Further Submission on Timaru District Plan

(Closing date: Friday the 4th August 2023 at 5pm)

То:	Timaru District Council 2 King George Place Timaru 7910 Phone: 03 687 7200
Email:	pdp@timdc.govt.nz
Further Submission From:	New Zealand Helicopter Association (NZHA) a division of Aviation New Zealand.
Submitter Contact Details:	Richard Milner Executive Officer NZ Helicopter Association
Phone:	027 2733784
Email:	eonzhauavnz@aviationnz.co.nz
Postal address:	NZ Helicopter Association PO Box 2096, Wellington, 6140

Background

Aviation New Zealand (AvNZ) is an industry body representing professional aviation operators in New Zealand. The New Zealand Helicopter Association (NZHA) as a division of AvNZ, represents helicopter operators engaged in operations across a range of activities for the purposes of:

- Primary production not covered by Agricultural Aviation operations including:
 - o Frost control
 - o Heli logging
 - o Pest control
 - o Rural farm support such as sling loading fencing supplies, water tanks etc
- Heavy lift operations
- Transmission wire installation and inspection
- Supporting security of energy supply and communications infrastructure
- I Tourism
- Helicopter flight training
- Carriage of people and material to and from remote areas in support of DOC
- Aerial photography/survey
- Special operations only possible by helicopter
- Firefighting, Search and Rescue (SAR), medical evacuation

Helicopters are an essential adjunct to New Zealand's economy in a range of roles from flight training through to air transport, tourism operations, special roles, and critical infrastructure security roles which cannot be provided by other means.

General submission

NZHA seeks to ensure that appropriate intermittent helicopter activities are provided for within the Plan.

The draft plan notes in the strategic directions that "regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and upgrading and development is enabled while managing adverse effects appropriately."

Helicopters form an important part of infrastructure security for investigation, installation, repair, and maintenance, particularly during and in the aftermath of adverse events.

The proposed activity rule NOISE-R10 would:

- severely limit the ability of helicopters to respond to urgent energy, communication, and infrastructure remedial and rectification tasks in a timely manner
- have a significant impact on the economic viability of intermittent helicopter operations in the region
- limit the economic benefits that helicopters add to the region's economy

Purpose:

I am the representative of the above-mentioned organisation representing a relevant aspect of the public interest as a representative of an organisation operating within the Timaru District.

NZHA wishes to speak to this submission. At the time of writing the industry is made up of 103 Civil Aviation Authority (CAA) certificated organisations operating about 265 helicopters. Helicopters are an essential adjunct to New Zealand's economy in a range of roles from critical infrastructure security roles through to air transport, tourism operations, special roles, and flight training which cannot be provided by other means.

If others make a similar submission we would not consider presenting a joint case

You have served a copy of the further submission on the original submitter (this is required under the Resource Management Act 1991 Schedule 1, s8A(2) to be completed within 5 working days after it is served on the Timaru District Yes \square No

Please note that I have replaced Bill MacGreggor who has left the role with NZHA so all future communications should be sent via the above email address.

NZHA's further submissions are set out in the attached table.

Signature:

Date: 03 August 2023

submission is in relation to			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Helicopters South Canterbury 2015 Ltd	Amend the definition of Hazardous Facility as follows: 3. Delete: "land based" and "which are not located in a drinking water" 8. Delete: "on site"	The definition of hazardous facility is relevant to HS-R1. The mixing and application of hazardous substances for pest control should not be limited to 'the site' as defined in the plan. Mixing may occur at a mixing point but application is on land other than 'the site'. Land based primary production is not defined in the Plan but 'primary production' is. Clause 3 should refer to 'primary production'. Also 'which are not located in a drinking water' Agrichemicals should be stored in accordance with NZS8409:2021 to ensure that they are safely stored.	Allow	Allow the deletions as sought

submission is in relation to the original submission of:	submission					Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Horticulture New Zealand		Amend the definition of Hazardous Facility as follows: 3. <u>Delete: "land based" and</u> "which are not located in a drinking water" 8. Delete: "on site" Add: 9. agrichemicals used, stored, and disposed of in accordance with NZS8409:2021 Management of Agrichemicals.		The definition of hazardous facility is relevant to HS-R1. The mixing and application of hazardous substances for pest control should not be limited to 'the site' as defined in the plan. Mixing may occur at a mixing point but application is on land other than 'the site'. Land based primary production is not defined in the Plan but 'primary production' is. Clause 3 should refer to 'primary production'. Also 'which are not located in a drinking water' Agrichemicals should be stored in accordance with NZS8409:2021 to ensure that they are safely stored.	Allow	Allow the deletions as sought. Allow the addition as sought
Helicopters South Canterbury 2015 Ltd	53.1	Retain the definition as notified.		Support the definition of improved pasture as defined in the National Policy Statement for Freshwater Management 2020 (NPSFM 2020)	Allow	Retain the definition as sought
Penny Nelson, DirectorGene ral of Conservation Tumuaki Ahurei	166.7	Retain as notified.	Support	The definition is consistent with the draft NPSIB.	Allow	Retain the definition as sought

submission is in relation to the original submission of:	submission	The particular parts of the original submission I/we support /oppose are:			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Helicopters South Canterbury 2015 Ltd	53.2	Add a definition of Agricultural Aviation Activities to the PDP, as follows: means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).		Provides clarity to avoid future confusion with general aviation activities	Allow	Adopt the definition as sought
Helicopters South Canterbury 2015 Ltd	53.3	Add a definition of Aircraft (as defined by the RMA) to the PDP. as follows: means any machine that can derive support in the atmosphere from the reactions of the air otherwise than by the reactions of the derive surface of the earth.	Support	Including the definition of aircraft as defined by the RMA to future proofs the Plan as technology develops	Allow	Adopt the definition as sought

