



Anonymous User just submitted the survey Submission Form - Plan Change 29: Open Space and Recreation Zones, Noise, Signs, and Variations with the responses below.

Full Name

Richard Geary

Contact person (if different from above)

Richard Geary

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0274331918

I acknowledge that the information above and all other information provided in this submission will be made publicly available

Acknowledged

Do you believe you could gain an advantage in trade competition through this submission?

No

The specific provisions of the proposal that my submission relates to are as follows:

We are local Commercial and Agricultural Helicopter Operators in South Canterbury and the Mackenzie. We fully support the NZAAA and NZHA submissions. I have attached the NZAAA submission, but was unable to attach the NZHA one as well, as was only able to attach one file.

I support/oppose these provisions:

(include whether you support or oppose in full or in part)

As above and attached

The reason(s) for my submission are:

(state in summary your reasons, and whether you seek any amendments)

As above and attached

I seek the following decision from the Mackenzie District Council: (give precise details)

As above and attached

Do you wish to be heard in support of your submission?

I do not

If others make a similar submission would you be prepared to consider presenting a joint case with them at any hearing?

I would not

If you have any additional supporting information as part of this submission please attach it here.

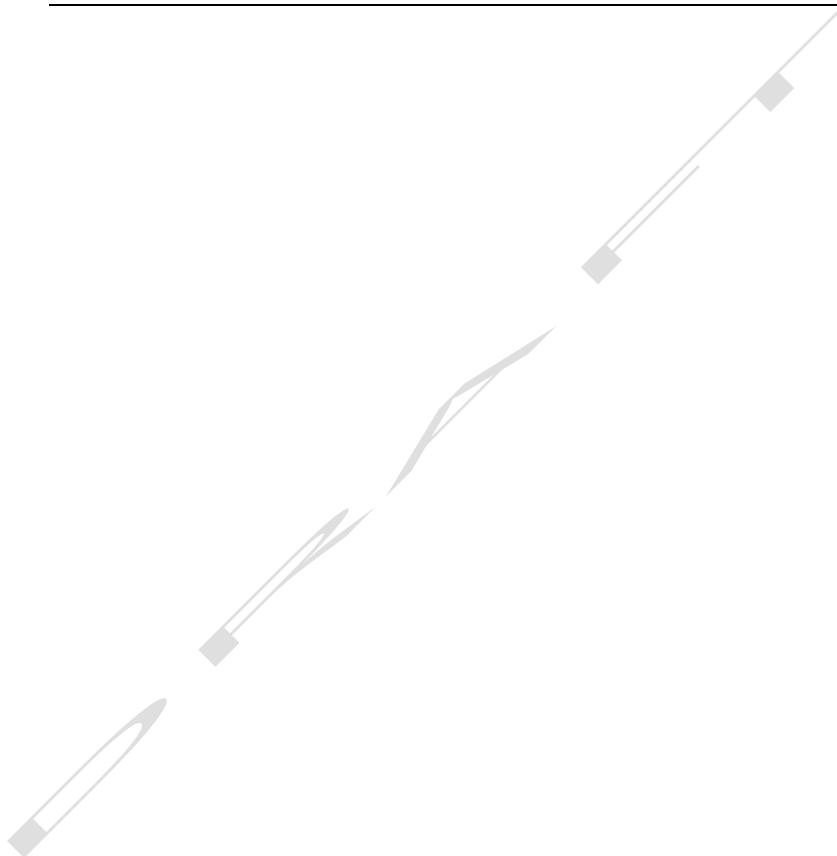
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MACKENZIE DISTRICT COUNCIL DISTRICT PLAN

IN THE MATTER

of the Proposed Plan Change 29

**STATEMENT BY TONY MICHELLE (EXECUTIVE OFFICER)
FOR THE NEW ZEALAND AGRICULTURAL AVIATION ASSOCIATION
18/12/2024**



To: Mackenzie District Council - Proposed Plan Change 29
districtplan@mackenzie.govt.nz

Submission from: NZ Agricultural Aviation Association (NZAAA)

Submitter contact details:

Tony Michelle
Executive Officer
NZ Agricultural Aviation Association

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NZ Agricultural Aviation Association
PO Box 2096, Wellington, 6140

Submissions due: 5.00pm Wednesday 22 January 2025

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

NZAAA wishes to speak to this submission.

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

NZAAA's submissions are set out in the attached table.

Signature:



Date: 18/12/2024

1. ABOUT THE NZAAA

1.1 The New Zealand Agricultural Aviation Association (NZAAA), a division of the Aviation Industry Association (AIANZ), represents fixed-wing and helicopter operators engaged in applying fertilisers, agrichemicals, and vertebrate toxic agents (VTA's) for the purposes of:

- Primary production
 - Forestry production
 - Crop protection and disease control
 - Weed and pest control
 - Biosecurity threats
 - Biodiversity and conservation values
 - Frost control
- a. 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 \$2.7BN annually to primary production for the NZ economy alone.
- b. Agricultural aircraft activities are deemed to be an essential service that is crucial in maintaining and enhancing primary sector production, ensuring animal welfare, responding to biosecurity threats, and protecting biodiversity values.
- c. An in-depth description of agricultural aviation activity can be found on the Quality Planning website at <https://www.qualityplanning.org.nz/index.php/node/709>

2. EXECUTIVE OFFICER QUALIFICATIONS AND EXPERIENCE

Tony Michelle, Executive Officer (EO) NZAAA

My name is Tony Michelle, and I am the EO of the NZAAA. I have been in the agricultural aviation industry since 1983 completing 11,000+ hours of flying as a helicopter pilot. I have recently sold my interests in a Company that I owned and managed for 33 years specializing in agricultural aviation and commercial helicopter activities including land and aquatic weed control, crop protection, fertiliser application, and pest eradication (including International and NZ offshore islands).

