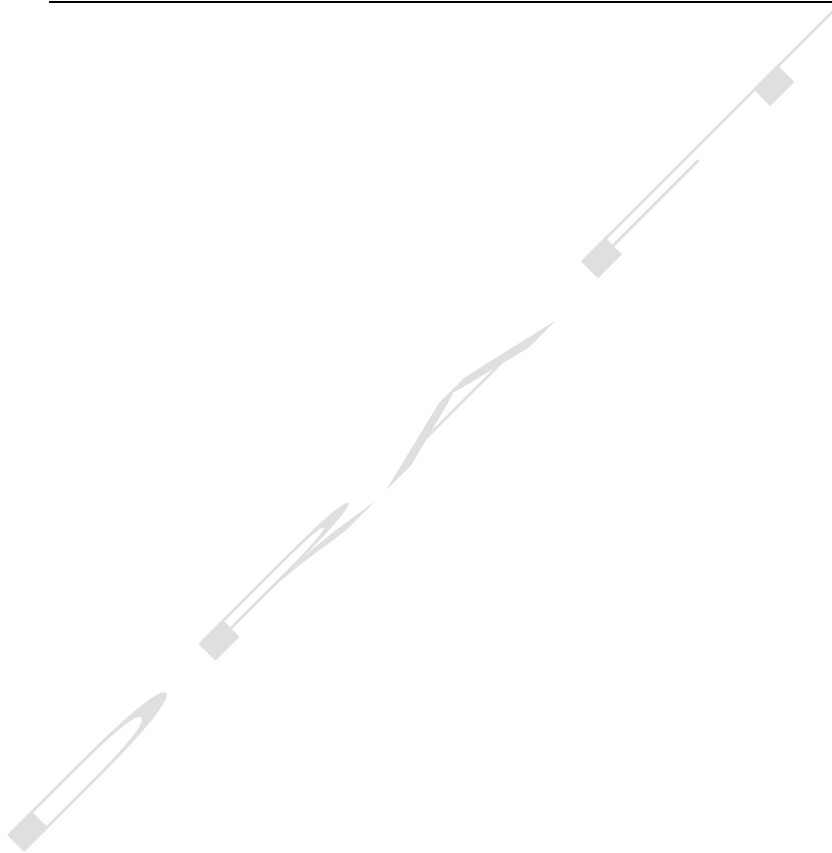


MACKENZIE DISTRICT COUNCIL DISTRICT PLAN

IN THE MATTER

of the Proposed Plan Change 29

**STATEMENT BY TONY MICHELLE
ON BEHALF OF THE NEW ZEALAND HELICOPTER ASSOCIATION
18/12/2024**



To: Mackenzie District Council - Proposed Plan Change 29
districtplan@mackenzie.govt.nz

Submission from: NZ Helicopter Association (NZHA)

Submitter contact details:

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NZ Helicopter Association
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Submissions due: 5.00pm Wednesday 22 January 2025

NZHA would not gain an advantage in trade competition through this submission.

NZHA wishes to speak to this submission.

If others make a similar submission, we will not consider presenting a joint case.

NZHA's submissions are set out in the attached table.

Signature:



Date: 18/12/2024

1. ABOUT THE NZHA

- 1.1 The New Zealand Helicopter Association (NZHA) which is a division of the Aviation Industry Association (AIANZ) represents the commercial interests of Helicopter Aviation. Commercial aviation businesses support New Zealand communities and the economy in a range of activities.
- 1.2 Some of these activities include but are not limited to:
- Aerial Spotting,
 - Asset management,
 - Construction,
 - Disaster relief work (after 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
- 1.3 The helicopter sector operates almost 900 helicopters nationwide with a large portion of these operating in various commercial roles supporting New Zealand.
- 1.4 Helicopter activities are deemed to be an essential service that is crucial in maintaining and enhancing infrastructure, ensuring continuity and security of services such as energy and communications, and are essential in times of emergency.