submission is in relation to the original	submission		• •		disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Helicopters South Canterbury 2015 Ltd		Add a definition of Conservation activity to the PDP, as follows: means the use of land or buildings for any activity undertaken for the purposes of protecting and/or enhancing the natural, historic and/or ecological values of a natural or historic resource. It includes ancillary activities which assist to enhance the public's appreciation and recreational enjoyment of the resource, including weed and pest control and the intermittent use of aircraft for conservation purposes.		A definition of Conservation activity which reflects a broader range of conservation activities than the definition of "DEPARTMENT OF CONSERVATION ACTIVITY" is more appropriate.	Allow	Adopt the definition as sought
Helicopters South Canterbury 2015 Ltd	53.6	Add a definition of Helicopter Landing Area to the PDP, as follows: means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing.	Support	Provides clarity to avoid confusion	Allow	Adopt the definition as sought
submission is in relation to the original	submission				disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point

Helicopters South Canterbury 2015 Ltd	53.7	Add a definition of Rural airstrip to the PDP, as follows: means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area	Provides clarity to avoid confusion with other general aviation activities	Allow	Adopt the definition as sought
Ballance AgriNutrients Limited	86.1	Add a new definition: Agricultural aviation activities: means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).	Provides clarity to avoid future confusion with general aviation activities	Allow	Adopt the definition as sought
submission is in relation to the original submission of:	submission	The particular parts of the original submission I/we support /oppose are:		disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point

Ballanco	oc 2	Add a now definition, Day Co	Cupport	The definition of a DAV as it relates to agricultural aviation activities is	Allow	Adopt the definition as sought
Ballance AgriNutrients Limited		Add a new definition: Day [in relation to agricultural aviation]: A "Day" as it relates to agricultural aircraft activities; means 10.5 hours aircraft hours conducted between the beginning of morning civil twilight (MCT) and the end of evening civil twilight (ECT). NOTE. A day is defined in the Civil Aviation rules as: the hours between— (1) the beginning of morning civil twilight, which is when the centre of the rising sun's disc is 6 degrees below the horizon; and (2) the end of evening civil twilight, which is when the centre of the setting sun's disc is 6 degrees below the horizon; and (2) the end of evening civil twilight, which is when the centre of the setting sun's disc is 6 degrees below the horizon.		The definition of a DAY as it relates to agricultural aviation activities is appropriate to be added to the definitions to support the proposed alternative wording in GRUZ-R14 and NZAAA's proposed rule for NOSZ.	Allow	Adopt the definition as sought
submission is in relation to the original submission of:	submission	The particular parts of the original submission I/we support /oppose are:			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Ballance AgriNutrients Limited	86.3	Add a new definition: Rural airstrip: Rural airstrip: means any defined area of land intended or designed to be used, whether wholly or partly, for the landing,		Provides clarity to avoid confusion with other general aviation activities	Allow	Adopt the definition as sought

Horticulture New Zealand	245.34	departure, movement, or servicing of aircraft in the rural area. Add a new definition to the PDP as follows: Rural airstrip: means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area.		Provides clarity to avoid confusion with other general aviation activities	Allow	Adopt the definition as sought
Helicopters South Canterbury 2015 Ltd	53.8	Retain the definition of Primary production as notified.	Support	Consistent with the NPS definition	Allow	Retain the definition as sought
Horticulture New Zealand	245.19	Retain the definition of Primary production as notified.	Support	Consistent with the NPS definition	Allow	Retain the definition as sought
Federated Farmers	182.29	Retain the SD-O2 as notified		NZAAA supports strategies that recognise, protect and enhance indigenous vegetation and native flora and fauna	Allow	Retain the objective as sought
submission is in relation to the original submission of:	submission	The particular parts of the original submission I/we support /oppose are:	•	The reasons for my/our support/ opposition to the original submission are:	disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point

Helicopters South Canterbury 2015 Ltd	53.12	Amend SD-O9 Rural Areas as follows: DELETE "primarily" REPLACE with "primary". Delete "ii. managing the adverse effects of intensive activities on sensitive activities; "Delete: "iii. managing the adverse effects of new sensitive activities on primary production;" Add: "ensuring that sensitive activities do not adversely affect primary production, including reverse sensitivity effects;"	NZAAA supports strategies that enable primary production, protect versatile soils, and manage reverse sensitivities. However clause ii) refers to 'intensive activities' which isn't defined so it is unclear what it refers to. The focus should be on ensuring that sensitive activities don't affect primary production. Clause iii) seeks to manage 'new sensitive activities'. NZAAA seeks that the plan ensure that sensitive activities do not adversely affect primary production, including reverse sensitivity effects.		Amend the objective as sought
Horticulture New Zealand		Supports a permitted activity for the use and /or storage of hazardous substances in a hazardous facility outside a sensitive environment (other than a Flood Assessment Area Overlay). Seek changes to the definition of hazardous facility to ensure that the exclusions provide for use of agrichemicals and fertilisers.	 NZAAA seeks to ensure that the definition of hazardous facility is amended to ensure that agrichemicals and fertilisers are able to be used as a permitted activity within the 'sensitive environments' as defined in the Plan		Amend the definition of Hazardous Facility as previously sought
submission is in relation to the original submission of:	submission			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point

