



Concession Reconsideration Report

Application Details

Decision Maker	Mark Davies, Director Operations, Western South Island
Applicant	Precision Helicopters Limited
Concession Number	81956-AIR
Concession Type	Notified aircraft landing permit

Document Links

Application Task Assignment	DOC-6127312 and DOC-6327170
Reconsideration Request	DOC-6896164
Interim Reconsideration Process Guidelines (2020)	DOC-6521063
Reconsideration Request - Decision 1	DOC-6916323
Original Decision Support Document	DOC-6831261
Options & Risk Assessment	DOC-6923581

Resources

Senior Permissions Advisor	Lisa Wheeler
Hokitika District Office	Michelle Lambert, Community Ranger Tim Shaw, Senior Ranger
Heritage and Visitor Advisor	Tony Thrupp, Senior Ranger Heritage and Visitors

1. Purpose

To make a decision on the reconsideration application.

2. Context

The Department received an application on 21 December 2021 from Precision Helicopters Limited (the Applicant) for a partial reconsideration of the decision made on their West Coast scenic and tourism regular helicopter landings application that was approved on 3 December 2021 with some landing restrictions.

Table 1 – Summary of original application request (green) and what was approved (yellow)
(The blue-coloured line for Mount Beaumont is the subject of this reconsideration)

Application				Decision	
Regular landings applied for (3 or more landings per day and/or 21 or more landings per year)				Concession term of 5 years	
Landing Site Name	Conservation area	Maximum per day	Maximum per year	Maximum per day	Maximum per year
Miserable Ridge	Totara - Mikonui Forests Conservation Area	3	150	3	75 Subject to Schedule 3, Condition 3
Mount Beaumont	Wanganui/ Otira Catchments Conservation Area	5	300	2	150 Subject to Schedule 3, Condition 3 Aircraft landing can only occur between 1 May and 30 September
Remarkable Peak	Wanganui/ Otira Catchments Conservation Area	3	300	3	300 Subject to Schedule 3, Condition 3
Whataroa Glacier	Waitangi Forest	3	300	Site withdrawn	
Prices Flat	Wanganui/ Otira Catchments Conservation Area	6	100	6	80 Subject to Schedule 3, Condition 3
Mount Greenland	Upper Totara Ecological Area	4	100	4	100 Subject to Schedule 3, Condition 3

In total, there are 68 special conditions in Schedule 3 of the concession Permit to mitigate the effects of these regular aircraft landings. Special condition 3 referred to in the above table states:

“The Concessionaire is limited to carrying out a maximum of 6 aircraft landings (across all sites) on any one day.”

Summary extract from the Decision Support Document relevant to the Mount Beaumont site:

"As the decision maker, you must consider the application request as lodged for this site of 5 landings per day/ 300 per year while taking into consideration the views of the internal expert advisers and submitters when deciding on the limits to be included in any concession if granted. The Recreation Advisor has recommended the landing limits of 2 landings per day / 150 per year from 1 May to 30 September only for this site.

The effects of regular landings in the Hokitika backcountry are not yet well known and this application if granted will allow this activity to be monitored. The Applicant has agreed to conditions being included that allow for limit reductions and/or noise restrictions to be put in place under certain circumstances. This along with the reduced concession term of 5 years will provide the best opportunity to better understand the effects of regular landings in this setting"

3. Reconsideration request and its rationale

The reconsideration request is pursuant to s.17ZJ(b) of the Conservation Act 1987 and is for the daily and annual landing limits and seasonal restriction granted for the Mount Beaumont site.

Within the detailed rationale below, the Applicant's representative has stated: *"The concession document already precludes his (the Applicant) landing within 500m of another ground party at any landing site. He is prepared to volunteer a further condition, which would restrict landings when any climbers/trampers are within 2km of the Mt Beaumont landing area. ... He is also accepting of a reduction to the number of landings per day to 3, but requests that the 300 per annum limit is retained."*

Reasons given by the Applicant for the reconsideration are:

"Condition 1 of the concession document limits the number of landings at the Mt Beaumont site, not only in number but also restricts these landings to the winter months of May to September. This restriction would be very detrimental to the application. The key tourism season for the West Coast is October to April, so to prevent the landings as proposed would severely impact the applicant. Without the Mt Beaumont site, the applicant would not have any sites covered in snow during the key tourist season. Many of the tourists who come to New Zealand have come to experience touching snow, and so removing the Mt Beaumont site during this time would defeat the purpose of many of the scenic flights. There are other conditions which seek to avoid impacts on recreational users, such as condition 6, condition 9, condition 10, condition 14, condition 15:

