



A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Michael NY
Organisation	
Date	22 July 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Landings at selected backcountry sites as detailed wherefore and henceforth

My reasons for my objection or submission are:

An unnecessary disturbance of natural landscape and the much cherished peaceful quiet and solitude. Permission will inevitably lead to expansion as commission will be leveraged for further access. A precedent will have been set. There will be no turning back.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Just say NO!

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
As per email	Word	Letter

How do I submit my objection or submission?

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Printed name of submitter or person authorised on behalf of submitter	Willem Keuppens
Organisation	/
Date	23/07/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The landing of helicopters in remote areas and the noise the brings with it, taking away from the experience one has when exploring these areas.

My reasons for my objection or submission are:

I'm writing this objection as a tourist in NZ. So as one of those these potential flights would supposedly be intended for. As such I'm hoping to show that there is no demand from a tourist's perspective for these flight and thus no reason to approve this application. The NZ backcountry is a unique place on this planet. One that I found very well managed in comparison to what's left on earth of the 'big blue'. There are a wide variety of people that enjoy exploring the backcountry for an equally wide variety of reasons. Tourists are certainly a part of this. So in 'managing' the outdoors I think it's important to try and accommodate the needs of all its fanatics without diminishing the experience for others and all that of course while conserving this pristine environment as best as possible.

Allowing this application will make it possible for Precision Helicopters to send helicopters into the backcountry for the sole purpose of letting tourists see a glimpse of this environment. Only the fly them back out moments later a and doing that multiple times throughout a day will not just impact the experience others have when seeking to explore these exact locations but also in these surroundings. It will also impact wildlife. For almost everyone else the charm of these locations lies in its remoteness and the challenge to get there. Being accompanied by helicopter noise while getting to these locations will not just diminish this experience but frankly, completely ruin it. As such I think the application does not favour the interests of the majority of parties but only one.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Rejection of application entirely. There are already enough locations that Precision Helicopters is allowed to land. Numbers also show that tourists wanting to go on one of these tours rarely do so twice so there's absolutely no need to increase the number of these landing spots.

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Good morning,

I am writing in support of the application by Precision Helicopters for access to new sites in the mountains behind Hokitika.

They are a well run professional company that provides transport into the mountains for locals and tourists.

There are many people who are physically able to hike into these places, but many who are not able to or simply can't afford the time to do so.

In these difficult economic times we live in it is important that local companies be given every opportunity to keep going.

Yours sincerely

Mike McClunie



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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Andy Somerville
Organisation	No.8 Tours- NZ's Senior Travel Club
Date	25/07/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Permission to operate a commercial helicopter service and landing requests at identified locations.

My reasons for my objection or submission are:

We have an ageing, and ever increasing urbanised population. These services are required for the majority of people to continue to access these areas in pursuit of the health benefits gained from recreational pursuits.

Hunters play a key role in conservation goals through animal management. They make up the highest number of users to this location, they are also ageing and having the opportunity to access these areas through helicopter makes this achievable.

Its not 1970 anymore. We all live in a modern era where technology and communication tools have never been better. Therefore appropriate plans in place to manage any potential conflict with other users can easily be put in place.

DOC would have the ability to save conservation dollars and get better conservation outcomes by working alongside the operator. I.e if the operator is dropping off a group into one of the areas, why not ask them to check a hut, a track, bring traps out, assist in the return of research staff etc.

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

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Printed name of submitter or person authorised on behalf of submitter

Chris Crose

Organisation

Date

27.07.2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The entire application. This area does not require more concessions for tourism/site seeing flights. This is not necessary and I do not agree with this concession being granted.

My reasons for my objection or submission are:

There are already a plethora of other established helicopter operators in the area offering a variety of site seeing/ tourism flights, most only a short to few hours drive from the proposed areas of operation if people want that kind of experience. The Southern Alps/West Coast conservation areas are already loaded with aircraft traffic, there is no need to add more to the mix. Two of these sites are relatively easy to access via foot (Mt Greenland, Miserable Ridge), and the Whataroa Glacier already has numerous landing concessions granted to other helicopter operators and, as such, is already congested with that traffic. Adding more traffic to the area only increases the chance of potential conflict, or at worst, collision - already the biggest pre-Covid risk in Glacier Country. These areas are already heavily loaded with aircraft, so some areas must remain as free of nuisance aircraft noise and interference. Granting the concessions are, at the least, going to create a noise nuisance and conflict to people wanting a back country wilderness experience tramping, at worst, more congested airspace and potential incidents and accidents.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

If this concession was granted, the applicant should only be allowed to exercise the privileges of this consent to facilitate access for people wanting recreation opportunities in the backcountry, eg. trampers, hunters, kayakers, fisherman, etc. NOT for site seeing/tourism. Tourism will increase potential for conflict, offering a very superficial experience. The pro's of tourism do not out-weigh the con's in this area. Where as if the concessions were specifically used to encourage more, and improve current, interaction with the back country, offering more expedient and better equipped acce for those who want a backcountry adventure. A group could be dropped into a specific location and not have to worry about a chopper returning 3-6 times a day if that spot becomes the only spot where the company can land on that particular day because of weather, or because that flight is the shortest route and offers the cheapest option for tourists or is the most profitable for the company.

Noise abatement requires slightly more than they have indicated:

<https://www.aia.org.nz/site/aianz/files/Aircare/Company%20training%20Package/Fly%20Neighbourly%20Guide.pdf>

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Hi just would like to say I fully support presion helicopters being aloud to land in

Wendy Maxwell



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Printed name of submitter or person authorised on behalf of submitter	Ted Brennan
Organisation	N/A
Date	01/08/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All proposed Landing Sites

My reasons for my objection or submission are:

I support this application in total because:

- It will enable locals and visitors who may not otherwise have the time resource or be physically able, to access some of Westland’s unique backcountry – away from most huts and well used tracks and routes.
- The proposed landing sites are all in areas infrequently visited by trampers on foot. While there are backcountry huts and tracks/routes in the general vicinity of each proposed landing site, the noise of the helicopter passing will be no more invasive than that of an overhead jet or aeroplane – or of an unrelated helicopter in transit.
- Importantly, it will enable a local business (that directly or indirectly supports other local small businesses) to operate and may well encourage visitors to stay in the District longer.

To give some context around the lack of issue I see with this proposal, for several decades I have tramped (and worked) through and in the various areas where the proposed landing sites are located. I have never had a helicopter land nearby (or anywhere in the vicinity) during that time. We have used helicopters in the past to take our young children to remote huts (fly in, walk out) and again, there has never been any other person at any of those huts. The same applies when landing at huts for work – there was never anyone else at those huts.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

If the application is approved a requirement of the operator should be that the stories of the formation of the Southern Alps, and any relevant Maori history and any relevant Pakeha history (e.g. hard rock goldmining on Mt Greenland, or the first crossing by Pakeha of the Whitcombe Pass, are told ...

The operator should be encouraged to explore and put into effect, any means possible to offset carbon emissions.

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Printed name of submitter or person authorised on behalf of submitter	Rick Fennell, manager
Organisation	Ross Goldfields Information and Heritage Centre (RGIHC)
Date	07/08/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this submission relates to are:

The RGIHC supports all aspects of the application by Precision Helicopters.

My reasons for my submission are:

RGIHC supports this application in total because:

- It will enable locals and visitors who may not otherwise have the time resource or be physically able, to access and experience some of Westland’s unique mountainous country – away from most huts and well used tracks and routes. Some of the proposed landing sites (Miserable Ridge, Mt Beaumont, Remarkable Peak and Mt Greenland) offer spectacular 360-degree views out to and along the coast and into the Southern Alps.
- The proposed landing sites are all in areas very infrequently visited by trampers on foot. While there are backcountry huts and tracks/routes in the general vicinity of each proposed landing site, the noise of the helicopter passing will be no more invasive than that of an overhead jet or aeroplane – or of an unrelated helicopter in transit. I have spoken with a local person who has recreated and worked in or near these specific areas for 50+ years. He has told me that in all this time no helicopter has landed at or near where he has been passing through or based, and when based at or landing at huts in the vicinity of these sites, no-one else has been present. This person remains an active trumper in the vicinity of most of these locations
- **Most importantly, post Covid19, approval of this application will further enable a local business (that directly or indirectly supports other local businesses through its operations) to continue to operate and may well encourage visitors to stay in the Westland District longer.**
- Mt Greenland, one of the proposed landing sites, is situated directly behind Ross township. With its rich goldmining history being actively promoted by the RGIHC, an opportunity will exist for visitors to learn about this history at the RGIHC and then be flown to the top and site of the hard rock gold mine village remnants. Here the visitor would gain a deep appreciation and understanding of the remoteness and hardships the early miners experienced. Visitors could also walk back to Ross from this site via a 10km 4wd track, while taking in the magnificent 360-degree views. They are likely to also make use of the local campground, visit the historic and incredibly unique Empire Hotel as well as the local shop. If this application is successful, the RGIHC will work closely with Precision Helicopters to ensure the success of the initiative and to maximise the benefit to all other local businesses.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The success of the application.

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Printed name of submitter or person authorised on behalf of submitter	Andrew Stile
Organisation	Ross Beach TOP10 Holiday Park
Date	09/08/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I fully support the development & operations of this business within this locale.

My reasons for my objection or submission are:

As a business operator in this part of Westland i feel we need to offer more attractions and activities to retain visitation to this locale.

The outcomes that need to be addressed by this application are:
 Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

n/a

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Printed name of submitter or person authorised on behalf of submitter	Katie Brennan
Organisation	N/A
Date	11/08/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

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- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All proposed Landing Sites

My reasons for my objection or submission are:

I support this application in total because:

- It will enable access the unique and rugged Westland backcountry, both in and away from well used or known tracks and huts, to those who may not otherwise be able to due to lack of time or be physically able.
- The proposed sites are all situated in areas that do not see many visitors on foot per year. If the unlikely incident occurs that someone is already at the landing site, the helicopter company has said it will move on to the next site. Furthermore, the helicopter visit will be quick and therefore minimal noise invasion. Finally, the company can only operate one helicopter from the Hokitika Gorge which is non-negotiable, meaning there is no chance our backcountry will end up as busy as that of South Westland.
- Most importantly, this is a local business trying to get off the ground. They will contribute to our local economy, and potentially support other small local business, especially if they contribute to visitors staying in the area longer.