Federated Farmers	182.1	Supports ECO-O2		Objectives that seek to maintain and enhance indigenous biodiversity are appropriate	Allow	Retain the objective as sought
Helicopters South Canterbury 2015 Ltd	53.13	Amend ECO-P3 Protection of indigenous biodiversity in sensitive areas, as follows: Protect indigenous biodiversity by providing for weed and pest control to maintain and enhance biodiversity and managing the clearance of indigenous vegetation in the following sensitive areas:		NZAAA supports the protection of indigenous biodiversity but the policy should provide for weed and pest control to maintain biodiversity values	Allow	Amend the policy as sought
Horticulture New Zealand	245.56	Retain ECO-R1		The rule allows for the clearance of indigenous vegetation for biosecurity purposes and the removal of pest plants and animals.	Allow	Retain the rule as sought
Horticulture New Zealand		Reconsider the approach within the GRUZ and NOISE provisions to better reflect the working rural production nature of rural areas.		NZAAA agrees that rural environments are working rural production areas and should not be portrayed as quiet. Noise does occur in those areas, sometimes on an intermittent basis	Allow	Reconsider as sought
Helicopters South Canterbury 2015 Ltd		Amend the plan, to ensure that the rural zones are not described as 'quiet' and that noise associated with primary production activities is anticipated.	support	Noise effects being compatible with the zone is appropriate but it needs to be recognised that the rural zone is not a 'quiet' area	Allow	Amend the plan as sought
submission is in relation to the original submission of:	submission	The particular parts of the original submission I/we support /oppose are:		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point

Helicopters South Canterbury 2015 Ltd	53.15	Amend NOISE-O2 Reverse sensitivity as follows: The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use and Industrial zones or primary production activities in rural zones, are not constrained by reverse sensitivity effects arising from noise sensitive activities.	Primary production activities in the Rural Zone should not be constrained by reverse sensitivity effects arising from noise sensitive activities.	Allow	Amend objective as sought
Ballance AgriNutrients Limited	86.6	Amend as NOISE-O2 Reverse sensitivity as follows The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use and Industrial zones or primary production activities in rural zones, are not constrained by reverse sensitivity effects arising from noise sensitive activities.	Primary production activities in the Rural Zone should not be constrained by reverse sensitivity effects arising from noise sensitive activities.	Allow	Amend objective as sought
submission is in relation to the original submission of:	submission			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Horticulture New Zealand	245.92	Amend as NOISE-O2 Reverse sensitivity as follows The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use and Industrial zones or primary production activities in rural zones, are not constrained by reverse sensitivity effects arising from noise sensitive	Primary production activities in the Rural Zone should not be constrained by reverse sensitivity effects arising from noise sensitive activities.	Allow	Amend objective as sought

		activities.				
Horticulture New Zealand		Add new Policy to the NOISE Chapter as follows: NOISE-PX To recognise that noise associated with primary production activities is appropriate for the working nature of the rural environment by exempting it from the noise limits. The operation of noisy equipment (in particular rural airstrips, audible bird scaring devices and frost fans) is provided for subject to appropriate controls.	support	Noise is an intergral part of primary production that should be recognised	Allow	Add the policy as sought
submission is in relation to the original submission of:	submission			,, , , . , . , . , . , . , . ,	disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Helicopters South Canterbury 2015 Ltd		Amend the plan to ensure that the rural zones are not described as 'quiet', and that noise associated with primary production activities is anticipated.	support	It needs to be recognised in the description of the rural zone that it is not a 'quiet' area	Allow	Amend the policy as sought
Helicopters South Canterbury 2015 Ltd		Amend NOISE-P5 Reverse sensitivity by either: 1. Removing reference to "higher noise environments" in the policy and include rural zones. OR 2. Developing a separate policy to address reverse sensitivity from noise sensitive activities in rural zones.		Reverse sensitivity effects are not limited to the 'higher noise environments' listed in the policy. Noise sensitive activitiesshould be managed in rural zones to ensure that reverse sensitivity effects on primary production is avoided.	Allow	Amend the policy as sought

AgriNutrients Limited		Amend NOISE-P5 Reverse sensitivity by either: 1. Removing reference to "higher noise environments" in the policy and include rural zones. OR 2. Developing a separate policy to address reverse sensitivity from noise sensitive activities in rural zones.		listed in the policy. Noise sensitive activitiesshould be managed in rural zones to ensure that reverse sensitivity effects on primary production is avoided.		Amend the policy as sought
submission is in relation to the original submission of:	submission				disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Ballance AgriNutrients Limited	86.9	Retain NOISE R-1 as notified.	in part	NZAAA supports the exemption for aircraft using airstrips and helicopter landing sites for activities in the rural zone. An exemption to the provisions of NOISE-R1 for aircraft using airstrips and helicopter landing sites for activities in the Natural Open Space zone is important so that there is the ability to use aircraft for weed and pest control for conservation activities outside of the rural zones.		Retain the rule as sought and add an exemption to the provisions of NOISE-R1 for aircraft using airstrips and helicopter landing sites for activities in the Natural Open Space zone
Helicopters South Canterbury 2015 Ltd	53.18	Amend NOISE-R1 Activities generating noise not otherwise specified in the Rules section as follows: ADD: 10. Aircraft using airstrips and helicopter landing sites for activities in the Natural Open Space zone that complies with NOSZ- (Rule numbering to be determined)		NZAAA supports the exemption for aircraft using airstrips and helicopter landing sites for activities in the rural zone. An exemption to the provisions of NOISE-R1 for aircraft using airstrips and helicopter landing sites for activities in the Natural Open Space zone is important so that there is the ability to use aircraft for weed and pest control for conservation activities outside of the rural zones.		Retain the rule and add as sought

