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9 August 2024

Hearing Evidence – proposed TTPP
C/o West Coast Regional Council
P O Box 66
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To whom it may concern,

WCRC written evidence for TTPP Hearing – NoiseTopic

The West Coast Regional Council (WCRC or the Council) wishes to appear before the proposed TTPP Hearing Panel on our submission point S488.033 on the Noise chapter.

Attached is the Council's written evidence.

Our contact details for service are:

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Policy Manager
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We would be grateful for acknowledgement of receipt of our written evidence.

Yours faithfully

Max Dickens
Manager Policy

Background

The West Coast Regional Council (the Council) made submission point S488.033 seeking that the TTPP permitted Rule NOISE – R2, Condition 12 be amended to more clearly provide for noise from aircraft undertaking biosecurity and biodiversity activities in the West Coast Region.

The amendment was sought by Council because the notified version of permitted Rule NOISE -R2 did not clearly allow for occasional, temporary noise from helicopters or fixed-wing aircraft undertaking aerial work to protect indigenous biodiversity from predators.

Changes to NOISE – R2, Condition 12

The s42A Officer's Report for the TTPP Noise chapter recommends to accept in part Council's submission point S488.033 and proposes the following amendments to Rule NOISE – R2, Condition 12:

~~12. Infrequent aircraft~~ Aircraft take off and landing for associated with rural production activities and conservation activities purposes on an intermittent basis for no more than 30 days in any 12 month period, including aerial topdressing and helicopter movements;

Except for one of the changes, Council supports all the other recommended changes to R2, Condition 12, on the basis that the definition of “conservation activities” refers to ancillary activities, and is recommended to be amended to include “...pest control and the intermittent use of aircraft for conservation purposes...”.

The Council does not support the addition to permitted NOISE – R2, Condition 12 of “...for no more than 30 days in any 12 month period...”.

The Council's reasons for not supporting the addition of this timeframe are:

- It is unclear what the maximum of 30 days applies to, whether it means no more than 30 days at one location, or no more than 30 days at any location throughout the region in any 12 month period. It is also unclear when the 12 month period would start and finish, which could be confusing when there may be several operations being undertaken by several different helicopter companies and pest control organisations. Staff understand that the new provision applies per

site/certificate of title, however that does not clarify the issues with determining the 12 month period.

- Part of an aerial operation can involve helicopter survey flights (that includes landing or taking off from the site), which then ticks off a day(s) from the permitted maximum of 30 days.
- Staff understand that two other councils have proposed a condition with a limit of 30 days over 12 months, but this is not practical on the West Coast due to the larger scale of aerial predator control operations. Some of these aerial drops cover thousands of hectares of very remote bush in South Westland, for example.
- If exclusions in Condition 12 of NOISE R2 are wider than most district plans, that is likely to reflect the remoteness of much of the West Coast, and that aerial operations occur in areas where no one lives. The wider exclusion is therefore appropriate for this Region.
- The length of time needed in any year for multiple aerial operations can vary at short notice for each operation, depending on weather.
- A key part of planning aerial operations is consulting with rural communities about the proposed activity. Any concerns about noise are taken on board and the operators make endeavours to minimise the impact of noise on households.
- The consequence of breaching the 30 day timeframe is that consent will be required. This creates extra cost and time delays for operations to be carried out. Operators could lose valuable good weather days that are optimal for flying, while waiting for a consent to be granted.
- We believe the risk of unreasonable noise from aerial pest control operations is less than what the noise expert or health submitters may believe. In many rural areas, there are very few households in close proximity to landing and take-off sites. Aerial operations are run very efficiently and the cost of hiring aircraft per hour means that there are no unnecessary trips made.

We emphasise the importance of providing for this activity in NOISE R2, Condition 2. Aerial pest control is a vital part of protecting indigenous biodiversity on the West Coast, making it a matter of national importance.

Decision sought

That the wording for no more than 30 days in any 12 month period...” Is not added to NOISE – R2, Condition 12.

This ends our written evidence.