

Further Submission on Waitomo District Plan

(Closing date: Friday the 28th of July 2023 at 5pm)

To:	Waitomo District Council Queen Street PO BOX 404 Te Kuiti 3941
Email:	districtplan@waitomo.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
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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 Waitomo 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.

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 submissions are set out in the attached table.

Signature:



Date: 27 July 2023

Further submissions from NZ Helicopter Association

Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
NZ Helicopter Association	02.17	<p>Amend NOISE-R8 by deleting: helipads, farm helipads and, and replace with: helicopter landing areas (helicopter landing area as defined in submission point 02.04</p> <p>Delete: general rural and rural production</p>	Support in part	Adopting the proposed definition in 02.04 is appropriate.	<p>Amend the rule as sought as per 02.04</p> <p>Allow the rule change sought by the Waitomo District Council (WDC) point 26.03</p>
	02.18	Retain the NOISE exemptions and add: 7. the intermittent and/irregular use of helicopter landing areas	Support in part	Aviation activities, and general helicopter activities undertaken to establish maintain and repair critical infrastructure and conservation infrastructure, should be included as an exemption to the noise rules.	Retain the exemptions and add to exception list as sought <u>if not</u> provided for in NOISE-R8

NZAAA	04.23	<p>Amend NOISE-R8 by deleting: helipads, farm helipads and, and replace with: helicopter landing areas:</p> <p>Amend NOISE-R8 as follows: Emission of noise from helipads, farm helipads and helicopter landing areas</p> <p>Delete: general rural and rural production:</p>	Support in part	<p>The intent of NZHA submission is to ensure that Helicopter Aviation and agricultural aviation activities for primary production, conservation, industrial and construction activities are provided for.</p> <p>The WDC submission point26.03 adequately provides for this.</p>	Allow the rule change sought by the Waitomo DistrictCouncil (WDC) point 26.03
Manulife Forest Management New Zealand Limited (MFMNZL)	08.02	Retain the definition of farm airstrips and farm helipads	Oppose	Aviation activities are not limited to rural zones as they occur in other zones such as conservation areas. Therefore, NZHA seeks to have broader definitions incorporated to reflect this.	Delete the definition as notified

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Heli A1 Limited	12.01	Add new definition for agricultural aviation	Support	It is important to have agricultural aviation defined to include primary production, biosecurity, and conservation activities undertaken by agricultural aviation	Add the definition as sought
	12.02	Add new definition for aircraft	Support	It is appropriate to include the definition of an aircraft as defined by the RMA to future-proof the plan	Add the definition as sought
	12.03	Amend the definition of agricultural, pastoral and horticultural activities by deleting: Farm airstrips and farm helipads and add: agricultural aviation activities	Support	NZHA supports the intent of inclusion of farm airstrips and farm helipads as part of agricultural, pastoral and horticultural activities but supports the more appropriate inclusion of agricultural aviation activities, for which a definition is sought 12.01	Amend the definition as sought
	12.04	Retain the definition of Conservation activities and add: (j) weed and pest control and the intermittent use of aircraft for	Support	Weed and pest control and the use of aircraft for biosecurity and biodiversity activities should be included in the definition	Retain and add to the definition as sought

		conservation purposes.			
	12.05	Delete the definition: farm airstrips and farm helipads	Support	New definitions as sought by the submitter are appropriate	Delete the definition as sought
	12.06	Add new definition: Helicopter landing area	Support	The definition is appropriate	Add the definition as sought
	12.07	Amend the definition of helipad	Support	The amended definition sought is appropriate	Amend the definition as sought
	12.08	Retain the definition of Primary Industry	Support	The definition is consistent with the NPS definition	Retain the definition as sought
	12.09	Add a new definition: Lawfully established activities	Support	It should be clear what is considered to the lawfully established activities	Add the definition as sought
	12.10	Add a new definition: Rural airstrip	Support	The definition is appropriate	Add the definition as sought
	12.11	Add an SD: Rural Environment	Support	It is important that there is strategic guidance for the rural area in the Plan.	Add the SD as sought
	12.12	Retain SD-O5 but delete lawful activities' and replace with 'lawfully established activities'. 8. weed and pest control	Support	Aligns with decision sought in 12.09	Retain and amend the SD as sought