submission is in relation to the original submission of:	submission is in relation to the original submission Number:		position on the original submissi on is:		disallow the original submission (in full or in part)	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Helicopters South Canterbury 2015 Ltd		Amend GRU-O2 Character and qualities of the General Rural Zone as follows: [] ADD: 1. a working environment of mostly utilitarian buildings and structures where primary production and associated activities generates noise, odour, light overspill and traffic, often on a cyclic and seasonable basis; DELETE: 2. higher levels of amenity immediately around sensitive activities and zone boundaries; and		The description of the rural zone is important to ensure that it adequately describes that it can be a noisy environment. Noise in the rural zone is from primary production and associated activities. Sensitive activities locating in a rural zone should not be anticipating a higher level of amenity in a working rural production environment.	Allow	Retain the objective and amend as sought
Helicopters South Canterbury 2015 Ltd		Amend GRUZ-O3 Protecting primary production as follows: The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General rural zone, and primary production is protected from reverse sensitivity effects and sensitive activities.		recognising the importance of primary production and its long-term protection but should be clear that it is reverse sensitivity effects from sensitive activities that it is protected from.	Allow	Retain the objective and amend as sought

submission is in relation to the original submission of:	submission			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Ballance AgriNutrients Limited	86.11	Amend GRUZ-O3 Protecting primary production as follows: The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General rural zone, and primary production is protected from reverse sensitivity effects and sensitive activities.	recognising the importance of primary production and its long-term protection but should be clear that it is reverse sensitivity effects from sensitive activities that it is protected from.	Allow	Retain the objective and amend as sought
Helicopters South Canterbury 2015 Ltd	53.21	1. Delete GRUZ-O4 Protecting sensitive activities; OR 2. Delete and replace with a new GRUZ-O4: Sensitive activities locating in the General Rural Zone anticipate effects that are generated by primary production activities and the boundary of the rural zones are managed through setbacks.	 GRUZ-O4 refers to 'intensive activities' which isn't defined so it is unclear what it refers to. The focus should be on ensuring that sensitive activities don't affect primary production.	l	Delete or replace the objective as sought
submission is in relation to the original submission of:	submission			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point

Helicopters South Canterbury 2015 Ltd		Add a definition of Day, as follows: A "Day" as it relates to agricultural aircraft activities; means 10.5 hours aircraft hours conducted between the beginning of civil morning twilight (MCT) and the end of civil evening twilight (ECT). NOTE. A day is defined in the Civil Aviation rules as: the hours between— (1) the beginning of morning civil twilight, which is when the centre of the rising sun's disc is 6 degrees below the horizon; and (2) the end of evening civil twilight, which is when the centre of the setting sun's disc is 6 degrees below the horizon.	The definition of a DAY as it relates to agricultural aviation activities is appropriate to be added to the definitions to support the proposed alternative wording in GRUZ-R14 and NZAAA's proposed rule for NOSZ.	Allow	Adopt the definition as sought
submission is in relation to the original submission of:	submission			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Helicopters South Canterbury 2015 Ltd		Amend GRUZ-P1 as follows: meet the standards and requirements to a void. remedy or mitigate adverse effects on sensitive activities and the environment; and 4. enabling a range of compatible activities that	 Primary production activities should be enabled and agricultural aviation acknowledged as part of the rural character		Retain the policy and amend as sought

		support primary production activities, including ancillary activities, and agricultural aviation.				
Horticulture New Zealand	, ,	Amend GRUZ-P1 as follows: meet the standards and requirements to avoid, remedy or mitigate adverse effects on sensitive activities and the environment; and 4. enabling a range of compatible activities that support primary production activities, including ancillary activities, and agricultural aviation.		Primary production activities should be enabled and agricultural aviation acknowledged as part of the rural character		Retain the policy and amend as sought
Helicopters South Canterbury 2015 Ltd	53.23	The rule providing for conservation activities in the General Rural Zone is supported but considers the definition of conservation activities should be amended as sought in previous submission point.		Providing for conservation activities in the General Rural Zone is supported but NZAAA supports seeking of the definition of conservation activities sought by the submitter previously		Retain GRUZ-P10 subject to amending the definition of Department of Conservation Activity (as per previous submission poin 53.4) as sought
submission is in relation to the original submission of:			• •	,,	disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Ballance AgriNutrients Limited	86.12	Retain GRUZ-P5 as notified		The protection for primary production activities from reverse sensitivity effects is important	Allow	Retain the policy as sought

Helicopters South Canterbury 2015 Ltd	53.24	Amend GRUZ-R10 as follows: Conservation activities Activity status: Permitted Where PER-1 Land, buildings and structures and equipment, machinery, vehicles and aircraft are used for: · preservation, protection, restoration, promulgation or enhancement of indigenous species or habitats of indigenous fauna; or · Weed and pest control; or	support	There should be provision for weed and pest control in conservation activities	Allow	Retain the rule and amend as sought
Federated Farmers	182.19(9)	Amend GRUZ-R10 Conservation activities follows: · agricultural aviation conservation		Agricultural aviation is an important weed and pest control activity that should be provided for	Allow	Retain the rule and add as sought
submission is in relation to the original submission of:	submission	The particular parts of the original submission I/we support /oppose are:			disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point