As a child I participated on many pure foot power tramping trips, as well as ‘fly in, walk out’ and ‘fly in, fly out’ trips into the Westland backcountry. These trips allowed me to gain an appreciation of the place I live in and what lies out there to be explored. It inspired me to continue my backcountry trips and enjoy what the ‘back yard’ had to offer. On all these trips I do not think I once came across another party at the site we were landing at. Allowing Precision Helicopters access to land at these sites will give access to backcountry that children, such as I was, are not able to access on foot. These experiences plant a seed of appreciation of the backcountry and can spark a lifelong passion of preservation and exploration of the area.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

If the application is approved a requirement of the operator should be that the stories of the formation of the Southern Alps, and any relevant Maori history and any relevant Pakeha history (e.g. hard rock goldmining on Mt Greenland, or the first crossing by Pakeha of the Whitcombe Pass) are told

The operator should be encouraged to explore and put into effect any means possible to offset carbon emissions.

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Printed name of submitter or person authorised on behalf of submitter	Jane Morris
Organisation	
Date	11 th August 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

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- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The amount of different locations for the landings and the amount of landings (Table One).

My reasons for my objection or submission are:

Many parts of the West Coast allow for tourism landings, and this application nibbles away at the edges of this terrain which further reduces area's where recreational outdoors people can go and not be landed on by machines or have the backcountry infiltrated by helicopters.

To extend this to area's from 'tourism' perspective - namely Prices Flat - is also questionable.

Yes the Whitcombe is a stunning river and valley, but to land tourists at Prices Flat is like taking a horizontal gondola through Christchurch. It does not make sense.

Mt Greenland is a local hill near Ross that is accessible to walk up, and provides a foreshortened view of the Coast and towards the peaks of the Main Divide. However it would be Hokitika's version of taking a helicopter to the top of Mt Maunganui. Does it really offer tourism benefit?

Last month my partner and I spent 2 nights above the Mikonui catchment, camped on Miserable Ridge and in the vicinity of Remarkable Peak and Mt Beaumont.

The attraction of going into these places is because of the lack of helicopter traffic (and landings).

The 'Hokitika Place' is home to some of NZ's finest rugged and remote backcountry huts and routes.

To have this eroded by helicopters to satisfy a few tourists seems incredibly short sighted.

There are plenty of opportunities for tourists to take flights into the mountains in established area's.

Recreational users accept that this is part of going into these areas (for e.g. Fox, Franz, Tasman Glaciers).

Surely there will be some backcountry area's where helicopters can't land multiple times a day in, and other recreational users are able to enjoy these places for the lack of tourism.

I appreciate PHL is (like many operators) trying to survive in these current times, but granting landing zones to obscure and remote backcountry destinations I do not think benefits anyone.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Grant ONE landing area, and have that as the Whataroa Glacier.

This is the closest area to where there are already existing landings and tourist flights (in Westland and Aoraki).

Air Safari has scenic flights from Tekapo that incorporates the fringes of this area already, and the Middleton Snowfield on the Tatare Range is an existing landing for West Coast helicopter companies.

In this zone it is not unusual to see, hear and view machines landing, so it keeping within this zone then allows places like the Mikonui, Hokitika and Whitcombe catchments to be left alone.

I'm a long time trumper and a recent vice president of the Christchurch Tramping Club.

I fully support this application. I have lead large numbers of trampers on heli trips backcountry and I would like to see more options and destinations for us.

As an example of interest, I've attached the trip list for an upcoming heli trip I'm leading to Almer Hut this coming October. You will see we have 21 participants already and we are still over 2 months out.

If you have any questions or need more info please don't hesitate to contact me - [REDACTED] is my mobile.

Regards,

Bill Johnson

Bill Johnson

[REDACTED]

[REDACTED]

- The West Coast CMS states that “*Concessions may be granted for regular aircraft landings within the backcountry-remote zone where adverse effects on conservation values, recreational users, remote or wilderness values can be avoided or otherwise minimised.*” (p205) and “*In the event of doubt, the operative parts of the CMS will be interpreted in favour of the intrinsic values identified at specific Places (see Volume I, Part 4, Chapter 4.2).*” How would the proposed landings affect your experience as a trumper?
- How would granting this concession fit with the country’s 2050 zero carbon target?
- What is the effect of helicopter noise on our native wildlife?
- Are the proposed mitigation measures adequate?
- Is it appropriate for the Department of Conservation to grant a concession to an aircraft operator that openly advertised flights over a gazetted Wilderness Area
- Has the applicant provided sufficient information on relevant issues to support a decision the public can have confidence in?

I object to an [application for a concession by Precision Helicopters Ltd](#) for regular landings in the backcountry inland of Hokitika.

Taryn van der Spuy



Get [Outlook for Android](#)

A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Biddy Manera
Organisation	<i>Biddy Manera</i>
Date	16/8/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support all proposed landing sites

My reasons for my objection or submission are:

I support this application in total because.....

it will help create opportunities for locals and visitors alike, to our area in the Westland District in giving access to our backcountry for opportunity in their outdoor pursuits and 'hunger for the wild'.

It will enable all of our local businesses who have accommodation, food and beverage, heritage and tourism etc to extend their outreach to visitors with engagement to encourage experiences in our unique area.

COVID 19 HAS MOTIVATED THOUGHTS TO CHANGE, AND SUPPORT A POSITIVE FOR OUR AREA - FOR ITS LOCAL BUSINESSES, EMPLOYMENT, SOCIAL ASPECTS, AND LONG TERM FUTURE DEVELOPMENT – HIGHLIGHTING OUR ENVIRONMENTS.

Within small townships – businesses working together and supporting each other (as well as the town as a whole) are an important 'backbone' – by encouraging experiences and opportunities means visitors will stay longer and get to know, and importantly, understand our vast and varied environments, our heritage and cultures and why we want to invite/encourage them to explore our 'backyard', and appreciate why we live here.

Ross is an historic township with opportunities for a welcomed stay to explore.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

That the Company highlights the local stories, as in - cultural, environmental, heritage, as well as current stories/information, plus all the other what to do and where to go places.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
NA		
NZ		

How do I submit my objection or submission?

Complete this form and email to DNSubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Level 1, John Wickliffe House, 265 Princes Street, Dunedin 9016 – Attention: Olivia Geddes, Senior Permissions Advisor.



A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Dan Roberts
Organisation	
Date	16 Aug 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Helicopters flying and landing in parks.

My reasons for my objection or submission are:

I am objecting to allowing helicopter access for recreation into parks.
The sites are not inaccessible by foot and thus the outdoors experience must be preserved as much as possible.
The outdoors are for quiet activities, not loud helicopters.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Reject the application for allowing these helicopter landings.

G. Attachments

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Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Nick Hann
Organisation	N/A
Date	16 August 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The proposed helicopter landings in the Hokitika backcountry.

My reasons for my objection or submission are:

In May this year, two close friends and I embarked on a 6-day tramp in the Hokitika backcountry, through much of the area under threat by this application. We walked to Ivory Lake Hut via Galena Ridge, past Miserable Ridge, Remarkable Peak and Mt Beaumont over 3 days, and travelled over Seddon Col and out the Whitcombe past Price Flat, over the remaining 3 days. Miserable Ridge, Remarkable Peak, Mt Beaumont and Price Flat are all locations where Precision Helicopters is requesting to land. As well as impressive landscapes and a backcountry experience, in embarking on this trip we sought isolation, tranquillity, and separation from civilization. The application by Precision Helicopters threatens these qualities, which are becoming harder and harder to experience in today's busy world.

I firmly believe there are enough places in New Zealand where people can use noisy, intrusive and pollution-emitting machines to reduce effort in their increasingly sedentary lifestyles. It's the locations that can only be reached by slogging for days with a heavy pack on one's back that are harder and harder to find. In these locations, all that can be heard is the streams babbling, the kea calling and the wind whispering over the landscape. In these locations, all that can be seen is what occurs here naturally; the remnants of the early snowfalls of winter, the golden tussock and snowgrass above the deep green hue of the bush, the crisp white line of a waterfall tumbling down the mountainside. It is these places that must be protected from the fingers of civilisation forcing their way into our wilderness areas.

Helicopter landings in the areas above will seriously change the character of the landscape, not just for people experiencing the area, but also for the local wildlife. Helicopter landings in these areas will also increase the chances of pollution and litter being left behind. Helicopter landings and flights will also further increase the effects of climate change on our backcountry. It is clear that global warming is rapidly altering our landscapes. A quick comparison of Ivory Glacier today to the photos in the hut from when monitoring of the glacier first began shows how dramatic the effects of climate change are on snow and ice in the mountains. The helicopter landings will directly contribute to this issue, further pushing the climate to the point of no return.

I strongly believe that the proposed helicopter landings in the Hokitika backcountry should not be permitted to go ahead.

I have attached four photographs from our trip of locations proposed as landing sites, demonstrating the beauty, tranquillity and remoteness of the area, and how intrusive helicopter landings would be.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be withdrawn.

If the landings are permitted, they should be kept to an absolute minimum, and there should be times of the year when the landings will not occur, so that users of the backcountry may select times to undertake trips where they will not be disturbed by landings.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
Submission attachment - photos	PDF	Photographs of landing sites.

How do I submit my objection or submission?

Complete this form and email to DNSubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Level 1, John Wickliffe House, 265 Princes Street, Dunedin 9016 – Attention: Olivia Geddes, Senior Permissions Advisor.



View across to Miserable Ridge from a tarn on Misty Ridge. Photo: Nick Hann.



Campsite below the distinctive rock wall of Remarkable Peak. Photo: Felix Harrison.



View down to Remarkable Peak, looking from the south-west. Photo: Nick Hann.



Late afternoon on the summit of Mt Beaumont. Photo: Felix Harrison.