	12.14	ECO-P12 Retain the policy	Support	NZHA supports policies that enable activities for weed and pest control	Retain the policy as sought
	12.15	ECO-R10 Retain the rule and amend the definition of conservation activities as sought above to include: “(j) weed and pest control and the intermittent use of aircraft for conservation purposes”	Support	NZHA supports the provision for conservation activities that include weed and pest control by aircraft as sought in 12.04	Retain the rule and add to the definition as sought
	12.16	NATC-R1 Retain the rule and amend the definition of conservation activities as sought above to include: “(j) weed and pest control and the intermittent use of aircraft for conservation purposes”	Support	NZHA supports the provision for conservation activities that include weed and pest control by aircraft as sought in 12.04	Retain the rule and add to the definition as sought
	12.17	Retain SUB-O11 and add Primary production	Support	The protection of rural production areas from reverse sensitivities is important to the community	Retain and add to the objective as sought

Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
	12.18	Retain SUB-P10	Support	It is important to protect rural activities from the potential for reverse sensitivity effects because of subdivision	Retain the policy as sought
	12.19	Retain NOISE-O1	Support	NZHA supports the enabling of activities which are compatible with the character of each zone	Retain the objective as sought
	12.20	Retain NOISE-P1	Support	Rural activities are an accepted part of these environments.	Retain the policy as sought
	12.21	Retain NOISE-P2	Support	Reduces the potential for reverse sensitivity and manage new noise-sensitive activities in proximity to areas that consistently experience higher noise levels	Retain the policy as sought
	12.22	Retain NOISE-P3	Support	Some noisy activities are important for economic and social well-being and may exceed specified noise levels on a temporary or irregular basis. Aviation activities are intermittent and short terms are temporary and irregular	Retain the policy as sought

	12.23	<p>Amend NOISE-R8 by deleting: helipads, farm helipads and replace with: helicopter landing areas.</p> <p>Delete: general rural and rural production:</p>	Support in part	<p>Adopting the proposed definition in 12.06 is appropriate.</p> <p>NZHA agrees with the submitters intent and opposes rules that inhibit the intermittent use of farm helipads and helicopter landing areas that provide critical support to primary production, critical infrastructure and conservation.</p>	<p>Amend the rule as sought as per 12.06</p> <p>Allow the rule change sought by the Waitomo District Council (WDC) point 26.03</p>
	12.24	<p>NOISE Exemptions: Retain the exemptions but include as a permitted activity rules and add: 7. the intermittent use of rural airstrips and helicopter landing areas for agricultural aviation activities.</p> <p>Include definitions of agricultural</p>	Support	<p>The intent of NZHA submission is to ensure that Helicopter Aviation and agricultural aviation activities for primary production, conservation, industrial and construction activities are provided for.</p> <p>It is not clear in the PDP as notified that fixed wing agricultural aircraft are provided for.</p>	Retain the exception and add to the exemption list as sought

		aviation, helicopter landing areas and rural airstrips as sought above			
	12.25	Retain GRUZ-O6	Support	Provides for maintaining lawfully established rural-based activities	Retain the objective as sought
	12.26	Retain GRUZ-O10.	Support	Protects existing lawfully based activities from reverse sensitivities	Retain the objective as sought

	12.27	Retain GRUZ-O15.	Support	Avoids the establishment of incompatible adjacent land uses that could result in reverse sensitivity effects on rural activities	Retain the objective as sought
	12.28	Retain GRUZ-P3 by deleting: farming, forestry, quarrying and add primary production and agricultural aviation	Support	Ensures that rural character, amenity and safety are maintained and that reverse sensitivity effects are minimized. The policy should use the term primary production as it encompasses all the activities	Retain and amend the policy as sought

