

To: Hutt City Council - Proposed District Plan  
[district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

Submission from: NZ Helicopter Association (NZHA)

Submitter contact details:

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Submissions due: 4 April 2025 at 5pm

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

The NZHA wishes to speak to this submission.

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

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

Signature:

A handwritten signature in blue ink, consisting of a single, fluid, upward-sloping stroke.

Date: 04/04/2025

## Background

The New Zealand Helicopter Association (NZHA), a division of the Aviation Industry Association of New Zealand (AIANZ), NZHA represents helicopter operators engaged in operations across a range of activities for the purposes of:

- Primary production not covered by Agricultural Aviation operations including:
  - Frost control
  - Heli logging
  - Pest control
  - Rural farm support such as sling loading fencing supplies, water tanks etc
- Heavy lift operations
- Transmission wire installation and inspection
- Supporting security of energy supply and communications infrastructure
- ad hoc aerial transport
- Helicopter flight training
- Carriage of people and material to and from remote areas in support of DOC
- Aerial photography/survey
- Special operations only possible by helicopter
- Firefighting, Search and Rescue (SAR), medical evacuation

At the time of writing the industry is made up of approximately 109 Civil Aviation Authority (CAA) certificated organisations operating about 886 helicopters.

Helicopters are an essential adjunct to New Zealand's economy in a range of roles from flight training through to air transport, tourism operations, special roles, and critical infrastructure security roles which cannot be provided by other means.

## Raymond Nelson, Executive Officer (EO) NZHA

My name is Ray Nelson, and I am the Executive Officer of AIANZ. I have extensive experience in the aviation industry, including managing flight training operations, overseeing aircraft fleets, and handling regulatory and safety management. I have also been involved in strategic leadership, contract management, and industry advocacy. My background includes working with both fixed-wing operations and rotary-wing knowledge.

## General feedback

NZHA seeks to ensure that provisions within the Proposed District Plan appropriately recognise the intermittent and temporary use of helicopters for critical operations, including primary production support, conservation activities, infrastructure maintenance, and emergency response. Permanent heliports and helicopter bases are not part of the permitted activity sought under these provisions.

The Hutt City district contains a mix of urban, rural, and extensive conservation land within the natural open space zone. It is essential that the plan includes provisions that enable the effective management of these areas while allowing necessary aviation activities to continue.

The Proposed District Plan (PDP) provisions relating to helicopter operations present several concerns:

#### Regulation of aircraft in flight

The proposed rules appear to attempt to manage aircraft in flight, which is beyond the scope of district plan land use rules. Aircraft in flight are regulated by the Civil Aviation Authority (CAA), and any attempt to impose additional restrictions through the district plan is inappropriate.

#### Unclear provision for temporary helicopter landing areas

The intent of the proposed rules appears to recognise the need for temporary helicopter landing areas. However, it is unclear whether the current wording fully provides for these essential activities, particularly in the rural and open space zones. Temporary helicopter landing areas play a crucial role in conservation management, critical infrastructure maintenance, and emergency response.

#### Noise provisions and operational limitations

The Section 32 Noise Report notes:

"In rural areas, establishing helicopter landing areas can lead to rural efficiencies and safety benefits. For non-noise reasons, it may be appropriate to provide at some level for helicopter landing areas in the rural zone, however that question is beyond the scope of this review."

Given this acknowledgment, NZHA seeks to ensure that the PDP appropriately provides for the intermittent use of helicopters without imposing unnecessary operational restrictions.

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## NZHA SPECIFIC SUBMISSIONS

