

Tourism Industry Association New Zealand (TIA)

Key Concerns on the Department of Conservation (DOC) Milford Sound Aircraft Access Proposals

Overview Comments

- The proposals are prescriptive without being backed by robust research. We also note that currently there is little research on visitor satisfaction. It is therefore difficult to establish that noise from aircraft is creating low levels of general visitor satisfaction.
- We note that research is based on flying in calm conditions and assumes that aircraft are flying in a straight line. The research methodology used to justify prescribed levels fails to take into account such factors as weather and atmospheric conditions, and pilot behaviour (and technique). This is a major omission as these factors have a major influence on how noisy aircraft are. This sharply reduces the reliability of the acoustic research that DOC has based its proposals on.
- DOC appears to be using noise issues to manage congestion. Ostensibly there is no research to back up claims that the Milford Sound air space is congested. Also, we had previously understood that DOC was concerned about ‘noise’ and not “congestion”.
- An important step has been left out of the consultation process with operators. Our understanding is that the acoustic consultant agreed to discuss the finding with aircraft operators before they were used to develop Plan proposals. We understand this did not occur so operators did not ‘peer review’ proposals.
- DOC had agreed to work with operators to develop a Code of Practice that is used in Westland to reduce noise, but appears to have decided against taking this approach in Milford. TIA is most concerned at this. While working towards a Code of Practice would have been time consuming, it would have enabled DOC and operators to work through the issues to ensure high levels of visitor satisfaction and ongoing business viability. This approach would have led to much more operator buy-in than has been achieved with the current proposals. Instead, DOC has decided to rely on its own judgment combined with limited research to impose activity levels on businesses. It has been reported to us that the levels in the proposals will make some businesses economically unviable.

Specific comments (Page by Page)

- (P3, Noise) Where was the “point surveyed on the Milford Track” and when was this survey undertaken and over what period? We remain to be convinced that this survey provides sufficiently robust data to justify the restrictions being proposed for aircraft operators in these proposals.
- (P3, Noise). DOC appears to be recommending the use of the Cessna C172 aircraft as an ideal aircraft to reduce noise emissions. As this aircraft carries only 3 passengers, this would appear to contradict DOC’s objective to see fewer aircraft movements (and larger aircraft being used).
- (P3, Noise). TIA believes that it is not realistic to expect to achieve an outcome that is “acceptable to all parties”. Instead, we have consistently recommended a co-operative framework for operators taking a range of agreed steps to reduce noise levels to ensure business viability and minimal noise impacts on the environment. This approach would have made it easier for DOC to achieve its objectives. We still do not understand why DOC has not been interested in taking this approach.
- (P3, Noise, final paragraph). DOC implies that further research is required to gauge the level of disturbance being caused by noise, yet is still prepared to propose activity restrictions. TIA requests that robust research precede the setting of activity restrictions.
- (P3, Congestion, last sentence). The “congestion issues” referred to requires explanation. We are not clear not what the congestion issues are here.
- (P4, Next Steps, First Paragraph). The proposal states that further research is needed into “the extent to which visitors to Milford and the adjoining National Park areas are affected by aircraft noise.” Again, TIA suggests that given this admission by DOC it is inappropriate for DOC to prescribe activity limits affecting flight operators’ livelihoods until further research has been carried out
- (P4, the goals, last sentence). Proposals would only produce a win-win outcome if businesses flying into Milford continue to be viable and profitable. Our concern is that the restrictions might lead to some businesses failing, as it is not worth them continuing to operate. This is especially the case as businesses are reliant on operating when weather conditions permit. By limiting the amount of revenue that can be earned on one day, the restrictions proposed threaten the viability of businesses.
- (P4, commercial operators). DOC concedes that data is limited for helicopters but has proposed limits to opportunities allocated. TIA asks: how will these

opportunities be allocated, and does DOC have sufficient information on which to base allocation decisions?

- (Section 6 (b)). We are not clear why it is proposed that flights can only occur between 9.00am-6.00pm.
- (Section 6 (e).) What is motivating the intention for the airport to become a “private airstrip”?
- (Section 7 (b)). What allocation process is intended, and what information would be used to determine this?
- (Section 7 (bi). Given the flaws in the acoustic research there is not a good basis for determining that up to 48 movements a day will be allowed. This comment applies to the rest of proposed section 5.5.
- (Section 7 (bv). It appears contradictory to offer a 5 year concession to be reviewed annually. This gives the concessionaire no certainty whatsoever.
- (Section 7ci). What is the data used to justify a figure of 27 movements a day?
- (Section 7e). What is an “irregular landing”? (In (7ei), how was the figure of 1 landing per month arrived at?
- (Section 7eiii). Why should the alternative aircraft be quieter than those in Appendix I?
- (Section 7eiv). What are the criteria? Has it been determined yet?
- (Section 7g). This states that provisions a-f “will have been implemented within one year from the date of this plan becoming operative.” This suggests DOC plans a quick implementation of these proposals. This is unacceptable to operators.
- (Section 7 h). The research programme set out here should have been completed before coming up with these management proposals. TIA is concerned that the current proposals (not adequately based on research and visitor satisfaction surveys) will become an unfair benchmark for visitor satisfaction measurements in the future. This potentially exposes operators to further restrictions.