OBJECTION OR SUBMISSION



Department of
Conservation
Te Papa Atawhai

New Zealand Government

A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Paulette Birchfield
Organisation	
Date	17 August 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application in full

My reasons for my objection or submission are:

See attached document – WCTTOP CMS Assessment P Birchfield and B Russ

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application to be approved with appropriate conditions based on the information provided in the concession application.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
WCTTOP CMS Assessment P Birchfield and B Russ	PDF	CMS assessment of proposal

How do I submit my objection or submission?

Complete this form and email to DNSubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Level 1, John Wickliffe House, 265 Princes Street, Dunedin 9016 – Attention: Olivia Geddes, Senior Permissions Advisor.

OBJECTION OR SUBMISSION



New Zealand Government

A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Brendon Russ
Organisation	
Date	17 August 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application in full

My reasons for my objection or submission are:

The proposal is consistent with the relevant sections of the CMS – see attached document.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application to be approved.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
WCTTOP CMS Assessment P Birchfield and B Russ	PDF	CMS assessment of proposal

How do I submit my objection or submission?

Complete this form and email to DNSubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Level 1, John Wickliffe House, 265 Princes Street, Dunedin 9016 – Attention: Olivia Geddes, Senior Permissions Advisor.

West Coast Te Tai O Poutini Conservation Management Strategy assessment

3.6.1 Recreational Opportunities

Objective 1: *To provide a comprehensive range of recreational opportunities that enable people with different capabilities and interests to enjoy and appreciate West Coast Te Tai o Poutini public conservation lands, whilst protecting natural, historical and cultural heritage from adverse impacts of recreational use.*

This is a low impact activity that will provide for people like ourselves who are unable to access these sites and will now hopefully be able to as the Objective states, enjoy and appreciate those areas. The maximum limits set on landings are more than adequate to ensure that the impacts on other users are minor – for all but the most grumpy and intolerant trampers.

Policy 7 states that *where there is uncertainty about potential adverse effects associated with the provision of recreational activities or services, then a precautionary approach should be taken.*

As a regular user of helicopters itself, the Department should be by now fully aware of the effects of their use both on native wildlife and people, which in most cases is de minimus. Noting though that there will always be some malcontent who will loudly complain about being disturbed for 60 seconds of their 4-day tramp but for the rest of us, any helicopter associated noise is temporary, infrequent, and hardly noticed.

3.6.4 Recreation and Tourism Activities

Objective 1: *To provide opportunities for people to undertake a wide range of recreation and tourism activities at places and in ways that optimize the quality of the experiences available, whilst avoiding or otherwise minimizing adverse effects on conservation values and conflicts with other users.*

The proposal is consistent with this Objective by allowing appropriately limited access to areas of outstanding natural scenery for recreation and tourism activities. As stated in the overview for this section, the positive aspects of recreational use of public conservation lands include enjoyment,

inspiration and increased understanding of conservation, as well as actual or potential physical and social effects associated with these visits.

3.6.4.2 Aircraft

The use of aircraft provides huge benefits to the conservation estate; these benefits include conservation management, pest control, provision and servicing of facilities, and emergency, or search and rescue - any mention of limiting their use due to an arbitrary 2050 zero carbon target should be given the contempt it deserves.

Policy 1. The concession is compatible with the statutory purposes for which the place is held (Hokitika Place, and Te Wahi Pounamu Place) and does not compromise the desired outcomes for the Places.

The proposed concession activity is generally low impact and is in keeping with the conservation values of the sites. Landings are intermittent and infrequent with varied flight paths, plus additional measures will be undertaken to minimize noise generation.

A regular visitor survey to monitor the effects of aircraft overflights on those visitors to the Franz Josef Glacier - arguably the most 'highly-impacted' area for helicopter over-flights on the West Coast, had a relatively low percentage of respondents that reported aircraft noise as 'least liked' (generally between 10%-15%).

It could be that there is an erroneous perception that the noise of aircraft is intolerable, and this perception is perpetuated by some who have their own alternate agenda, and not actually founded in reality.

P Birchfield



B Russ

OBJECTION OR SUBMISSION



A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Brendon Breeze
Organisation	
Date	17/8/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support Precision's application to have consent granted for the landings areas as defined in the proposal:

My reasons for my objection or submission are:

Reasons for support: I am a member of Hokitika Land Search and Rescue. Precision's geographic base is central to our high probability callout area. In the event of the critical need for a speedy Heli-Vac Precision's location could mean the difference between life and death for someone in the future (as opposed to a dispatch from either Hokitika or Greymouth Airports). To make Precision's venture commercially viable (and hence stay where they are) consent needs to be granted in a sensible manner which takes in the need for conservation management and the strategic merit from an emergency point of view of having Precision stationed where they are. Losing them from this location would be a loss in the arsenal of tools you can call upon in an operational sense.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Nil

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Andrew Buglass

17/8/20

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My objection is to allowing landings on five of the six proposed sites, the exception being Mt. Greenland

My reasons for my objection or submission are:

I don't have a problem with Precision Helicopters' application in itself, rather the incredibly worrying precedent it creates. Before it is even considered a discussion needs to take place about the status of the not so large area of alpine wilderness in which it will occur and whether or not further expansion of helicopter tourism into New Zealand's natural wilderness spaces should even be allowed. This type of activity benefits only one user group and impacts on the quality of the experience for all the others, in this case hunters, trampers, climbers, kayakers and naturalists. A wilderness should be a place we can rest and rejuvenate, with only the sounds of nature, wind, water, and birdsong, not the constant drone of helicopters. In other parts of the world with similar natural features this is recognised and access is restricted to less intrusive forms of transport. In the pre-covid situation around Franz Josef and Fox Glacier we were having 36,000 helicopter landings a year. The noise there is constant and highly unpleasant. This is a travesty that never should have been permitted in the first place, however seeing that it has, we now need think very seriously about whether or not we want to destroy the natural quiet of the remaining tracts of alpine backcountry that are largely noise free. This particular application if approved will likely be used as precedent for other operators wanting exploit stewardship land which has little if any statutory protection. I view it as the thin edge of the wedge. I'd like to see the sound equivalent of a clear skies space established in central Westland. A place set aside that specifically recognises, addresses and preserves the existing natural quiet. We can talk about concessions for tourist flights and landings once boundaries have been established. Currently, helicopter landings are limited to the dropping of hunters and trampers, and hut and track maintenance. This is low level, infrequent and non-intrusive and I have no problem with it continuing. The mountains behind Hokitika have arguably the best network of remote huts and tracks anywhere in the world. It provides an alternative and more challenging alternative to the crowded and more sanitised Great Walks and has far greater and more long-lasting than if we turn it into another tourist theme park. If people want to take a tourist flight and land in a scenically spectacular spot, they can already do this down at the Glaciers.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Apart from the Mt. Greenland landing site, I would like to see this application declined until we figure out whether we want to specifically preserve some quiet spaces in the Central Westland Alps for other user groups, and having done that create some boundaries around an area that is sufficient large enough to do this. If approved I like to see a caveat placed on further applications in the same area.





A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

JEFFREY IAN SHERMAN

Organisation

N/A.

SELF

Date

AUGUST 2020

D. Statement of Support, Neutrality or Opposition

I **Support** this Application (I am making a submission)

I am **Neutral** on this Application (I am making a submission).

I **Oppose** this Application (I am making an objection).

E. Hearing Request

I **Do Not** wish to be heard in support of this objection or submission at a hearing.

I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

HELICOPTER FLIGHTS AND LANDINGS IN THE HOKITIKA
BACKCOUNTRY AS LISTED IN THE APPLICATION BY
PRECISION HELICOPTERS.

My reasons for my ~~objection~~ or submission are:

Through my personal experience with Precision Helicopters I have found them to be extremely trustworthy, professional and safety conscious operators. They have a comprehensive knowledge of the mountain environment and conditions in which they operate with a modern, well maintained and ideally suited machine(s) for task. From a personal perspective I totally support this application due to the excellent service I have experienced during the past 2 years (2019/2020), my companion (70) and myself (68), spent a total of 50 days in the remote Hokitika/Whitcombe valleys indulging in our lifelong passions of Hunting, tramping and photography/art. We have both spent considerable time in these environments since the 1970s but are no longer as young and fit as then, the service and location of Precision Helicopters has meant we are still able to indulge in our love of this mountain region knowing this excellent service is but a text message away at all times.

N/A.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
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N/A.

How do I submit my objection or submission?

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18 August 2020

Attn: Olivia Geddes
Senior Permissions Advisor
Department of Conservation



Cc: Nicole Kunzmann, DOC Operations Manager, Hokitika;
West Coast Conservation Board

Dear Olivia,

FMC submission on concession application by Precision Helicopters Limited, 81956-AIR

We write further to our letter of 28 July 2020. (Copy enclosed).

This letter contains Federated Mountain Clubs' (FMC's) full submission on the concession application by Precision Helicopters Limited (*Precision*) for landing activities in the Hokitika and Whataroa backcountry (*Application*). We thank the Department of Conservation (DOC) again for the opportunity to submit. We repeat our wish to be heard at hearing.

In this submission, we deal with:

- Who and what FMC is;
- The implications of DOC's response to our earlier submissions re-set request;
- The indeterminacy of the effects of Application on available material;
- Our lack of confidence that the full Application materials are adequate;
- The inability to adequately mitigate effects of the large scale likely;
- The inconsistency of the Application with the West Coast Conservation Management Strategy 2010-2020 (CMS); and
- The relevance of carbon emissions and concessions decisions.

We wish to be heard in support of our submission

Executive Summary

FMC represents the interests of over 90 tramping and other outdoor recreational clubs, who together have over 22,000 members.

Responding to our letter of 28 July 2020 through a letter from Natasha Hayward dated 11 August 2020, DOC essentially confirmed that the publicly-available material represents the full material detail of the Application. Given this clarity on the Application material, it is now also clear that DOC is not in a position to fairly or lawfully decide the Application.

We therefore invite DOC to:

- Pause processing of the Application;
- Through the power in section 17SD of the Act, require Precision to supply further information (including an environmental impact assessment) against *every matter listed in section 17S of the Act* – this being the only rational standard of information “necessary to enable a decision to be made” on the Application;
- Publish all further information publicly for all submitters; and
- Re-set the timeframes for public response.