Helicopters	53.25	Amend GRUZ-R14 as follows:	Support	NZAAA supports the enabling of the use of rural airstrips and helicopter landing	Allow	Amend the rule as sought
South		ADD: GRUZ-R14 Use of Rural		sites for primary production purposes as a permitted activity however the		
Canterbury		airstrips and helicopter landing		proposed rule is overly complex and the proposed setbacks will be unduly		
2015 Ltd		areas. DELETE: PER-1 The flights		restrictive which are not supported or justified by the s32 Report.		
		are for emergency purposes such				
		as medical evacuations, search		NZAAA supports an alternative rule that will be enabling.		
		and rescue, firefighting or civil				
		defence; or PER-2 The use is for				
		primary production including				
		spraying, stock management,				
		fertiliser application or frost				
		protection for: 1. a maximum of				
	seven days within any three month period where the airstrip					
		or helicopter landing site is				
		setback between 500m-1,000m				
		from: a. any Residential zone;				
		and b. the notional boundary of				
		a building containing a noise				
		sensitive activity, not located on				
		the site of the airstrip or				
		helicopter land site; or 2. the				
		airstrip or helicopter landing site				
		is setback greater than 1,000m				
		<u>from:</u>				
		a. any Residential zone; and b.				
		<u>the notional boundary of a</u>				
		building containing a noise				
		sensitive activity, not located on				
		the site of the airstrip or				
		helicopter land site; or PER-3				
		Take offs or landings must not				
		exceed 10 per month; and the				
		airstrip or landing site is setback				
		<u>a minimum of 500m from:</u>				
		1. any Residential zone; and 2.				
		the notional boundary of a				
		building containing a noise				
		sensitive activity not located on				
		the site of the airstrip or				
		helicopter land site. ADD: PER-1				

		Agricultural aviation activities for the purpose primary production or conservation on a seasonal, temporary or intermittent basis for a period up to 30 days in any 12 month period or 315 aircraft hours (whichever is the greater).				
Ballance AgriNutrients Limited		Delete current GRUZ-R14 Use of airstrips and helicopter landing sites and replace with the following: GRUZ-R14 Use of airstrips and helicopter landing sites Aircraft and helicopter movements are limited to between the hours of Morning Civil Twilight and Evening Civil Twilight and Evening Civil Aviation rules. A log detailing the time and date of all aircraft movements and helicopter movements shall be maintained and made available to the Council at its request.		NZAAA supports the enabling of the use of rural airstrips and helicopter landing sites for primary production purposes		Amend the rule as sought or alternatively accept the amendment as requested by submitter 53.25
submission is in relation to the original submission of:	submission				disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Fire and Emergency New Zealand	131.38	Retain GRUZ-R14 as notified	in part	NZAAA supports enabling rules for emergency services but opposes rules that do not enable the use of rural airstrips and helicopter landing sites for primary production purposes.		Retain Per 1 of the rule and reject the rest of the decision sought

Federated Farmers		Supports NZAAA rule amendment GRUZ-R14 and addition of specfic definitions		NZAAA supports the enabling of the use of rural airstrips and helicopter landing sites for primary production purposes as a permitted activity however the proposed rule is overly complex and the proposed setbacks will be unduly restrictive which are not supported or justified by the s32 Report. NZAAA seeks an alternative rule and the inclusion of specific definitions that will be enabling.		Accept the rule amendment and addition of definitions as sought
Helicopters South Canterbury 2015 Ltd		Amend NOSZ-P3 as follows:Enable conservation activities that are consistent with a Department of Conservation plan orstrategy for the area and do not generate significant adverse effects on the surrounding area oradjacent sites that will enhance or protect the Open Space Zone. AND 2. Amend the definition of Department of Conservation Activity (as per previous submission point).		Conservation activities are not limited to Department of Conservation activities. A new definition is sought by the submitter for conservation activities that includes the wider range of conservation activities that can be undertaken, including weed and pest control.		Amend the policy and the definition as sought
submission is in relation to the original submission of:	submission		•	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	disallow the original submission (in	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Helicopters South Canterbury 2015 Ltd		Add a new rule to the NOSZ - Natural Open Space Zone chapter, as follows: NOSZ-RX Agricultural aviation activities Activity status: Permitted Where: PER-1 The activity is for the purpose of conservation on a seasonal, temporary or		The plan should provide for the use of airstrips and helicopter landing sites for conservation, infrastructure, Maintenance or construction purposes	Allow	Add the rule as sought

	1	intermittent basis for a period up to 30 days in any 12 month period or 315 aircraft hours (whichever is the greater).			
Station Air Ltd	161.1	Considers the limit of only 10 take-offs per month is overly restrictive and heavily hinders the abilities of aviators, aviation clubs and business owners to continue their activities. [Refer original submission for full reason].	Amend GRUZ-R14 Use of airstrips and helicopter landing sites to: 1. delete the limitations of take-offs under PER3; 2. allow landowners to retain their existing rights to use their airstrips without a frequency limit.	Allow	Amend the policy and the definition as sought
Simon Pemberton		Considers that the proposal to limit takeoffs and landings to ten per month would be restrictive and would excessively limit the use, and the right to use private airstrips for recreation, business, primary production requirements and emergency purposes. [refer to original submission for full reasons]	Amend GRUZ-R14.PER-3 to preserve the existing use rights of private landowners and the aviation community by removing the proposed limitations in PER-3.	Allow	Amend the policy and the definition as sought
Jeremy Talbot		Oppose GRUZ-R14 as it is too restrictive on owners of small light aircraft on a small property which are used for a range of activities including flight training, farming, transportation and social events. As the operation of small flights is largely weather dependent, owners tend to make the most of them on a fly day (e.g., 26 were seen on a small airstrip on a fly day).	Amend GRUZ-R14 Use of airstrips and helicopter landing sites with the following changes: 1. remove restrictions on number of landings; and 2. Remove the 500m from boundary for landing strip.	Allow	Amend the policy and the definition as sought

