

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of hearings on the Proposed Mackenzie District
Council District Plan Stream Plan Change 23

Submission from:

New Zealand Agricultural Aviation Association
(NZAAA)

To:

Hearing Commissioners, Mackenzie District
Council Plan

Date:

03/05/24

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 that included operations in the Mackenzie District.

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 NZAAA acknowledges that the provisions in Proposed Plan Change 23 adequately provide for the use of aircraft undertaking agricultural aviation activities in the General Rural Zone to support primary production and conservation.

Definitions

- 2.2 The S42A recommendation (44) that 'supporting activities' are included in GRUZ-P1 is supported.
- 2.3 The S42A recommendation (44) that the definition of 'conservation' is retained as notified is supported.
- 2.4 The S2A recommendation (44) that the definition of 'helicopter landing area' is retained as notified is supported.
- 2.5 The S42A recommendation (496) to add a new definition of an 'aircraft movement' that specifically excludes helicopters is supported.
- 2.6 The S42A recommendation (497) to add a new definition of a 'helicopter movement' is supported.
- 2.7 The S42A recommendation (499) that a new definition be added for 'agricultural aviation activities' as defined is supported.
- 2.8 The S42A analysis (498) that rejects the NZAAA submission seeking that 'rural airstrips' be added as an exclusion to the definition of 'airfields' is not supported.
- 2.9 NZAAA sought that a new definition be added for 'rural airstrip' to provide clarity in the Plan:

Rural Airstrip: means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area. Submission points NZAAA (2.09) and Aviation NZ (19.10).

- 2.10 For clarity, it is important to ensure that the intermittent use of a rural airstrip for agricultural aviation activities is specifically provided for by providing a specific definition that clearly delineates a rural airstrip from an airfield.

Natural Character

- 2.11 The S42A recommendation (97) that provides for pump sheds with a building footprint size limit of 10m² is supported.

- 2.12 NZAAA disagrees with the S42A analysis (86) relating to the setbacks in NATC-S1 (submission points from NZAAA (2.13) and the Wolds Station (50.04)) that recommends that the submission points be rejected.
- 2.13 It is not clear that the setbacks in NATC-S1 only apply to activities specified in the NATC rules. Clarity for plan users would be achieved by adding to the 'Note for Plan Users' stating that the NATC setbacks only apply to the specified activities.

General Rural Zone

- 2.13 The S42A recommendation (440) that GRUZ-P1 is amended to make reference to 'supporting activities' as is used in the title is supported.
- 2.14 The S42A recommendation (513) that GRUZ-R15.1.a is amended to replace the current wording with the new defined term 'agricultural aviation activities' is supported.

3. Decisions sought

- 3.1 NZAAA seeks that a new definition of 'rural airstrip' be added, and
- 3.2 NZAAA seeks that the definition of an 'airfield' be amended as sought:

*'Airfield (amended): means any area of land intended or designed to be used, whether wholly or partly, for aircraft movement or servicing, excluding helicopters **and rural airstrips.***

- 3.3 Amend the note at the start of the NATC section by adding: 'The rules and setbacks in this chapter only apply to the specified activities in NATC-R1 – R4'.

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



Tony Michelle
Executive Officer
NZ Agricultural Aviation Association