Despite the lack of available information and the shortcomings of that information, Precision have provided enough so that it *does* remain clear that:

- The effects of granting the Application mean the potential loss of consistent natural quiet on a massive scale across the whole lower Whitcombe Valley and vicinity;
- There are no adequate or reasonable methods for remedying, avoiding, or mitigating the adverse effects of the Application; and
- Even if it were possible, the practical reality of Precision’s mitigation undertakings are that they amount to nothing – no mitigation at all.

Accordingly, the Application should be declined at least under section 17U(2)(b) of the Act for its effects on recreation. This conclusion holds also for other effects.

In addition to creating effects on recreation that could simply not be mitigated, DOC should decline the Application because it is very obviously inconsistent with the CMS, and in particular its Hokitika Place, Aircraft and Wilderness Area provisions. Indeed this is so obvious that in the event of a grant decision, we would look forward to an explanation as to how a decision *not* to simply return the Application to Precision, or to decline it outright in present form, could possibly have been rational.

The mitigation in the Application is – on the CMS’s own terms – ‘inadequate’ with respect to Wilderness Area overflight. Only flight restrictions could be adequate. Therefore, in the event that DOC decided to grant the Application, FMC would also look forward to a condition in substance as follows:

This concession shall commence upon DOC giving notice to the Concessionaire of the successful negotiation between DOC and CAA of flightpath restrictions sufficient to avoid potential noise effects of operations:

- I. associated with the exercise of this concession; and*
- II. that are within and close to the Adams Wilderness Area.*

Finally, it would be perverse for DOC to approve the Application when its own statutory conservation mandate is compromised by the Application's core activity.

Yours sincerely,

Jan Finlayson
FMC President

FMC

Federated Mountain Clubs (FMC) was founded in 1931. We represent the interests of 96 tramping and other outdoor recreational clubs, who together have over 21,000 members. We are a national organisation that has a strong interest in the good governance of all public conservation land.

Re-set request

We thank DOC staff for their time for a phone call with FMC Executive Officer Danilo Hegg on 4 August 2020. In that call, DOC staff recorded that they may or may not respond to the requests in our earlier letter. Only by letter from Natasha Hayward dated 11 August 2020 did DOC formally respond. This was a full fortnight from our initial letter on the matter, which represents one half the required statutory period.

DOC's response included that:

- The published Application material is “the applicant’s current application... with the exception of some documents that were considered not relevant for the public to understand the proposal.” In essence, then, it appears that the publicly-available material represents the full material detail of the Application; and
- Some material was rejected for lacking detail; and
- “A decision was made under section 17S of the Conservation Act, that the application contained the information for the public to understand the proposal.”

FMC remains puzzled, if only because if DOC's response is accurate, then references in the published Application material to an (un-published) AEE must in fact refer to a *non-existent* AEE. That points to a very clear shortcoming against section 17S of the Act. We are also puzzled as to why poorly-detailed material would be swapped for none at all. Or why some reference material might be provided, but other material withheld for privacy reasons. Nonetheless, we take DOC's response to be accurate, and welcome clarity on the true state of Precision's Application.

Given this clarity on the Application material, it is now clear also that DOC is not in a position to fairly or lawfully decide the Application. The Applicant has not provided material against every matter in section 17S of the Act, as is its obligation. Let alone provided such material on anything approaching a standard that will allow DOC's delegated decision-maker to make an assessment under section 17U on a lawfully adequate foundation.^[1]

For just one example, the Application contains no concrete description of the effects of the proposed activity on:

- Wildlife, including effects on kea, whio, rockwren and other birds;^[2]
- Recreation, in particular by effects on tranquillity and natural quiet.

By definition, “effects” includes potential effects, so it can not be enough for an applicant to merely omit robust consideration of these kinds of matters. To do so is a clear shortcoming against section 17S(c) of the Act.

It is not the role of submitters to assess and describe the effects of a proposal, or to guess at them where they are not provided by DOC in a submissions process. It is the Applicant's role to assess and describe them, and where it has decided to notify DOC's first duty to provide them to publicly.^[3]

We therefore invite DOC to:

- Pause processing of the Application;
- Through the power in section 17SD of the Act, require Precision to supply further information (including an environmental impact assessment) against *every matter listed in section 17S of the Act* – this being the only rational standard of information “necessary to enable a decision to be made” on the Application;^[4]
- Publish all further information publicly to all submitters,^[5] and
- Re-set the timeframes for public response.^[6]

The decision-maker should only consider the Application in accordance with the matters set out in section 17T.

Should Precision raise the issue, FMC is confident that a short delay would cause no obvious or reasonable ‘prejudice’,^[7] though we would not be comfortable with that framing in any event. It cannot be that requiring an applicant to correct its own manifestly inadequate Application could be held against DOC as acting prejudicially.

Should DOC elect not to take the steps set out in our invitation, it will be processing a concession that it is very clearly not in a position to properly and lawfully decide. The decision-maker will also have placed themselves in an awkward position with respect to:

- The rationality of their *non-exercise* of section 17SA and 17SD powers; and
- Having now perhaps inadvertently cut down its ability to exercise of section 17U(2)(a) powers without creating undue applicant-side risk.

Coming very soon after issues with sufficiency of information on other applications, these ought to be striking and salutary issues for the West Coast office, if not higher levels of the Department. Ms Hayward's approach to the issue is not encouraging or legally sustainable. We can only urge a high-level visit upon these issues.

Administrative law is very clear that all statutory powers of decision *must* be decided on sufficient information.^[8] In the context of concessions decisions under the Act, a lack of information on an adequate standard against every matter in section 17S, is not acceptable. In such circumstances, DOC has the power to return the application under section 17SA of the Act, or insist further information be provided through section 17SD.

In general, as in Precision's Application specifically, failure to take one of these steps where applicant information is so manifestly lacking against section 17S would likely be found to be in error under challenge.

FMC did not have confidence in the Precision material that it has not viewed

DOC's view on the sufficiency of Precision's Application material – that it is sufficient – is puzzling to the extent that we think it must be in legal error.

In the period when it appeared that DOC would ignore FMC's request for information, FMC formed a view that we did not have confidence that Precision would have provided robust material against every matter listed in section 17S of the Act. While that position is now confirmed, we set out our reasons for coming to that position for the public record.

FMC was comfortable to make conjectures about the true standard of Precision's Application material, now confirmed, for the obvious reasons that:

- Material provided as “further information” on noise abatement landing procedures accepts noise abatement as a live issue, and therefore noise issues as a relevant effect. But that information is lacking in basic detail. It provides no quantitative *or even qualitative* assessment of actual effect-mitigating potential of the procedures mentioned. Nor does it deal with whether such procedures would be ‘adequate’ methods of mitigation. Similarly, Precision provides no information on whether the procedures are the full extent of ‘reasonable and practicable’ methods of mitigation. This being ‘further’ information, the implication must be that the AEE itself treats *the principal effect associated with the Application* – noise – with similar lack of robustness. If this was the case for the principal effect of the Application, it was likely to be the case for the other effects listed above also. So it proves.
- Precision has also provided a statutory assessment as “further information”. Yet it too is lacking in basic ways that should be familiar to any person familiar with the CMS. The material makes no attempt to engage meaningfully with the Application's consistency with the Act or CMS. Specifically, it does not engage meaningfully with the CMS's Hokitika Place Outcomes or Aircraft Objectives and Policies, or engage *at all* with its relevant Wilderness Area Objectives and Policies, insofar as these provisions deal with overflight. If it had done so, serious questions of CMS consistency would have been raised (see below). While an unbalanced treatment of relevant statutory documents can perhaps be expected from an applicant firm, such treatment does not amount to sufficiency against a legislative standard.
- Rotorcraft Helicopter Support's reference letter *is almost wholly-irrelevant* to decisions under Part 3B of the Act, and in particular the decision-making considerations permissible under section 17U. Rotorcraft's letter shows that Precision has strong standing within the aviation industry but does not address the second part of the requirement - that which indicates that operation on public conservation land involves certain unique considerations: *Your qualifications, resources, skills, and experience to adequately conduct the activity on public conservation land*. Again, it shows insufficient knowledge or care in providing DOC with relevant information for a concession application to an adequate standard. As one of few supporting documents, its presence highlights the striking absence of other necessary Application material, including material addressing potential effects on wildlife and recreation.

Effects on Recreation cannot be adequately mitigated

Despite the lack of available information and the obvious shortcomings of even that, Precision have provided enough so that it *does* remain clear that the Application should be declined. There are clearly very significant adverse effects, including potential and cumulative effects, and no adequate or reasonable methods for remedying, avoiding, or mitigating them. In particular, effects on recreation cannot be adequately mitigated. Accordingly, the Application should be declined at least under section 17U(2)(b) of the Act.

Scope and scale of noise effects

Precision can provide no concrete indication of the effects of its proposal *at all*, let alone measures to mitigate those effects. For example, supporting information provides that:

“The application does not propose to land at all of the above sites for the frequency outlined each day of operation. The maximum per day and year outlines the maximum use of the site. Operational factors including type of passenger and weather will govern the use of each site”

The maximum use of each site per day is not provided by Precision. But by simple arithmetic, it is as follows:

Location	Max Landings / Day	Max Landings / Year	Max Days at Max Rate
Miserable Ridge	3	150	50
Mount Beaumont	5	300	60
Remarkable Peak	3	300	100
Prices Flat	3	300	100
Whataroa Glacier	6	100	16 2/3
Mount Greenland	4	100	25

In simple language, and for example, Precision proposes a maximum of three landings per day at Prices Flat over 100 days of the year. This also means it could operate up to two landings on 150 days. It proposes similarly at Remarkable Peak.

Allowing for the vagaries of weather and seasonal fluctuations in demand, it must be that these Prices Flat and Remarkable Peak totals would make for more than one landing at these sites on virtually every fine summer day. When combined with the permutations for the other four landing sites and the stated intention to make a flexible offering, Precision is *explicitly* offering potential effects of sporadic helicopter noise in an area including at minimum *any point* between the landing sites *at any time*.^[9]

When considering Precision's base location and the realities of mountain flying, this sporadic potential over the whole realistic operations area must almost certainly rise to a *strong possibility for consistent noise on any and every fine day* over the entire Lower Hokitika and Whitcombe to Prices Flat, the Derdrichs Range, Meta Range, and entire Prices and Tuke River catchments. This puts the Application in a different category of effects than adding landings to an already-crowded flying area. Despite some indeterminacy in the available information, the picture emerging is the potential loss of consistent natural quiet on a massive scale.

