

Further Submission on Timaru District Plan

(Closing date: Friday the 11th August 2023 at 5pm)

To:	Timaru District Council 2 King George Place Timaru 7910 Phone: 03 687 7200
Email:	pdp@timdc.govt.nz
Further Submission From:	UAVNZ a division of Aviation New Zealand.
Submitter Contact Details:	Richard Milner Executive Officer UAVNZ
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Background

Aviation New Zealand (AvNZ) is an industry body representing professional aviation operators in New Zealand. UAVNZ as a division of AvNZ, represents unmanned aircraft operators often referred to as UA, UAV, AUS, RPAS, RPA or Drones are engaged in operations across a range of activities for the purposes of:

- Agricultural Aviation
- Primary production not covered by Agricultural Aviation operations including:
 - Frost control
 - Pest control
 - Rural farm support such as sling loading fencing supplies, water tanks etc
- Transmission wire installation and inspection
- Supporting security of energy supply and communications infrastructure
- Tourism
- flight training
- support of DOC
- Aerial photography/survey
- Special operations only possible by unmanned aircraft
- Firefighting, Search and Rescue (SAR),

General submission

UAVNZ seeks to ensure that appropriate intermittent Unmanned Aircraft 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.”*

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

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.

UAVNZ wishes to speak to this submission. At the time of writing the industry was surveyed in 2019 and found a little over 200,000 unmanned aircraft in New Zealand. There are around 130 Aircraft Operator Certificate holders under Pat 102 of the Civil Aviation Rules for Unmanned aircraft and many more that operate legally in the more rule based Part 101 Rules. Unmanned aircraft form an essential adjunct to New Zealand's economy in a range of roles.

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 No

Please note that I as represent the New Zealand Helicopter Association (NZHA) as a joint role. Any submission made by myself for the NZHA must not be considered a joint submission for any reason what so ever.

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

Signature:

A handwritten signature in black ink, appearing to be 'T. Hill', written over a horizontal line.

Date: 09 August 2023

New Zealand Agricultural Aviation Association	132.2	<u>Request a new definition for 'Aircraft' as defined by the RMA to future-proof the plan but in consideration of unmanned aircraft to include a minimum weight..</u>	Amend	<p>Add a new definition as follows: Aircraft means any machine of 200 kilograms or more 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.</p> <p>If all aircraft regardless of their size are defined as above then significant restrictions could be placed on unmanned aircraft operations. Many Unmanned aircraft are small, light weight and pose very small risks to persons and property. Noise profiles are also very small and no louder than household equipment.</p> <p>Unmanned aircraft conduct a range of essential activities of our economy and their inclusion in the above aircraft definition in the RMA could destroy their contributions to safety, the economy and further applications.</p> <p>Unmanned aircraft could also provide a suitable solution to setbacks implied on larger manned aircraft from urban and residential zones. Such activities are Agricultural activities, Energy and communication activities and inspection and maintenance of infrastructure.</p>	Allow	Amend as follows means any machine of 200 kilograms or more 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.
Helicopters South Canterbury 2015 Limited	53.3	<u>Request a new definition for 'Aircraft' as defined by the RMA to future-proof the plan but in consideration of unmanned aircraft to include a minimum weight..</u>	Amend	<p>Add a new definition as follows: Aircraft means any machine of 200 kilograms or more 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.</p> <p>If all aircraft regardless of their size are defined as above then significant restrictions could be placed on unmanned aircraft operations. Many Unmanned aircraft are small, light weight and pose very small risks to persons and property. Noise profiles are also very small and no louder than household equipment.</p> <p>Unmanned aircraft conduct a range of essential activities of our economy and their inclusion in the above aircraft definition in the RMA could destroy their contributions to safety, the economy and further applications.</p> <p>Unmanned aircraft could also provide a suitable solution to setbacks implied on larger manned aircraft from urban and residential zones. Such activities are</p>	Allow	Amend as follows means any machine of 200 kilograms or more 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.

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