Noise impacting Bushwalkers

I also object as a bushwalker and for all those bushwalkers who visit, who know nothing of this proposal. The noise will be extremely intrusive over the closest areas which are Katoomba Creek, Minnehaha Falls and Grand Canyon

1.3 Environmental Impacts

I also have environmental concerns about an increase in aircraft movements to and from this site, which also implies flying over at least part of the National Park :

- The **climate change** impacts of unnecessary flights are best addressed by not having them – planting a tree that takes many years to mature is not effective mitigation just ‘greenwash!’
- The **impacts on fauna** of frequent low flying aircraft are well documented internationally; particularly on animals who use hearing for feeding, care of young and protection against predators. The airfield is on the path of the honeyeater migration over the upper mountains each April/May; interruption to this internationally recognized phenomena is potentially significant. The bushland surrounding the airfield itself has woodlands and heathlands which sustain both resident and migrating birds.

2.0 Support for inclusion of land into National Park

I support the inclusion of Katoomba Airfield into the Blue Mountains National Park, to be managed as an emergency airfield. This would enable the Park to be managed well and avoid the adverse management implications of an inholding being used for non-compatible purposes.

I recognise that the use of the airfield provides a **benefit to the urban community** not just the National Park, so **funding** should be provided by Treasury for the rehabilitation and management of the airfield to enable NPWS to manage it adequately. The funding sources provided to support RFS should be made available, eg through the Bushfire Risk Mitigation and Resilience Program.

3.0 Contravention of Greater Blue Mountains World Heritage Area (GBMWA) Values and Strategy

3.1 Expansion of Inholding Use

The presence of inholdings within the GBMWA was one of the obstacles to the World Heritage status listing which had to be overcome by the Australian government making a number of commitments. This is now an opportunity to remove this inholding and hence the potential of future management difficulties and environmental impacts.

3.2 Inappropriate Tourism and Recreation

Inappropriate tourism and recreation is recognised as one of the 7 key threats to the GBMWA in the current Strategic Plan. It identifies the value of natural quiet for the visitor experience. In this section 7, a desired outcome is clearly stated as

“Recreational and tourist flights do not interfere with the natural quiet, biodiversity and GBMWA aesthetic values”

The Department’s current efforts to promote this commercial airfield within the WHA is in direct conflict with the management response accepted in the strategic plan; i.e.

“to seek the establishment of a Restricted Area under the Air Services Regulations to provide statutory restrictions on tourist flights over the GBMWA” (p34)

Not only will bushwalkers be impacted but also the large numbers of International and Australian visitors who gather at lookouts to appreciate and learn about the area. This should be compared to the relatively few in helicopters and light planes “enjoying” their experience.

3.3 Wilderness

The negative impacts on the wilderness values of the adjoining Grose Wilderness area from recreational flights include noise and visual disturbance. The topography of the landscape, with its deeply incised gorges and canyons, is such that helicopter noise carries for kilometres, detrimentally affecting visitor experience and appreciation of these wilderness values.

4.0 Objection to DOI Process

4.1 Pre-emptive Process

The issuing of a licence over the airfield in February 2018 pre-empted any possibility of considering community concerns and preferences on this public land. As the licence was the beginning of a continuous process for the issuing of a long term lease, it cannot be denied that the Department of Industry was well down the path of issuing a commercial lease, prior to seeking any community input. Whilst the process may be legal, there is clearly a probity issue here and the department has certainly not demonstrated 'best practice' with an open, transparent and democratic process.

I wish to lodge an objection to the inadequacy of this process undertaken under the banner of 'community engagement'. This tokenistic exercise, commenced 20 months **after** the course of action to issue a new lease had commenced; ie the calling for expressions of interest for a lease in September 2017.

If the department had intended to consider community concerns and ideas, it would have commenced a consultation about the question of the 'future of the airfield' well before September 2017.

I have been involved in many consultations and submissions over a 16 year period between 1992 and 2008 as both a resident of North Katoomba who was directly impacted by commercial helicopter flights, and also as a member of concerned community groups.

The findings of this consultation and extensive reports by the Crown Lands division of the various departments it has been moved to (over 1995- 2008) have been completely negated. This constitutes a huge waste in time and effort for both community members, as well as officers from local and state governments.

The CES process has been severely restricted to the question: "what do you think about this commercial lease and these people we have already chosen?."

The obstacles created by the Department to prevent discussion at the information sessions included: physical set up of chairs, lack of microphones, lack of display materials and resistance to participants efforts to reorganise the arrangement to enable all present to hear answers to questions, and allow for an open forum.

4.2 Blatant promotion of a single Private Commercial Lease Application

There were no alternative options presented for community consideration with accompanying information on impacts and benefits of each. This is essential for any consultation process to be genuine. I am fully aware of the difference between tokenism and a process with integrity, as I have conducted a number of consultations for government agencies as a trained [REDACTED].

Instead, the website and information sessions were a blatant 'promotion' for one very specific option – a commercial lease for 1 selected private business. The options

considered by the more transparent 'Land Assessment 'process of 1999-2000 were not even presented.

Prior to the scheduled information sessions, I was one of many who asked that all future land use/management/tenure options be open for consideration. However this was rejected, but instead received emails with information which did not accurately represent the positions of NPWS and Blue Mountains City Council.

I received an email from Mark Maloney of DOI, as did others, that implied that Council and NPWS were no longer in favour of the transfer of this land to the surrounding National Park. It stated that "neither agency expressed its opposition to the planned EOI campaign. Nor has either raised any objection to the outcome". I have discovered that neither of these agencies were asked to comment, nor would it have been appropriate for them to make unsolicited comments. A person with less experience would not have been able to detect the difference between the implication and the facts.

4.3 Decision should be a Whole of Government Approach

It is not appropriate that the decision about the future of this small parcel of Crown Land be decided solely by the Crown lands section of the NSW government. It is a far broader issue and needs to be considered in the wider context of the World Heritage Area. Tourism considerations are also relevant.

REPORT ON COMMUNITY ENGAGEMENT STRATEGY SUBMISSIONS

I request that the report on the community submissions and the Department's recommendations be made public prior to the Minister making a final decision.

Regards



KATOOMBA AIRFIELD (Reference LX 602686)

Community Member Submission 21 July 2019

Re: The FlyBlue Crown Land Lease Proposal.

Comments

1.

Volunteering your time for consultations.

To be involved in community consultation takes days and days, if not weeks of unpaid time. Hundreds, if not thousands, of people have written submissions and attended meetings on the above topic and now we must resubmit again. The current Licence holders are not the only people who have put in time and money into this subject.

2.

The Independent Panel information.

I don't know where the collated information of our first submissions in 2018 was summarised and presented as community issues to the community prior to the Independent Panel's decision to convert the use of Crown Land from Emergency or private use to a temporary licence for a commercial proposition. I don't know who was on the "Independent Panel" and whether it was biased by commercial interests or truly proportionately representative of all stakeholders.