Entertaining this level of cumulative effect in any area cannot be tenable. It is doubly so in this area, which is described in the CMS as New Zealand's "backcountry adventure 'capital'", and when created *by the effects of a single application*.

Yet the information provided simply fails to engage in how this kind, scope or scale of noise might effect this recreational context, let alone might be mitigated. We now know that the AEE referred to fails similarly – in that it does not seem to exist.

Inadequacy of mitigation

In a context of very significant effects, the expectation around 'adequacy' of mitigation must be that mitigation will be strong. On the other hand, the Application information fails, on a level of basic credibility, to offer up *any* real mitigation.

As mentioned above, the information represents a clear aim to retain flexibility of landing location, timing, frequency etc. By way of mitigation, the information states an intention of "avoiding landing sites as far as practical for us".

While FMC welcomes some desire to "avoid" landing sites, the question is what is really meant by "as far as practical for us". There is only one explicit expansion on this point. It is the suggestion that "when recreational users are spotted within 1000 metres of a landing site", a landing may be avoided.

In FMC's view this undertaking is not even remotely credible mitigation from a practical perspective. It is certainly not 'adequate' mitigation – not least given that it would achieve either nothing or *a worsening* of noise effects. Instead, it is no mitigation at all.

Picturing the scene in a Precision helicopter cockpit on approach to a possible landing site, Precision's vague undertaking leaves open:

- Whether the pilot is obliged to check the nearby bush or country for recreational users *with anything other than a routine lookout*;
- Whether performing some check like that *would consistently be safe*;
- Whether doing so *would be likely to yield any sighting* except with exacting knowledge of the nearby country and a significant investment of flight time;^[10]
- Whether or not such a procedure *would increase or decrease overall noise effects*;
- Even when all decisions might be safe, etc, *whether or not a no-landing decision is even realistically open to the pilot* given the commercial imperatives, including present Precision advertising or ticketing situation of the passengers on board.

Considering these questions, one can imagine the spectrum of possibilities. It could be that:

- Precision takes its undertaking very seriously. But in this case the noise effects of a short, small-area search would become worse than for a simple landing.
- A cursory procedure is undertaken, perhaps described as ‘practicable’ or similar. This would amount to a worst-of-both-worlds effects situation, one where helicopters alter their flight configuration, course etc close to the ground – with all the associated noise effects but no realistic increase in the likelihood of spotting and avoiding people on the ground.
- Much more likely, given the cost implications, difficulty, knowledge of lack of consistent DOC enforcement etc, the undertaking could not be taken seriously. In this case, of course, pretending to offer ‘adequate’ mitigation then becomes disingenuous.
- Only in cases where a recreationalist, common as they are in the area in all weathers, is spotted *by sheer luck* might a landing decision change. And in these cases, the likelihood is that the helicopter will have had to pass so close to a person as to have created a significant noise-related disturbance anyway.

The practical reality of Precision’s undertaking is that it amounts to nothing – no mitigation at all.

Interaction with other concessions

Finally, Precision’s material is silent on what will happen upon landing. We are aware that Precision holds other concessions, and so might seek to exercise these concessions in conjunction.

FMC has no difficulty with the right of concessionaires to exercise the privileges granted to them, and do so in combination where they are held over several concessions. But without a detailed explanation on this issue, the simple fact remains that the full cumulative effects of the Application will not have been described, let alone the potential mitigation of those effects. Here is another significant shortcoming against section 17S.

Other effects unlikely to be able to be adequately mitigated, remedied or avoided

The Application will have indeterminate effects on wildlife, including disturbance and even possibly lead-related effects on kea, whio, rockwren and other birds. These species are, respectively, threatened/nationally endangered; nationally endangered; and threatened/nationally vulnerable.

Above we mentioned that we are not confident that Precision will have dealt with these matters at all, despite their statutory obligation to deal with potential effects of their proposal. We also infer that there has been no consideration of possible mitigation of these potential effects.

FMC would welcome our being wrong on these points, and would welcome the establishment – through this process – that there will in fact be no effects on wildlife

Proposal is clearly contrary to the CMS

Despite Precision’s un-balanced assertions to the contrary, the Application is, at almost every turn, clearly inconsistent with the CMS.

Consistency with Place Outcomes

Precision’s statutory assessment material deals largely with the Place outcomes. It seeks to present the Application as consistent with the CMS Outcomes for the Hokitika and Te Wahi Pounamu Places.

We make only brief comment on the consistency of the Application with the relevant Place Outcomes. Only brief comment is necessary because:

- These Outcomes *simply do not contemplate* overflight and noise intrusion issues, which are the major known effects of the Application; and
- The ability to show some consistency with respect to explicit Outcomes *does not* show “consistency with the CMS”. It does not negate a need to show consistency with other relevant provisions in the CMS. In particular, it does not remove a need to show consistency with the CMS Aircraft and Wilderness Objectives and Policies.

Our simple observation is that the Application is squarely contrary to the relevant Hokitika Place Outcome. At 4.2.6.7, the CMS provides:

Concessions may be granted for regular aircraft landings within the backcountry- remote zone where adverse effects on conservation values, recreational users, remote or wilderness values can be avoided or otherwise minimised.”

(emphasis added)

Precision’s analysis focuses essentially only on landing regularity. It says that its landing sites are suitable for ‘regular’ landings. It does not acknowledge that the issue of appropriate landing regularity comes only after a significant rider – the bolded text above. Against that rider, the above analyses demonstrate very clearly that the Application neither avoids nor truly mitigates or minimises *any* of its effects. On the available materials and probably the full documentation, these effects are either indeterminate or very large in scope and scale.

Precision’s silence on these issues, can only speak again to an insufficient knowledge or care in sufficiently assessing relevant effects, including potential effects, of its proposals, or in applying these to relevant regulatory provisions.

In the event that DOC decided to grant the Application, for these reasons we would look forward to an explanation as to how the Application was allowed to pass the gateways in section 17SA or section 17SB of the Act – i.e. how a decision *not* to simply return the Application to Precision, or to decline it outright in present form, could possibly have been rational.

Inconsistency with Wilderness Area and Aircraft provisions

The Application is for a series of landing points adjacent to the Adams Wilderness Area, one of which is at its opposite end. Having offered sightseers “ringside seats” to the high ground of the Whitcombe/Evans and Garden of Eden/Allah areas, only a short flight time away, there is no need to pretend that Precision will only offer short flights over the Backcountry Remote Zone of the lower Whitcombe, Hokitika and Tuke areas.

The Application obviously implies frequent Wilderness Area overflight. In FMC’s view, it would be implausible for a decision-maker to infer otherwise. This raises wilderness area overflight as a significant issue on the Application.

We accept that Precision seek to frame the “activity” to which its Application relates to be solely aircraft landings.^[11] However, for the following reasons, it is not conceivable – on the CMS’s own terms – that a balanced statutory assessment could avoid issues associated with wilderness area overflight. Yet Precision’s assessment is deficient in precisely this way.

The CMS provides Objectives and Policies relating to aircraft usage. The CMS Aircraft Objective is to “optimise” available experiences, “whilst avoiding or otherwise minimising adverse effects on conservation values and conflicts with other users”. On overflight, Aircraft Policies 8 and 9 provide that:

Policy 8: The Conservancy will liaise with relevant authorities, interest groups and operators in order to minimise the adverse effects of aircraft overflights of West Coast Te Tai o Poutini public conservation lands.

Policy 9: The Conservancy should seek Civil Aviation Authority agreement to regulatory restrictions over airspace where implementation of Policy 8 has failed to adequately minimise the effects of aircraft overflights on West Coast Te Tai o Poutini public conservation lands.

The CMS also provides, on gazetted Wilderness Areas, the following:

*Objective 2: To enable people to experience extensive natural settings with diverse topography and very high levels of natural character, including natural quiet, where... **“no noise intrusion from aircraft is present”**...*

(emphasis added)

A balanced analysis of these provisions begins with what the Aircraft Objective means to “Optimise”. Optimise is a neutral and generic operator. It is neither permissive nor restrictive in general, and may mean a number of things when connected with a context. When combined with an objective of “avoiding

or otherwise mitigating” adverse effects, it is clear that this “optimising” is not operating in the abstract, but in the context putting priority on conservation and recreation.

When further combined with Wilderness Area Objective 2, the position becomes even clearer for wilderness areas. There, “optimising aircraft use” means taking steps to avoid their usage. This is the only way to ensure that there is “no noise intrusion from aircraft.”^[12] This is a much stronger injunction than even the general position of minimising or mitigating aircraft effects.

In simple language, then, the CMS takes a very clear Objective posture of seeking no wilderness area overflight. This is the true CMS Objective context against which the Application must be considered.

Against that context, Precision’s application obviously contemplates commercial wilderness area overflights of indeterminate but potentially significant frequency. These would be the most frequent flights of that character in the area. A description of this as *other than* “obviously inconsistent” with the Objective context – the combination of the Aircraft Objective and Wilderness Area Objective 2 – is rather to strain the plain meaning of “obvious inconsistency”. It cannot be right.

For these reasons again, upon a grant decision we would look forward to an explanation as to how the Application was allowed to pass the gateways in section 17SA or section 17SB of the Act.

Having established the Objective context on overflight, the next exercise is to consider how this can be put into action with respect to the Application. On this, FMC appreciates that DOC does not regulate flightpaths, and disclaims any formal ability to do so unilaterally. Yet Aircraft Policies 8 and 9 make clear that the Objectives on wilderness area overflight are not “tools without teeth”, especially with respect to new concession applications. In these Policies, DOC has regulatory tools with which to make its overflight objectives “bite”.

In simple language, again, the CMS takes a very clear Policy posture of co-ordinating DOC action to prevent wilderness area overflight, *absent only a direct and formal ability to do so unilaterally*. This is the true CMS Policy context against which the Application must be considered.