6. *The applicant must take flight paths that avoid overflying climbers, tramping tracks and huts where possible.*
9. *The Concessionaire acknowledges they don't have exclusive use of the landing sites. If the Concessionaire views another ground party within 500 m of the landing site, they must not land at that site.*
10. *The Concessionaire must ensure that aircraft idle times on the ground are kept to a practicable minimum.*
14. *During the term of the concession, where Grantor believes that the effects of aircraft noise should be further reduced, the Grantor may, by notice, require the concessionaire to either*

undertake measures to minimise the effects of noise on conservation values or become accredited to a recognised noise abatement and disputes resolution programme. If such notice is given by the Grantor, the concessionaire must:

- (i) if required to undertake measures to minimise the effects of noise on conservation values within 3 months from receiving the notice, undertake those measures to the satisfaction of the Grantor until the Final Expiry Date.*
- (ii) if required to become accredited to a recognised noise abatement and disputes resolution programme within 3 months from receiving the notice provide proof to the Grantor that such accreditation has been completed and must keep their participation in that programme or training current until the Final Expiry Date.*

The Grantor may, at any time, issue a subsequent notice(s) requiring the Concessionaire to implement the other option.

- 15. If during the term of this Concession there are reoccurring complaints from the public regarding significant conflict about helicopter landings at a particular site, then the Grantor has the right to review landings at that site. This includes the right to withdraw the site completely from the concession or impose further restrictions on that site designed to avoid the adverse effects on the public.*

I have reviewed the decision document, and it appears that there was some acceptance in your commentary that the concession allowed ample opportunity to review landings at a site if there are recurring complaints about a landing site, but unlike all other points which the decision maker has been requested to consider, there is no clear recommendation made on this point.

These conditions clearly allow for the concession to be reviewed should there be recurring complaints, and we feel that this is an adequate control to ensure that there are no adverse effects arising from granting the concession. As Matt has discussed with you, trampers/climbers are highly visible in the terrain, and he does not intend to land near recreationists utilising the area. Due to this being a snow landing site there are also no ecological values to protect. I reiterate that having a snow landing site for Matt during the summer is vital to his operations.

The concession document already precludes his landing within 500m of another ground party at any landing site. He is prepared to volunteer a further condition, which would restrict landings when any climbers/trampers are within 2km of the Mt Beaumont landing area. That would ensure that at an average 3km/hr walking rate in that terrain, any scenic landing would be complete before the climber/tramper would be anywhere near the landing site. He is also accepting of a reduction to the number of landings per day to 3, but requests that the 300 per annum limit is retained. We consider this would be consistent with the recommendations of the Hearing Chair.

Matt has been through an extensive process, and as noted in the local Hokitika office's comments on the application, he has consulted frequently with the local Department of Conservation staff, including seeking advice about the best locations to apply for this concession for landings. He has worked collaboratively with staff and has patiently awaited the outcome now for more than 18 months (the application was notified in July 2020 and submitted some time before this).

Again, we respectfully request that the Department reconsider the terms of the concession with respect to the seasonal and daily limits imposed on the Mt Beaumont landing site, without undue delay or cost."

Outcome sought by the Applicant is for:

- a) an increase on the maximum number of landings per day from 2 to 3 (which is 2 less than *woteu* the 5 originally applied for);
- b) an increase on the maximum number of landings per year from 150 to 300 (as originally applied for);
- c) a removal of the seasonal restriction to allow for year-round landings; and
- d) if the above are approved, would accept an additional special condition added to restrict landings when any climbers/trampers are visible within 2km of the Mt Beaumont landing area only (an increase from the 500m visible range already approved for all sites).

4. Reconsideration process

Section 17ZJ(b) of the Conservation Act 1987 contains provisions for an applicant to request a reconsideration:

"Without limiting any other provisions in this Part, upon application by an applicant for a concession, -

- (b) *Where the Minister has decided to grant a concession to the applicant, the Minister may reconsider any decision made by the Minister in relation to the proposed concession if the application under this section is made before a concession document is executed."*

In 2020 the Department revised the way it undertook its reconsideration process. Interim guidelines now outline the reconsideration as a re-assessment of the concession decision (or part thereof), not a consideration of the application from scratch (as if it were a new application).

This interim reconsideration process is comprised of two decisions.

- (a) The first decision is whether to accept the reconsideration application and carry out the reconsideration; and
- (b) The second and final decision is whether to change the original decision.

The Applicant's reconsideration request was lodged within the timeframe specified in the decision letter and the concession Permit has not been fully executed (signed by the Applicant). These two elements confirm the Applicant's eligibility to apply for a reconsideration.

The Applicant has then outlined the reasons why they are seeking a reconsideration and the decision to accept the request and that a reconsideration be carried out was approved on 11 February 2022 (refer to the Reconsideration Request – Decision 1 report).