3. AGRICULTURAL AVIATION ACTIVITIES - THE USE OF RURAL AIRSTRIPS AND HELICOPTER LANDING AREAS

The NZAAA supports agricultural aviation activities as a permitted activity – Rationale:

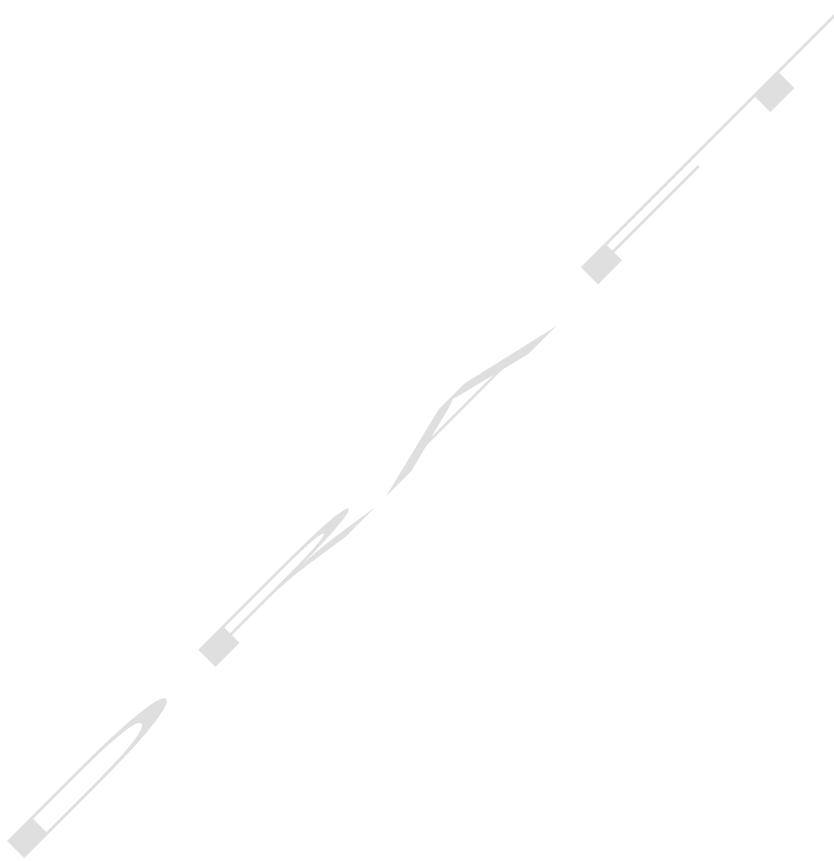
- a. Agricultural aviation adds significant value to farming and primary production for the NZ economy.
- b. Animal welfare is dependent on timely applications of fertiliser at critical seasonal feed deficit crunch points.

- c. Aircraft are used for application of fertilisers and agrichemicals in areas where the safety risks are too high for ground application.
- d. Rapid responses to biosecurity threats are critical.
- e. Pest and disease outbreaks cannot always be forecast.
- f. Agricultural aviation is critical in maintaining and enhancing NZ's biodiversity values.
- g. Helicopters are a critical tool in protecting horticultural crops from frost damage.
- h. Suitable weather conditions for the application of agrichemicals, fertilisers, and vertebrate toxic agents (VTA's) are variable and often unpredictable. Safe and effective applications require operational flexibility to optimise suitable conditions.
- i. Agricultural aircraft operate in a highly regulated environment and additional regulation will have a detrimental effect on primary production, ability to respond to biosecurity threats, and enhancing NZ's biodiversity values.
- j. Agricultural aviation activities are part of the rural character of the rural environment and an ancillary activity to primary production activities.
- k. Agricultural aircraft activity is intermittent or infrequent – multiple flights are usually undertaken over a relatively short period with no subsequent activity over long periods, therefore, the overall effects are limited and minor.

4. SPECIFIC FEEDBACK TO PROPOSED PLAN CHANGE 29

- a. The proposed Plan Change 29 NOISE rules provide for agricultural aviation activities through the General Rural Zone rules namely GRUZ-R15 and GRUZ-R16.
- b. The NZAAA does not agree with some of the provisions in Plan Change 23 that provide for agricultural aviation activities.
- c. The NZAAA (through the AIANZ) has appealed the Plan Change 23 decisions that:
 - i) Reject an amendment sought to the definition of an 'airfield'
 - ii) Reject a new definition sought for a 'rural airstrip'
 - iii) Reject a new definition sought for a 'temporary helicopter landing area'
 - iv) Reject an addition to GRUZ-R15
 - v) Reject an amendment sought to the title of GRUZ-R16
- d. The proposed NOISE objectives and policies do not provide sufficient guidance for the consideration of social and economic benefits of noise generating activities nor do they adequately address appropriate protection from reverse sensitivities.

