

## Statement for the Timaru District Hearing

I am Richard Milner of the New Zealand Helicopter Association.

As a Commercial Helicopter Pilot with two decades of experience in various operations in New Zealand and Australia, I bring a wealth of knowledge to this process. Additionally, I serve as a Training Manager for a helicopter operator in Auckland, and I own and operate FlyUAV, which operates, training and examines drone operators in NZ.

The NZ Helicopter Association comprises **COMMERCIAL helicopter operators** who operate in the Timaru District and conduct a range of operations that the public often does not witness, conducting a range of much-needed activities that are **positive** for communities and the district and provide for Social and Economic benefit. While we will also Present on GRUZ and Noise Rules, the definitions here will impact those at later hearings.

It is easy to become concerned about Waiheke Island in Auckland, and thankfully, we only have one of those. It is important that these Strategic Objectives and Definitions do not become skewed in that direction but do meet the needs and demands of the public through the use of Commercial Aviation Operations.

It is easy to cast social hatred on a Police helicopter buzzing around at 3 a.m without acknowledging the Social good and security it brings. The definitions in this plan have an opportunity to provide a balance between enabling commercial aviation without hindering the citizens of Timaru District.

It is much harder to nail down our economic benefits to a number like the NZAAA can do, as commercial helicopter operations are often a smaller part of a much larger operation.

It must also be considerate of the recent Port Hills Fires, TC Gabrielle and Kaikoura, whereby commercial aviation provides social and economic benefits as well as preserving our way of life and the well-being of New Zealand. Often at great cost to the operators before emergencies are declared. Restrictive District plans will see these lifesaving resources move out of the district, causing a loss of jobs and a reduction in services provided.

Some great examples of commercial aviation are but not limited to:

- Frost control
- Heli logging
- Pest control
- Rural farm support such as external load fencing supplies, water tanks etc
- Heavy lift operations
- Transmission wire installation and inspection
- Supporting the security of energy supply and communications infrastructure

- Tourism
- Helicopter flight training
- Carriage of people and material to and from remote areas
- Aerial photography/survey
- Special operations only possible by helicopter
- Firefighting, Search and Rescue (SAR), medical evacuation.

We recognise that:

The New Zealand Helicopter Association prepared an initial submission; however, the person for the NZHA did not appear to send the submission to the Timaru District Council. He is now retired.

We have further submitted to gain standing in areas essential to our members' operations. We also accept that our interpretations of some of the definition's intent may be different from our interpretation. However, it offers a perspective on what is understood and the gap between understanding and intent.

In the matters of Section 42A – Strategic Direction and Urban Form and Development dated 5 April 2024

215 & 228&229	SD-09 Rural Areas "Primary Production"	Support for NZAAA position – no further position and are consistent with NZAAA.
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Section 42A Report: Part 1 and Overarching Matters Dated 5 April 2024

Item 253	Aircraft Definition	Support for Clarity
Item 266	Conservation Activity	Support
Item 273	Definition:  Intermittent Use of Aircraft in Conservation Activity	Disagree Council Position  Seek to have intermittent use of aircraft in conservation Activity included to allow for: <ul style="list-style-type: none"> <li>• Operations that are temporary by nature</li> <li>• Do not require a fixed base helicopter landing area</li> <li>• Often will not be used for many years in between</li> <li>• Can be controlled through times in the day</li> <li>• BUT can not fit within other rules like GRUZ R14 (10 take-off and landing).</li> <li>• Should the council decide that this definition change is not warranted then we will argue for changes in GRUZ R14</li> </ul>

		<p style="color: red;">and Noise R10 for changes to allow greater considerations.</p> <p>Example:  Trees become dangerous in a weather event that was not classified as an Emergency -  1 landing and take-off to setup lifting gear, 1 landing and take-off to pack gear up allowing for only 3 lifts. Recently in the Auckland Region a Helicopter company was tasked to remove trees that were overhanging due to erosion of sandstone. This took 100 lifts. This was completed in 1 day.  It is unlikely that the operation will be needed for many years to come.</p> <p>Water sampling, Geotechnical works, Pest control all are examples of shorter notice, temporary by nature operations which GRUZ R14 limits as 10 movements in a month does not allow for ongoing maintenance of such operations.</p> <p>In these examples we are not suggesting the building of a Permanent fixed base helicopter operation. For those NZHA supports a Resource Consent, we are advocating for what is essentially one offs where the title land may need to be able to accommodate more than these restrictive measures that do not appear to have considered the necessary use of helicopters.</p> <p style="color: red;">But your Rules (not up for discussion today)</p> <p style="color: red;">GRUZ R14 and Noise R10 are defined towards Permanent fixed base operations which 90% of our operators are not doing in this rule</p>
	280 and 281	<p>Helicopter Landing Areas and Helicopter Landing Sites.</p> <p>Defining a  <span style="color: red;">Helicopter landing area</span></p> <p><span style="color: red;">Helicopter Landing Site</span></p>

Defines whether GRUZ R14 and Noise R10 are applicable as they are both written with the intention to be applied for a fixed base operation

Not a temporary landing site used infrequently

Once again NZHA advocates for permanent fixed base operations should be defined as such and your Rules Gruz R14 and noise R10 should apply

However for temporary and infrequent operations you need to define what they are as it creates confusion which could lead to

- extensive Resource consent requests and unintended workloads
- misunderstanding what is temporary by nature and permanent
- significant reduction in the Helicopter industry ability to help the regions social and economic benefits.

Another Example would be Telecommunication repairs at a repeater station as currently defined becomes a fixed base operation with take off and landing limits, times of day and setbacks. GRUZ R14 and Noise R10

As does a downed power pole on the road cutting off a city from Power, these rules would see it taking 2 months due to numbers of take-off and landings

Following on a State of Emergency is fine but in TC Gabrielle we saw the state of Emergency lifted and several months and in some cases even 1 year on communities are still receiving supplies by Helicopter – But then at ten take-offs to a site in a month perhaps they will need to go without!.

So NZHA seeks that council consider a definition that clearly defines the difference between a helicopter landing area – permanent

Helicopter landing site – temporary

		And whether GRUZ R14 and Noise R10 are applied in each case.
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