

Westland Tai Poutini Allocation

Summary of Feedback

Below is a summary of responses provided by applicants to the Westland Tai Poutini Allocation Discussion Document. Feedback was considered in determining the settings of the final allocation process.

Q1 — Do you have any comments or feedback on the proposed criteria?

Submitters provided a wide range of views on the proposed criteria. Some sought greater operational flexibility, including encouraging itinerant operators who do longer flights to the area to use sites not on the normal short flight scenic routes, while others opposed the criteria on the grounds that they overlook longstanding compliant operators and disadvantage new entrants. Several submitters supported the criteria overall, with some specifically endorsing requirements aimed at protecting natural quiet and ensuring concessionaires participate in local aviation user groups. Others advocated for recognising factors such as long-term investment, safety records, contributions to conservation, and existing engagement in user groups. Additional suggestions included increasing total aircraft numbers and daily limits, giving preference to resident operators, strengthening transparency, clarifying selection criteria, and introducing stronger weighting for conservation and noise management—including mandatory acoustic monitoring.

Q2 — Are there any other bodies that you think should be represented on the Assessment Panel? Please explain your views.

Submitters expressed a range of views on additional representation. Some had no suggestions for change, while others recommended broadening the panel to include independent aviation expertise, tourism sector representatives, business experience, or operator input to enhance practical insight into flight operations. Several submitters emphasised the value of including recreation users to reflect the wide range of interests in the park. Overall, views ranged from support for the proposed panel to calls for greater balance, technical capability, and sector representation.

Q3 — Do you support differentiating between regular and low-use operators? Why or why not?

Feedback ranged from clear support to strong opposition. Supporters felt differentiation reflected operational realities, gave certainty for resident operators, and recognised the substantial investment required to maintain a local presence. Others supported differentiation only if low-use operators retained a baseline allocation and participated in local user groups. Opponents argued it could create unnecessary tiers, divert allocation from core operators, or disadvantage longstanding businesses. Several submitters highlighted the need to balance equitable access with safety, training, and the nature of different types of landings (tourism vs recreation).

Q4 — Do you support the use of daily limits over annual limits? Why or why not?

Submitters were divided, with many operators strongly favouring annual limits due to highly variable weather, the need to maximise good flying days, and the mismatch between daily caps and visitor demand patterns. Some supported daily limits only if set significantly higher than current thresholds. Conversely, conservation-oriented submitters supported trialling daily limits

as a tool for managing cumulative noise, site congestion, and visitor experience impacts, subject to review. Several operators highlighted that daily limits may restrict safety-based decision making and reduce operational flexibility.

Q5 — Do you support the creation of a flexible pool of allocation? Why or why not?

Most submitters supported creating a flexible pool, noting its value for accommodating weather events, demand fluctuations, and operational contingencies. Support was often conditional on the system being simple, accurate, and well managed. Some submitters opposed the concept, citing concerns about administrative complexity and uncertainty. Others sought assurances that the pool would not allow disproportionate access by any one operator. Conservation groups were cautious, requesting clearer detail on how the pool would function in practice.

Q6 — What portion of the overall allocation should be reserved for the flexible pool?

Submitters provided a wide range of suggested percentages, from 5% to 25% or more, while some opposed setting aside any portion at all. Those supporting a dedicated percentage often cited recent utilisation levels and the need to accommodate new entrants without undermining existing business viability. Several submitters emphasised that setting aside landings for the flexible pool should not reduce operators' ability to meet tourist expectations, or compromise fixed allocations needed for planning.

Q7 — Are there any additional considerations that should form part of the proposed flexible pool?

Suggestions varied considerably. Several submitters proposed real-time online systems for confirming availability, the ability to hold short-term access across multiple sites, and flexibility to accommodate weather and site conditions. Others emphasised active participation in user groups as a prerequisite or stressed the need to account for changing site conditions, safety, and pilot experience in alpine environments. Opponents argued that adding further conditions risked creating bureaucracy and increasing inconsistencies across operators.

Q8 — Do you support encouraging operators to return unused allocation to the Department? Why or why not?

Submitters held mixed views. Some opposed the idea entirely, concerned that operators could be disadvantaged for prudent planning or forced to operate in marginal weather to avoid losing allocations. Others supported returns within the same allocation period, provided these did not reduce future entitlements. A number supported stronger measures such as clawback mechanisms or incentives to prevent accumulation of unused landings and ensure the allocation block is efficiently used. Conservation groups supported returns in principle but highlighted risks around competitive behaviour.

Q9 — Do you support three-year reviews of utilisation and any adjustments in fixed allocations as a result? Why or why not?

Feedback ranged widely. Supporters viewed regular reviews as a fair and reasonable mechanism to recalibrate allocations, address emerging issues, and respond to environmental changes. Others opposed reviews on the basis they would undermine long-term business planning, particularly for operators with multiyear marketing cycles, and may fail to account for weather volatility, road closures, and other disruptions outside operator control. Conservation-focused

submitters supported periodic review to address changing alpine conditions, site safety, and environmental pressures.

Q10 — Do you have any comments on the current activity fees/fee structure we should consider for the fee assessment?

Submitters provided a broad spectrum of feedback. Some felt current fees were high relative to the service provided, while others supported transparent CPI-adjusted models. Several advocated for differentiating fees between high-impact and low-impact sites, while others preferred retaining the per-person model. Some submitters emphasised the need for fees to support local conservation outcomes, including acoustic monitoring and site management. Others noted that past fee reviews occurred during periods of atypical disruption and should not be relied on as benchmarks.

Q11 — Do you have any comments on the introduction of seasonal activity fees?

Most submitters did not support seasonal fees, viewing them as ineffective in changing visitor behaviour and as adding unnecessary complexity. Operators argued that seasonal demand patterns are driven by weather and tourism flows, not price. Some suggested that sitespecific pricing may be more appropriate than seasonal variation. Conservation submitters did not express a position.

Q12 — Do you have any comments on introducing a minimum activity fee or similar, to incentivise utilisation of allocation?

Responses ranged from strong support—particularly from those favouring a “use it or lose it” approach—to opposition based on concerns that underutilisation is often outside operators’ control. Supporters suggested minimum thresholds ranging from 10% to 30%, with some favouring quarterly invoicing aligned to reporting. Others argued that if a three-year utilisation review is adopted, additional minimum fees would be unnecessary or duplicative. A minority considered the tool potentially useful for discouraging over-application for allocations.

Q13 — Do you have any comments on the proposed timeline for running the allocation process?

Submitters generally welcomed the extended timeline, with several noting it would allow for more considered applications and align better with peak-season workload pressures. Operators requested that deadlines avoid the busiest months and emphasised the importance of completing the process before the 2026/27 season begins. Some suggested offering online meeting options to support out-of-district participants. Conservation submitters appreciated the extension and saw it as correcting earlier timing constraints.

Q14 — Do you have any other feedback on the proposed approach and options outlined in the consultation document? If yes, please provide details

Additional feedback covered a wide spectrum of concerns and observations. Some submitters questioned whether the increased complexity of the proposed approach would lead to meaningful conservation gains, while others sought opportunities to reflect collective operator feedback more clearly. Several operators emphasised the need for higher daily limits to maintain business viability and support future investment in low-emission aircraft technologies. Conservation groups highlighted principles focused on protecting natural quiet, accommodating recreation needs, responding to climate change driven landscape change, and implementing

robust acoustic monitoring. Others requested opportunities to comment on any revised proposal before final decisions are made.

