



16 June 2010

Approvals and Wildlife Division  
Department for Environment, Water,  
Heritage and the Arts  
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**Attention:** Senior Project Officer - Referrals

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<b>ABN</b>	22 020 026 644

Dear Sir/Madam

**Reference: Heli Experiences/Tourism and recreation/North of Hanson Bay,  
Kangaroo Island/SA/Helicopter Joyflight Operation**

(Guy Maine – Helicopter Joy Flight Proposal – Allotment 4, Plan DP18009,  
Hd. McDonald, Kangaroo Island, South Australia)

I am writing on behalf of the Conservation Council of SA to object to the proposal by Mr Guy Maine of 14 Eva Street, Malvern (Development Application Number 520/238/09) to operate helicopter joy flights on allotment 4, Plan DP18009, Hundred of Mc Donald.

The **Conservation Council of South Australia (CCSA)** is South Australia's peak non-government community environment organization. Formed in 1971, it is an umbrella group for 57 of the state's diverse environment groups, who collectively represent tens of thousands of individuals.

Summary of proposed activity as per referral by applicant Mr. Guy Main;

Name Guy Maine  
Title Director  
Organisation The Experiences Group  
ACN / ABN (if applicable) 139054998  
Postal address 14 Eva Street Malvern Victoria, 3144  
Telephone 0403 999123  
Email guy@heliexperiences.com

#### **2.1 Description of proposed action**

Our business proposal includes the following setup. We intend to set up an office in close proximity to the Koala walk at Hanson bay Koala sanctuary. This has car park access and is close to the main road. We intend to manage bookings at this location. Customers who wish to take a joy flight will be driven by 4x4, to our helipad as indicated by the co-ordinates given. There they will depart for their joy flight or scenic. We intend to offer 4 key joy flight tours. These tours range from 12 minute short scenic flights to 60 minute adventures. These trips are detailed in the attached Google earth images, with heights and distances from land. These flight routes have also been discussed and agreed with the Department of environment managers and officers at Kangaroo Island, to ensure minimisation of any impact with local flora and fauna. It is important to note that we are flying out to sea by at least 600 metres, and will be at a minimum height of 1000 feet. This has been agreed with the DEH and will become part of their "Fly Neighbourly agreement" which will be eventually gazetted by CASA. Heliexperiences will at all times respect and follow the flight guidelines as advised for Wilderness protection areas and Conservation areas. The only flights over land will be across private land, and we will avoid these sensitive areas by Flying out to Sea.

Clearly the proponent intends to conduct flights across and along coastal regions, which are zoned Conservation or Coastal Landscape under the Kangaroo Island Development Plan at an altitude less than 500m. This proposal will impact on nationally threatened species and migratory species listed under the Environment Protection and Biodiversity Conservation Act 1999 (Cwth).

The Conservation Council has consulted appropriately qualified experts within the membership of the Council, relevant researchers and local Kangaroo Island experts with specific knowledge about resident and migratory bird species. The Conservation Council is convinced that the proposed activities will impact directly on foraging and nesting birds to the extent that birds will be struck in flight and killed and also nesting activities and therefore breeding and recruitment will be severely reduced.

Listed species (derived from the Bonn List) known to occur, either as residents or seasonally, within the proposed flight path (C.Baxter, T.E.Dennis and F.J.Vickery Pers comm.) that will be impacted include the following;

#### **Migratory**

Caspian Tern  
Curlew Sandpiper  
Eastern Curlew  
Greenshank  
Japanese Snipe  
Lewin's Rail  
Red-necked Stint  
Sanderling  
Sharp-tailed Sandpiper  
Sooty Albatross  
Southern Giant Petrel  
Wandering Albatross  
Whimbrel

#### **Threatened species**

Hooded plover  
Osprey  
Western whip-bird  
White-bellied sea eagle

Supporting comment by relevant experts on conservation of the subject species;

*"Based on the major threats to the species, the long-term survival of the White-bellied Sea-Eagle in Australia depends primarily upon the retention of existing habitat (especially nesting habitat) and the protection of nesting sites from interaction with humans or human activity (Clunie 1994; Dennis & Lashmar 1996)."*

*"The disturbance of nesting pairs by human activity can thus lower breeding success, and has been associated with some local population declines, for example, abandoned territories on the Eyre Peninsula and far west coast of South Australia were located in areas that had been developed for tourism or that contained recreational sites accessible by vehicles (Clunie 1994; Dennis & Lashmar 1996; Mooney & Brothers 1986). Abandonment of nesting sites on Kangaroo Island also followed developments in the areas (Dennis & Baxter 2006)."*

*"Since 1971 all Australian raptors have been protected by legislation. Care still must be taken to ensure their conservation, particularly as Peregrine Falcons are excitable birds and easily disturbed. They nest on spectacular cliffs that are also the preferred sites used by rock climbers, nature lovers and sightseers. The risk of disturbance to some Falcon pairs has also led to closure of some cliffs to the public during breeding season and nature trails and lookouts have also been moved to where they cause least disturbance." (Environment Protection and Biodiversity Conservation website.)*

Clearly the proposal is associated with Southern Ocean Lodge where restrictions (emergencies operations only) have already been placed on helicopter operations as part of the development approval under the relevant South Australian Development Planning legislation. In particular, reference should be made to decisions Gazetted on October 15 2009, which confirm the restriction of helipad use to 24 movements per calendar year, and define a specific flight path in which "flight paths over the coastline shall be avoided in all situations."

The activities proposed as detailed in the Referral of Proposed Action documentation must be determined as 'unacceptable'.

Yours sincerely



Julie Pettett  
CEO