This leaves the overall situation of the Application with respect to the CMS overflight provisions, as follows. There is:

- A CMS Objective posture that is obviously directed to *avoiding* aircraft noise in wilderness areas, and not a lesser standard like minimisation or mitigation.
- CMS Policies containing tools with which to carry out those objectives; and
- An Application obviously implying frequent Wilderness Area overflight, offering up no mitigation on general flight noise issues, and only vague and impracticable noise minimisation procedures in and around landing areas.

Given all this, and whatever Precision’s own internal view of that “adequacy” might be, it must be clear *by the fact of its making the Application* that it has no interest in the “adequate minimisation” on terms that the CMS would recognise. In other words, on the CMS’s terms the mitigation in the Application is inadequate with respect to Wilderness Area overflight.^[13]

Should it approve the Application, this could only leave the strange position of Aircraft Policy 9 being squarely engaged. To give effect to its own policy, a statutory duty, DOC would therefore need to seek Civil Aviation Authority agreement to regulatory restrictions on Precision's flight operations, in so far as they affected the Adams Wilderness Area. Perhaps more strangely still, of course, this would all have arisen not by a failure of DOC-operator korero, *but as a result of DOC's own approval decision.*

Strange as it might seem, then, in the event that DOC decided to grant the Application, FMC would also look forward to a condition in substance as follows:

This concession shall commence upon DOC giving notice to the Concessionaire of the successful negotiation between DOC and CAA of flightpath restrictions sufficient to avoid potential noise effects of operations:

I. associated with the exercise of this concession; and

II. that are within and close to the Adams Wilderness Area.

FMC is well aware of the history of DOC-CAA negotiations on these matters. Quite aside from bringing up potential derogation-from-grant issues as between DOC and Precision, we are aware that this condition would be unacceptable to Precision.

The fact that there is a need, *on the CMS's own terms*, for a condition substantively of this form can only indicate that the Application is not consistent with the Aircraft or Wilderness Objectives and Policies of the CMS.

Consistency with section 20 of the Act

Finally, section 20 of the Act provides that authorisations for activities "on" wilderness areas unless that activity "is in conformity with the conservation management strategy or conservation management plan". We are aware of the long history of this issue, and have little doubt that DOC would assert that the word "on" in section 20 implies power to regulate of surface activities only. While we do not accept that that position is beyond argument, the place for that issue is not here. We merely note that that position does not square with Wilderness Area Policy 2 of the CMS, which uses the language of "within", or Wilderness Area Policy 4, which uses "in".

In the event of a decline decision, FMC would therefore ask that DOC consider explicitly recording that it *does not* rely on Wilderness Area Policies 2 or 4, or section 20 of the Act. This would reduce any residual risk of the decision being challenged by Precision on the basis that DOC claims a jurisdiction that it does not have.

Carbon Emissions and Concessions

It is very clear, when the effects of the Application are applied to the relevant provisions of the Act and CMS, that Precision's application should be declined.

A further factor, as yet not in outward-facing parts of the statutory guidance, but whose presence is underlying and it would be derelict to ignore, is anthropogenic climate disruption. Such disruption is inimical to conservation, the Department's primary statutory function.

Given that function, it is arguable that the Department has a mandated responsibility to seek attenuation of carbon emissions caused by concession activities undertaken on public conservation land.

FMC is aware that the Department is making laudable transitional changes to reduce its operational carbon emissions. It is also working in a context of heightened public understanding of climate disruption, an understanding that has crystallised in the Climate Change Response (Zero Carbon) Amendment Act 2019.

Regardless of issues raised in sections above, for the Department of Conservation to approve the Application when its own mandate is compromised by the Application's core activity, when its own conservation operational functioning has been altered to reduce conservation-inimical carbon emissions, and in a context in which pushback against carbon is both popular and statutory, would be perverse.

Footnotes

- [1] While no approval could properly or lawfully be made in these circumstances, the deficiency is especially severe considered against Precision's proposed term of 10 years – incidentally, for which Precision does not appear to have given a reason.
- [2] It is well-known that bird populations can be affected by mechanised overflight. For a New Zealand context, see treatment and citations in Tal 2004. In particular, given growing evidence of east coast disturbance and lead-related effects on kea, and the growing evidence of helicopter-related lead contamination in glacial ice, potential effects on kea may be significant.
- [3] The standard of information provided publicly by DOC in this case is likely to breach the statutory duty in section 49 of the Act.
- [4] We note that Ms Hayward's reference to a "decision under section 17S" is not a correct characterisation of procedure required from that provision.
- [5] This being required by necessary implication of the statutory duty in section 49(2) of the Act to receive submissions "on a proposal".
- [6] We are indeed aware of the timeframe matters raised by Ms Hayward. The Resource Legislation Amendment Act 2017 amended section 49 of the Act such that it is absolutely plain that concessions notification periods are 20 working days from notification of an Applicant's full proposal.
- [7] There is, for example, no indication that Precision will incur additional capital spending or cashflow issues as a result of a short delay. A short delay is also negligible in relation to the proposed ten year term.
- [8] DOC Legal will be well aware of the long run of authorities relating to these matters, with New Zealand provenance beginning in *Daganayasi v Minister of Immigration* [1980] NZLR 130 (CA).

- [9] Though it is unstated, FMC presumes that Precision proposes operating only in daylight hours.
- [10] FMC is well aware, and well appreciative of, the extraordinarily skilled and time-consuming flying needed to spot people in mountain SAR operations.
- [11] In addition, only a non-serious decision would take this approach without any underlying analysis.
- [12] These provisions also reflect DOC's Visitor Strategy 1996.
- [13] We make a similar 'adequacy' analysis in relation to the Place Outcome provisions. We have not explicitly stated that full analysis because the case of inconsistency there is very clear.

A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Cam Doake
Organisation	Recreational User
Date	17/08/20

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application in full

My reasons for my objection or submission are:

The application is consistent with all relevant sections of the West Coast Te Tai O Poutini Conservation Management Strategy.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

For the application to be approved, with conditions based on the information provided by the applicant.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to DNSubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Level 1, John Wickcliffe House, 265 Princes Street, Dunedin 9016 – Attention: Olivia Geddes, Senior Permissions Advisor.

Submission on 81956-AIR Precision Helicopters Limited

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

Submitted by Clare Backes, [REDACTED]
[REDACTED]

This is a very poor application. There is not enough detail for a member of the public to assess the nature and full scope of the application and its effects. Unless DOC has a lot more information that it has not put into the public domain, then neither can DOC assess this application thoroughly. The application is totally deficient in outlining the potential effects of the proposed activity and therefore does not meet the requirements of the Conservation Act.

There is no assessment of environmental effects – there is no mention of the vegetation at the different landing sites or the effect of between 3 and 6 landings per day and between 100 to 300 per year at each site. There is no mention of the actual species present in each landing site, so even a botanist would not know the potential effects of these landings. Helicopters affect vegetation as they land and take-off. Will the landing site be the same one at each landing site or will it move around? What will the cumulative damage be at each of the proposed landing sites?

There is no mention of indigenous fauna in the whole application. This would include not only flying and flightless birds, but also snails and other invertebrates. The West Coast Te Tai O Poutini Conservation Management Strategy (CMS) actually states that *Powelliphanta rossiana* and *P. fletcheri* are found near Mt Greenland which is part of the Mikonui priority site for biodiversity management. There needs to be a thorough assessment of the flora and fauna at each site, and then a very wide-reaching assessment made as to the possible effects on this precious biodiversity before helicopter landings should be allowed. The application does not imply any rigorous analysis of the effects of the helicopters. The recently released *Biodiversity in Aotearoa – an overview of state, trends and pressures 2020*, states how important New Zealand biodiversity is. DOC needs to protect our remaining indigenous biodiversity, not allow it to be compromised.

I also found the table in the application form *K. Effects Assessment* to be totally inadequate. I realise this table was written by DOC, but it is simplistic in the extreme, and not surprisingly the applicant has just ticked all the boxes.

There are no flight paths given in the application and although they are meant to keep GPS records of the helicopter movements, there is no analysis of which flight paths are suitable. The applicant is going to rely on some kind of continual assessment of weather, presence of other members of the public and other vague statements to determine actual flight paths and landing sites. This would be fine if this was private land – but it's not, it belongs to the public and any concession needs to have strict controls on what is allowed. It is very important that the path flights are recorded and specifically exclude flying over wilderness areas and strictly limited flying over remote areas. The CMS states under the objectives for wilderness areas that there will be no noise intrusion from aircraft to enable people to experience extensive natural settings with diverse topography and very high levels of natural character including natural quiet. (3.6.1.2). Again in the objectives for Remote Zone (3.6.1.3):

1. To retain a range of challenging remote natural settings with few, if any, facilities and very limited noise intrusion, so that suitably equipped people can enjoy these places on nature's terms.

2. To enable people to experience extensive natural settings with diverse topography and high levels of natural character, including remoteness and natural quiet.

So any extra noise from helicopters would be against these objectives. Any flying over wilderness areas must not be allowed and flying over remote zones must be minimised to achieve the objectives of the CMS. This is another reason for flight paths to be stated in the application and closely monitored, with GPS tracks being regularly submitted to DOC monitoring team for analysis. Precision Helicopters website currently advertises a journey around 6 glaciers and Ivory Lake or the Garden of Allah – flying over wilderness and remote zones. This is contrary to the outcomes as stated in the CMS for these regions. If the company is already prepared to ignore the outcomes stated in the CMS, then they should be denied any concession. The analysis of the CMS in the *supporting information* paper is very limited. The applicant has only considered a small fragmented part of the CMS – they shouldn't ignore the parts they don't like.

The application does not state what the visitors will do once they have landed. If the pilot takes them for a walk - long or short, then they need another concession for this activity. Are they just going to sit there, appreciating the peace and quiet after the noisy journey there?

As a backcountry trumper, I would be disturbed by helicopters flying over the area I was walking, and even more so if a helicopter landed at a site I had taken several days to walk to. In the outcomes for the Hokitika Place (CMS 4.2.6.7) it states that

Concessions may be granted for regular aircraft landings within the backcountry-remote zone where adverse effects on conservation values, recreational users, remote or wilderness values can be avoided or otherwise minimised.

