

QLDC District Plan Hearings 24th May 2016

Submission presented by Carlton Campbell. Thank you for the opportunity to speak.

Please note that as stated in my written submission, while I work for the Civil Aviation Authority of NZ, I speak today as an individual, a pilot instructor, a Flight Examiner, an aircraft owner and a QLDC ratepayer.

My name is Carlton Campbell. I have been flying for 46 years, both privately and professionally. While I have flown in several countries my predominant experience has been based out of Queenstown training and examining pilots, particularly for the local scenic and charter operators. As a consequence I have extensive experience operating on the rural airstrips addressed in Chapter 21 of this plan.

I commend the planners response to submissions where the 500m distance from roads and the number of movements have been amended however I don't believe this has gone far enough, given many existing airstrips are closer than 500m to houses, zones etc. and two landings per day does not assist with pilot competency and therefore safety.

Aviation is as essential to our society as any other form of transport and any interference with it must be viewed in the wider life cycle context. Fixed wing activity particularly so, given that operations are limited to a long enough piece of land; typically an aerodrome or airstrip, free of obstacles on both the departure and arrival fans, and aligned as much as possible into the prevailing wind. Such places are integral to the transport system as are boat ramps, jetties, harbours, bus stops, taxi stands, railway stations and helipads.

It is easy to acknowledge the importance of an airstrip for the purpose of topdressing activity and other agricultural objectives such as pest control. However it is also important to realise that for some remote land holders access for various reasons, whether emergency or normal is critical. Recreational activity can also rely on aviation as much, sometimes more than other forms of transport.

Often neglected in occasions such as this District Plan process is the fact that pilots don't just appear qualified out of the blue with the skills, competence and currency to operate on airstrips. The training required is extensive and ongoing. It requires among other things training experience in various seasonal, weather, loading and different aircraft types to be safe. As with any airline operating into Queenstown aerodrome the strip training commences with *initial training* on any particular strip; *transition training* to experience the wide range of differences in weather, surface conditions, seasonal variances and more sophisticated aircraft; and *recurrent training* to accommodate lack of currency due illness, leave or other miscellaneous reasons. These are legal requirements if operating in the professional activity and moral if operating privately.

Such airstrips are essential to local commercial operator's safety plans in the event of any emergency and continued competence for their pilots is integral to that safety plan. Natural disasters can often mean airstrips play a significant part in rescue and recovery processes.

Therefore availability and access to such airstrips is essential to safety and the life cycle of aviation at all levels. Currently a significant proportion of the airline pilots operating into Queenstown experienced their early training and employment in what is called General Aviation in this area.

When considering implementation of any plan changes as it pertains to aviation activity I believe consideration must be given to separating out both the private and commercial, and the aeroplane and helicopter activity.

Helicopters have infinitely greater flexibility for landing areas and use much less real estate. Fixed wing aircraft however have much more limitation on the landing areas available. The likelihood of new airstrips being developed in the region, let alone the country is very limited.

If this plan defines that numbers of landings must be determined then it is necessary to understand why and how such numbers would be policed and by whom.

In most circumstances the weather has a culling effect on the numbers, simply because approximately a third of the time weather itself prevents the activity taking place. Private activity is not a user of intrusive intensity except where a rare group fly-in may occur or training is being conducted and even then it is seldom intrusive as instructors are conscious of fly neighbourly principles.

When training is conducted having a restrictive number such as two movements per day is not conducive to safety as competence would very rarely be achieved in two movements given approaches from both directions in different configurations would generally be necessary.

A consenting process for private operations is unnecessarily cumbersome and impractical given that applying for consent for a particular occasion on a particular date cannot and does not allow for the vagrancies of weather and its impact on planned activity. A recreational pilot sees that today is a nice day for a fly and goes flying just as a picnicker or surfer goes to the beach on a suitable day. An instructor needing a crosswind for training purposes cannot plan for that day in advance.

Commercial activity by comparison could in most cases be self-policing as operators have significantly more document control requirements that are regulated than do recreational pilots.

Throughout my tenure as the Chief Flying Instructor of the Wakatipu Aero Club and as a Flight Examiner conducting the operational competency checks for most of the Queenstown operators it would not have been in the interests of safety to have pilots know the planned simulated emergencies requiring use of an airstrip in advance such as a consenting process might require as that would not have been realistic and their response to such simulations would not be a real insight into their competence.

Also during this period I had extensive involvement in the Council planners' considerations of rural airstrip activity management. Successive planners became aware that particularly for airstrip activity the consent process was onerously expensive for all parties and that existing use rights was the relevant principle.

I therefore recommend that recreational and training use of existing airstrips remains a grandfathered existing use right with no limits on the number of landings conducted, and that where commercial activity sought to use an existing airstrip that that activity be a consent process where landing numbers were realistically determined for viable economic activity respectful of a "bankable" total in acknowledgement that daily figures are not realistic given uncontrollable weather factors.

Thank you for listening to my submission.