Carrying out a reconsideration

The Minister will consider the materials related to the concession decision (to the extent that these are relevant to the grounds for reconsideration). This includes the Decision Support Document, all supporting information from the original assessment, technical advice, and stakeholder and public objections and submissions.

5. Original decision and its rationale

Hokitika District Office: Michelle Lambert, Community Ranger

Summary of what has been granted

1. *The Concessionaire is limited to carrying out a maximum of 6 aircraft landings (across all 5 sites granted) on any one day (special condition 3).*
2. *Pilots will check for people on the ground before undertaking a landing, and if people are visible, the landing will be aborted and an alternative landing site chosen (special condition 9).*
3. *The average landing duration is around 12mins¹ depending on the nature of the flight. The aircraft must be left at idle to avoid the risk of the helicopter failing to restart in a remote location (which is a health and safety risk), (special condition 10).*

The company plans to spread flight routes as much as possible to avoid concentrating along pre-determined flight paths.

The CMS does not specify a number of landings and/or season where landings can occur on Mt Beaumont.

Summary of original key advice provided by technical advisors:

1. *Advice provided by Senior Visitor Advisor, Ian Wightwick (DOC-6627828 pg 12/13)*

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The applicant proposes a maximum of 5 landings per day/ 300 per annum on Mount Beaumont (elevation 2136m). Mount Beaumont must be climbed on high level traverses.

The proposed frequency of landings per day/per annum has the potential to impact on recreationists seeking solitude and quiet, particularly when the weather is fine, and conditions allow for a safe traverse of this terrain.

To minimise the effects of aircraft activity on these recreation users and retain a high level of natural quiet, I recommend that aircraft landings at Mount Beaumont are limited to a maximum of 2 landings per day and 150 per annum and a seasonal restriction on landings between 1 May and 30 September.”

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¹ Note - The average landing duration time is a notation from the Applicant within the original application, it is not a timeframe specified in the special condition.

2. Advice provided by Senior Management Planner, Joanne Easterbrook (DOC-6625280)

"The revised application for aircraft landings at 5 landing sites in the Hokitika backcountry is consistent with the West Coast CMS, provided the following is undertaken:

- It is recommended the number of landing sites available to each concessionaire is specified in concession conditions.
- There may be some landing sites where seasonal restrictions could be considered such as Remarkable Peak.
- The applicant has offered a concession term of 5 years, which is recommended.

The West Coast CMS requires adverse effects of proposed landing sites to be assessed and avoided or otherwise minimised (Hokitika Place Outcomes p249). The recommendations in the Environmental Impact Assessment (EIA) by KJ Ladley Ecological Consultant and those in the recreational advice by Ian Wightwick address minimising the impacts of the proposed landings. Implementing those recommendations would meet the requirements of Hokitika Place Outcomes. These recommendations include:

Recommendations from recreational advice by Ian Wightwick:

- It is suggested the operators do not fly below 500ft from land over the Wilderness Area and suggests a higher overflight limit for the wilderness area.
- A reduction of proposed daily and annual landings at Mt Beaumont landing site - maximum of 2 landings per day and 150 landings per year.

Comments from the Community Ranger

"Approach (made) to considering the original application

- A conservative approach was used and was appropriate for original decision.
- A conservative approach was recommended by the Conservation Board. Their conservative approach also recommended a decline of the concession.

Reconsideration still fits within the Decision maker's conservative approach."

Permissions Advisor Comment

Of noting here, is all iwi, Conservation Board and public engagement was carried out on information provided by the Applicant at the time the application was publicly notified.

Additional information (a full environmental impact assessment) was requested and provided following a more detailed assessment of the application by the Department (after the public notification and hearing process had concluded). This additional information was not provided back to iwi, the Conservation Board, or the submitters as the views of these parties were understood and the environmental impact assessment proposed mitigation methods that appeared most of the concerns raised by the feedback received.

6. Options and Risk Assessment

In light, of what the Applicant has proposed, in support of their reconsideration request, the following three options have been identified and assessed by the District Office:

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Noted 1

- 1) Decline the request in full (no change to the landing limits approved).
- 2) Grant part of the request to increase the annual limits of regular scenic landings on Mt Beaumont (increase annual limit and remove the seasonal restriction).
- 3) Grant the request in full to increase the scale of regular scenic landings on Mt Beaumont (increase daily and annual limits and remove the seasonal restriction).

