

IN THE MATTER of the Resource Management Act 1991
AND
IN THE MATTER of hearings on the Proposed Waitomo District Council District Plan
Submission from: New Zealand Agricultural Aviation Association (NZAAA)
To: Hearing Commissioners, Waitomo District Council Plan
Date: 01/07/24

1. Introduction

- 1.1 I am Tony Michelle, Executive Officer of the New Zealand Agricultural Aviation Association.
- 1.2 I recently retired after 38 years as an agricultural helicopter pilot and CEO of my own helicopter company in North Canterbury.
- 1.3 The New Zealand Agricultural Aviation Association (NZAAA), a division of Aviation New Zealand (AvNZ), represents fixed-wing and helicopter operators engaged in applying **fertilisers, agrichemicals, and vertebrate toxic agents (VTA's) for the purposes of:**
- Primary production
 - Biosecurity threats
 - Biodiversity and conservation values

The industry is made up of circa 109 Civil Aviation Authority (CAA) certificated organisations operating circa 76 fixed-wing aircraft and 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.

Restrictive district plan requirements can adversely affect the ability of aerial operators to undertake and respond to farmer/grower pests/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.

2. **NZAAA's** submissions

General

- 2.1 The notified Waitomo PDP does not adequately provide for agricultural aviation activities.
- 2.2 NZAAA acknowledges that if accepted, the recommendations in the S42A NOISE, GRUZ and NOSZ reports would adequately provide for agricultural aviation activities through GRUZ-R1 'Agricultural, pastoral and horticultural activities' and proposed NOISE rule exemption #4 and #7.

Noise

- 2.3 We note the S42A point #26 that 'the correction proposed by the Council clarifies that there is no intention to restrict flight movements in the general rural, natural open space or rural production zones or aerodrome precinct.'
- 2.4 We further note that the S42A point #26 states that 'a clarifying sentence is added to the rule to state that all flight movements in the general rural, natural open space and rural production zones and aerodrome precinct are permitted'. This is supported.
- 2.5 The S42A point #30 that NOISE-R8 is amended to exclude noise emitted by helicopters used by the Department of Conservation undertaking a conservation activity is supported.
- 2.6 The S42A point #51 to exempt take offs and landings of fixed-wing aircraft in the natural open space zone and general rural zone is supported.

General Rural Zone

- 2.7 The S42A point #22 that weed control and removal of material infected by unwanted organisms under the Biosecurity Act 1993 could be added to the rule is supported.
- 2.8 The S42A point #82 proposing a revised definition of agricultural aviation activities from that originally sought by NZAAA is supported.
- 2.9 The S42A point #83 amendment to definition of agricultural, pastoral and horticultural activities is supported.
- 2.10 The S42A point #84 amending the definition of **'farm airstrips and farm helipads' to align with the use of 'rural airstrip' and 'farm helipad'** is supported.

3. Decisions sought

- 3.1 NZAAA seeks to have the proposed amendment to GRUZ-R15 accepted:

GRUZ-R15: Activity status: PER

Where:

- 1. Clearance of non-indigenous vegetation (excluding plantation forestry) for weed control, pasture reinstatement or for a building platform where this is located outside of an identified significant natural area is permitted; and

2. Clearance of indigenous scrub vegetation (manuka, kanuka, tree ferns) outside of an identified significant natural area for weed control, pasture reinstatement or for a building platform must:
 - (i) Not occur within 5 m of a water body; and
 - (ii) Not be cleared if the vegetation is greater than 5 m in height.
 3. Clearance of non-indigenous vegetation or indigenous scrub vegetation (manuka, kanuka, tree ferns) outside of an identified significant natural area for removal of material infected by unwanted organisms under the Biosecurity Act 1993.
- 3.2 NZAAA seeks to have the proposed **revised definition of ‘agricultural aviation activities’** accepted:
- agricultural aviation activities means the intermittent operation of an aircraft from a rural airstrip or farm helipad for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including firefighting, 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).
- 3.3 NZAAA seeks to have the proposed **revised definition of ‘definition of agricultural, pastoral and horticultural activities’** **accepted**:
- agricultural, pastoral and horticultural activities means the use of land and/or buildings where the primary purpose is to produce livestock, crops and other agricultural produce that relies on the productive capacity of land and maintains the groundcover, including:
- (a) Agriculture, pastoral/livestock farming, dairying and horticulture.
 - (b) Storage of horticultural and agricultural products produced on the site or holding.
 - (c) The storage and spreading of solid and liquid animal waste.
 - (d) Beekeeping.
 - (e) Covered and uncovered stock yards.
 - (f) Accessory buildings including farm implement sheds, milking sheds, woolsheds, stables, hay barns and buildings for the storage of feed which is to be used on the holding.
 - (g) Farm airstrips and farm helipads Agricultural aviation activities
- 3.4 NZAAA seeks to have the proposed revised definition of **‘farm airstrips and farm helipads’** accepted:
- rural airstrips and farm helipads means any area of land designed to be used for the landing, departure, movement or servicing of aircraft (including fixed-wing aeroplanes, helicopters and unmanned aerial vehicles), for the purpose of agricultural aviation activities. For clarity it does not include storing of aircraft or freight handling facilities or airstrips or helipads directly associated with commercial passenger transport.
- 3.5 Amend the NOISE rule exemptions

4. Helicopters used as an air ambulance or for emergency operations. Helicopters used by the Department of Conservation, by the military, CDEM or by search and rescue operations. This includes training for the purposes of undertaking those activities
7. In the general rural and natural open space zones, any noise emitted in the course of recreational hunting or during the take off and landing of fixed-wing aircraft.

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

A handwritten signature in black ink, appearing to read 'Tony Michelle', written in a cursive style.

Tony Michelle
Executive Officer
NZ Agricultural Aviation Association