Overflying and landing of helicopters would definitely cause adverse effect on me as a trumper. Hokitika Place is known for its tramping opportunities: *New Zealanders continue to regard the extensive Hokitika backcountry as the country's backcountry adventurer 'capital', because of the comprehensive network of backcountry tracks, routes and huts.* (CMS p248)

The presence of helicopters destroys this sense of adventure. The effects on other users of the backcountry must be taken into account.

The Climate Change Response (Zero Carbon) Amendment Bill passed in 2019 provides *"a framework by which New Zealand can develop and implement clear and stable climate change policies that contribute to the global effort under the Paris Agreement to limit the global average temperature increase to 1.5 degrees Celsius above pre-industrial levels."*

Allowing more helicopters to have concessions for landing on public conservation land is completely contrary to the intent of this act. The act is meant to be a framework for the whole of Government – DOC cannot just ignore it.

I would like DOC to decline this application for a concession.

Before DOC could even assess it, they would need more information:

- Flight paths
- Flora and fauna present at each of landing sites, and its current threat level
- Effect of helicopter landing on the flora and fauna
- Description of what tourists are expected to do upon landing
- Mitigation measures of production of CO₂ by helicopter flying

However for the reasons already stated the application should just be declined.

I wish to be heard I support of my submission.

A handwritten signature in black ink that reads "Clare Backes". The signature is written in a cursive style and is underlined with a single horizontal line.

Clare Backes



A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

Wayne O'Keefe

Organisation

Date

18 August 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application in full

My reasons for my objection or submission are:

The application is consistent with all relevant sections of the West Coast Te Tai O Poutini Conservation Management Strategy and strikes the right balance between promoting recreational activities, whilst minimising adverse effects.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

For the application to be approved, with conditions based on the information provided by the applicant.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	
Organisation	<i>Craig Swinburn - Chair</i>
Date	<i>16 / 8 / 2020</i>

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application in its entirety

My reasons for my objection or submission are:

Any actual and potential effects of the use of aircraft are mitigated through conditions as noted in the application, including methodologies of operating that mean the proposed Aircraft Concession is appropriate, and is consistent with all relevant sections of the West Coast Te Tai O Poutini Conservation Management Strategy for both the Hokitika Place and the Te Wahi Pounamu Place, and is compatible with the statutory purposes which the 'places' are held.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application to undertake aircraft activities should be approved with appropriate conditions based on the information provided in the application.

G. Attachments

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Kyle Kohe-Lyns
Organisation	
Date	03.08.2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support the application - excellent operator

My reasons for my objection or submission are:

I support the application - excellent operator

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Sue Smith
Organisation	
Date	18/8/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support this application

My reasons for my objection or submission are:

Nil

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Nil

G. Attachments

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter <i>Durham Havill</i>	
Organisation	
Date	<i>18/8/2020</i>

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I Donham Havill support the Application.

My reasons for my objection or submission are:

None.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

None.

G. Attachments

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Steve Smith
Organisation	
Date	18/8/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support this application

My reasons for my objection or submission are:

Nil

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Nil

G. Attachments

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Page Smith
Organisation	
Date	3/08/2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support this application - excellent operator

My reasons for my objection or submission are:

I support this application - excellent operator

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

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DNMA



A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Margaret Costello
Organisation	
Date	19.8.20

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Heli-tourism, especially where it includes low-flying and landing on DOC estate

My reasons for my objection or submission are:

DOC should be helping to lead the way in reducing carbon emissions. An obvious place to start this is to phase out concessions for heli-tourism.

DOC is primarily responsible for protecting our threatened biodiversity. The unknown effects on biodiversity of helicopter landings or low-flying can surely only be adverse. In this situation landings etc should be minimised both in number and location - with preference given to operations with an overall positive environmental outcome such as pest control.

Helicopter traffic has a strong detrimental effect on the enjoyment of other recreationists in the mountains, especially if it is nearby or frequent. For this reason any heli-tourism should be kept to particular areas (eg Franz/Fox where it is already endemic). In particular, flights ought to be kept well away from all designated Wilderness or Remote Experience areas.

There would seem to be no controls in place to effectively manage the needed restrictions.

And even if the none of the above applied, this is hardly the time to grant further helicopter concessions. With the current decrease in visitor numbers the last thing our present West Coast operators need is an increase in competition.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I believe the application should be declined.

G. Attachments

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Bruce Stuart-Menteath
Organisation	
Date	19 August 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. Description of activity
2. Consultation
3. Consistency with DOC statutory plans
4. Location of activity
5. Maximum number of flight/landings
6. Effects on the environment assessment

My reasons for my objection or submission are:

1. The applicant fails to provide a detailed description of the activity eg of specific landing sites and what activities will be conducted at each site.
2. The applicant has failed to consult with recreation/environmental groups that have an interest in the application areas.
3. The application is not consistent with the West Coast Conservation Management Strategy eg 3.3.3.5 Threatened species management - Objective 1. To prevent further extinctions or range contractions of indigenous species found on the West Coast *Te Tai o Poutini*, and 2. To ensure, where practicable, that representative populations of all indigenous species have long-term security in predominantly natural habitats within their natural range. This objective should apply in this instance in particular to kea, which are declining and are susceptible to disturbance from helicopter activity.
The CMS at 3.6.1 Recreational opportunities, provides ample instances where the natural peace and quiet should be retained eg at 3.6.1.1 Objective 1. To provide a comprehensive range of recreational opportunities that enable people with different capabilities and interests to enjoy and appreciate West Coast Te Tai o Poutini public conservation lands, whilst protecting natural, historical and cultural heritage from adverse impacts of recreational use. And at 2. To avoid or minimise conflicts between different users, including people undertaking different types of activities in the same location.
4. The exact location of the landing sites eg grid reference, has not been identified and therefore a full and proper assessment of environmental effects is not possible. Whilst there may be no legal restrictions on flight paths above a certain attitude, the assessment of the application needs to take into consideration the wider effects of noise throughout the flight paths on native/indigenous wildlife and other recreational users of the areas, particularly over remote areas and wilderness areas, and given the frequency, and therefore the cumulative effect, of the proposed flights.
5. The maximum number of proposed landings/flights will have a significant negative effect on the natural character of the areas and detracting from recreational activities on the ground. For trampers/climbers to be subjected to helicopter noise up to 12 times per day (6 flights in and 6 flights out for the Wanganui catchment) would be an appalling intrusion on the natural peace and quiet of the areas.
6. The applicant has failed to provide any significant assessment on the environmental impact of the proposed activity. eg frequent landings will have a significant negative effect on the flora and fauna within the immediate area of the landing sites and the effect of noise will still impact on wildlife, eg kea, some distance from the landing sites. The noise of repeated landings and takeoffs will negatively impact on the peace and quiet that is an important part of the enjoyment of the areas for other recreational users who prefer to travel on foot precisely to avoid destroying the peace and tranquillity of the area.

The outcomes that need to be addressed by this application are:

The application fails to provide sufficient information necessary for a proper assessment of its effects on the environment and other recreational use of the areas concerned, and should be declined.

The applicant fails to provide: a full description and a comprehensive assessment of the environmental effects of the proposed activities; the specific landing sites to be used; the proposed flight paths to and from the landing sites; the noise decibels that other recreational users and/or wildlife would be subjected to; any consultation with recreational groups that also use the area. The application is inconsistent with the West Coast Conservation Management Strategy, notably where it concerns the protection of flora and fauna, and the natural quiet that should be retained for other recreational users in remote/wilderness areas.

G. Attachments

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A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Fletcher Anderson
Organisation	Anderson Helicopters Ltd
Date	19-8-2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Repetitive Landings per day at Miserable Ridge, Prices Flat & Mt Beaumont.

My reasons for my objection or submission are:

Miserable Ridge – This area we fly hunters to often as it is a good area for deer and is ideal for those that want tops hunting, but have access to track to Explorer Hut, which is used as a fall back in case of weather. The proposed landing site is not ideal as it is right at ideal camp site and is between two walking tracks. We have had hunters in this area which have been disturbed by Precision Helicopters landing scenic flight tourists landing near their campsite.

Prices Flat – Another primary site for flying in Hunters to enjoy the remote experience. This is a popular hut for hunters due to the historic nature of the area. It also allows access to Steadman Brow for hunting & Cataract Creek.

Mt Beaumont – This site would disturb another hunting area (tahr & chamois) that hunter's access from the Tuke Valley. It is also on a walking route from Ivory Lake for trampers.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

- 1) Other areas are selected that the repetitive nature of landings would not disturb these hunting areas.
- 2) Other options could be limit landings during specific hunting season or that if hunter's area in the area, no landings should be made.
- 3) They could avoid these areas when during the period hunters are located.
- 4) We acknowledge that this is only a small part of the year, but it is upsetting for hunters & walkers to be disturbed when enjoying a wilderness experience.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to DNSubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Level 1, John Wickliffe House, 265 Princes Street, Dunedin 9016 – Attention: Olivia Geddes, Senior Permissions Advisor.

A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

Precision Helicopters Limited has applied for helicopter landings for the purpose of scenic flight landings in the Hokitika Backcountry including six landing sites total in Wanganui/ Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	James Costello
Organisation	
Date	19-8-20

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I object to the total lack of detail in this application and the loss of the remote natural setting in the Hokitika Place which covers most places mentioned in this application. As the application contravenes many of the relevant clauses in the CMS Document relating to Hokitika Place I submit that it should be declined.

My reasons for my objection or submission are:

1. There is not enough detail in the application to assess the potential effects of the proposed activity.
2. Considering that the proposed flights are over public land flight paths should be quite specific rather than the wishy-washy detail given in this application with no mention of GPS Records of the helicopter route to allow for some monitoring and accountability.
3. The outcomes for Hokitika Place (See CMS 4.2.6.7.) can not be met by this application and after looking at their advertising it appears that they are already flying in Wilderness Areas and Remote Zones. If they are already ignoring the outcomes for these areas as stated in the CMS document, they should definitely not be given a concession to continue doing so. (Wilderness Areas-CMS 3.6.1.2.) + (Remote Zones-CMS 3.6.1.3.)

