

DDPR_feedback_0067s	
Name	Sven Thelning
Organisation	North Otago Aero Club
Email	[REDACTED]
Response Date	Aug 29 22
Notes	
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
	GRUZ-13
Q4	Feedback/Comments
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
	0
Q12	If you need more space, or have any other general comments, please leave them here

FROM: [REDACTED] RECEIVED AT 2022-08-29T20:58:56+00:00

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[cid:122083006585300366@au-mta-96.au.mimecast.lan] On behalf of the North Otago

Aero Club Incorporated, and those signed below: General Rural GRUZ-R13 1. I

submit in favour of permitting recreational and training flights of both fixed

wing and helicopters to land on airstrips in the general rural and lifestyle

rural zone. 2. This could be achieved by allowing recreational and training

flights in the same manner as primary production activities in the General Rural

Zone. 3. This training provides the future agricultural pilots for both fixed

wing and helicopters (helicopter pilots often start off in fixed wing) and

therefore it is an appropriate activity for general rural zones. 4. Once trained

the pilots must stay current operating at airstrips (as opposed to airports) to

remain safe and to sharpen their skills in the absence of an instructor and this

would probably be considered recreation. 5. A landowner with an airstrip may

have their own aircraft for recreational use and rural general zones and rural

lifestyle zones are the most suitable location for this activity to reduce the

risk of reverse sensitivity. 6. Farmers live on farm and many don't have easy

access to recreation facilities provided by the council or businesses in town.

An airstrip on the farm can provide recreation as well as transport, education

and primary production activity. 7. Therefore recreational aviation is also a

suitable activity for rural general zones. 8. I submit that PER 1 should read:

1. "PER-1 The use is solely for the purpose of primary production activities,

recreational activities, training activities; or" 9. I submit that the limit of

8 movements (four take offs and four landings) is not sufficient for the

permitted activity as it is currently undertaken in the district. 10. The

training mentioned above will at times include at least four take off and

landings in a single flight and likely more. 11. Although existing rights would

apply to airstrips currently in existence a limit could prevent future airstrips from reaching their full potential as pilot training aids and recreational facilities. 12. Airstrips at places like Kurow provide access to flight training for people located in our remote communities. 13. The requirement to get consent to exceed the limit would be an unnecessary administration for both the landowner and the council. 14. The administration burden will curtail the development of new strips to replace those that close over time. 15. There is no financial reward for operating an airstrip. None of the private airstrips available to the public in this district are currently charging any fees. 16. A diminishing number of strips would have a negative effect on safety as less strips become available for training pilots, or to use for recreation resulting in lower skill levels in the pilot population. 17. Landing on airstrips rather than airports prepares pilots for emergency landings in a realistic environment as opposed to the prepared runways at an airport which is important for all pilots whether they plan to become agricultural pilots or not. 18. Less airstrips would also result in fewer places for aircraft to land in actual emergencies or diversions. 19. We are fortunate that some land owners give public access to their airstrips and often groups of up to twenty private aircraft can land at these strips in a single recreational or training event which would instantly put the landowner in breach of the district plan if they had not received a consent. 20. Many of these pilots are from out of the district and will be unaware of the district plan changes. 21. Individual itinerant aircraft would cumulatively breach the weekly limit at private airstrips even in the absence of a larger event. 22. These airstrips don't count movements currently so it would be problematic to prove existing use for those who have existing use rights should they be challenged. 23. It is unreasonable to expect a landowner providing their asset to the public free of charge to install a costly system to count aircraft movements. 24. There is often no power at the air strip to operate a counting system. 25. Any requirement to count aircraft movements in relation to this rule should only be in response to complaints and at the cost of the complainant. 26. The burden of proof should be

on the complainant both in the case of new airstrips and those with existing rights. 27. The number of movements at a private strip can be inconsistent with a large event causing a spike in a given day. 28. Therefore I submit that if a limit must be imposed (which I oppose) then it should be an annual limit to allow flexibility within the permitted activity to avoid unnecessary administration for pilots, land owners and council. 29. I submit that any limit for aircraft should be the equivalent to four movements (two take offs and two landings per day) which which would not be unreasonable, expressed as follows:

1. "PER-2 The use of the landing pad or airstrip is for any other activity which results in no more than 1,460 aircraft movements per year (730 takeoffs and 730 landings); or"

30. Even the suggested number above is a guess because it's not known how many movements there are at the various private strips in the district which reinforces my submission that there should be no limit on the number of movements. 31. Private airstrips are not lighted and therefore operations are during daylight hours only. 32. PER 5 which prohibits the flight over various types of district plan zone is not enforceable by the Waitaki District Council which administrates the land, not the air. 33. The appropriate tool to restrict aircraft flight is administrated by the Civil Aviation Act 1990 rather than the district plan. The CAA promulgates this information to pilots nationwide while the district plan may not even reach all pilots or airstrip owners in this district. 34. The Civil Aviation Rules specifically allow for flight lower than the usual minimums when an aircraft is taking off or landing. 35. Landowners cannot control the flight path of aircraft. 36. The best way to achieve noise abatement is through requesting pilots avoid certain areas. This is best achieved through the aviation system rather than the district plan for the same reasons as above. 37. The Civil Aviation Authority undertake education on noise abatement. 38. Aircraft on approach are very quiet. They don't create a noise issue. 39. Departing aircraft can cause a noise issue but this can be minimised by aircraft obtaining minimum legal height above ground level (500ft above ground level when not over a built up area) and then flying as high as practical for their mission and leaving the area as soon as practicable. 40. Aircraft that

are training cannot always depart the area immediately as a means of noise abatement when they need to use the airstrip for practising take offs and landings (circuit training). 41. Noise abatement conditions must not jeopardise safety. Reducing power for take off is not appropriate for most light aircraft. 42. Aircraft taking off will still be subject to the noise chapter of the district plan which makes the limits on aircraft in GRUZ-R13 redundant. Noise Chapter 43. I submit in favour of the Noise chapter of the draft district plan. 44. The General Rural Zone is the most appropriate place for noisy activities. Light Chapter 45. I submit in favour of exempting helicopter lighting and helipads from the lighting restrictions. 46. Aircraft flying at night are landing with sole reference to the lights on the ground. Everything else is a black void. 47. These lights must be facing up to the sky. 48. In low visibility they must be very bright to penetrate haze or fog. 49. Therefore I also submit that the exemption from lighting restrictions should also apply to the runway lighting for fixed wing aircraft. 50. In practice, the only lighted runway is at Oamaru Airport and it would be counter productive for the Council to obstruct itself when the time comes to replace the lights or should the runway ever be extended or any other situation where existing use rights may not apply. I request further consultation on any provisions in the district plan relating to aircraft operation prior to notifying the draft plan, and suggest also engaging with the Civil Aviation Authority to ensure district plan compatibility with the aviation system. I would be happy to facilitate a meeting at the aero club to help with this. [REDACTED] Regards, Sven

Thelning Flight Instructor North Otago Aero Club Paul Mortimer President North Otago Aero Club Gary Hawkins Kurow Airstrip Owner