	Considers the 500m from any boundary is unworkable either due to constraints on space, or practically with the strip needing to be placed in to the prevailing wind. [Refer original submission for full reason]			
Transpower New Zealand Limited	Considers the Policy fails to reflect the nuanced approach to the management of adverse effects set out in NPSET Policies 7, 8 and 9, and the relevant considerations in NPSET Policies 3, 4 and 5. The submitter notes it is more efficient and effective to include a standalone policy on the effects of the National Grid. [Refer original submission for full reason]	Amend	1. Amend EI-P2 Managing adverse effects of Regionally significant Infrastructure and other Infrastructure as follows: Except as provided for by Policy EI-PX, pProvide for Regionally Significant Infrastructure and other infrastructure where any adverse effects are appropriately managed by: []" AND 2. Insert a new National Grid specific policy as follows: Policy EI-PX Managing adverse effects of the National Grid Provide for the operation, maintenance, repair, replacement, upgrade and development of the National Grid where any adverse effects are appropriately managed by: 1. enabling the ongoing operation, maintenance, repair, replacement and minor upgrading of existing National Grid assets; 2. when providing for new, or upgrades that are more than minor to, National Grid: a. In urban environments, avoid adverse effects of the National Grid on town centres, areas of high recreation value and existing sensitive activities; b. in the coastal environment, recognising that there will be areas where avoidance of adverse effects is required to protect the special values and characteristics of those areas; c. where (a) and (b) do not apply, seek to avoid adverse effects on the characteristics and values of the following: i. significant natural areas listed in SCHED7, ii. outstanding natural features and landscapes listed in SCHED8 and SCHED9, iii. High Naturalness Waterbodies Areas, iv. areas of high or outstanding natural character, v. historic heritage sites listed in SCHED3-4, vi. sites and areas of significance to Kāti Huirapa listed in SCHED6, vii. visual amenity landscapes listed in SCHED10, and 3. where it is not practicable to avoid, adverse effects on the characteristics and values of the areas listed in (2), remedy or mitigate adverse effects having regard to:	Amend to include the use of Helicopters as a permitted activity for the maintenance and construction of regionally significant Infrustructure

			 a. the operational needs or functional needs of the National Grid and the extent to which those requirements constrain measures to avoid, remedy or mitigate adverse effects; b. the extent to which significant adverse effects are avoided; c. the extent to which any adverse effects have been avoided, remedied or mitigated by route, site and method selection; 	
Transpower New Zealand Limited	Supports that the rule enables indigenous vegetation clearance for the operation, maintenance or repair of the National Grid. However, considers that the policy should provide for the upgrade of the National Grid, consistent with the NESETA and to give effect to the NPSET.	Amend	Amend ECO-R3 Clearance of indigenous vegetation associated with the National Grid as follows: [] PER-1 The vegetation clearance is to provide for the operation, maintenance, or repair or upgrade of the National Grid, including maintenance of existing access to National Grid support structures; and []	Amend to include the use of Helicopters as a permitted activity for the maintenance and construction of regionally significant Infrustructure
Transpower New Zealand Limited	Supports that the rule enables vegetation clearance for the operation, maintenance or repair of the National Grid. But seeks that the rule provide for the upgrade of the National Grid consistent with the NESETA and gives effect to the NPSET.		Amend NATC-R1 Vegetation clearance as follows: Riparian Margins of a river that is not an HNWB Activity status: Permitted Where: [] PER-3 The vegetation clearance is for the operation, maintenance, or repair or upgrade of the National Grid; or []	Amend to include the use of Helicopters as a permitted activity for Vegetation clearance
Connexa Limited	Considers it is necessary to permit the maintenance, repair and removal of infrastructure.	Amend	Retain as notified.	Amend to include the use of helicopters as a permitted activity for maintenance, repair and removal of infrastructure.
KiwiRail Holdings Limited	Supports subject to amendment. Considers the definition should recognise that in the context of rail, activities are more than operation of the railway and should encompass development, upgrading and ongoing maintenance of the rail network including rail yards. [see original		Amend the definition of Reverse Sensitivity as follows: means the potential for the development, upgrading, operation and maintenance of an approved, existing lawfully permitted established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an approved, existing or permitted activity.	Amend the policy and the definition as sought

		submission for full reason}				
KiwiRail Holdings Limited	187.21	Supports the recognition of the benefits and operational needs of infrastructure. The enabling of the operation, maintenance, repair, upgrade and development of the railway		Retain as notified.	Allow	Retain the Policy
KiwiRail Holdings Limited	187.37	Supports the permitted activity status of maintaining existing land transport infrastructure.	Amend	Retain as notified.	Allow	Amend to include the use of Helicopters as a permitted activity for supporting the maintenance of transport infrastructure.
Spark New Zealand Trading Limited	208.42	Considers it is necessary to permit the maintenance, repair and removal of infrastructure.	Amend	Retain as notified.	Allow	Amend to include the use of Helicopters as a permitted activity for supporting the maintenance, repair and removal of infrastructure.
Southern Wide Helicopters	213.1	Supports the submission made by the New Zealand Agricultural Aviation Association.	Support	Grant the relief sought in the submission made by the New Zealand Aviation Association.	Allow	Amend the rule as sought
Fire and Emergency New Zealand	131.4	Seeks the inclusion of a new definition for 'Temporary emergency services training activity' in order to provide greater clarity to plan users and to support the relief sought elsewhere in this submission. Firefighter training is essential		Add new definition as follows: TEMPORARY EMERGENCY SERVICES TRAINING ACTIVITY means a temporary activity undertaken for the training of any component of Fire and Emergency New Zealand for any emergency purpose. An emergency purpose are those purposes which enable Fire and Emergency New Zealand to achieve its main functions under sections 11 and 12 of the Fire and Emergency New Zealand Act 2017.	Allow	Amend the rule as sought