	12.29	GRUZ-R1 Amend the definition for agricultural, pastoral and horticultural activities to include agricultural aviation activities	Support	The definition of agricultural, pastoral and horticultural activities should include agricultural aviation activities to ensure that it is provided for in the rules.	Amend the rule as sought
	12.30	GRUZ-R15 Retain the rule and add weed control	Support	The rules for the clearance of non-indigenous and indigenous vegetation of the purposes of pasture renewal should include weed control	Retain the rule and add as sought
	12.31	Retain NOSZ-O1.	Support	Protects natural, ecological, and landscape values	Retain the objective as sought
	12.32	Retain NOSZ-P1	Support	Protects and enhances natural open space values	Retain the policy as sought
	12.33	Retain NOSZ-R3 and add conservation activities	Support	NZHA supports the inclusion of conservation activities that may be undertaken	Retain the rule and add as sought

	12.34	Retain NOSZ-R4 and add: Conservation Activities in the list as a permitted activity or; specifically list weed and pest control as a permitted activity on conservation and reserve land.	Support	Conservation Activities (as sought in 12.04) should be provided for as a permitted activity or alternatively weed and pest control be listed as specific activity in the rule.	Retain the rule and add Conservation activities in the list as a permitted activity as sought or; specifically list weed and pest control as a permitted activity on conservation and reserve land as sought
PF Olsen (PFO)	19.10	Amend Definitions Farm Airstrips and Farm Helipads	Oppose	Sporadically used non-dedicated landing areas for Agricultural aviation activities are not limited to forestry but apply equally to the use of rural airstrips and helicopter landing areas for primary production and conservation activities. Therefore, NZHA seeks to have broader definitions incorporated to reflect this as sought in submissions.	Reject the definition amendment sought, the notified definition sought and accept the definition sought by NZAAA
	19.20	Delete NOISE-R8 and provide for the emission of noise from primary	Oppose	NZHA agrees with the submitters intent but deleting NOISE-R8 would mean NOISE-R1 would apply significantly	Reject the decision sought, and Allow the rule change sought by the Waitomo District Council (WDC) point 26.03

		production helipads etc.		limiting agricultural aircraft activities	
NZDF	21.22	Amend NOISE-R8	Oppose	NZHA opposes rules that inhibit the intermittent use of helipads and farm helipads and helicopter landing areas that provide critical support to primary production Conservation, tourism, industrial and construction activities	Reject the decision as sought, and Allow the rule change sought by the Waitomo District Council (WDC) point 26.03
	21.27	37. Noise	Oppose	NZHA opposes rules that inhibit the intermittent use of helipads and farm helipads and helicopter landing areas that provide critical support to primary production Conservation, tourism, industrial and construction activities	Reject the decision sought, and Allow the rule change sought by the Waitomo District Council (WDC) point 26.03

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Ballance AgriNutrients	23.07	Amend SUB-P3 to include primary production activities	Support	Protection from reverse sensitivity effects which compromise the operation or expansion of regionally significant	Amend the policy as sought

				industries, including primary production activities should be provided for	
	23.14	Add the following to the list of exempt activities in the General rural zone: x. The intermittent use of rural airstrips and helicopter landing areas for agricultural aviation activities.	Support	Agricultural aviation activities should be provided for as a permitted activity to support primary production, conservation, biosecurity and biodiversity. It is not clear in the PDP as notified that fixed wing agricultural aircraft are provided for.	Add to the list of exempt activities as sought
	23.19	GRUZ-R1 Amend the definition of 'agricultural, pastoral and horticultural activities' to include agricultural aviation activities as sought above to ensure activity is included in GRUZ-R1.	Support	Agricultural aviation activities should be provided for as a permitted activity to support primary production, conservation, biosecurity and biodiversity	Amend the definition as sought