Please refer me to where the Independent Panel's located for the public to view.

3.

FlyBlue's short term licence contractual awareness and the Prior Community Consultation and Community Consultation Process by DOI.

The current licence holder "FlyBlue" (FB) has been aware for the past few years that, once consulted, the large numbers of community stakeholders involved may not want the FB proposal as a long term lease (How long is long term, two generations... 50 years, 10 years? Too many) in a confined area 1 km from Katoomba and Blackheath residents and 2 km from Medlow Bath residents and surrounded by a World Heritage Area and Blue Mountains National Park.

The sensitive location of the Katoomba (Medlow Bath) Airfield is probably why it was never considered as anything more permanent than a dirt emergency airstrip for use by the community and latterly privately up kept by a single private user.

p.2

FB was aware of the risk that their proposal may not gain approval when they became involved in the EOI process. I hope they weren't lead to believe by DOI (Department of Industry) that their lease proposal was likely to be approved, even in a modified version, regardless of what the community and other stakeholder's problems with proposal were.

The Department of Planning, Industry and Environment's Department of Industry (DOI) – Crown Land has a Community Engagement Strategy that requires community input **before decisions are made.**

On the point of not making decisions prior to all stakeholders being consulted, why was the DOI representative at the "information", sessions in Katoomba last month, already suggesting a compromise between the flightpath height of FB's helicopters over the Grose Valley? The public was only 'informed' of the proposed flight path over the Grose Valley and surrounding wilderness area at the Drop in Meetings and had no chance prior to consider flightpaths at all. Isn't it pre-emptive of DOI to suggest modifications to this proposal prior to completing and reporting on community consultation issues raised? Was the DOI already looking at how to modify the proposal, in an attempt to get FB's proposal approved and "off the ground" regardless of community issues because they feel under leverage from FB?

Scott, DOI, also advised a room full of perhaps 90 people against the FB proposal, 2 for it and one undecided, that many people were in favour of the proposal. Who are these people? Are they mostly directly going to benefit financially from FB's proposal? How many are there? I guess if that's the case the support for the proposal will be duly reflected by the number of supporter's submissions received by DOI by August 4 2019. These comments sounded like DOI was already biased in favour of the FB proposal before the community consultation process truly began.

The community only knew, via one unreproducible map put on the wall for the day, where the flightpaths were to be on the "Information Session" drop in day. **Why wasn't the proposed flightpaths in the Grose and anywhere else available on the DOI website and on the Fact sheets prior to the community consultation process?** DOI and FB had the advantage of knowing the flightpath proposal before the Drop in meetings. Where is this information available for the community to consider when making their submissions prior to August 4? It appears from the FB webpage that the flightpath proposal has been altered since the meetings but are still over Flat Top, the Grose Valley, Fortress Ridge etc.

How is this genuine and effective community consultation when vital information is withheld and not allowed to be considered prior to the "community consultation"? The FB proposal effects the Blue Mountains World Heritage Wilderness Area, pretty well our

communities core business drawcard. Perhaps some Sydneysiders only ever go to visit the Three Sisters and think the Grose Valley not in use and ripe for exploitation?

The whole “information drop in process” looked like an attempt by DOI to control the communities input, not to genuinely consult the broader community for their views. It looked like a box ticking exercise for “Do Community Consultation: Done (ignored.....) tick.”

Was the “Drop In” set up so DOI representatives could speak to each community member separately “informing them” of the FB proposal so the community could not see how broadly its issues were felt and therefore be given the false impression by DOI that there were not many people against the proposal?

The Community Drop In’s were named correctly as **“Information sessions”** because, indeed, it seemed like an attempt by DOI to ***control a narrative already prepared and favoured by DOI*** to support FB’s lease proposal. If it was a **“Community Consultation Session”** it would have been set up to listen to and gather information from the community, not give it to them. Of course the community has feelings about our hometown management. It was very patronising to think that the community would favour a commercial industry view of a dirt Airfield “commercial upgrade” in our National Parks and Wilderness Area. I’m surprised DOI was so surprised! Was this a democratic process or just the feigning of one? It did not gain my confidence as a community member that the majority of stakeholders concerns were going to be of equal weight and value and genuinely considered prior to a fair decision being made. I hope I am incorrect about this or this whole submission as an atrocious waste of my precious time and the many other concerned submitters.

I also hope the few people involved in FB likely to make money and jobs for generations out of Crown Land that belongs to the public are not worth more or equal value to hundreds if not thousands of people in the community, the State, Nationally and Internationally. If this were the case then the process would be corrupt and a sham. The majority of people in the room at the community Drop in at Katoomba the day I attended were really annoyed, insulted and upset by how the “Community Consultation Process” has been conducted, primarily to their disadvantage. The community members weren’t born yesterday and have a lot of skills and experience of good planning practice between them.

N.B. You can drop your helicopter lower into the Grose Valley as its altitude level is lower than the escarpment and this increases the reverberating noise in the relatively narrow valleys. Pilots already drop to 500’ above the valley floor in the Jamison Valley, which they are permitted to do in this Class G aircraft area.

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This is a unique area sound wise and biodiversity wise and the Australian Air Services Class G classification should be revisited.

4.

The proposed flight path and FB's proposal to address local aircraft noise by "Flying Neighbourly."

There is no enforceable Fly Neighbourly policy in NSW so most pilots already do not Fly Neighbourly through this area. In fact in the last five years they have been rather bullish about pushing what they can legally do without any community grounds for complaint i.e. fly to 500' above the residential and bushland areas any time of day or night. This has lead, naturally, to distrust of the industry.

Fly Neighbourly is *Industry self-regulated* which in practice means it is basically not practiced, and it is extremely in favour of the Aviation Industry. A limit of flying 500' over your head i.e. just over 3 Olympic length swimming pools, is not making any difference to noise levels, especially between Wentworth Falls and Katoomba, over the valleys/escarpments and villages and especially by fixed wing aircraft pilots from Bankston Airport. Many already push their Class G entitlements to the limit e.g. A regional Flying club's loop the loops over Leura Golf Coast like it's the wild west.

Who's going to ensure FB Fly Neighbourly policy meets what the COMMUNITY WANT FROM A FLY NEIGHBOURLY POLICY AND NOT ONLY INDUSTRY REPRESENTATIVES and what new hassles are the locals going to have trying to maintain the peace for all and try and get the accurate evidence without walking around with binoculars and video cameras all the time?

I don't think it is possible to Fly Neighbourly in such a confined area and over the top of people bushwalking etc. Commercial Airfields and National Park/Wilderness Areas are two completely different activities at polar ends of the recreational spectrum and incompatible. You can easily hear a helicopter/fixed wing aircraft from miles away.

