

Helicopter Landing Site Review  
Statutory Planning Systems Reform  
Department of Planning & Community Development  
GPO Box 2392  
Melbourne. 3001  
Email: [planning.systems@dpcd.vic.gov.au](mailto:planning.systems@dpcd.vic.gov.au)

Dear Sir/Madam,

**I strongly oppose the proposed planning scheme amendments to Clause 52.15 for Helicopter Landing Sites for the following reasons, and make some recommendations:**

1. The helicopter industry already lacks adequate regulation against public nuisance and needs greater controls rather than less. All helicopter landing or take off sites on public or private land must require a permit, except for emergency landings.
2. The terminology of the proposed Clause is not prescriptive and is open to interpretation which can cause loopholes and result in an already highly problematic industry becoming more unruly with increased disputes and accompanying costs in time, money and energy, and increased community anxiety.
  - ‘Sensitive use’ is too limited in its current definition in the planning scheme. Clause 45.03 only refers to “sensitive use’ as being “residential use, child care centre, preschool centre or primary school”.
  - Clause 52.15 must therefore be extended to include Clause 12.04-1 “Environmentally sensitive areas”, and it must include clear references to ‘residences, farms, coasts, and especially national parks...’ etc.
  - Clause 74 Helicopter Landing Site. Should read as:  
‘Area used for the take off or landing of a helicopter.’  
This is necessary as helicopters may land in places other than ‘land’, such as pontoons, rivers, bays... Limits to the number of landings and take offs should apply regardless of the number or type of landing site in use in a given area.
  - Similarly 52.15-1 should read as:  
“A permit is required to use or develop any area for a helicopter landing or take off site including if it is ancillary to another use on the land”.
3. The proposed conditions for exemption from a permit are inadequate. All helicopter landing sites must have a permit and the following must apply:
  - a. Setbacks: A 1000 m setback is too close and a 2000 m setback or greater would be more reasonable for these reasons:
    - There is a cumulative impact from regular use such as four in a 24 hour period or eight in a 30 day period, especially near sensitive areas.
    - There is no reasonable consideration of noise pollution or what rights and expectations persons living in sensitive areas, such as natural bush settings or adjoining national parks, should be able to have to completely retain natural sounds. Helicopters at 2000 m can still be obtrusive in natural settings.

- The permit process is necessary in that it also considers accompanying Flight Paths. There should be restricted flight areas and agreed altitudes above sea level for daily and seasonal periods.
  - It may be problematic in that once a use is established, the operator could apply for extending the frequency of operations.
- b. Time and Frequency of Operations: The proposed time and frequency of operation is excessive regardless of whether it is a weekday or weekend. For areas near sensitive sites, it would be more appropriate to have more restricted operating hours, e.g. 9.30am may be more appropriate, and helicopters should stop flying at least 2 hours before sunset.  
In some sensitive areas it is reasonable to expect that there should be some days completely without take off or landings or flights. CASA and all stakeholders must be party to discussions on this matter.
- c. The proposed amendment refers to building permits. It is agreed that buildings or works must have a permit and this must include appropriate setbacks and screening from sensitive areas.
- d. Existing helicopter landing or take off sites should also be made to comply with the setback from sensitive sites, i.e., a helipad should be closed and a new one made further away.
4. The planning process for a helicopter operator must not be reduced. The proposed planning shortcuts are likely to have severe impacts on amenity of the wider community and result in habitat degradation for wildlife in the area.
5. Environmental Impacts: Impacts on the environment, EPBC or FFG listed species have not been considered adequately if at all to date and must be considered fully and appropriately. An EIS, which is open to public consultation and scrutiny, must be prepared for any prospective helicopter take off or landing site.
6. EPA noise levels which may be suitable in a city, are not suitable for sensitive sites such as coastal areas, farmlands, or near national parks. Greater consideration of noise impacts on sensitive uses and sensitive sites must be part of the Clause and permit system.
7. Helipads for agricultural operations must also require a permit, as it may be that a permanent heliport is proposed near a sensitive use or sensitive area.

This is an opportunity to ensure the helicopter industry is appropriately regulated to stop unacceptable impacts on regional and coastal communities' liveability and on natural environments and sensitive sites and sensitive areas. It would be also an appropriate to get all relevant parties relating to helicopters: federal, state, local governments and community representatives together to make clear controls for the helicopter industry.

Yours faithfully,

Name:

Full Address:

Signature: