

To: Waitomo District Council - Proposed District Plan
districtplan@waitomo.govt.nz

Submission from: NZ Helicopter Association (NZHA)

Submitter contact details:

Bill MacGregor
Executive Officer
NZ Helicopter Association

Phone: 0274 360 022

Email: bill.macgregor@aviationnz.co.nz

Postal address:

NZ Helicopter Association
PO Box 2096, Wellington, 6140

Submissions due: 12pm on 23 December 2022

NZHA would not gain an advantage in trade competition through this submission.

NZHA wishes to speak to this submission.

If others make a similar submission, we will not consider presenting a joint case.

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

Signature:



Date: 12 December 2022

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:
 - Frost control
 - Heli logging
 - Pest control
 - Rural farm support such as sling loading fencing supplies, water tanks etc

- Heavy lift operations
- Transmission wire installation and inspection
- Supporting the security of energy supply and communications infrastructure
- Investigation of, development, and maintenance of renewable energy, energy, and communications infrastructure
- 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

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 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.

Helicopters form an important part of infrastructure security for investigation, installation, repair, and maintenance, particularly during and in the aftermath of adverse events. They are also critical to the development and maintenance of infrastructure in remote locations that enhance natural environments that provide for enjoyment and social well-being.

The proposed activity rule NOISE-R8 would:

- severely limit the ability of helicopters to respond to urgent energy, communication, and infrastructure remedial and rectification tasks in a timely manner
- limit the ability of helicopters to support conservation activities
- 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
- reduce the social well-being benefits that can be gained from enhancing natural areas

NOTE: This submission relates to the intermittent use of helicopter landing ONLY and NOT fixed location/regular helicopter landing areas.

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NZHA SPECIFIC SUBMISSION'S

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	AIRCRAFT New	n/a	NZHA seeks to have the definition of an aircraft included as defined by the RMA to future-proof the plan	<u>Add a new definition:</u> <u>Aircraft;</u> <u>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</u>
Definitions	CONSERVATION ACTIVITIES	Support in part	NZHA seeks to have conservation infrastructure included in the definition	Retain the definition <u>and add:</u> (e) The establishment, maintenance or upgrading of public walking/cycle tracks <u>and infrastructure</u> .
Definitions	FARM AIRSTRIPS AND FARM HELIPADS	Oppose	Helicopter activities occur in other zones such as conservation areas therefore NZHA seeks to have broader definitions incorporated to reflect this	<u>Delete the definition FARM AIRSTRIPS AND FARM HELIPADS</u> <u>Include a definition of HELICOPTER LANDING AREA as sought below</u>
Definitions	HELICOPTER LANDING AREA New	n/a	NZHA seeks to have a definition of a Helicopter Landing Area included in the plan	<u>Add a new definition:</u> <u>Helicopter landing area;</u> <u>means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing</u>

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Definitions	HELIPAD	Oppose	NZHA seeks to have the definition of FARM AIRSTRIPS AND FARM HELIPADS replaced with a definition of HELICOPTER LANDING AREA that is more appropriate	<u>Delete the definition</u> <u>Include a definition of HELICOPTER LANDING AREA as sought above</u>
Definitions	New definition for HELICOPTER	Add new	NZHA seeks a new definition for HELICOPTER as defined in the Civil Aviation Rules, Part 1, Definitions.	<u>Add a definition of Helicopter:</u> <u>means a rotorcraft incorporating one or more power driven rotors. Rotorcraft means any heavier-than-air aircraft which derives its lift in flight from the reaction of the air on one or more rotors on substantially vertical axis</u>
Definitions	REGIONALLY SIGNIFICANT INFRASTRUCTURE	Support	NZHA supports a comprehensive definition of significant infrastructure	Retain the definition
STRATEGIC DIRECTION, URBAN FORM AND DEVELOPMENT	SD-O5	Support	NZHA supports strategies that recognise, existing lawful activities and protect their ongoing operation from incompatible activities	Retain the strategy
STRATEGIC DIRECTION, URBAN FORM AND DEVELOPMENT	SD-O30	Support in part	NZHA supports the recognition and providing for nationally and regionally significant infrastructure and industry, and seeks to have infrastructure security recognised	Retain the strategy <u>and add:</u> Recognise and provide for nationally and regionally significant infrastructure and industry, <u>infrastructure security</u> , and for

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				those activities associated with significant mineral resources.
ENERGY, INFRASTRUCTURE & TRANSPORT Energy	ENGY-O4.	Support	NZHA supports enabling the growth and expansion of renewable energy activities	Retain the objective
ENERGY, INFRASTRUCTURE & TRANSPORT Energy	ENGY-P1	Support	NZHA supports policies that enable the ongoing operation, maintenance, and repair of renewable energy	Retain the policy
ENERGY, INFRASTRUCTURE & TRANSPORT Energy	ENGY-P5	Support	NZHA supports policies that allow activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation	Retain the policy
ENERGY, INFRASTRUCTURE & TRANSPORT National Electricity and Gas Transmission	NEGT-P2	Support	NZHA supports policies that ensure the safe and efficient operation, maintenance, repair, upgrading or development of the national grid is not compromised	Retain the policy
ENERGY, INFRASTRUCTURE & TRANSPORT Network Utilities	NU-O1	Support	NZHA supports objectives that provide for essential and secure services	Retain the objective

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ENERGY, INFRASTRUCTURE & TRANSPORT Network Utilities	NU-P2	Support	NZHA supports policies that recognise the benefits of effective, safe, secure, and efficient infrastructure and network utilities	Retain the policy
NOISE	NOISE-P3	Support	NZHA supports the policies that recognise that some activities are important for economic and social well-being and may exceed the specified noise levels	Retain the policy
NOISE	NOISE-R8	Oppose	NZHA opposes rules that inhibit the intermittent use of helicopters to respond to infrastructure security threats, enable the development and maintenance of infrastructure and utility networks, and enhance natural areas for social well-being	Delete the rule
NOISE	Exemptions	Support in part	NZHA seeks to have intermittent and irregular helicopter activities as an exemption to the noise rules	Retain the exemptions and add: <u>7. the intermittent and/or irregular use of helicopter landing areas</u> <u>Include definitions of HELICOPTER LANDING AREAS as sought above</u>
General Rural Zone	GRUZ-O10	Support	NZHA supports objectives that protect existing lawfully based activities from reverse sensitivities	Retain the objective
Natural Open Space Zone	NOSZ-P1	Support	NZHA supports policies that protect and enhance natural open space values and provide	Retain the policy

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
			for adequate existing or planned infrastructure to service the activity and/or development	