Any helicopter or fixed wing aircraft can fly where ever they like to 500' in the valleys now. **Pilots now also want a landing strip in a prime, confined and much visited Wilderness Area surrounded by habitation and quiet, appropriate tourist activities!**

The FB proposal sets up an unnecessary conflict of recreational space usage.

Aircraft noise waking you up from 7.00 a.m. and buzzing around at 7pm when the "high yield set" want the sunrise and sunset views to their noisy selves isn't what the vast majority of tourists come to the Blue Mountains to experience! It's what they come up to

p.5

the mountains to get away from. They want to sleep in sometimes!!!!Watch the peaceful sunset themselves!!!!!!They are not impacting on anyone else's enjoyment!!!!!!

I think the majority of the Public up here, who have already lost local ownership of the majority of high end accommodation facilities to international businesses, have had enough of loss of ownership, access and amenity to our communal heritage.g the HydroMajestic, Medlow Bath.

A few more points on aircraft height limit proposals should they come up:

You have to ascend and descend to an airfield 1 km from NORTH Katoomba residents,(not 5km as FB states. It's 5 km to the CENTRE of Katoomba) and major bushwalks to get to any height and so obviously this is an extremely noisy suggestion. **The whole of the Upper Grose Valley is where some of the most popular tourist destination of the Blue Mountains Wilderness Area are and it in effect they would be under an aircraft take-off and landing ramp!**

5.

Echoes and Reverberations.

Have you heard an Airbus go over the Jamison Valley or the Grose Valley (one of the "quiet ones" they have these days) at 15,000'? a Piper PA? **Being well above the valley and surrounding escarpments also causes incredible noise reverberation** that can be heard long distances away e.g. in South Leura when an Airbus goes over the northern Grose Valley.

The **noise impacts of the valleys are unique to the area** and aircraft frequency has already rapidly increased.

Who has studied the noise effects in the Jamison and Grose Valleys and Blue Mountains ridges of overhead aircraft?

Do you want to completely ruin the point of why the vast majority of people visit the Blue Mountains and trash "our brand"? Visitors want to hear the echoes of themselves coeeeing, the waterfalls and the birds, not the torturous noise of propellers and engines of helicopters or fixed wing aircraft in the valley or overhead!

6.

Unique Crown Land location

I consider this a unique small piece of Crown Land in that it is unusually situated in a National Park and Wilderness Area. This small parcel of Crown Land is situated in close

p.6

proximity to tens of thousands of residents and situated in one of the greatest tourist visitor areas in NSW (**4 million visitors per annum *people on the ground***). Its use historically has been acceptable to the community as an emergency airfield and very low use dirt airfield as it has had a low environmental impact on our National Park/Wilderness Area, visiting tourists and all the residents within a couple of kilometres or more of the airfield i.e. (Wentworth Falls, Leura, Katoomba, Medlow Bath and Blackheath for those who are not familiar with the area).

This Crown Land, Public Land, has unique circumstances. FB's proposal ramps up this **existing low impact airfield to an airfield of high local impact which is an enormous change of the existing use in a very sensitive area for a comparative few tourists.**

7.

Community use and Enjoyment and Social use.

As a member of the community I wish to USE and ENJOY the Katoomba Airstrip Land and surrounding Wilderness as a quiet and rarely used Emergency Airfield managed by the appropriate Emergency Services Authority or have it incorporated into the Blue Mountains Wilderness that it so obviously sits in. I also want to be able to enjoy quietly, as always, the many historic (going back 100 years of European culture and longer for indigenous culture) bushwalks around the couple of kilometres around the existing dirt airstrip.

The use of the airfield ended up over time becoming an unsuitable location for an airfield, as is the navigational aid in Valley Road, Katoomba. How often was Katoomba airfield used when originally purposed in the 1960's? What was the population and number of tourists p.a. in the 1960's? There are now many more residents and visitors.

The public needs to be heard in relation to what they wish for this land as it belongs to the Crown for benefit and use by the general public. To flog off a public asset to a large noisy Commercial venture providing an earning capacity for one small group of people for generations is not in the spirit of the government's role to protect Crown Land on our behalf. The offsets proposed to compensate the public by FB are not satisfactory re our concerns of noise disturbance and pollution in Wilderness Area. The two activities are incompatible and cannot be met by the FB lease proposal. You can't make helicopters quieter or valleys stop echoing or move the residents.

The use and enjoyment of the airfield and all the communities multiple nature based activities around it is proposed to be exchanged for the use and enjoyment of a "high yield" i.e. wealthy privileged, few. Now that's some elitist thinking.

I'm not sure BMCC wanted "HIGH IMPACT" tourism when they said they were after "HIGH YIELD" tourism.

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I think the general idea was that we have so many tourists it is affecting the quality of life of the residents, the functioning of the community and our ability to fund via our rates the required infrastructure. The very high numbers of tourists require roads, parking, toilets, services, paths, signage and park maintenance. Businesses might want more tourists to make money out of but it's the residents who pay their rates for the services these people require.

We are trying to keep the place quiet and attractive to tourists and now FB proposes to up the anti and threaten other local businesses by making one of the last quieter places noisier. **FB's proposal is not adding value for the average tourist.**

SOCIALLY the immediate surrounding area is currently used by low impact tourism activities where each activity has little impact on the other and various types of recreational pursuits e.g. bushwalking, cycling, hang gliding, rock climbing, canyoning, camping, Fun Runs to raise money for charity, all coexist in harmony with little need for supervision and have low impact on the environment and the residents i.e. ideal for our type ("brand") of tourist area.

8.

Comments on Fly Blue's Proposal re their "Spoke and Hub" model.

KATOOMBA ALREADY is very busy TRANSPORT HUB (Aircraft, Railway& Highway)

WE DON'T NEED MORE TRANSPORT NOISE FROM AIRCRAFT IN THE UPPER BLUE MOUNTAINS, WE NEED LESS.

Consider the overall context of Fly Blue's proposal.

(As I write in this LGA an emergency helicopter is flying over my house. One went over around 8 a.m. this morning and another at 10.00 p.m. a few nights ago.)

We don't need anymore "spoke and hub" forms of transportation in the Upper Blue Mountains. We already are a transport spoke and hub.

There already is an emergency helipad at Blue Mountains District Anzac Memorial (Katoomba) Hospital for those who require evacuation due to accidents on the Great Western Highway, Bushfire related activities, Emergency Rescue Services required by people who have accidents using the National Park/Wilderness Area and patients who need transferring.

(The pilot of NRL flying a very noisy Piper PA-28-181 right now is having a great time, for the second time this morning, flying directly over the Valley of the Waters and Katoomba Airfield. The Piper PA I believe is a fixed wing aircraft.)

We have a four lane western/eastern heavy transport vehicle highway through the centre of our residential villages and townships as the main arterial road to western NSW from the Sydney megalopolis. This includes all the villages Upper Blue Mountains along with all the 4 million visitors p.a. mostly coming by vehicles including buses and minibuses.

