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:	Richard Geary – Helicopters South Canterbury
То:	Hearing Commissioners, Timaru District Council Plan
Date:	4/7/24

1. Introduction

- 1.1 I am Richard Geary, CEO and Owner/Operator of Helicopters South Canterbury.
- 1.2 I have been in the Aviation industry in South Canterbury for 25 years. As an employee for Helicopters South Canterbury then we took over ownership in 2015.
- 1.3 Helicopters South Canterbury operates predominately between the Waitaki River and Rakaia River including the Mackenzie Country.
- 1.4 Our company is engaged in a mix of operations over the South Canterbury region. Our work is approx 20% Commercial and 80% Agricultural which includes applying agrichemicals, fertiliser and VTA's for the purpose of:
 - Primary Production
 - Forestry
 - Crop Protection and Disease Control
 - Weed and Pest Control
 - Biosecurity Threats (ie. Wallabies)
 - Biodiversity and Conservation Values (ie. Wilding Pines)

Our commercial work includes Lifting, Surveying, Fire Fighting, Fire Lighting, Frost Fighting and Tourism. We are engaged by the following entities Environment Canterbury, Department of Conservation, Fire and Emergency NZ, NZ Police, NZ Search and Rescue and Civil Defence amongst others.

1.5 When on Agricultural Operations we can land and take off up to 10 times an hour depending on the job. Depending on conditions we operate early morning and/or late evening for ideal weather (less wind) and to ensure Bees are not harmed when using agrichemicals.

- 1.6 Agricultural Aircraft are crucial for when the ground conditions/terrain are not suitable for vehicles and for when time critical applications of agrichemicals and fertilisers are required to enhance and protect primary production.
- 1.7 In weather events ie. Damaging winds/flooding/Snow etc we are used to survey the extent of damage and support repairs, in a safe and efficient way. We are also used by Search and Resce, NZPolice, FENZ and Civil Defence. We are proud to support our local agencies promptly and with local knowledge to ensure the community is well looked after.
- 1.8 The proposed District Plan is overly restrictive for helicopter operations both commercial and agricultural. If our submission along with the NZHA and NZAAA's are not taken into consideration, the flow on effect could be disastrous for the community. The restrictions would mean a loss in business for our company which would result in us having to reduce the number of helicopters and their capacity, putting the local community at risk in adverse/emergency events along with an economic loss for primary producers.
- 1.9 We fully stand by The New Zealand Agricultural Aviation Association (NZAAA) and NZHA submissions.

2. Helicopters South Canterbury in support of NZAAA's submissions

<u>General</u>

- 2.1 The notified Timaru PDP does not adequately provide for agricultural aviation activities.
- 2.2 NZAAA acknowledges that if accepted, the recommendations in the S42A Rural Zone report would adequately provide for agricultural aviation activities through GRUZ-R10 'Conservation activities General Rural Zone' and the proposed GRUZR14A 'Aircraft and Helicopter Movements.'

Rural Zone

- 2.3 The S42A point #10.22.7 that recommends that GRUZ-R10 be amended to include 'equipment, machinery, vehicles and aircraft', and 'weed' control is supported.
- 2.4 The S42A point#10.25.32 recommending the inclusion of a definition for 'Aircraft and helicopter movement' is supported
- 2.5 The S42A point #10.25.22 that rejects the introduction of a specific definition of 'Agricultural aviation activities' is not supported.
- 2.6 For clarity, NZAAA seeks to have agricultural aviation activities defined to prevent future ambiguity, noting that an amendment of the definition originally sought, is included in 3.3 to allow for the S42A recommendation of a definition for ' Aircraft and helicopter movement'.

- 2.7 Selwyn, Wellington City, Wairarapa combined, Central Hawkes Bay and Gore have all included specific definitions for agricultural aviation activities to future proof their district plans.
- 2.8 The S42A point #10.25.36 that recommends the amendment to GRUZ-R14 PER-2 is supported in part; and
- 2.9 NZAAA seeks to have the wording amended in accordance with the definition of 'agricultural aviation' as sought in 3.3.

3. Decisions sought

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

GRUZ-R10 Conservation activities General Rural Zone

Activity status: Permitted Where: PER-1

'ER-1 and buildings a

Land, buildings, and structures, **<u>equipment, machinery, vehicles and</u>** <u>aircraft</u> 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, board walks, pedestrian bridge.
- 3.2 NZAAA seeks to have the proposed definition of 'Aircraft and helicopter movement' accepted:

<u>Aircraft and helicopter movement - means a single aircraft flight operation (landing or departure). Maintenance procedures are excluded.</u>

3.3 NZAAA seeks to have a revised definition of 'agricultural aviation activities' accepted:

<u>Agricultural aviation activities mean an intermittent aircraft or helicopter movement</u> for primary production, frost mitigation, 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)

3.4 NZAAA seeks to have the proposed amendment to GRUZ-R14A PER 2 accepted in part and further amended:

<u>GRUZR14A Aircraft and Helicopter Movements</u> <u>Activity status: Permitted Where:</u>

<u>PER-2</u>

<u>Agricultural Aviation Aircraft and Helicopter Movements associated with purposes</u> <u>ancillary to rural production.</u>

Thank you for the opportunity to present this statement in support of Helicopters South Canterbury, NZHA and the NZAAA's submissions.

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Richard Geary CEO Helicopters South Canterbury