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| DDPR_feedback_0043s | |
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| Response Date | Aug 29 22 |
| Notes | |
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| Q1 | Select the chapter you want to provide feedback on |
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| Q2 | In general, to what extent do you support the contents of this chapter? |
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| Q3 | Objective/Policy/Rule/Standard reference: |
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| Q4 | Feedback/Comments |
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| Q5 | Objective/Policy/Rule/Standard reference: |
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| Q6 | Feedback/Comments |
| | |
| Q7 | Objective/Policy/Rule/Standard reference: |
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| Q8 | Feedback/Comments |
| | |
| Q9 | Objective/Policy/Rule/Standard reference: |
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| Q10 | Feedback/Comments |
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| Q11 | supporting documents? |
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| Q12 | If you need more space, or have any other general comments, please leave them here |
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WAITAKI DISTRICT COUNCIL

IN THE MATTER

of the Proposed Review of the Waitaki
District Plan (PDP)

**STATEMENT BY CRAIG MCMILLAN (DIRECTOR)
HELIVENTURES NZ LIMITED
29/08/2022**

1. ABOUT HELIVENTURES NZ

Heliventures is a commercial and agricultural helicopter company with bases at the Oamaru Airport and Pukaki Airport. Our operations are predominantly in the Otago and Canterbury region; however we work throughout New Zealand at times. Our commercial work includes fire-fighting, fire-lighting, scenic flights, filming and photography, power line surveys and construction, and precision lifting. Some of our agricultural services include the application of fertilisers, agrichemicals, and vertebrate toxic agents (VTA's) for the purposes of:

- Primary production
- Forestry production
- Crop protection and disease control
- Weed and pest control
- Biosecurity threats
- Biodiversity and conservation values

Agricultural aircraft are crucial in maintaining and enhancing primary sector production, responding to biosecurity threats, and protecting biodiversity values.

2. GENERAL OBSERVATIONS OF THE PROPOSED PLAN

a) The PDP allows for the use of airstrips and helicopter landing areas by fixed-wing and helicopters as a permitted activity for primary production that includes agricultural and forestry activities with some exceptions relating to settlements and rural lifestyle zones.

Heliventures supports the proposed permitted activity rule but does not support the exceptions relating to settlements and rural lifestyle zones.

b) The PDP does not address the use of rural airstrips and helicopter landing areas by agricultural fixed-wing and helicopters undertaking activities relating to biosecurity and biodiversity values – particularly on public land.

The WDC website notes: *“Biodiversity in the Waitaki District is undergoing a significant decline. As the remaining patches of tussock and bush get smaller they also tend to get overrun with weeds and pest animals like possums, rabbits and hares that eat native plants and animals. Animal pests can also introduce weed species like blackberry, banana passionfruit, and hawthorn.”*

Biosecurity and biodiversity activities that utilise aircraft that are relevant in the WDC area include but are not limited to:

- MPI's wilding conifer eradication program
- LINZ Lagarosiphon Major control works on the Waitaki lakes
- LINZ weed and pest control on riverbeds and crown-owned land
- OSPRI Tbfree eradication program
- NZ Predator free 2050 program
- DOC weed and pest control on conservation land

- Regional council weed and pest control on riverbeds

c) The inclusion of specific rules and definitions in the PDP that define agricultural aviation activities would assist the council in controlling the effects of aircraft land use whilst ensuring that primary production, biosecurity, and biodiversity activities are not adversely affected.

NOTE: Our submission relates to the intermittent use of rural airstrips and helicopter landing areas for the purposes of agricultural aviation. Aircraft depots/bases that are used on a regular basis are not part of the permitted activity that is sought.

3. DEFINITIONS RELATING TO YOUR PROPOSED PLAN

a) PDP Definition of an “Aircraft”

Heliventures supports the definition of an aircraft except drones and UAV’s should not be excluded.

Rationale: Drones and UAV’s are becoming much larger and are now competing in the same commercial market as conventional aircraft. We have recently seen a drone which can perform similar agricultural spraying and fertiliser operations to our smaller helicopters. Therefore, they should not be excluded from the aircraft definition in the plan.

b) Definition of an “Agricultural aviation activity”

Heliventures proposes that a definition for agricultural aviation activities be included in the PDP:

Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production, biosecurity, or biodiversity purposes including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA’s). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV’s)

Rationale: Agricultural aviation activities are intermittent. A specific rule would be separate from other rules that manage the use of land for other types of aircraft landings and take-offs at airports or aircraft depots.

c) PDP Definition of a Helicopter landing area

Heliventures does not support the definition of a Helicopter landing area in the PDP. Heliventures proposes that the definition of a Helicopter landing area should be:

Helicopter landing area means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing

Rationale:

- The proposed definition is confusing regarding the term “primary purposes”

- Helicopters undertaking agricultural activities require on-site servicing e.g., re-fuelling and loading
- Bullet point number 5 in the PDP definition is opposed (refer to separate comments 6 (a))

4. PROPOSED SPECIFIC AGRICULTURAL AVIATION ACTIVITY RULE

Heliventures considers that there are two ways that agricultural aviation activities could be permitted in your district plan:

- (a) Agricultural aviation activities be included as an ancillary activity to primary production, farming, biosecurity, and biodiversity activities;

OR

- (b) Inclusion of a specific permitted activity rule that provides for intermittent agricultural aviation activities using rural airstrips or helicopter landing areas for primary production, farming, biosecurity, and biodiversity activities;

AND

Recognition in the noise provisions of the plan that noise for intermittent agricultural aviation activities are part of the rural environment and exempt from noise restrictions.

NOTE: This rule would be separate from other rules that may manage the use of land for other types of aircraft landings and take-offs at airports or aircraft depots.

5. NOISE E1

- a) This section allows for Noise exemptions for agricultural on a seasonal and intermittent basis. This describes exactly our helicopter agricultural work which is vital for the support of the local agricultural economy. This clause specifically excludes helicopters which we think is unfair and unreasonable. Helicopters should be included with this exemption. A lot of our work needs to be early in the morning or late at night to make use of calm weather and also to ensure the survival of bee populations.

6. OTHER PDP MATTERS

- a) PDP Definition Helicopter Landing Area “other than 5. Rural farming operations (where the site boundary is greater than 2km from a boundary with the Settlement Zone or Rural Lifestyle Zone)”

Heliventures opposes the exclusion of helicopter landing areas within 2kms of a settlement
or

Rural lifestyle zone for intermittent use in farming and primary production activities.

Rationale: Farming activities occur within Rural Lifestyle zones that require intermittent use of agricultural helicopters. District plans can only control land use

activities therefore inflight activities can occur on the boundaries of Settlement Zones or within Rural Lifestyle Zones creating the same effects that the council is attempting to address with land use limitations.

The CAA rules appropriately regulate aircraft in flight that prohibits aircraft from being operated in a manner that may cause a hazard to 3rd parties, persons, or property.

b) GRUZ-R13 PER-5

Flight paths over rural lifestyle zones

Heliventures opposes the clause dictating flight path of aircraft as this is not in the jurisdiction of District Plans. This is covered under Civil Aviation Laws.

Rationale: The council controls land use NOT aircraft once they are in flight. The CAA rules appropriately regulate aircraft in flight that prohibits aircraft from being operated in a manner that may cause a hazard to 3rd parties, persons, or property. provide further information to assist in your plan development

c) GRUZ-R13 PER -1

I oppose the rule stating that there is a limit of 8 movements (four take offs and four landings) as it is completely unviable and unrealistic for agricultural activities. Certain larger jobs would take upwards of 50 movements as helicopters need regular reloading of agrichemical and fertiliser.