We have the only railway corridor west/east including screeching brakes from coal trains over the Blue Mountains throughout the day and night.

Improving commuter rail services that haven't improved in the 35 years I've been here would be a great transport solution for residents and visitors. Tourists coming by train would spend their money in the local village businesses and don't need parking.

I meet friends at a halfway point in northern Sydney who come down the F3, they don't pay any tolls and the people in the west pay tolls for the M4, M2 M7 etc. That's not "egalitarian" NSW. **So MORE TRAINS PLEASE, NOT MORE PLANES!**

We need unique attractions to attract tourists. We have them and we want to look after them. Sydney should recognise the people who care are great custodians of the National Park for all.

As Fly Blue has said thousands of aircraft fly through the Wilderness Area each year. That's why we don't want any more! Thanks for pointing out all the Sydney based helicopter tours...no wonder we feel inundated.

Western Sydney Airport flight paths aren't even in the mix yet!

The location of the Katoomba beacon/ Navigation Aid in Valley Road Katoomba, installed two generations ago, is now inappropriate. Residents, tourists and aircraft numbers have vastly increased since the 1950's and combined with the recent overuse of GPS, means pilots fly directly to the aid. This increases the density of aircraft flying a narrow route over the centre of our primary tourist attractions from Wentworth Falls escarpment to west Katoomba.

There goes LCW from Bathurst to Bankstown in a Cessna 400 Corvallis TT at just over 5,000' (2,000 feet, not metres over us) over the Carrington Hotel, Leura Cascades and Wentworth Falls Lookout.

More aircraft in the area would cause damage to our reputation ("brand") as a scenic, peaceful "come up for the air" (not "come up for the aircraft") area attractive to those on holiday and/or seeking a break from hectic city life. *Our current visitor numbers of 4 million p.a. is a great indication that BMCC has been managing our local tourist attractions well.*

(There goes ZRS in a Beech 76 Duchess from Dubbo weaving east from Hartley to Govetts Leap Lookout, Blackheath, south down Megalong Valley past the Three Sisters, east over to Wentworth Falls Lookout and now descended to 5,067 ' and below the radar over Lake Burragorang.

Simultaneously an Etihad Boeing 777-3FX(ER) has just flown NW from Sydney to the Katoomba Navigation aid then turning SW to Abu Dhabi? Directly after Tigerair Australia is flying an Airbus A320-232 between Mt. Solitary and the Three Sisters but much closer to the Three Sisters . Meanwhile the Uni of NSW Diamond DA40,NPN, an incredibly noisy aircraft is on a different route east over Katoomba airfield and Wentworth Falls Lake back to Bankstown. I can't type fast enough. REX Regional's SAAB 340 B has flown over Wentworth Falls Lookout NW to Bathurst.

The noise goes on all day as aircraft fly directly over the Jamison Valley (that the Three Sisters face), iconic Wentworth Falls(WF) Lookout, Charles Darwin Walk at WF, The Conservation Hut at WF, The Valley of the Waters (WF), The Fairmont Resort, Everglades Historic House, Leura cascades, Leuralla Toy museum, the southern escarpment walks and lookouts, Leura Mall, The Three Sisters, The Carrington Hotel and the centre of Leura and Katoomba via the Katoomba navigation aid. As I write it is a quiet Monday in winter. Come Friday the great vehicle and aircraft exodus from Sydney and Bankstown Airports really revs up. Then come the private weekend pilots touring and the Aircraft Schools, Aircraft recreational clubs, people flying to and from their country properties, all mainly from Bankstown airport and continually disturbing the peace.

Air Services Australia doesn't monitor air craft traffic paths outside the Sydney Basin so data from all directions to the Katoomba Navigational aid is not kept. It's as if you are not in Sydney you don't exist. How can you plan and manage an environment you are not keeping basic data of aircraft activity in and plan for future flight paths?

There goes BYG from SW of Dubbo to Bankstown in a Piper PA-31-350 right through Katoomba, Leura and over Wentworth Falls Lookout.

The following also fly through several times a day: International Boeings and Airbuses, Interstate aircraft (Qantas, Jetstar, Virgin, Tiger Air), Rex Regional to western NSW from Sydney.

Many, many helicopters and fixed wing aircraft fly from Bankstown to and fro via the Katoomba navigational aid. It's as if pilots can't navigate any more or is it an easy or fuel cheap path to fly? Pilots come from Camden, Bathurst, Merimbular, Port Macquarie, Dubbo, Cobar etc. via Katoomba navigational aid. Richmond RAAF does a run up to the Katoomba Navigational aid numerous times a week in their booming Hercules.

p.10

Why the navigational aid in use needs to remain in Central Katoomba is questionable. To add a commercial airfield 5 km away is way too much impact for a small area.

JKE ET Aviation is just roaring overhead from Bankstown to Melbourne, apparently, yep, they are turning SW from the navigation aid in Katoomba at 5,833' in a Cessna R182 Skylane RG) Here comes another Rex Regional SAAB to Parkes.

We are a transport hub already and our “tourism products” are already under enormous pressure. We don’t want to “down trade” these communal heritage natural assets so a few people get rich now. Some of us think beyond the benefits of ourselves to the benefit of everyone, people we don’t know, haven’t met or aren’t even born yet because we care about the environment we have received so we too can pass it on. We take the LONG VIEW.

We make no financial gain, get no great remuneration package. We do things for free e.g. volunteer to run historic houses, garden shows, bushcare etc. so the community as a whole benefits.

NSW needs some **genuinely sustainable** ways to make money. Not just “sustainability spin”

A spoke and hub model that is basically a fly in fly out from helipad to helipad and only benefits the businesses that are flown into doesn’t benefit us all at all.

9.

BY THE WAY WHAT’S THE LONGER TERM USE OF THE FIXED WING AIR CAPACITY OF THE AIRFIELD GOING TO BE?

This looks like Stage 1 with the subsequent stages hidden from the public. WHAT’S the LONGER TERM PLAN ?

WHAT “ADD ON ACTIVITIES” are you considering at Katoomba Airfield or will that be in “commercial confidence”? If so, it is not a transparent process and it is undemocratic. I imagine the majority would like to know now. Please run another “information session”.

10.

FLYBLUE CLAIM THEY WILL OPEN UP THE SITE AND AREA FOR BUSHWALKING AND OTHER COMMUNITY ACTIVITIES.

I find this claim ridiculous. Helicopters flying in the Grose Valley would be to the obvious denigration of the walkers on the incredibly beautiful established bushwalks along the escarpment and via waterfalls and lookouts around and in the Grose Valley.