The District Office have completed a risk assessment against each option to help understand what the effects of increasing the landings per day; per year; and on the removal of the seasonal restriction. This assessment is shown in Table 2 below:

Table 2 – Options and Risk Assessment – Mount Beaumont site

	Option	Mitigation Measures	Risks
1	<p>Decline all of the proposal to increase the scale of regular scenic landings on Mt Beaumont</p> <p>This would retain the current concession conditions to</p> <ul style="list-style-type: none"> - Mount Beaumont – Max. of 2 landings per day / 150 per annum / 1st May thru 30th Sept - Overall (on all locations approved)- Max. of 6 landings per day / over 5 landing locations / total of 705 landings per annum 	<ul style="list-style-type: none"> - Many <u>Concession conditions</u> to minimize effects of the activity on other recreation users (listed in appendix 1). Key conditions include a short term to concession to allow activity to be halted if it proves to have greater than perceived effects, and the ability to amend the Permit if effects of the activity can't be minimized. <p>The total number of actual landings will not be 705 due to adverse weather and availability of customers.</p>	<ul style="list-style-type: none"> - Risk already exists that the currently approved scale of activity could result in some loss of quality of visitor experience for some individuals. - How many people will have a reduced experience, how significant this reduced experience is and how effective the mitigation measures are is unknown. This is reinforced by the varying views in the Public Notification process submissions. There is clear provision in the short and medium term to correct the level of activity if necessary. - In granting the existing level of use, the Department was confident the mitigation measures in place would effectively manage effects. Overall, the risks are considered to be low. <p>The applicant has stated the current options for landings are insufficient for a viable business.</p>
2	<p>Grant part of the proposal to increase the scale of regular scenic landings on Mt Beaumont</p>	<ul style="list-style-type: none"> - Same as Option 1. Plus: - Including volunteered condition: 'If the 	<ul style="list-style-type: none"> - As with Option 1, the scale and significance of effect and the effectiveness of mitigation measures is unknown.

	<p>The decision maker could choose to approve any iteration of the requested number of landings per day, per annum, and season.</p> <ul style="list-style-type: none"> - The proposed iteration is Mount Beaumont – Max. of 2 landings per day / 300 per annum / All year round - Overall (on all locations approved)- Max. of 6 landings per day / over 5 landing locations / total of 855 landings per annum 	<p>concessionaire views a ground party within 2km (2,000m) of the Mount Beaumont landing site, they must not land at that landing site' (Figure 1 below).</p> <ul style="list-style-type: none"> - Require the applicant to provide meaningful data to allow for reporting of positive and negative effects to the Department. - Require the review of the landings on Mt Beaumont after two years by the Department. The review will focus on the effect of the activity on recreationists. - If the total number of overall landings was to increase above 705, the actual landings will not reach that number due to adverse weather and availability of customers. 	<ul style="list-style-type: none"> - Any increase in the scale of approved landings will increase the potential for on ground visitors to hear, see and encounter helicopter activity. <p>The increase from a 500m to 2km buffer being offered represents a significant increase in the applicant's ability to avoid close encounters with people on the ground and to some extent in the air.</p> <ul style="list-style-type: none"> - The Department's confidence that the mitigation measures in place will effectively manage effects applies to any slight increase granted. - Any additional risk for the increase in landings per annum and over the whole year can be addressed by the 2-year review period. If the effects of the activity are too high the condition can be amended to a more appropriate level after the 2-year review. - Overall, the risks are considered to be low.
3	<p>Grant all of the proposal to increase the scale of regular scenic landings on Mt Beaumont</p> <p>This would increase concession conditions to</p> <ul style="list-style-type: none"> - Mount Beaumont – Max. of 3 landings per day / 300 per annum / All year round 	<ul style="list-style-type: none"> - Same as Option 1 & 2. - Including volunteered condition: 'If the concessionaire views a ground party within 2km (2,000m) of the Mount Beaumont landing site, they must not land at that landing site' (Figure 1 below). - Require the applicant to provide 	<ul style="list-style-type: none"> - As with Option 1 & 2, the scale and significance of effect and the effectiveness of mitigation measures is unknown. - The increase in the scale of approved landings will increase the potential for on ground visitors to hear, see and encounter helicopter activity year-round. - The increase from a 500m to 2km buffer being offered represents a significant increase in the applicant's ability to avoid close encounters with people on the

	<p>- Overall (on all locations approved)- Max. of 6 landings per day / over 5 landing locations / total of 855 landings per annum</p>	<p>meaningful data to allow for reporting of positive and negative effects to the Department.</p> <p>- Require the review of the landings on Mt Beaumont after two years by the Department. The review will focus on the effect of the activity on recreationists.</p> <p>Total number of actual landings will not reach 855 due to adverse weather and availability of customers.</p>	<p>ground and to some extent in the air.</p> <p>- The Department's confidence that the mitigation measures in place will effectively manage effects applies to any slight increase granted.</p> <p>- Any additional risk for the increase in landings per day, per annum and over the whole year, can be addressed by the 2-year review period. If the effects of the activity are too high the condition can be amended to a more appropriate level after the 2-year review.</p> <p>- Overall, the difference in risk between option 1 and 3 is small. The risks associated with an increase in number of landings and season are considered to be low.</p>
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Note: The “total number of landings (across all 5 sites)” referred to in the options column are the total (combined) annual landing limits approved across all 5 landing sites as shown in Table 1 of this report.