New Zealand		and may include live fire training and equipment training both on and off site. Supports strategies that	Support	Retain as notified.	Allow	Amend the rule as sought
Agricultural Aviation Association		recognise, protect and enhance indigenous vegetation and native flora and fauna.				
New Zealand Agricultural Aviation Association	132.1	Requests a new definition for (Agricultural aviation activities' to include primary production, biosecurity, and conservation activities undertaken by agricultural aviation.		Add a new definition as follows: Agricultural aviation activities means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.2	Request a new definition for 'Aircraft' as defined by the RMA to future-proof the plan.		Add a new definition as follows: Aircraft means any machine that can derive support in the atmosphere from the reactions of the air otherwise than by the reactions of the air against the surface of the earth.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.3	Add a new definition as follows: Conservation activity means the use of land or buildings for any activity undertaken for the purposes of protecting and/or enhancing the natural, historic and/or ecological values of a natural or historic resource. It includes ancillary activities which assist to enhance the public's appreciation and recreational enjoyment of the resource,		Add a new definition as follows: Conservation activity means the use of land or buildings for any activity undertaken for the purposes of protecting and/or enhancing the natural, historic and/or ecological values of a natural or historic resource. It includes ancillary activities which assist to enhance the public's appreciation and recreational enjoyment of the resource, including weed and pest control and the intermittent use of aircraft for conservation purposes.	Allow	Amend the rule as sought

		including weed and pest control and the intermittent use of aircraft for conservation purposes.				
New Zealand Agricultural Aviation Association	132.4	The definition of a 'day' as it relates to agricultural aviation activities should be added to the definitions to support the proposed alternative wording in GRUZ-R14 and NZAAA's proposed rule for NOSZ.		Add a new definition as follows: Day	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.5	Include a definition of a 'Helicopter Landing Area'.		Add a new definition as follows: Helicopter landing area means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.6		Support		Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.7	Supports the definition of Plantation Forestry but seeks to have agricultural aviation added to the definition.		Amend the definition of Plantation Forestry as follows: means a forest deliberately established for commercial purposes, being— a. at least 1 ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted; and b. includes all associated forestry infrastructure and agricultural aviation activities; but c. does not include— []	Allow	Amend the rule as sought

New Zealand Agricultural Aviation Association	132.8	Supports the definition of Primary Production that is consistent with the NPS definition.	Support	Retain as notified.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.9	Seeks to have a definition of a 'Rural Airstrip' included in the plan.		Add a new definition as follows: Rural airstrip means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.10		Support		Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.11	Supports strategies that recognise, protect and enhance indigenous vegetation and native flora and fauna.	''	Retain as notified.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.12	Supports strategies that enable primary production, protect versatile soils, and manage reverse sensitivities. However, clause ii) refers to 'intensive activities' which isn't defined so it is unclear what it refers to. The focus should be on ensuring that sensitive activities don't affect primary production. Clause		Considers the definition of hazardous facility be amended to ensure that agrichemicals and fertilisers are able to be used as a permitted activity within the 'sensitive environments' as defined in the Plan. It is important that weed and pest control can occur within these areas.	Allow	Amend the rule as sought

		iii) seeks to manage 'new sensitive activities'. The plan should ensure that sensitive activities do not adversely affect primary production, including reverse sensitivity effects.				
New Zealand Agricultural Aviation Association	132.13	Considers the definition of hazardous facility be amended to ensure that agrichemicals and fertilisers are able to be used as a permitted activity within the 'sensitive environments' as defined in the Plan. It is important that weed and pest control can occur within these areas.		No specific relief sought for HS-R1. AND Amend the definition of 'hazardous facility' as sought above.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.14		Support		Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.15	Supports policy ECO-R1, that provides for the management of pest plants and pest animals to enhance biodiversity values.	Support	Retain as notified.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.16	Supports the protection of indigenous biodiversity but policy ECO-P3 should provide for weed and pest control to maintain biodiversity values.		Amend ECO-P3 as follows: ECO-P3 Protection of indigenous biodiversity in sensitive areas Protect indigenous biodiversity by providing for weed and pest control to maintain and enhance biodiversity and, by managing the clearance of indigenous vegetation in the following sensitive areas: 1.riparian areas, wetlands and springs; and 2.coastal areas; and 3.areas at higher altitude; and 4. areas on steep slopes.	Allow	Amend the rule as sought

New Zealand Agricultural Aviation Association	132.17	Supports ECO-R1(1) that allows for the clearance of indigenous vegetation for biosecurity purposes and the removal of pest plants and animals. It is noted that clearance of native vegetation is a permitted activity below 900 m and slope is less than 30 degrees. Supports ECO-R1(2) that allows for the clearance of indigenous vegetation for biosecurity purposes, the removal of pest plants and animals, grown up under plantation forestry or within an area of improved pasture.	Retain as notified.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.18	Supports noise effects being compatible with the zone as appropriate but it needs to be recognised that the rural zone is not a 'quiet' area.	 Amend NOISE-O1 to ensure that the rural zones are not described as 'quiet' and that noise associated with primary production activities is anticipated.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.19	Primary production activities in the Rural Zone should not be constrained by reverse sensitivity effects arising from noise sensitive activities.	Amend NOISE-O2 as follows: NOISE-O2 Reverse sensitivity The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use and Industrial zones or primary production activities in rural zones, are not constrained by reverse sensitivity effects arising from noise sensitive activities.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.20	Considers noise effects being compatible with the zone is appropriate but it needs to be recognised in the description of the rural zone that it is not a 'quiet' area.	Amend NOISE-P1 to ensure that the rural zones are not described as 'quiet' and that noise associated with primary production activities is anticipated.	Allow	Amend the rule as sought