Who in their right mind comes to an International Wilderness Area, a city within a National Park and wants to go, of all the amazing views and walks on offer within a few kilometres, to bushwalk at an airstrip/port where helicopters (the noisiest vehicle on earth?) and “fixed wing” aircraft are taking off and landing over the bushland and causing such noise you can’t hear each other talk and you have to get away from them? (Other than Darryl Kerrigan from “The Castle”, but that was “irony”).

We have well established bushwalks and community activities and if we want more we wouldn’t be asking for them at an active airstrip.

The claim that this proposal adds value to the existing activities in the area is unsubstantiated and in fact the opposite is true. It doesn’t add to our existing bushwalking etc. experience, it denigrates it.

How is a helicopter run landing at Megalong Valley Tea rooms, having flown west close to residents, and the National Park to land in the quiet rural setting of the Megalong Valley repeatedly going to positively affect the existing patrons of Megalong Valley Tea Rooms, let alone the people who have gone to ride horses and stay in peaceful cabins and have other eco/agricultural businesses?

I wonder if at least half the staff considering this proposal have ever actually bushwalked around or in the Grose Valley. If they had the enormity of FB’s proposal would be obvious.

11.

Bushwalking, Lookouts and existing long established community activities in the Grose Valley.

The bushwalks from Leura along the Mt Hay road along the ridges are fantastic.

People cycle and walk out to these unique landscape features all the time. They walk up to the top of Flat Top, 4 km east of the airstrip, which is proposed to have the landing path right over it! At what altitude will these aircraft be at as they descend to Katoomba airstrip over the heads of the walkers? People walk from here past the Pinnacles out to Fortress Ridge and an amazing view of the Grose Valley. They walk up to Mt Hay and out to Lockleys Pylon again looking into the Grose Valley.

On the opposite side of the Grose Valley is the walk out to Mt Banks from the Bells line of road.

People walk from north Katoomba to Minihaha Falls on Katoomba Creek. This waterfall is 1 kilometre south from the airfield.

p.12

Many International and national travellers go to Evan's Lookout and walk the Grand Canyon and Neates Glen walk 1 kilometre from the airfield. They walk around the Grose valley escarpment from Evan's Lookout to Govett's Leap lookout. The lookouts are accessible if you are disabled. They walk from Govett's Leap to Pulpit Rock go up and down Rodriguez Pass into the Blue Gum Forest, the birthplace of the National Park and to Junction Rock on and out via Perry's Lookdown. These tracks have been walked for nearly 100 years.

Imagine coming half way around the globe to have a day or a few hours to be at these iconic places and then to have your day absolutely spoilt by helicopter noise reverberating in the Grose Valley.

What will the sightseers' hear? Lyre bird calls? Waterfalls? Is helicopter noise what they came here to experience? I strongly doubt it. I can't imagine anyone other than FB advertising that helicopters now fly over or in the Grose Valley as they are the only people to benefit.

People go out Hat Hill road and walk to Pulpit Rock and Anvil Rock on the edge of the Grose valley escarpment and look towards Sydney. Instead it is proposed that they will be deafened and have the tranquillity ruined by a helicopter. The Grose valley is narrow, in some spots 1 kilometre, mostly around 2 kilometres wide. The flightpath is proposed right in the middle of this confined area.

People walk or cycle out to Hanging Rock and Victoria Falls Lookout between Blackheath and Mt Victoria.

All these places are along the Grose Valley where FB is proposing a tourist high end monopoly of the whole experience!

A plane has just flown over our roof, under the flightpath to Katoomba, so low, as is common now it is not detected by Flightradar24. This type of low level flying at night or just above the mist in Katoomba so the aircraft can't be identified is increasing, presumably to avoid noise complaints being made.

Are you going to allow one business to sell this experience at the expense of the majority of tourists who do contribute largely to the local economy without interfering with the enjoyment of others??

Basically, other than Wentworth Falls and the Three Sisters already under a flightpath and in a class G zone FB wants the cream of the Grose valley experience taken from the public for themselves and the "high yielding" minority.

12.

Biodiversity Agreement.

p.13

I have no idea why the word “SUSTAINABLE” keeps coming up in FB’s proposal. “SUBSTANTIAL” would be more apt. I think the use of this term has been misappropriated to use for a persuasive sales pitch and spin to tick whatever boxes have to be ticked to get a proposal through.

Its proposal is “ADDITIONAL” to the current use of the air strip. It adds noise, fuel, traffic and infrastructure.

A few limited species of trees planted in one far away area with less than its original biodiversity and clean soil, air and water don’t offset the damage to somewhere that already has better biodiversity, water and soil. That is not good ecological management. Keep what you already have that is of high environmental value and conserve it as insurance for the future. That’s how the indigenous population managed to truly live sustainably in Australia for 60,000 years so it wasn’t polluted and overdeveloped before European settlement. I can’t see the current population’s land use lasting 100 years. There is little enough left and we haven’t fully felt the impacts of the degradation we have already caused to our environment.

There goes BYG back west over the same flightpath through Katoomba again.

Donate the Crown Land to the Wilderness area and it will regenerate itself from surrounding seed stock into better biodiversity than a few species of trees planted in an already degraded environment and the NPWS are the experts in this area.

The suggestion that FB’s proposal will support tourism and benefit the local community.

What evidence is there that this is likely to happen or can be substantiated? Whom, where, when and what’s the dollar value on that? How does it subtract from other activities and businesses?

I imagine the opposite will be true. House prices will drop, eco businesses and all the tourists on the ground will be adversely affected by excessive noise from very early in the morning and all day to dusk.

Armidale Fire and Safety sound like they are about to drop a bomb, someone else is travelling. NSL is flying a Cessna 182S Skylane at a very slow 128kts 1600 feet overhead and UNJ’s Diamond DA-40 Diamond Star has this afternoon done a slow loop over Wentworth Falls and Sublime Point (the new “back way”) We were woken by General Aviation Maintenance about 6.40 a.m. Wednesday and Airbuses boomed overhead after 10.00 p.m.

At 11.15 a.m. Friday a very low plane flew through the middle of Leura. It was under the radar heading west

p.14

More visitors are likely to be put off by the helicopter and fixed wing aircraft taking off, landing and circling around overhead than be keen to get on board.

High Yield Customers

That's a great term. Yielding what? Money? For whom? The only, people who are going to benefit for decades at the expense of the majority are FB and whoever they do business with.

There goes AirAsia X's flight to Kuala Lumpur just as the emergency helicopter goes over having done a loop up to the hospital and heading SE again.

SUMMARY

1.

I object to Fly Blue's Lease proposal. I object to its proposed location, conditions, duration, flightpaths, frequencies and disagree with the economic and environmental claims FB make.

The environmental offsets do not outweigh the environmental risks of fire and contamination and noise for the 82,000 residents and 4 million tourists p.a.

The enjoyment by people of "non aviation" zones will not continue with helicopters over the Grose Valley and all the escarpment and valley walks around the Grose Valley. The noise doesn't confine itself to the "aviation zone".