It is important when understanding the above table, how these total numbers have been derived to understand the importance of special condition 3 (in Schedule 3 of the concession) that limit the actual combined total daily landing limit to 6 landings per day across all sites.

So, while each individual site has a total combined daily limit of 18 landings per day, each location is subject to special condition 3. Effectively restricting the possible daily landings across all sites to a third of their overall allocation.

Hokitika District Office: Michelle Lambert, Community Ranger

“Risk assessment Rationale

(i) Approach

It is reasonable for the Decision Maker to impose conditions and restrict flight paths to avoid, remedy and mitigate potential adverse effects associated with the proposed aircraft landing on public conservation land.

Within the backcountry remote zone, regular aircraft landings may be authorized. The number and frequency of landings should be considered on a case-by-case basis.

The effect of helicopter noise on recreational values is subjective and varies person to person and situation to situation.

(ii) Visitor Advisor advice

The approach to Mt Beaumont forms part of the Ivory Lake route and Mount Beaumont itself is a popular day trip. The season when visitors usually travel in the area is October to April at the latest. An estimate for the number of trampers/climbers accessing this route is estimated to be 100 - 300 people per year. January 2022 recorded 21 groups over 22 days with each group likely to consist of 4 people and staying one night at the hut. However, the number of people travelling in this area is very dependent on weather conditions. There were consistently good weather windows for longer trips to occur in January and February 2022 plus the additional work of volunteers and DOC rangers on huts and tracks in the Waitaha Valley that forms part of this route to increase access and ease of travel for this route.

I discussed the reconsideration request with Ian Wightwick explaining what Precision Helicopters want reconsidered. Ian pointed me to his original advice for clarification of why there was a restriction on landing numbers and season for Mt Beaumont.

The key consideration for the restrictions in the current Permit for Mt Beaumont is to the minimise the potential to impact on recreationists seeking solitude and natural quiet, particularly when the weather is fine, and conditions allow for a safe traverse of this terrain. The question for this reconsideration request is whether the proposed changes of landing numbers and season would be that different to what is already proposed.

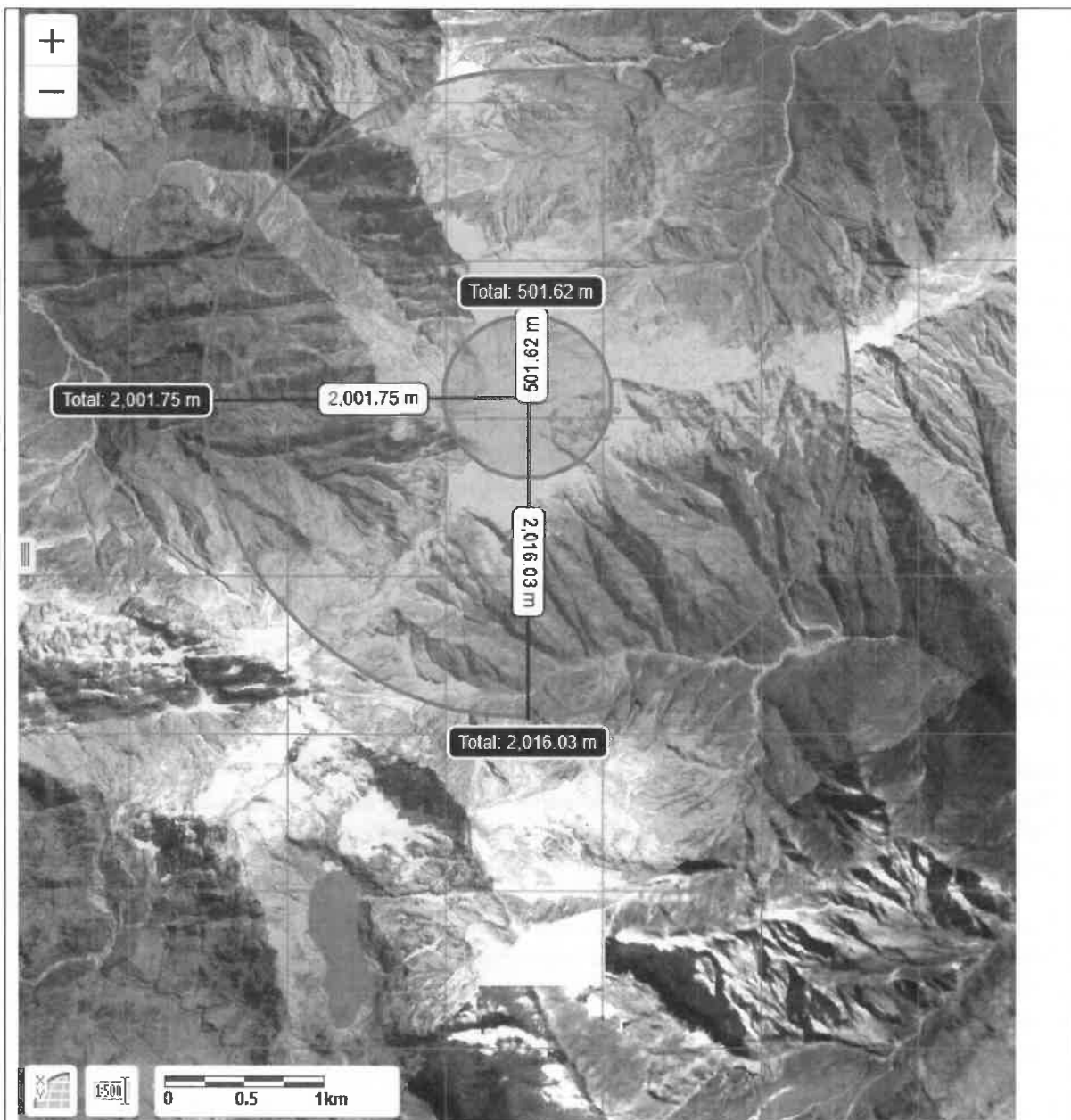
Risks (assessment of effects):

