

Further Submission

This is a further submission on the Proposed Te Tai o Poutini Plan that was lodge online.

Further Submitters Name	New Zeland Helicopter Association
Further Submitter Number	FS83
Wish to be heard	Yes
FS qualifier	a person who has an interest in the proposal that is greater than the interest the general public has.
FS qualifier reason	<p>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 commercial Purposes.</p> <p>I am Richard Milner - A helicopter pilot of 18 years and hold or have held senior person positions for Aircraft Operations Certificate holders across aviation.</p> <p>I am the Executive Officer of NZHA and act on their behalf.</p>
Joint presentation	No
Attention:	Mr. Richard Milner
Contact organisation	New Zealand Helicopter Association
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Date lodged	27/06/2023 4:23am

Further submission points

Raw FS number	Related Submission Point	FS Decision requested	SupportOppose	Reasons
FS83.1	S166.006	Allow	Support	The NZHA supports NZAAA in this submission
FS83.2	S166.012	Allow	Support	The NZHA supports NZAAA in this submission
FS83.3	S166.005	Allow	Support	The NZHA supports this submission

FS83.4	S573.007	Allow	Support	The NZHA supports this submission
FS83.5	S573.007	Allow	Support	<p>Temporary activities of Helicopters include but are not limited to the following types. All of these operations are unable to be conducted safely without the ability to be conducted as temporary activities.</p> <p>Frost control Heli logging Pest control Rural farm support such as sling loading fencing supplies, water tanks etc Heavy lift operations Supporting security of energy supply and communications infrastructure including powerline transmission installation and inspection Tourism Helicopter flight training Carriage of people and material to and from remote areas in support of government agencies (e.g. DOC, NZ Police, MPI, Customs etc). Aerial photography/survey Special operations only possible by helicopter Firefighting, Search and Rescue (SAR), medical evacuation</p>

FS83.6	S602.075	Allow	Support	NZHA supports the use of helicopters in this submission
FS83.7	S560.484	Allow in part	Oppose in part	NZHA partly opposes the submission on the removal of Helicopter Recovery Methods - the clearing of vegetation to allow for temporary Helipads must be controlled in their location and number of helipads to reduce the harm to the environment however some clearing of vegetation to allow for skid sites (places equipment and materials such as gravel for tracks etc) must be considered and allowed for.
FS83.8	S441.034	Allow	Support	NZHA supports this submission for the importance of airstrips and helipads in rural communities where noise is of a temporary nature
FS83.9	S166.023	Allow	Support	NZHA supports this submission

FS83.10	S190.535	Disallow in part	Oppose in part	<p>NZHA would like to seek an exemption to the noise standards for Emergency Medical Service helicopter noise.</p> <p>Helipads of a permanent or temporary nature should be required to meet noise standards if the aircraft being used exceeds the noise standards but is on a preservation of life operation</p>
FS83.11	S519.025	Disallow	Oppose	<p>NZHA operations may not always meet this standard and for some operations it may not be possible in situations such as Emergency Operations - Preservation of life/ Fire Fighting etc or for Primary Industry operations or for construction activities such as Heavy lift operations for Telecommunications and Energy.</p>

FS83.12

S166.024

Allow

Support

NZHA operations include those listed by NZAAA.

NZHA would like to see additions as listed added:

Primary production not necessarily 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
Supporting security of energy supply and communications infrastructure including powerline transmission installation and inspection
Helicopter flight training
Carriage of people and material to and from remote areas in support of government agencies (e.g. DOC, NZ Police, MPI, Customs etc).
Aerial photography/survey
Special operations only possible by helicopter
Firefighting, Search and Rescue (SAR), medical evacuation

FS83.13	S190.535	Allow in part	Oppose in part	NZHA seeks clarification that Noise standard 6807:1994 is not recommended for Emergency Helicopter SAR and EMS activities
FS83.14	S488.033	Allow in part	Support in part	Noise R2 should be amended to include other commercial helicopter activities to include construction, Energy, Communications and Maintenance of Assets such as tracks, roads, rivers with helicopters
FS83.15	S519.027	Allow	Support in part	NZHA supports this submission but would like activities conducted by helicopters for Construction, Energy, Communications or maintenance to be added to the R2 Rule
FS83.16	S602.180	Allow	Support in part	NZHA supports this submission but would like activities conducted by helicopters for Construction, Energy, Communications or maintenance to be added to the R2 Rule
FS83.17	S620.212	Allow	Support	NZHA supports this submission

FS83.18	S488.029	Allow	Support in part	This should be amended to include other commercial helicopter activities to include construction, Energy, Communications and Maintenance of Assets such as tracks, roads, rivers, pilot training with helicopters
FS83.19	S166.032	Allow	Support	NZHA supports this submission
FS83.20	S486.072	Allow	Support	NZHA supports this submission
FS83.21	S166.033	Allow	Support	NZHA supports this submission to include other commercial helicopter activities to include construction, Energy, Communications and Maintenance of Assets such as tracks, roads, rivers with helicopters
FS83.22	S486.073	Allow	Support	Support to include other commercial helicopter activities to include construction, Energy, Communications and Maintenance of Assets such as tracks, roads, rivers with helicopters
FS83.23	S486.074	Allow	Support	NZHA supports this submission

FS83.24	S488.028	Allow	Support	NZHA supports this submission but would like to see it include other commercial helicopter activities to include construction, Energy, Communications and Maintenance of Assets such as tracks, roads, rivers with helicopters
FS83.25	S538.595	Allow	Support in part	NZHA supports this submission - Noise R2 should not be applied to HEMS or SAR operations