The rural attraction of Megalong valley will be spoilt for the majority of people.

A "hub and spoke" aircraft gateway to the west in the World Heritage Area is completely an inappropriate use of an area set aside for this purpose and I think is audacious to even dream it up.

If there was an accident at the airfield in the middle of the National Park the fire risk to the 82,000 Blue Mountains residents who have one way west and one way east to evacuate is far too high.

Flying aircraft do not confine themselves to the one site of Katoomba airfield. They fly low to land, take off and circulate above the Wilderness Area.

The claim FB make of net positive regeneration would be several times greater if the airfield was incorporated into the National Park.

The current number of Joy flights to the Blue Mountains should be reduced.

p.15

It is only FB's assessment and not BMCC's that FB's proposal meets with the BMCC's Destination Management Plan.

The idea that anyone would choose a bushwalk around an airfield compared to what's on offer a kilometre away in the Wilderness area is ridiculous.

2.

I object to any commercial activity on Crown Land within the Blue Mountains World Heritage Area and Blue Mountains National Park.

I object to the use of public Crown Land to a private business's profit at the expense of the public. I don't think this Crown Land should ever have been considered for commercial use by the DOI. It is in too sensitive a location and no one enterprise should have such a commercial advantage for so long in an area recognised as of value to the locals, our country and the world.

You obviously can't be 2,000' above the National Park at all times when you are taking off and landing from an airfield in the National Park. Flat Top and the Pinnacles are well known landscape features with walking tracks and FB wants to use them as a navigational aid!

You can provide an air safety ramp and ground zero during emergencies to an Emergency Airfield by paying contractors to maintain the airfield.

There are too many joy flights already circling above in the Upper Blue mountains let alone taking off and landing 1 km from residents in the wilderness area. This is not a World heritage paradise as per FB advertising for those on the ground when helicopters and low aircraft fly over without any negative problems experienced by the people in the aircraft.

The existing bushwalks enjoyed by generations of the public will be spoilt for the benefits of a few.

4.

I object to helicopters and fixed wing aircraft using Katoomba airfield situated in Blue Mountains National Park and Wilderness area in the future .

There are too many aircraft in our area already especially considering our main source of income relates to the environment. This is an inappropriate site for a commercial airfield. Existing businesses scenic flights from Sydney contribute nothing to our local economy, they fly over and return to Sydney.

p.16

5.

I support maintaining the Katoomba Airfield as an **Emergency Purpose airfield only** and employing the appropriate staff to maintain the airfield **or donate it to the Wilderness Area** to be managed by NPWS.

Perhaps the constant reduction in NPWS staff is due to commercial interests pushing their agenda with government at the expense of the community so they can gain access to the park for their own profiteering, commercial purposes. We could have done that already ourselves if we thought it was a good idea.

The majority put the community and future communities ahead of themselves. In fact if such selfless people had not established the National Park in the first place it wouldn't even be a community resource available for the avaricious private sector to target for their own benefit.

It's much healthier for people to go on a bushwalk than passively sit in an aircraft whilst make an enormous disturbance, contributing carbon to the atmosphere and ruining other people's enjoyment of nature. We have some vantage points and short paths with disability access but more could be done to add additional disabled access.

█

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To: Department of Industry – Crown Lands

Re: Proposed Commercial Lease for Katoomba Airfield LX602686

I am writing to you to object to the proposed granting of a commercial lease for Katoomba Airfield.

I have a background in Science [REDACTED] as well as studies in biology, medical science and conservation and land management.

I have lived in the upper Blue Mountains at [REDACTED] for almost twenty years.

I acknowledge that the airfield has been operating for over 50 years and has had a number of commercial leases in place over that period. However, the current application for a such a lease will present a significant increase in the scale of operations compared to those of the past. I am particularly concerned about impacts on the biodiversity of this particular part of the Greater Blue Mountains World Heritage Area.

From your review of the submissions being made to you at this time, the overwhelming opposition to the granting of a commercial lease expressed by locals at the community consultation sessions held in Katoomba and the opposition expressed by over 12000 NSW citizens in the petition presented in the NSW parliament on 1st August, I believe the following outcomes must result:

- 1. NO commercial lease should be granted for the airfield**
- 2. The airfield land be incorporated into in surrounding Blue Mountains National Park**
- 3. The airfield be maintained for emergency use only and managed by NPWS with appropriate funding being provided for its upkeep.**

I acknowledge the concerns of the proposed lease that I expect you will receive during this community consultation period. These will most likely be based around detrimental impacts on tourism and the local economy, the environmental impacts, the impacts upon the lifestyle and amenity enjoyed by the 15000-odd residents of the upper Blue Mountains and, undoubtedly, the lack of transparency, particularly from DoI, during this whole saga.

These are all very important and will, no doubt, be covered in many of the submissions you receive. I express my support for all of them here.

As a person with scientific background, though, I am particularly concerned with the impacts of the proposal on the biodiversity of the local environment particular to the upper Blue Mountains.

Biodiversity is defined as the variability among living organisms in a particular area from all sources including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part. Biodiversity can be assessed by Species Richness in a particular area and quantified by measurement of the Ecological Indicators.

The rich natural biodiversity of the Greater Blue Mountains Area was in fact one of the key reasons underpinning the UNESCO granting of World Heritage Status in 2000.

The Great Western Highway, and the towns along its path, represent a “ribbon development” through the Blue Mountains World Heritage National Park. It is here that protection needs to be vigilant particularly where developed areas adjoin the national park. Here, damage to biodiversity through aerial, water and weed pollution, clearing, destruction of native vegetation and wildlife habitat can occur.

To have a development such as that proposed for Katoomba Airfield **within** the boundaries of the national park poses a serious threat to the areas around it. This is particularly the case as it is in close proximity to a number of water catchment areas and several hanging swamps, which are habitats of the Blue Mountains Water Skink (*Eulamprus leuraensis*) and the Giant Dragonfly (*Petalura gigantean*) - both Endangered Species (<https://www.colongwilderness.org.au/areas-listed-world-heritage>)

The Lake Medlow, Greaves Creek and Cascade dam areas are classified as Schedule 1 Special Areas. They are patrolled by water authorities and only authorised personnel may enter them. These areas, consequently, are places where high levels of biodiversity have been maintained. The close proximity of the airfield may well compromise these areas. The airfield site are near these catchment areas and its expanded operations have the potential to compromise them. The threat to the local water supply from aviation fuel, the potential use of PFAS chemicals and fuel combustion products from aircraft (gaseous and solid particulates and nitrogen oxides) and the laying of tarmac and bitumen is also unacceptable as they will leach chemicals into the soil which will settle into the surrounding environment and eventually enter the natural food chain.