The key risk for this reconsideration request is the potential for an increased effect of the Scenic flight activity on on-ground recreation users (trampers, hunters etc.) at Mount Beaumont and surrounding vicinity through noise and/or visual impacts on the environment.

The key issue is the effect of helicopter noise and visual intrusion on recreation users while the helicopter is in the air. The helicopter could interact with recreationists while it is in the airspace (above or below 500ft). The effect of the helicopter in the airspace on recreationists on the ground is still relatively unknown i.e. How many people will have a reduced experience? How significant is this reduced experience? and how effective are the mitigation measures?

Interaction between the helicopter on the ground and recreationists is unlikely due to the proposed mitigation conditions by Precision Helicopters (not landing if ground party seen within 2km).

Figure 1: Aerial map of proposed mitigation with no landings if people seen 500m away (small inner circle) and no landings if people seen within 2km of Mt Beaumont (outer circle).



Mitigating factors

- 1) Actual activity will be a fraction of that approved
It is unlikely a full allocation of landings in the Permit will be used due to weather conditions and availability of customers/visitors etc. The allocation for landings needs to be fair in considering conservation values and effects on those values plus justifiable in a business sense.

As stated by the Conservation Board, 'weather' patterns affecting landing viability, including the regular anti-cyclonic cloud cover developing after 10am that is a common feature of these sites, along with the number of irregular landings permitted in this region, may concentrate effects to limited seasons, periods and even hours of weather windows where conflict between user groups is more likely.'

- 2) *If effects are unacceptably high- a reduction of activity or no activity can be imposed*
The application has a short term of 5 years. This is likely to be long enough to allow the activity to occur to get a better understanding of the actual effects of the activity. But is also short enough to allow the application not to be considered for renewal if affects can't be adequately mitigated or minimised.

The Department will undertake a review of the Mount Beaumont landing site after two years. This will provide the Department with an opportunity to scale back the activity if the effects of the activity are not adequately minimized or mitigated.

Allowing the activity to occur will also provide evidence around the actual effects of the activity and can inform future decisions relating to Scenic flights in the Hokitika Backcountry area.

- 3) *Conditions of the concession will reduce effects*
There are numerous conditions imposed by DOC and volunteered by the concessionaire to reduce the effects of the activity on recreational users.

As mentioned above, the Department has imposed limits on the number of and when landings can occur on Mt Beaumont. As part of the limits imposed, the Department will undertake a review after 2 years to understand any actual effects of the activity.

This will allow for revisiting the number and timing of landings on Mt Beaumont. The condition volunteered by Precision Helicopters increases the area around Mt Beaumont to trigger a landing elsewhere. This proposed condition seems adequate to further minimize any potential effects on recreationists.