New Zealand Agricultural Aviation Association	132.21	Considers that reverse sensitivity effects are not limited to the 'higher noise environments' listed in the policy. Noise sensitive activities should be managed in rural zones to ensure that reverse sensitivity effects on primary production is avoided.	Amend NOISE-P5 to delete reference to 'higher noise environments' OR Include a specific policy for reverse sensitivity from noise sensitive activities in rural zones.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.22	Supports the exemption for aircraft using airstrips and helicopter landing sites for activities in the rural zone that complies with GRUZ-R14. Seek an exemption to the provisions of NOISE-R1 for aircraft using airstrips and helicopter landing sites for activities in the Natural Open Space zone that complies with the rule proposed by NZAAA in this document (NOSZ). It is important that there is the ability to use aircraft for weed and pest control for conservation activities outside of the rural zones.	Amend NOISE-R1 as follows: NOISE-R1 Activities generating noise [] Activity status: Permitted Where: PER-1 NOISE-S1 is complied with; and PER-2 NOISE-S2 is complied with. This rule does not apply to noise generated by: [] 10. Aircraft using airstrips and helicopter landing sites for activities in the Natural Open Space zone that complies with NOSZ- (Rule numbering to be determined). [] AND 2. Add a new definition of 'helicopter landing area' and 'rural airstrip' as sought earlier in this submission.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.23	Considers the description of the rural zone is important to ensure that it adequately describes that it can be a noisy environment. Noise in the rural zone is from primary production and associated activities. Sensitive activities locating in a rural zone should not be anticipating a higher level of amenity in a working rural production environment.	Amend GRUZ-O2 as follows: GRUZ-O2 Character and qualities of the General Rural Zone The character and qualities of the General Rural Zone comprise: 1. large allotments with large areas of open space; and	Allow	Amend the rule as sought

New Zealand Agricultural Aviation Association	132.24	Supports recognising the importance of primary production and its long-term protection but should be clear that it is reverse sensitivity effects from sensitive activities that it is protected from.	Support	Amend GRUZ-O3 as follows: GRUZ-O3 Protecting primary production The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General rural zone, and primary production is protected from reverse sensitivity effects and sensitive activities.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association		GRUZ-O4 refers to 'intensive activities' which isn't defined so it is unclear what it refers to. The focus should be on ensuring that sensitive activities don't affect primary production. Sensitive activities locating in rural zones should recognise that they are locating in a working rural production environment so 'protecting' their amenity is inappropriate.		1. Delete GRUZ-O4 OR 2. Amend GRUZ-O4 as follows: GRUZ-O4 Protecting sensitive activities and sensitive zones	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.26	Supports the enabling of primary production activities but seeks to have agricultural aviation acknowledged as part of the rural character.	Support	Amend GRUZ-P1 as follows: GRUZ-P1 Primary production activities Enable a range of primary production and associated activities, where they: 1. allow for the ongoing productive use of land for present and future generations; or 2. maintain the character and qualities of the General Rural Zone; and 3. meet the standards and requirements to minimise avoid, remedy or mitigate adverse effects on sensitive activities and the environment. 4. enabling a range of compatible activities that support primary production activities, including ancillary activities, and agricultural aviation.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	132.27	Supports the separation distances in GRUZ-P2.	Support	Retain as notified.	Allow	Amend the rule as sought

New Zealand Agricultural Aviation Association	Supports the protection for primary production activities from reverse sensitivity effects in GRUZ-P5.	''	Retain as notified.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	Supports GRUZ-P10 insofar as it provides for conservation activities in the General Rural Zone but seeks to ensure that the definition of conservation activities is amended as outlined in earlier submission point.		Retain as notified AND Amend the definition of 'department of conservation activity' as sought above.	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	Seeks to have the use of airstrips and helicopter landing sites for conservation purposes as a permitted activity.		Add a new permitted activity rule in the NOSZ chapter as follows: Agricultural aviation activities for the purpose of conservation on a seasonal, temporary or intermittent basis for a period up to 30 days in any 12 month period or 315 aircraft hours (whichever is the greater).	Allow	Amend the rule as sought
New Zealand Agricultural Aviation Association	Opposes the overly complex rule GRUZ-R14 which includes unduly restrictive setbacks which are not supported or justified by the s32 Report. Rule should be more enabling.		Amend GRUZ-R14 as follows: GRUZ-R14 Use of Rural airstrips and helicopter landing sites Areas Activity status: Permitted Where: PER-1 The flights are for emergency purposes such as medical evacuations, search and rescue, firefighting or civil defence; or PER-2 The use is for primary production including spraying, stock management, fertiliser application or frost protection for: 1. a maximum of seven days within any three month period where the airstrip or helicopter landing site is setback between 500m-1,000m from: a). any Residential zone; and b). the notional boundary of a building containing a noise sensitive activity, not located on the site of the airstrip or helicopter land site; or 2. the airstrip or helicopter landing site is setback greater than 1,000m from: a). any Residential zone; and b). the notional boundary of a building containing a noise sensitive activity, not	Allow	Amend the rule as sought

_				
			located on the site of the airstrip or helicopter land site; or	