

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of hearings on the Proposed Timaru District
Council District Plan

Submission from:

New Zealand Helicopter Association (NZHA)

To:

Hearing Commissioners, Timaru District Council
Plan

Date:

03/05/24

1. Introduction

- 1.1 I am Richard Milner, Executive Officer of the New Zealand Helicopter Association.
- 1.2 I am a commercial helicopter pilot and unmanned aircraft operator with 20 years of aviation experience. I have owned and operated helicopters in New Zealand and Australia.
- 1.3 The New Zealand Helicopter Association represents the commercial interests of the helicopter sector in the New Zealand industry. It is difficult to define precisely how much of the GDP commercial aviation contributes as it is entwined in so many aspects of New Zealand business and is often a necessary but overlooked part as a tool for a specific purpose and used in industries such as but not limited to:
- Aerial Spotting
 - Asset management,
 - Construction,
 - Disaster relief work (after the State emergency has ended)
 - Flight training,
 - Frost protection,
 - Infrastructure repairs and development,
 - Science and Research
 - Search and Rescue
 - Surveillance
 - Survey operations
 - Tourism
 - Transportation of people
 - TV and Film

It is essential to raise the concern that limiting the operations of helicopters through rules and requirements in this plan, where the rule's intent means one thing to the council but is not clear to operators, can become restrictive and have unintended consequences.

Commercial aviation is also an essential tool for disaster relief, emergency work, short-notice repairs, and maintenance of national assets, including but not limited to the electrical, water, gas, and telecommunications services essential to the NZ public.

While the plan allows for emergency work requiring a state of emergency to be declared, it is often overlooked that a downed power pole from a motor vehicle accident that can't be solved quickly without a crane truck usually becomes a helicopter operation. The way these rules have been written casts doubt on whether the community would have power for heating and cooking, which are the root concerns of our submissions. It is also essential to recognise that if commercial aviation operations are overly restrictive, the helicopter operators that the district has come to rely on will have to move their operations away from the district or face closing their businesses. In this case, those assets for emergency and disaster relief work (such as those recently in the Port Hills in Christchurch) would experience longer dispatch times, which would have consequences for the public. It is important also to note that during Cyclone Gabrielle, helicopters performed emergency operations long before a state of emergency was declared, preserving life, and those assets would not be available should the district plan unintentionally restrict commercial aviation operations.

It is essential to recognise that agricultural aviation is part of commercial aviation in New Zealand. Many agricultural aviation operators also operate in other commercial aviation sectors, and the viability of their businesses depends on all their activities.

2. NZHA's submissions

General

- 2.1 The notified Timaru PDP does not adequately provide for commercial aviation activities.
- 2.2 NZHAA acknowledges that if accepted, the S42A Rural Zone report recommendations would adequately provide for commercial aviation activities through the proposed GRUZ R14 and R14A 'Aircraft and Helicopter Movements.'

Rural Zone

- 2.3 The S42A point #10.22.7 recommends that GRUZ-R10 be amended to include 'equipment, machinery, vehicles and aircraft', and 'weed' control **is supported**.
- 2.4 S42A point#10.25.32, which recommends the inclusion of a definition for 'Aircraft and helicopter movement,' **is supported**.

- 2.5 The S42A point# 10.25.32 that recommends a setback of 100m **is supported**
- 2.6 The S42A point #10.25.36 that recommends the amendment to GRUZ-R14 and R14A **is supported**
- 2.7 The S42A point #10.25.37 that recommends the additional definitions **is supported**
- 2.8 The S32AA point #10.25.38 that recommends the amendment to GRUZ R14 **is supported**

3. Decisions sought

- 3.1 NZHA seeks to have the proposed amendment to GRUZ-R10 accepted:

GRUZ-R10 Conservation activities General Rural Zone

Activity status: Permitted Where:

PER-1

Land, buildings, structures, **equipment, machinery, vehicles, and aircraft** are used for:

1. preservation, protection, restoration, promulgation, or enhancement of Indigenous species or habitats of Indigenous fauna; or
2. **weed or** pest control; or
3. conservation education; or
4. observation or surveying; or
5. walking tracks, boardwalks, and pedestrian bridges.

- 3.2 NZHA seeks to have the proposed definition of 'Aircraft and helicopter movement' accepted:
Aircraft and helicopter movement - means a single aircraft flight operation (landing or departure). Maintenance procedures are excluded.
- 3.3 NZHA seeks to have GRUZ R14 and 14A accepted as written in 10.25.26:

Thank you for the opportunity to present this statement supporting the NZHA's submissions and further submissions.



Richard Milner
Executive Officer
New Zealand Helicopter Association