Critical issues:

- *Reliability of Precision Helicopters seeing people within the landing buffer area or if the people are in vegetation and obscured in the landing buffer area is unknown.*
- *How many complaints would we accept before revisiting the conditions on the Permit? This is common to all concessions and is no different with the currently approved or proposed landings in this reconsideration.*
- *Is it safe for the helicopter to land, or for customers to get out and walk around without getting injured in this terrain? This is not a new critical issue and existed with the landings proposed prior to the reconsideration request.*

Summary

Approval of Option 2 will result in a small change in the scale of potential affect. Combined with the adequate conditions that allow for revisiting the numbers, and other options for landing sites, allows for the proposed numbers to still be considered a conservative approach.

Existing and proposed conditions of the concession, plus the physical limitations on when flights can occur mean a low likelihood of an increase in effects. The effect of this activity is also very dependent on people being present in the area to see and hear the helicopter in the first instance.

The mitigation measures in this assessment will allow us to work with the Concessionaire and recreation users to minimize the effect of the activity to provide a compromise between the groups. “

7. Statutory analysis and assessment of effects

It is not necessary to undertake a further analysis of the statutory planning documents for this reconsideration. The original statutory analysis was carried out against the sites and activity limits (landings per day and per year) that were originally applied for. The analysis found the activities to not be inconsistent with the statutory planning documents.

Assessment of effects

Instead, it is the assessment of effects that needs to be reassessed to understand the effects of increasing the daily and/or annual limits along with removing the seasonal restriction.

As already discussed in this report, the Applicant has requested the maximum daily limit be increased to 3 (up 1 from what has been granted and down from 5 in the original application).

While the District Office undertook a risk assessment against 3 options, option 1 was the status quo, being the benchmark of what has been granted.

Table 3 - Options and risk assessment impact summary

Option 1 (status quo)	Option 2 (preferred option)	Option 3 (alternative option)
Max. 2 landings per day	Max. 2 landings per day	Max. 3 landings per day
Max. 150 landings per year (seasonal - 153 days)	Max. 300 landings per year (all year round - 365 days)	Max. 300 landings per year (all year round - 365 days)
<p>If this site used all of its allocation in favour of other sites - this would equate to</p> <ul style="list-style-type: none"> 1 landing per day over the season (to the maximum of 150 days) or 2 landings per day on 75 days of the season or a combination of both 	<p>If this site used all of option 2 allocation in favour of other sites - this would equate to</p> <ul style="list-style-type: none"> 1 landing per day for 300 days in any (365 day) year or 2 landings per day on up to 150 days of the year or a combination of both 	<p>If this site used all of option 3 allocation in favour of other sites - this would equate to</p> <ul style="list-style-type: none"> 1 landing per day over 300 days in any (365 day) year or 2 landings per day on any 150 days of the year or 3 landings per day on any 100 days of the year or a combination of these

In summary, the impacts of the risk assessment show that if the full allocation was used on a daily basis in favour of the other sites approved for landings:

- The daily impact on the site does not increase at all in options 2 and 3 if the Applicant wanted to land once or twice a day until it reached its annual allocation limit regardless of whether this was a seasonal allocation or year-round.
- The daily impact will only then increase under option 3 for a maximum of 100 days if the Applicant wanted to condense the visits to a smaller number of days until the annual allocation limit is reached. This could equally be achieved if the seasonal restriction of 153 days was retained, and the daily limit were increased to 3 landings per day (not an option that was assessed).

- c) If the Applicant were to refrain using this site during the winter months in favour of landing there in the peak season (October to April) there are 212 days in the peak season, so on average, landings over this season would average out to 1.5 landings per day. If 3 landings per day were carried out, the annual allocation would be achieved within 100 days as discussed in b) above.
- d) When adding in the key allocation restriction under special condition 3 *“The Concessionaire is limited to carrying out a maximum of 6 aircraft landings (across all sites) on any one day”* the Applicant has access to 16 other landing opportunities per day across the other 4 landing sites granted (until their annual allocation limit is met) in which to determine where they might undertake these 6 (maximum) landings per day. This further reduces the likelihood of the Applicant wanting to land at the Mount Beaumont site more than twice a day on a frequent basis.
- e) Removing the seasonal restriction increases the flexibility of the Applicant to utilise the daily and annual allocation to work within the restricted weather patterns and customer expectations and reduces the overall risk of encounters with recreationalist on the ground. This has been recommended by the District Office.

In both options 2 and 3 the District Office have proposed measures to mitigate the effects of an increase in landings per annum (over the whole year) to include the following conditions:

“The Grantor will undertake a review on the 2nd and 4th anniversary of the concession on the effects of the activity on the on-ground recreationists;”

Plus, the additional condition offered by the Applicant:

“If the Concessionaire views any climbers/trampers within 2 kilometres of the landing site, they must not land at the Mount Beaumont site”.