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	Conservation activities	Support in part	The NZHA supports the definition that includes conservation management work weed and pest control and seeks to have the maintenance of conservation infrastructure included in the definition which enables the objectives in NOSZ-02	<p><b><u>Include in definition:</u></b></p> <p>a. Species protection and conservation management work, including <b><u>infrastructure maintenance</u></b>, restoration and revegetation</p>
Definitions	Helicopter landing area  New	n/a	It is important to provide a definition of a 'helicopter landing area' that can be used to clarify the difference between a landing area used on an intermittent temporary basis and a permanent heliport.	<p><b><u>Include definition:</u></b></p> <p><b><u>Helicopter landing area means any area of land, building, or structure used, whether wholly or partly, for helicopter movements on an intermittent temporary basis.</u></b></p>
Definitions	Heliport  New	n/a	<p>Inclusion of a definition for a 'heliport' clarifies the difference between a 'helicopter landing area' that is used on an intermittent temporary basis and a 'heliport' that is used on a regular basis or as a permanent helicopter base.</p> <p>The proposed definition is the Civil Aviation Part 1 definition for a 'heliport'.</p>	<p><b><u>Include definition:</u></b></p> <p><b><u>Heliport means any defined area of land or water, and any defined area on a structure, intended or designed to be used either wholly or partly for the landing, departure, and surface movement of helicopters</u></b></p>
NOISE	Rules	Support in part	Councils do not control aircraft in flight, aircraft in flight are controlled through the Civil Aviation Authority rules. Inclusion of	<p><b><u>Delete:</u></b></p> <p><b><u>a. Aircraft being operated above 1,000 feet (305m) above ground over</u></b></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
	Note on application of noise rules		<p>rules to control aircraft in flight in a district plan is inappropriate.</p> <p>The NZHA supports the inclusion of a note that the rules of the NOISE chapter do not apply to aircraft being used in agricultural aviation activities in the rural zone or natural open space zone as it relates to the use of rural airstrips and helicopter landing areas and seeks to have the note amended.</p>	<p><del>the urban environment or above 500 feet (152m) above ground over the rural environment.</del></p> <p><b><u>Amend by deleting</u></b> and <b><u>adding:</u></b>  b. Aircraft being used <del>in</del> <b><u>for</u></b> agricultural aviation activities. <del>while in flight</del></p>
NOISE	NOISE-R2	Support in part	NZHA seeks to have an advice note added to the construction activity rule recognising that helicopters are critical for building, maintaining and repairing critical infrastructure.	<p><b><u>Add advice note</u></b></p> <p><b><u>Noise from helicopters associated with construction work is provided for by NOISE-R2</u></b></p>
NOISE	NOISE-R9	Oppose in part	<p>NZHA seeks to have temporary/infrequent commercial helicopter activities using helicopter landing areas provided for in the plan.</p> <p>The application of NZS6807:1994 is only appropriate for heliports that are regularly used or as an aircraft base.</p>	<p><b><u>Add to the rule</u></b></p> <p><b><u>3. Movements from or to a site are undertaken on no more than 3 days (either consecutively or non-consecutively) over a 3-month period; and</u></b></p> <p><b><u>a. Movements are only undertaken between the hours of 7am and 7pm</u></b></p> <p><b><u>b. For the purposes of this rule a 'day' is counted where there is at least one movement although there is no limit on the number of movements which may be undertaken on that 'day'.</u></b></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				<p><u>Delete</u></p> <p><u>NOISE-R9</u></p> <p><u>1. Activity status: Permitted</u></p> <p><u>Where:</u></p> <p><u>1. The helicopter landing area is used solely:</u></p> <p><u>a. For agricultural aviation activities between dawn and dusk, on no more than 30 days in any calendar year, or</u></p> <p><u>b. In unforeseen emergencies, and</u></p> <p><u>2. The helicopter landing area is managed to comply with the recommended noise limits and noise management provisions set out in NZS6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas (excluding clause 4.3 Averaging).</u></p>
Natural Open Space Zone	NOSZ-O2	Support	Objectives that provide for the maintenance and enhancement of conservation are supported.	Retain the objective
Natural Open Space Zone	NOSZ-P1	Support	It is important to provide for activities that support conservation.	Retain the policy

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Natural Open Space Zone	NOSZ Rules  Note:  New	n/a	Section 4(3) of the RMA exempts the Dept of Conservation from district plan rules for certain activities on land it administers. The NZHA seeks to have these provisions included in the plan.	<b><u>Add to the NOSZ Rule Note:</u></b>  <b><u>Section 4 (3) RMA allows certain Crown activity to contravene a District Plan in relation to any work or activity on land held under the Conservation Act 1987 that is consistent with a conservation management strategy, conservation management plan, or management plan and does not have a significant adverse effect beyond the boundary of the land. Accordingly, this chapter does not apply to the Department of Conservation activities that meet section 4(3) RMA, but does apply to their activities that do not meet section 4(3) RMA</u></b>