Hort NZ	27.53	Amend NOISE-R8 (2) by limiting the rule to the Tourism Zone.	Support in part	NZHA agrees with the submitters intent and opposes rules that inhibit the intermittent use of farm helipads and helicopter landing areas that provide critical support to primary production and conservation.	Allow the rule change sought by the Waitomo District Council (WDC) point 26.03
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New Zealand ForestManagers Ltd (NZFM)	30.20	Delete criteria point 1 from NOISE-R8, so that there is no limit of the number of flight movements in association with the use of helicopters for primary production land uses	Support in part	NZHA agrees with the submitters intent and opposes rules that inhibit the intermittent use of farm helipads and helicopter landing areas that provide critical support to primary production <u>and conservation</u> activities.	Reject the decision sought, and Allow the rule change sought by the Waitomo District Council (WDC) point 26.03
Joy Hurley	37.01	Delete NOISE-R8 and NZS 6807:1994 as it relates to limiting agricultural aviation activities and emissions of noise from	Oppose	NZHA agrees with the submitters intent but deleting NOISE-R8 would mean NOISE-R1 would apply significantly limiting agricultural aircraft activities	Reject the decision sought, and Allow the rule change sought by the Waitomo District Council(WDC) point 26.03

		helipads and landing areas.			
Gary and Joy Jeffries	41.01	Delete NOISE-R8, particularly the noise controls on agricultural aviation activities, helipads, farm helipads and helicopter landing areas.	Oppose	NZHA agrees with the submitters intent but deleting NOISE-R8 would mean NOISE-R1 would apply significantly limiting agricultural aircraft activities	Reject the decision sought, and Allow the rule change sought by the Waitomo District Council(WDC) point 26.03
Federated Farmers of NZ (FF)	46.06	Retain the definition for 'farm airstrips and farm helipads' as notified.	Oppose	Agricultural aviation activities are not limited to rural zones as they occur in other zones such as conservation areas. Therefore, NZHA seeks to have broader definitions incorporated to reflect this.	Delete the definition: FARM AIRSTRIPS AND FARM HELIPADS as sought and add new definitions as sought elsewhere

Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
	46.75	Amend NOISE-R8(2) as follows: 2. This activity may only be undertaken in tourism zones;	Support in part	NZHA agrees with the submitters intent and opposes rules that inhibit the intermittent use of rural airstrips, farm helipads, helipads and helicopter landing areas that provide critical support to	Reject the amendment sought, and Allow the rule change sought by the Waitomo District Council (WDC) point 26.03 Allow the addition to the exemptions list as sought

		And, Add agricultural aviation activities in the list of exemptions to the NOISE rules		primary production <u>and</u> <u>conservation</u> activities.	
	46.76	Retain exemptions for agricultural aviation activities in the NOISE Advice Notes. Or Amend the NOISE rules to provide for the exemptions (including agricultural aviation activities) through permitted activity status.	Support in part	NZHA agrees with the submitters intent and opposes rules that inhibit the intermittent use of rural airstrips, farm helipads and helicopter landing areas that provide critical support to primary production and conservation activities. It is not clear in the PDP as notified that fixed wing agricultural aircraft are provided for.	Allow the rule change sought by the Waitomo District Council (WDC) point 26.03 Allow the addition as sought to the list of exemptions
DOC	53.04	Add to the Definition of Conservation activities: (j) Any use of aircraft by the Department of Conservation	Support	NZHA supports the use of aircraft for biosecurity and biodiversity activities included in the definition	Retain and amend as sought

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	53.68	NOISE-R8 seek the following or relief to like effect: NOISE-R8 Emission Of noise from helipads, farm helipads and helicopter landing areas Activity Status: PER Where: 1. The Department of Conservation is undertaking a conservation activity	Support in part	NZHA agrees with the submitters intent and opposes rules that inhibit the intermittent use of farm helipads and helicopter landing areas that provide critical support to primary production, critical infrastructure, and conservation	Allow the rule change sought by the Waitomo District Council (WDC) point 26.03
Waitomo District Council (WDC)	26.03	Amend NOISE-R8 as follows: Activity Status: RDIS Where: 2. This rule does not apply to the general rural, rural production and natural open space tourism zones or to the Aerodrome Precinct – PREC3;	Support	NZHA opposes rules that inhibit the intermittent use of helipads, farm helipads and helicopter landing areas that provide critical support to primary production, critical infrastructure, and conservation	Allow the amendment as sought