In summing up the options and risk assessment, the District Office have recommended the approval of option 2 stating *“Option 2 will result in a small change in the scale of potential affect. Combined with the adequate conditions that allow for revisiting the numbers, and other options for landing sites, allows for the proposed numbers to still be considered a conservative approach.*

Existing and proposed conditions of the concession, plus the physical limitations on when flights can occur mean a low likelihood of an increase in effects. The effect of this activity is also very dependent on people being present in the area to see and hear the helicopter in the first instance.

The mitigation measures in this assessment will allow us to work with the Concessionaire and recreation users to minimize the effect of the activity to provide a compromise between the groups.

The Visitor Advisor has estimated the number of trampers/climbers accessing this route to be between 100-300 people per year. The likelihood of encounters between helicopters and on ground recreationalist is even further reduced by the addition of the following volunteered special condition if the annual allocation per year is increased to 300.

As the Applicant has alerted, there are special conditions that allow ongoing monitoring to occur such as special conditions 6, 9, 10, 14 and 15.

If the request is granted in part or in full, special condition 15 above would allow the Grantor, in this case the Hokitika Operations Manager to review the landings at the site, with the ability to subsequently withdraw or reduce the daily limits if required.

Any additional risk for the increase in landings per day, per annum and over the whole year, can be further addressed by the 2-year review periods being proposed by the District Office. If the effects of the activity are too high the condition can be amended to a more appropriate level after the 2-year review.

Overall, the difference in risk between option 2 and 3 is small. The risks associated with an increase in number of landings and season are considered to be low.

7. Applicant Comments

The Applicant was provided with a copy of this report in draft form and provided the following comment "I've received confirmation from Matt that he is appreciative and comfortable with the recommendations of the reconsideration request, and should it proceed as recommended he looks forward to signing the contract."

9. Decision Making

Summary

The District Office has undertaken an options and risk assessment of the application to reassess the effects of daily and annual landing limits approved for the Mount Beaumont site.

One of the arguments put forward in the original decision document was based on the effects on the recreationalist in the peak season. In both option 2 and 3 the District Office has considered that with the addition of two further special conditions, the first to widen the viewing circle (to 2 km) for the Applicant to not land in, if there is anyone visible within this circle; and 2 yearly reviews is enough to further mitigate the effects of removing the seasonal restriction.

In addition to this the assessments for options 2 and 3 with regards to increasing the daily landing limit the risk assessment concluded that for both these options:

- Option 2 - "Overall, the risks are considered to be low;" *noted*
- Option 3 - "Overall, the difference in risk between option 1 and 3 is small. The risks associated with an increase in number of landings and season are considered to be low."

In section 7 above, I have considered the likelihood across different scenarios of undertaking 3 landings at the Mount Beaumont site occurring on any one day are unlikely to be a regular occurrence.

With the number of overall special conditions already contained in the approved Permit, and the introduction of two further ones (recommended below), the effects of the activity will be regularly monitored and can be further mitigated if the effects are found to influence recreationists. For these reasons, I recommend that option 3 be approved.

Recommendations

1. The maximum number of landings per year is increased from 150 to 300 and the season restriction removed to allow for landings to occur all year round. ✓
2. The maximum number of landings per day be increased from 2 to 3 (option 3). ✓
3. That special condition 61 in the approved Permit is deleted and replaced with the following: ✓

Mount Beaumont land site

"If the Concessionaire views another ground party within 2 kilometres of the landing site, they must not land at the Mount Beaumont site".

"The Grantor will undertake a review on the 2nd and 4th anniversary of the concession on the effects of the activity on the on-ground recreationists."

Decision: Concession Reconsideration under Part 3B of the Conservation Act 1987

1. Agree this application has been considered in accordance with s17ZJ(a) and (b) of the Conservation Act 1987:

Agree / ~~Disagree~~

2. Approve the increase of the maximum number of landings per year to 300 per year and the removal of seasonal restrictions to allow year-round landings:

Approve / ~~Decline~~

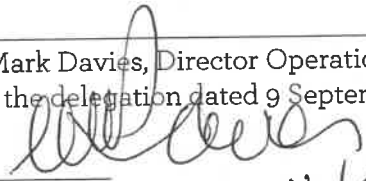
3. Approve the increase in the maximum number of landings per day to 3:

Approve / ~~Decline~~

4. Approve the removal of special condition 61 from the approved Permit and replace it with the above two recommended special conditions for the Mount Beaumont landing site:

Approve / ~~Decline~~

Signed by Mark Davies, Director Operations, Western South Island
Pursuant to the delegation dated 9 September 2015



Date

11/4/2022

Decision Makers Comments

