

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of hearings on the Proposed Taupo District Council District Plan PC42 - General Rural & Rural Lifestyle

Submission from:

New Zealand Helicopter Association (NZHA)

To:

Hearing Commissioners, Taupo District Council Plan

Date:

23/08/2023

1. Introduction

1.1 I am Richard Milner, Executive Officer of the New Zealand Helicopter Association.

1.2 I am a commercial Helicopter Pilot, Drone Pilot and Drone Flight Examiner. I have operated in the aviation sector since 2005.

1.3 The New Zealand Helicopter Association (NZHA), a division of Aviation New Zealand (AvNZ), represents commercial helicopter operators engaged in a variety of activities including applying fertilisers, agrichemicals, and vertebrate toxic agents (VTA's) for the purposes of:

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

The industry is made up of circa 109 Civil Aviation Authority (CAA) certificated organisations including those operating circa 248 helicopters. Services provided by our industry add an estimated \$2.75BN annually to primary production for the NZ economy alone.

Agricultural aircraft are crucial in maintaining and enhancing primary production, responding to biosecurity threats, and protecting biodiversity values including farming, plantation forestry, public land, and conservation land.

Restrictive district plan requirements can adversely affect the ability of aerial operators to undertake and respond to farmer/grower pests and diseases, and biosecurity and biosecurity threats, so the industry seeks to ensure that the use of airstrips and helicopter

landing areas for agricultural aviation activities on an intermittent basis are adequately provided for in plans.

It is recognised that the Taupo district includes a diverse range of primary production activities along with extensive areas of production forestry and large areas of conservation land with high biodiversity values.

2. Support of NZAAA's submissions

- 2.1 NZHA supports NZAAA's submission to ensure that the provisions in the Proposed District Plan Change 42 adequately provide for the use of fixed wing, helicopters and UAV's undertaking agricultural aviation activities in the General Rural Environment & Rural Lifestyle zones.
- 2.2 Agricultural aviation activities can be defined as: the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for 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).

3. Section 42A report and NZHA support for NZAAA response

- 3.1 The Notified Plan provides for agricultural in 4b.2.13 Maximum Noise – Other “Nothing in the foregoing Performance Standards shall apply to farm animals including working dogs, and to agricultural and forestry vehicles,” by way of an exemption to the Noise standards.
- 3.2 NZAAA made a submission seeking specific inclusion for agricultural aviation in the exemption.
- 3.3 The s42A Report is recommending the addition of 'agricultural aircraft and support vehicles'.
- 3.4 NZAAA supports the addition to the provisions of 4b.2.13 that provides for agricultural aviation activities as a permitted activity in the General Rural Zone, although it may be better to be 'agricultural aviation activities'.
- 3.5 Linked to the submission requesting changes to 4b.2.13 the NZAAA submission sought to add a definition of 'agricultural aviation'
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)ii) For the purposes of this plan agricultural aviation is part of Primary Production activities.

- 3.6 The s42A Report Recommendations rejects the submission point stating “it is not currently used in the rural environments chapter, and there is no need for a definition”.
- 3.7 However if the recommended change to 4b.2.13 is accepted the provisions of 4b.2.13 will provide for agricultural aviation as a permitted activity, but with no corresponding definition.
- 3.8 Agricultural aviation activities include activities for forestry production, conservation and biodiversity, and biosecurity. The inclusion of a specific definition of ‘Agricultural Aviation’ as submitted by NZAAA provides clear guidance to the intent of 4b.2.13 preventing future supposition and/or dispute.
- 3.5 The s42A Report recommendation rejects the NZAAA submission to add a definition of ‘Conservation’ stating “it is not currently used in the rural environments chapter, and there is no need for a definition”.

Conservation activity means the use of land for activities undertaken for the purposes of maintaining, protecting and/or enhancing the natural, historic and/or ecological values of a natural or historic resource. It may include activities which assist to enhance the public's appreciation and recreational enjoyment of the resource and includes planting; pest and weed control including the use of agricultural aviation; plant and tree nurseries; and track construction; biosecurity.

- 3.6 Agricultural aviation is an important tool in the control of weeds and pests in conservation areas to maintain and enhance biodiversity values. NZAAA accepts that there would be no need for a definition of ‘Conservation’ providing the definition of ‘Agricultural Aviation’ is accepted.

4. Decisions sought

- 4.1 NZHA supports NZAAA concerns could be addressed by:
1. Retain the provisions of 4b.2.13:
4b.2.13 Maximum Noise – Other “Nothing in the foregoing Performance Standards shall apply to farm animals including working dogs, and to agricultural and forestry vehicles, agricultural ~~aircraft~~ aviation activities and support vehicles...”
 2. Make an amendment by adding a definition of Agricultural Aviation Activities:
the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for 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).
- 4.2 Such an approach would achieve the objectives and policies in the Plan and ensure that primary production, forestry, biodiversity and conservation, and biosecurity agricultural aviation activities can be appropriately undertaken within the Taupo District.

Thank you for the opportunity to present this statement in support of the NZHA Further submissions supporting NZAAA's submissions and further submissions.

A handwritten signature in black ink, appearing to read 'R Milner', with a long horizontal stroke extending to the right.

Richard Milner
Executive Officer
New Zealand Helicopter Association