2. EXECUTIVE OFFICER QUALIFICATIONS AND EXPERIENCE

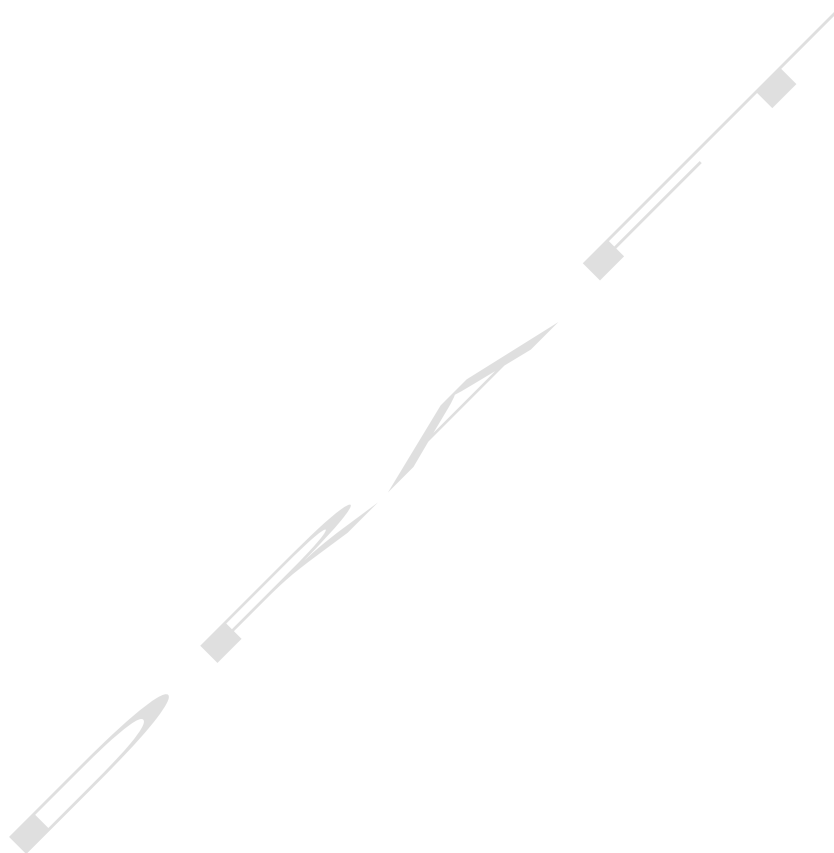
Tony Michelle, Executive Officer (EO) NZAAA

My name is Tony Michelle, and I am the EO of the NZAAA. I have been in the agricultural aviation industry since 1983 completing 11,000+ hours of flying as a helicopter pilot. I have recently sold my interests in a Company that I owned and managed for 33 years specializing in agricultural aviation and commercial helicopter activities.

3. SPECIFIC FEEDBACK TO PROPOSED PLAN CHANGE 29

- a. The proposed Plan Change 29 NOISE rules do not adequately provide for temporary commercial helicopter activities including provisions in the General Rural Zone rules namely GRUZ-R15 and GRUZ-R16.
- b. The NZHA does not agree with some of the provisions in Plan Change 23 that relate to 'temporary commercial helicopter activities.'
- c. The NZHA (through the AIANZ) has appealed the Plan Change 23 decisions that:

- i) Reject the addition of 'temporary commercial helicopter activities' to GRUZ-P8
 - ii) Reject a new definition sought for a 'temporary helicopter landing area'
 - iii) Reject an addition of 'temporary commercial helicopter activities' to GRUZ-R15
 - iv) Reject an addition 'as a depot or base' to GRUZ-R16
 - v) Reject an amendment sought to the title of GRUZ-R16 (4)
- d. The proposed NOISE objectives and policies do not provide sufficient guidance for the consideration of social and economic benefits of noise generating activities nor do they adequately address appropriate protection from reverse sensitivities.
- e. Submissions relate to temporary helicopter landing areas used on an infrequent and intermittent basis. Airfields, helicopter depots/bases, and helicopter landing areas that are used on a regular basis are not part of the permitted activity that is sought.



7. SPECIFIC FEEDBACK RELATING TO THE PROPOSED PLAN CHANGE

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	Temporary Helicopter Landing area New	n/a	NZHA seeks to have the difference between a fixed location helipad used on a regular basis and a helicopter landing area used infrequently on a temporary basis clarified <i>Addition sought through the AIANZ appeal to PC23 decisions</i>	<u>Decision sought on appeal PC23</u> <u>Add a new definition:</u> <u>Temporary commercial helicopter activities are intermittent activities that are of limited duration such as:</u> <ul style="list-style-type: none"> <u>Infrastructure repairs and development</u> <u>Construction</u> <u>Aerial spotting</u> <u>Asset management</u> <u>Disaster relief work (when State emergency has ended)</u> <u>Flight training</u> <u>Science and research</u> <u>Surveillance</u> <u>Survey operations</u> <u>Infrequent transportation of people</u>
Definitions	Commercial recreation activity	Support	NZHA supports the exclusion of commercial aviation activity from the definition of commercial recreation activity	<u>Retain the definition</u>
NOISE	NOISE-O1	Support in part	Recognising the benefits of appropriate noise generating activities is important to the economic and social wellbeing of the region. An amendment is sought to ensure that the benefits are recognised.	<u>Amend NOISE-O1:</u> Noise is consistent with the purpose, and anticipated- <u>The benefits of activities that generate noise are recognised where the adverse effects from noise are compatible with the anticipated purpose,</u> character and qualities of the receiving environment, and