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be denied as there is no evidence provided about the:

Flight Paths.

Landing Sites

Fauna + Flora present at each landing site and any effects on same.

Mitigation for CO2 produced by the various machines involved.

G. Attachments

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OBJECTION OR SUBMISSION



Department of
Conservation
Te Papa Atawhai

New Zealand Government

A. Permission Application Number and Name of Applicant

81956-AIR Precision Helicopters Limited

B. Name of Proposed Activity and Location(s)

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C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised
on behalf of submitter

Ian Horner

Organisation

Date

19 August 2020

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission)
- I **Oppose** this Application (I am making an objection)

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application in full

My reasons for my objection or submission are:

The application is consistent with all relevant sections of the West Coast Te Tai O Poutini Conservation Management Strategy in particular 3.6.1.4 Backcountry-remote zone, and 3.6.4.2 Aircraft. The proposed activity strikes a good balance between allowing appropriately limited access to these areas, whilst mitigating adverse impacts.

Also this can help with the management of wild animal species

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

For the application to be approved, with conditions based on the information provided by the applicant.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

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19 August 2020

Director-General
Department of Conservation
Level 1, John Wickliffe House
265 Princes Street
Dunedin 9016

Royal Forest and Bird Protection
Society of New Zealand Inc.
P O Box 2516
Christchurch
New Zealand

P: 03 940 5522
M: 021 165 9658
www.forestandbird.org.nz

BY EMAIL: DNSubmissions@doc.govt.nz

CC: West Coast Conservation Board j.cowan@doc.govt.nz

CC: DDG Partnerships kbooth@doc.govt.nz

Tena koe,

Re: 81956-AIR Precision Helicopters Limited

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird) is an independent community-based conservation organisation, established in 1923. Its mission is to be a voice for nature, on land, in fresh water, and at sea, on behalf of its many members and supporters. Volunteers in 50 Forest & Bird branches, including the West Coast Branch carry out community conservation projects in their regions around New Zealand. Forest & Bird has been involved in conservation management processes in New Zealand for many years, at the national and regional level.
2. This is a submission on the Precision Helicopters Limited proposal for the purpose of scenic flight landings at five landing sites in the Hokitika Place and one landing site in the Te Wahi Pounamu Place as identified in the West Coast Conservation Management Strategy (CMS) on the West Coast of the South Island. The landing sites are located in the conservation areas known as Wanganui/Otira Catchments, Totara-Mikonui Forests, Waitangi Forest, and Upper Totara Ecological Area and identified in the application by map references.
3. The proposed landing sites appear to be located within the visitor management zone known as the backcountry remote zone. Reaching the Whataroa Glacier proposed landing site appears to require travel across the Adams Wilderness Area, a specially protected area and one landing site is proposed within a specially protected ecological area. Despite inclusion in the application, there is no map showing proposed flight paths.
4. Forest & Bird does not support the Precision Helicopters Limited proposal and recommend that this application be declined. The application is wholly inadequate. We do not consider that a generic tick box effects assessment is adequate for the apparent scale and duration of the proposed activity at the proposed locations.

5. It is concerning to Forest & Bird that the Department of Conservation would accept an incomplete application for further processing and proceed to advertise it for public notification without full information. In the absence of full information, for a member of the public to make informed comment on this proposal is nigh on impossible. Forest & Bird are increasingly alarmed at the way concession processes are carried out. This erodes our confidence in the processes designed to manage public conservation land (PCL) and in the Department's capability to make good decisions.
6. The application does not meet the requirements of the Conservation Act Part 3B s17SA nor does it appear to be consistent with purpose of the Conservation Act 1987(CA), the General Policy for Conservation 2005 (GPC) or with West Coast Conservation Management Strategy 2010-2020 (CMS) specifically objectives, policies and outcomes that seek to protect and restore nature and preserve natural quiet¹; and for aircraft.²
7. The Conservation Act 1987(CA) Part 3B s17S sets out the content to be included in a concession application. The application fails to describe the proposed activity, beyond helicopter landings. It fails to identify the characteristics of the landing sites where the activity will be carried out, beyond providing a name, maps and GPS co-ordinates. As mentioned above, no description of proposed flight paths has been provided to the public. There is no description of the potential effects of the proposed activity, especially on wilderness area or ecological area values, on indigenous flora and fauna, or on people. Subsequently the applicant cannot provide any narrative about actions they propose to take to avoid, remedy or mitigate any adverse effects of the proposed activity. Notably, the Department has the power to request an environmental impact assessment but does not appear to have done so.³
8. Furthermore, the adverse effects of helicopters particularly on birds are well documented. According to Harbrow et al. (2011) for example, wildlife may respond to the size, speed or sudden appearance of aircraft as well as to noise. Adverse effects for example may include but are not limited to hearing loss, collisions with aircraft, flushing of birds from nests or feeding areas, or alteration in movement and activity patterns. Noise and disturbance from aircraft overflights has the potential to affect far wider ranges of habitat.⁴ It is surprising that the applicant has not identified these effects. There is also no description of any cumulative effect that could arise from an additional operator at the proposed locations. Public submitters have no clue as to how many helicopters already utilize these sites or for what purposes.
9. The CMS explicitly states that irregular or occasional landings may be granted in backcountry remote zone; and regular aircraft landings may be granted where adverse effects are avoided or otherwise minimized.⁵ Without a description of adverse effects and actions to minimize effects, or an environmental impact assessment, regular landings as proposed in this application, cannot be granted at the proposed locations.

¹ CMS Management Objectives and Policies Part 3

² CMS 3.6.4 Recreation and Tourism Activities Objective 1 p129; 3.6.4.2 Aircraft Policies p130

³ CA section 17SD

⁴ Harbrow, M.A., Cessford C.R. and Kazmierow, B.J. (2011) The impact of noise on recreationists and wildlife in New Zealand's natural areas - A literature review. Accessed on 17 August 2020 at <https://www.doc.govt.nz/documents/science-and-technical/sfc314entire.pdf>

⁵ CMS p274

10. On these bases, Forest & Bird considers that under the CA Section 17SA the Minister may return an application that lacks the required information; or under the CA Section 17SB may decline an application that is inconsistent with the Act; under CA 17SD require the applicant to provide more information; or under CA Section 17U 2 (b) decline the application where there are no adequate or reasonable ways to avoid, remedy or mitigate adverse effects. Any of these actions by the Department of Conservation would demonstrate a commitment to good process, but ideally would have been undertaken prior to public notification.

General comments

11. Prior to the COVID 19 lockdown, tourism and especially helicopter tourism, was beginning to place significant pressure on PCL especially in some national parks, jeopardising the ability to preserve the reason that often draws visitors – nature and peace and quiet. Aotearoa New Zealand has an opportunity to re-set its priorities and to ensure that its point of difference can be preserved. This is likely a once in a lifetime opportunity.
12. Recently the Department of Conservation released Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020 which “sets a strategic direction for the protection, restoration and sustainable use of biodiversity, particularly indigenous biodiversity, in Aotearoa New Zealand.” Te Mana o te Taiao recognizes that when nature is in trouble so are people and that we urgently need to do a better job of looking after it. Te Mana o te Taiao stresses that biodiversity is in crisis globally, including in Aotearoa New Zealand. The strategy proposes that an all sector approach, including the tourism sector is necessary, if the strategy goals are to be realized.
13. As part of the COVID recovery plan, the Government has established a Tourism Task Force with the main purpose of advising what changes Aotearoa New Zealand can make to its tourism system, so that tourism enriches both New Zealand and the wellbeing of New Zealanders. The Task Force will make recommendations to address the long-standing productivity, inclusivity and sustainability (environmental, social and economic) issues present in some parts of the tourism sector.⁶ Forest & Bird are part of the Task Force advisory group and will advocate for ways that tourism can benefit nature and communities, and for ways the tourism industry can assist in implementing Te Mana o te Taiao.
14. Similarly, all sectors of New Zealand’s economy have a responsibility to focus on climate change adaptation and ways to meaningfully reduce carbon emissions so Aotearoa New Zealand can achieve a climate stable future, give effect to the Climate Change Response (Zero Carbon) Amendment Act 2019 and to international climate agreement obligations.
15. Te Mana o te Taiao is a Department of Conservation led strategy; it is assumed that the Department will lead by example to protect nature, people and the environment and to ensure that the economic recovery supports this vision. Good process with regard to managing activities on PCL to protect and restore nature is a vital part of that vision.
16. The Precision Helicopter Limited proposal appears to be at odds with Aotearoa New Zealand’s strategic direction. This application appears to be little more than business as usual. The application states: “*Tourism is good for the economy with very little impact to the environmental if done correctly*” yet offers no explanation of what “*if done correctly*” means

⁶ Tourism Futures Website Accessed 17 August 2020 at <https://www.mbie.govt.nz/immigration-and-tourism/tourism/tourism-recovery/tourism-futures-taskforce/>

in practice. In the context of carrying out any commercial activity on PCL, a robust understanding of what good tourism looks like, is vital. *If done correctly* in the present climate perhaps means at the very least to ask the question - how and to what extent will nature conservation benefit from this activity?

Decision sought

Forest & Bird recommends that the Department decline the Precision Helicopter Limited application and to improve its permissions processes for undertaking commercial activities on PCL. After all to do so is a privilege, and not a right.⁷ We welcome further discussion on anything in this submission.

Thanks for the opportunity to submit. We would like to be heard.

Nāku noa, nā



Nicky Snoyink

Royal Forest and Bird Protection Society of New Zealand Inc.

Regional Advocacy Manager Canterbury/West Coast

Email: n.snoyink@forestandbird.org.nz

⁷ CMS 3.2.3.7 Tourism Associates p52

Dear sir/madam

I am writing in support of the above companies current submission before Department of Conversation.

As a Director of a tourist business its beneficial for a company such as the above to be able to offer the experience to guests visiting Westland. Also the opportunity for local people to enjoy the area. Percision Helecopters bring diversity to a guests stay and offers an insight into the Conservation estate that some may otherwise never have had.

The owners knowledge of the area and extensive flight experience is an asset to the West Coast.

Sonja Barker/Director
Stopforth Motels Limited

