

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:

New Zealand Helicopter Association (NZHA)

To:

Hearing Commissioners, Timaru District Council Plan

Date:

03/05/24

1. Introduction

- 1.1 I am Richard Milner, Executive Officer of the New Zealand Helicopter Association.
- 1.2 Thank you for hearing our submission today, We would like to The West Coast Combined District for hearing the NZHA today. Aviation is 100% committed to engage and resolve challenges in this plan where possible.
- 1.3 I am a commercial helicopter pilot and unmanned aircraft operator with 20 years of aviation experience. I have owned and operated a helicopter business and owned and operated helicopters in New Zealand and Australia.
- 1.4 The New Zealand Helicopter Association represents the commercial interests of the helicopter sector in the New Zealand industry.
- 1.5 It is very easy to group all Helicopter aviation into one category; however, there are two very separate categories, and we would like the council to recognise that difference. Recreational vs commercial
- 1.6 Commercial Helicopter Pilots are highly trained and very noise-sensitive. It is a recognised additional training activity for operators to complete a noise abatement course that teaches how to approach and depart from sites with the minimum amount of noise, utilising the paths of least noise. The Aviation Industry Association provides one of these types of courses.
- 1.7 Commercial helicopter operators, where possible, use modern aircraft that reduce their aircraft's noise output. Much of the noise a Helicopter produces comes from its tail rotor, and aircraft operators are sensitive to this. Many use either enclosed tail rotors, four-bladed fans, or ducted fan systems.

- 1.8 Everyone is aware of Waiheke Island and the challenges that it has presented.
- 1.9 As a commercial pilot who flies into these permanent helipads, I can report that the company I fly for receives very few if any, noise complaints. This is primarily due to noise sensitivity, modern aircraft, and regular training on these sensitivities.
- 1.10 At the 2024 Aviation Industry Conference in late August, the Transport Minister, Hon Simeon Brown, highlighted that Aviation, directly and indirectly, contributes 11% of NZ GDP. Significant restrictions such as those recommended here will affect how much of the GDP commercial aviation contributes.
- 1.11 Commercial Helicopter Aviation plays an integral part in the economic, social and cultural well-being of the West Coast combined area in areas such as but not limited to:
- Aerial Spotting
 - Asset management,
 - Construction,
 - Disaster relief work (after the State emergency has ended)
 - Flight training,
 - Frost protection,
 - Infrastructure repairs and development,
 - Science and Research
 - Search and Rescue
 - Surveillance
 - Survey operations
 - Tourism
 - Transportation of people
 - TV and Film
- 1.12 It is essential to raise the concern that limiting the operations of helicopters through rules and requirements in this plan, where the rule's intent means one thing to the council but is not clear to operators, can become restrictive and have unintended consequences.
- 1.13 Commercial aviation is also an essential tool for disaster relief, emergency work, short-notice repairs, and maintenance of national assets, including but not limited to the electrical, water, gas, and telecommunications services essential to the NZ public.

- 1.14 While the plan allows for emergency work requiring a state of emergency to be declared, it is often overlooked that a downed power pole from a motor vehicle accident that can't be solved quickly without a crane truck usually becomes a helicopter operation.
- 1.15 It is also essential to recognise that if commercial aviation operations are overly restrictive, the helicopter operators that the district has come to rely on will have to move their operations away from the district or face closing their businesses. In this case, those assets for emergency and disaster relief work (such as those recently in the Port Hills in Christchurch) would experience longer dispatch times, which would have consequences for the public.
- 1.16 It is important also to note that during Cyclone Gabrielle, helicopters performed emergency operations long before a state of emergency was declared, preserving life, and those assets would not be available should the district plan unintentionally restrict commercial aviation operations.
- 1.17 It is essential to recognise that agricultural aviation is part of commercial aviation in New Zealand. Many agricultural aviation operators also operate in other commercial aviation sectors, and the viability of their businesses depends on all their activities.

2. NZHA's submissions

General

- 2.1 The Westcoast combined plan needs to adequately provide for commercial aviation activities.
- 2.2 NZHAA acknowledges that if accepted, the S42A Rural Zone report recommendations would adequately provide for commercial aviation activities through the proposed GRUZ R14 and R14A 'Aircraft and Helicopter Movements.'

Noise

- 2.3 Section 42A Report – Paragraph 121. Item 5

Provided that the District defines a Helicopter Landing Area as a Heliport for a permanent base of operations. For infrequent take off and landings. These are temporary and without a base of operations (such as those used by hunters, pest controllers and other activities in section 1.11; NZS6807 should not apply and would **be supported**).

2.4 NZHA Further supports all NZAAA positions in association with its hearing document for this District Plan hearing, which will be heard on September 4th, 2024, at 1430.

3. Decisions sought

3.1 Noise R-1 to define that a Helicopter landing area is for a permanent base of operations and does not include the site where the Helicopter takes off or lands in a temporary or infrequent activity such as, but not limited to, those listed in 1.11.

3.2 While not yet heard, Temp R-6 does allow for a limited number of helicopter movements, and 3.1 above could fit nicely into this rule if it was amended to allow more movements without restriction for no more than five consecutive days in a rolling 30-day period. See Selwyn District Council Partially Operative Plan.

3.3 When considering helicopters, the District consider Commercial Operators of helicopters could achieve greater synergy with councils, providing those commercial operators have received specific noise abatement training such as that delivered by the Aviation Industry Association or HAI Fly neighbourly. Operators also use modern technology to reduce their noise footprint. Using acoustic instruments to measure noise is impractical, costly, and often inaccurate due to changing weather, wind, terrain, and other factors. NZHA seeks councils to give relief to operators with documented noise abatement training.

Such noise abatement processes have been instrumental in the changes following hearings in the Timaru District, which removed the limits on helicopter movements and reduced setbacks for buildings not on the same site from 500m to 100m—Timaru District Council Hearings July 2024.

Thank you for the opportunity to present this statement supporting the NZHA's submissions and further submissions.



Richard Milner
Executive Officer
New Zealand Helicopter Association