The airfield will bring additional motor traffic and tourists who will traverse the area on foot, most likely dumping of rubbish at the roadsides (regularly observed in the “popular” destinations in the Blue Mountains) but this is something which has not previously occurred on the road to the airfield in the time I have lived here. No doubt the threatened and endangered bird species, plants, microbats, reptiles, rare frogs, fungi and soil inhabitants, which are most sensitive to disturbance will be the first to move out or die ,thus affecting biodiversity.

The threatened Glossy Black Cockatoo (*Calyptorhynchus lathami*) frequents and nests in the local area. The area contains the migratory paths of other birds. Studies have shown the impact of helicopters on wildlife and they identify bird strikes, disruption to breeding and feeding areas as well as adverse impacts on movement and activity patterns.

The threatened Spotted Tailed Quoll (aka Tiger Quoll) (*Dasyurus maculatus*) and Microbats (Order – Microchiroptera) is also present in this area and will be affected by noise and traffic and the pollution generated by aircraft activity, particularly helicopters, which emit unburned hydrocarbons, nitrogen oxides and other particulate matter.

My studies in the sciences have made me acutely aware of these aspects of development and their effects on pristine natural areas.

I trust the time will be taken to consider this submission along with the many others that I expect that you will receive opposing the granting of a commercial lease.

I have no issue with my submission being published by DOI with my name and suburb being shown.

I do NOT wish my street address to be published.

In conclusion, I reiterate the key points of my submission – that NO commercial lease is granted and that the airfield is incorporated into the national park for use as an emergency airfield only under the control of NPWS. It will then be in the hands of a group which understands the environment and is proactive in terms of its appropriate management “for the benefit of the people of New South Wales” as set out in Crown Lands Act, 2016.

Mary CATER

[REDACTED]

Medlow Bath

NSW 2780

Minister Pavey

Minister for Crown Lands

Level 17, 52 Martin Place SYDNEY 2001

Dear Minister Pavey,

RE: PROPOSED LEASING OF CROWN LAND AT MEDLOW BATH OCCUPIED BY KATOOMBA AIRFIELD
(Reference Number **602686**)

Thankyou for the opportunity to make a submission regarding this very important matter for my community and for the World Heritage listed area within which the site is located.

I would like to make FOUR recommendations regarding the aforementioned land. The first two are that: (i) the land be incorporated into the Blue Mountains National Park, and (ii) the airfield be kept for emergency use only. The reasons for my recommendations include the following:

- This piece of land is within a World Heritage Area. It is situated within both a highly precious and sensitive area of natural bushland that drains into the Grose Wilderness. It cannot be overstated that we need to protect and steward this extremely valuable public asset for the benefit of all. Activities on the site should be limited to what is essential. A commercial lease is inappropriate and inconsistent with our responsibilities to this area, and this is discussed further below.
- The site is surrounded by a vast area of bushland with communities within in it that are highly at risk of bushfire. Memories of the 2013 fires are still fresh in our minds. When fires are needed to be fought at the scale that occurs in the area, aircraft are usually required and this land is well situated for this crucial function. It must be designated for this priority use. It is the Government's responsibility to ensure that this capacity to fight bushfires effectively is not only maintained but constantly upgraded to meet best practices.
- In the mountains, helicopters are used for other emergency situations, such as rescues, other searches, and medical evacuations. Members of the community are aware that these happen relatively frequently and that this is a crucial service both for residents and visitors. This piece of land should be designated for this purpose only.
- The National Parks and Wildlife Service are interested in managing this piece of land as an emergency airstrip within the National Park. Clearly this is possible because it is already occurring at other National Parks in Australia. The Greater Blue Mountains World Heritage Area covers a vast area that qualifies it for this designated airstrip. The National Parks and Wildlife Service should be given additional funding to upgrade the airfield so that it is fit for purpose. Again, this is the Government's responsibility, and the Bushfire Risk and Mitigation Resilience Fund (a Treasury Managed Fund) would be appropriate for this use. The Government does not need to risk a situation where its culpability comes under scrutiny in the event of a catastrophic bushfire within the area that cannot be effectively fought because it has neglected its responsibilities to this geographical area.

I urge the NSW Department of Industry to put all recommendations and suggestions made by community members to the National Parks and Wildlife Service. This should be the first pathway explored by the Department.

My third recommendation is, therefore, that NO COMMERCIAL LEASE be granted over this piece of PUBLIC LAND. The reasons for this recommendation include:

- First and foremost, commercial activities likely to be conducted from this land (commercial aviation activities such as helicopter joy flights) are NOT IN THE PUBLIC INTEREST. I elaborate further below.
- Helicopter and fixed-wing plane flights over the area are not in the interests of the local **economy**. This is primarily because it is a tourism-dependent economy and the vast majority of visitors come here not only for the aesthetic natural beauty but also for the relative natural quietness of the place. They will not use the services of commercial operations from this site. We know this from hosting and interacting with visitors on an ongoing and regular basis. The pleasure of a small few will be at the cost of the vast majority. This would be devastating for the local economy. A commercial aviation operation on this piece of land is **economically unviable**. It is an horrendous airfield to land at because of air waves over the mountains, and the prevailing westerly winds. The volume of flights that would be required to attempt to make the commercial operation viable would be completely unacceptable to the community, resulting in Air Service Australia being inundated with complaints as happened when a commercial operation was attempted in 1994. This operation proved economically unviable, but not before significant cost to the community. It is unfathomable why tourism and commercial interests would support a proposal for a commercial lease. Any such support would indicate that these enterprises are not in tune with or concerned about the local economy.

- Negative **social** impacts for local residents would be enormous. Related to economic concerns is that residents would be forced to suffer the consequences of the value of their properties plummeting. There would be negative impacts on general wellbeing and mental health from noise and other forms of pollution. The impacts from increased stress and sleeplessness will be significant. Noise impacts have not been assessed, nor the increased stress and exacerbation of Post-Traumatic Stress Disorder that would occur for local residents for whom the sound of helicopters is associated with emergency situations. Helicopter pilots tend to ignore the Department of Civil Aviation's Fly Neighbourly Policy, and helicopter noise can only be described as horrendous. The community tolerates this noise for purposes that we identify as priority, and this does not include commercial aviation operations.

There are also concerns about the potential for the emergence of an air taxi service, resulting from a commercial aviation operation. The increased volume of additional people brought in this way would overwhelm what is currently a sustainable tourism industry. Negative impacts on the community, infrastructure and environment resulting from significantly increased use of the area would include increased need for waste management, increased traffic on local roads, and pressure on the conditions of public facilities such as toilets.