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				maintains the health and well-being of people and communities
NOISE	New Objective	n/a	Where appropriate, protecting noise generating activities from reverse sensitivity effects is important	<p><u>Add objective:</u></p> <p><u>NOISE-O# Reverse sensitivity</u> <u>The function and operation of existing and permitted noise generating activities are not compromised by reverse sensitivity effects from noise sensitive activities.</u></p>
NOISE	New Policy	n/a	NZHA seeks recognition that some noisy activities are important for economic and social well-being and may exceed specified noise levels on a temporary or irregular basis while maintaining character and amenity values appropriate to each zone and maintaining the health, safety and well-being of people and communities.	<p><u>Add policy:</u></p> <p><u>NOISE-P# Enable noise-generating activities in appropriate areas</u></p> <p><u>Enable the generation of noise from activities that:</u> <u>a. maintain the predominant character and amenity values of the receiving environment by controlling the types of activities and levels of noise permitted in each zone; and</u> <u>b. recognise that some activities are important for economic and social wellbeing and may exceed the specified noise levels on a temporary and/or irregular basis; and</u> <u>c. maintains the health, safety, and wellbeing of people and communities.</u></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
NOISE	New Policy	n/a	NZHA seeks a policy that reduces the potential for reverse sensitivity and manages new noise-sensitive activities in proximity to areas that consistently experience higher noise levels.	<p><u>Add policy:</u></p> <p><u>NOISE-P# Manage reverse sensitivity</u></p> <p><u>Reduce the potential for reverse sensitivity effects by employing land use controls that manage the design and/or location of new noise sensitive activities in proximity to areas that consistently experience higher noise levels.</u></p>
NOISE	NOISE-R10	Support in part	<p>NZHA seeks amendments to GRUZ-R15 and GRUZ-R16 to provide for temporary commercial helicopter activities and provide clarity between temporary activities and activities undertaken from a fixed location depot or base</p> <p><i>Additions sought through the AIANZ appeal to PC23 decisions</i></p>	<p><u>Decision sought on appeal PC23:</u></p> <p><u>Add to GRUZ-R15 (1)</u> as follows:</p> <ol style="list-style-type: none"> 1. Associated with purposes ancillary to: <ol style="list-style-type: none"> a. Agricultural Aviation Activities b. Personal transportation. c. Emergency services and civil defence. d. Non-commercial recreational purposes. e. Management purposes on land administered under the Conservation Act or its First Schedule. f. Activities of the New Zealand Defence Force. g. Commercial recreation within public conservation land undertaken in accordance with a concession held from the Department of Conservation h. Natural and physical resource monitoring required by statutory or regulatory instruments. <p><u>Or</u></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				<p><u>i. Temporary commercial helicopter activities</u></p> <p><u>Decision sought on appeal PC23:</u></p> <p><u>Add to GRUZ-R16 (4)</u> as follows: 4. The airfield or helicopter landing area is not used on a regular basis <u>as a depot or base</u> for commercial aviation activity</p>
NOISE	NOISE-R10	n/a Error	There appears to be an error in part 2 of the rule	<p><u>NOISE-R10 Confirm that the reference to the ASPZ is an error and should be the AIRPZ:</u></p> <p>Where the movements originate from any zone other than the GRUZ or <u>ASPZ AIRPZ</u></p>
NOISE	NOISE-R11	Support in part	<p>NZHA supports in part the intent of NOISE-R11 as it relates to aircraft and helicopter bases/depots and the regular use of airfields, and helicopter landing areas.</p> <p>The temporary, infrequent use of rural airstrips and temporary commercial helicopter landing areas should be subject to GRUZ-R15 and GRUZ-R16 providing that the changes sought through the AIANZ appeal to PC23 decisions are accepted (refer appeal decisions sought in NOISE-R10 above)</p>	<p>Retain the rule subject to <u>acceptance on appeal to PC23 as sought:</u></p> <ol style="list-style-type: none"> 1. New definition for 'rural airstrips' 2. New definition of 'temporary helicopter landing area' 3. Amendments to the definition of an 'airfield' 4. Addition to GRUZ-R16 (4)

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
			<i>Amendments to the definition of an 'airfield', GRUZ-R16 a new definition of 'rural airstrips' and a new definition of 'temporary helicopter landing area' are being sought through the AIANZ appeal to PC23 decisions</i>	
Natural Open Space Zone (NOSZ)	Introduction	Support	NZHA supports the inclusion of provisions under section 4(3) of the RMA, providing exemption for DOC's management activities. This is important for building and maintaining infrastructure on DOC managed land.	Retain the provisions of section 4(3) of the RMA