- There would clearly be negative environmental impacts from a commercial aviation operation in this World Heritage area. This cannot be disputed. The area is listed because of its outstanding biodiversity values. Noise pollution disrupts wildlife, particularly birds who will abandon a nesting and feeding area due to unnatural noise, hence placing them at risk of local extinctions. Noise startles and disrupts the normal behaviour of Honeyeaters, for example, which are a rare and endangered species. Helicopters and fixed wing planes in this area would also devastate the migratory patterns of the Honeyeaters whose flight paths include the Shipley Plateau and Narrow Neck into the Grose Valley. We also know that run-

off and changes to soil chemistry and structure from works and the volume of commercial use of the crown land site would have a significant adverse impact on plant communities in the Grose Wilderness. In addition to biodiversity values, this area has enormous amenity value for both local residents, regular visitors from Sydney, and visitors from all over Australia and the world. The noise resulting from a commercial aviation operation would destroy this value for everyone.

My fourth recommendation is that the community consultation process be expanded and include a whole of government approach/response. The department should be clear that a commercial lease over this piece of land, in particular the current proposition before the Department, will not only give **nothing to the community**, it will devastate the community and the surrounding environment.

This piece of **public land** is too important for the area's disaster preparedness/response and management of the extremely valuable public asset of the Greater Blue Mountains World Heritage Area, impacting both residents and the millions of visitors to the area each year.

With the previous lease terminated, the process of considering a commercial lease should be stopped now. In its place, a process involving whole of government and the community about the **responsible use** of this piece of land should be commenced. The Department of Industry has not, for example alerted the entire community about the implications of a commercial lease over this land, such as the noise and visual pollution resulting from flights across the upper-mid-lower mountains and the Megalong Valley. The Department of Industry needs to extend the community consultation period to include people further afield such as the mid to lower mountains and Lithgow. The Department needs to make a commitment to a process that enables a properly considered decision to be made about the future and use of this extremely valuable public land.

In conclusion, my overall recommendation to the Department of Industry is that the Crown Land at Medlow Bath occupied by Katoomba Airfield be included within the Blue Mountains National Park for emergency use only.

Your sincerely,

[Redacted signature]

[Redacted contact information]

Email [Redacted email address]

cc. Trish Doyle, Member for the Blue Mountains

Attached to email sent to airfield.submissions@crowland.nsw.gov.au

Ref: LX 602686

FROM: [REDACTED]
E: [REDACTED]
M [REDACTED]

SUBMISSION **against** a commercial lease to use the Katoomba airfield.

Submission to **SUPPORT** the incorporation of the Katoomba airfield into National Parks & Wildlife Service with the airstrip maintained for emergency services and community use.

MY POINTS supporting my submission:

- How can a proposal be properly considered when we do not have information on the number of helicopters, flights or flight paths?
- The potential noise of the helicopters will affect residents in around their path.
- The sound of helicopters is disturbing to residents as they usually indicate a bushfire or accident
- The increase along the already busy Great Western Highway of large and small tourist buses bringing people in to the airfield, plus
- Extra heavy traffic off the GWH entering & departing the airfield
- The disturbance of helicopter movement and sound and smelly emissions onto the animals, birds, bees and vegetation around the area
- The potential risk of air collisions causing a bushfire
- What will happen to rubbish, sewerage requirements left by the tourists?

In addition:

- No dollars will be spent in the villages surrounding the airfield as the tourists will be bussed in and out
- The tourists will not physically experience the natural land and fauna as they will be sitting high up with headsets on.
- Walkers and hikers will be disturbed by the sound of helicopters

This proposal is contradictory to the natural landscape and wilderness area of the Blue Mountains. It is inappropriate to consider this type of tourist activity. We are already seeing reduced birdlife and other native fauna. The pollution will also degrade the natural vegetation.

The Department of Industry (Crown Lands)
P.O. Box 2155 Dangar, NSW 2309
21.7.2019

Re: Reference No. 602686

Dear Sirs,

I am writing to express my concerns over the proposed lease application for Katoomba Airfield currently being considered by the Department.

Of primary concern to me, as [REDACTED] airfield and a resident since 1986 [REDACTED] airfield is located, is this lease appears to be a significant change of usage from the lease that was initially issued on a small country dirt airfield.

In 1992-1995 residents opposed and successfully halted scenic joy flights run from this airfield. At that time, we were assured by the then authority over the airfield, that activities such as these would not be considered again and that included increased helicopter movement from the airfield.

From information gathered at the recent DOI community engagements and from the presentations held by the lease applicant, one can only assume that there will be a significant increase in helicopter flights and since the inception of the airfield an EPA licence has never been required. Should it be required, as no doubt it will be, this is clearly a change of usage into an aerodrome which will impact on the sensitive environment, noise levels, local road traffic and eventually over time filter down to local tourism numbers being affected.

The Department of Industry has clearly stated that they are not Aerodrome operators and at the recent DOI organised community engagement sessions it was very clear to all present that they do not possess the knowledge of aerodrome operations.

The airfield has now been included into the highly sensitive environment of The Greater Blue Mountains World Heritage Area. This change of usage will impact on World Heritage values with visual pollution and odour, as well as noise and vibration affecting wildlife as well as air quality - the Blue Mountains are not peaks, they are canyons and canyons echo. It will also affect by intrusion the public enjoyment of walking and camping in the Park as well as relaxing and socializing in designated picnic areas.

No environmental impact study has been carried out before this expression of interest was published and nor any community consultation and engagement until after it was published.

Another of my concerns is, that the proposed usage of this public land for a highly developed commercial purpose for the benefit of a very few, is that it lacks transparency. This appears to be a very large commercial venture of which the breadth of the lease applicant's plans still remains relatively undisclosed. The community have a right to know the full details of the lease applicant's proposal before the DOI enters into any lease negotiations with the applicant.

I request of the Department that the airfield be transferred to the National Park and Wildlife Services for management while maintaining a dirt airfield for emergency services only, and that it be included into the surrounding National Park as it should have been in 1988, thus preserving forever the natural quiet and biodiversity of the Greater Blue Mountains World Heritage Area's aesthetic values and hence be protected forever.

This is also in support of the 12,200 signatures collected on a petition submitted by the local member for Blue Mountains to the NSW Parliament for hearing and debate on August 1st 2019.

My letter may be published but do not include my name and address.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

From

To whom it may concern,

As a very concerned member of the Katoomba community I feel compelled to write a submission.

To say NO to the commercialisation of Katoomba Airfield and YES to putting it back into the surrounding national park, to be managed by National Parks and Wildlife Service (NPWS) for emergency services use only. I seek to preserve the serenity of the Blue Mountains for residents, visitors and future generations by incorporating Katoomba Airfield into the National Park and to stop helicopter flights in, and over, the World Heritage area .This crown land should be transferred to the national Park so that it is preserved for ever .

I am incredibly disappointed in the lack of concern that this bureaucratic process has with the natural environment and the potential negative impact this will have on native species and wildlife. I am also concerned that this so called airport could be a potential threat used by foreign investors or invaders in the future, of which, our government is happy to ignore the repercussions that this could have on our safety in the future.

yours sincerely