- e. Submissions relate to rural airstrips and temporary helicopter landing areas used on an infrequent and intermittent basis. Airfields, aircraft depots/bases, and helicopter landing areas that are used on a regular basis are not part of the permitted activity that is sought.



7. SPECIFIC FEEDBACK RELATING TO THE PROPOSED PLAN CHANGE

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	Airfield	Support in part	<p>NZAAA seeks to have a specific definition for 'rural airstrips' that recognises the intermittent nature of the use by agricultural aircraft as opposed to fixed location airfields used by aircraft on a regular basis</p> <p><i>Amendment sought through the AIANZ appeal to PC23 decisions</i></p>	<p><u>Decision sought on appeal PC23</u></p> <p><u>Add to the definition:</u></p> <p>means any area of land intended or designed to be used, whether wholly or partly, for aircraft movement or servicing, excluding helicopters <u>and rural airstrips</u>.</p>
Definitions	<p>Temporary Helicopter Landing area</p> <p>New</p>	n/a	<p>NZAAA seeks to have the difference between a fixed location helipad used on a regular basis and a helicopter landing area used infrequently on a temporary basis clarified</p> <p><i>Addition sought through the AIANZ appeal to PC23 decisions</i></p>	<p><u>Decision sought on appeal PC23</u></p> <p><u>Add a new definition:</u></p> <p><u>Temporary commercial helicopter activities are intermittent activities that are of limited duration such as:</u></p> <ul style="list-style-type: none"> <u>Infrastructure repairs and development</u> <u>Construction</u> <u>Aerial spotting</u> <u>Asset management</u> <u>Disaster relief work (when State emergency has ended)</u> <u>Flight training</u> <u>Science and research</u> <u>Surveillance</u> <u>Survey operations</u> <u>Infrequent transportation of people</u>
Definitions	<p>Rural Airstrip</p> <p>New</p>	n/a	NZAAA seeks to have a definition of a 'rural airstrip' included in the plan to recognise the intermittent nature of use by agricultural aircraft	<p><u>Decision sought on appeal PC23</u></p> <p><u>Add a new definition:</u></p> <p><u>Rural airstrip:</u></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
			<i>Addition sought through the AIANZ appeal to PC23 decisions</i>	<u>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.</u>
Definitions	Agricultural and Horticultural noise	Support in part	<p>The Plan Change includes a definition for agricultural and horticultural noise:</p> <p>NZAAA seeks that it specifically include agricultural aviation activities</p>	<u>Amend definition of agricultural and horticultural noise to include agricultural aviation activities:</u> <p>means noise associated with the application of fertiliser, planting, harvesting, use of agricultural or horticultural vehicles or equipment, <u>agricultural aviation activities</u> and movement, handling and transport of livestock</p>
NOISE	NOISE-01	Support in part	Recognising the benefits of appropriate noise generating activities is important to the economic and social wellbeing of the region	<u>Amend NOISE-01:</u> <p><u>Noise is consistent with the purpose, and anticipated</u> The benefits of activities that generate noise are recognised where the adverse effects from noise are compatible with the anticipated purpose, character and qualities of the receiving environment, and maintains the health and well-being of people and communities</p>
NOISE	New Objective	n/a	Where appropriate, protecting noise generating activities from reverse sensitivity effects is important	<u>Add objective:</u> <p><u>NOISE-O# Reverse sensitivity</u></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				<u>The function and operation of existing and permitted noise generating activities are not compromised by reverse sensitivity effects from noise sensitive activities.</u>
NOISE	New Policy	n/a	NZAAA seeks recognition that some noisy activities are important for economic and social well-being and may exceed specified noise levels on a temporary or irregular basis while maintaining character and amenity values appropriate to each zone and maintaining the health, safety and well being of people and communities.	<p><u>Add policy:</u></p> <p><u>NOISE-P# Enable noise-generating activities in appropriate areas</u></p> <p><u>Enable the generation of noise from activities that:</u></p> <p><u>a. maintain the predominant character and amenity values of the receiving environment by controlling the types of activities and levels of noise permitted in each zone; and</u></p> <p><u>b. recognise that some activities are important for economic and social wellbeing and may exceed the specified noise levels on a temporary and/or irregular basis; and</u></p> <p><u>c. maintain the health, safety, and wellbeing of people and communities.</u></p>
NOISE	New Policy	n/a	NZAAA seeks a policy that reduces the potential for reverse sensitivity and manages new noise-sensitive activities in proximity to areas that consistently experience higher noise levels.	<p><u>Add policy:</u></p> <p><u>NOISE-P# Manage reverse sensitivity</u></p> <p><u>Reduce the potential for reverse sensitivity effects by employing land use controls that</u></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				<u>manage the design and/or location of new noise sensitive activities in proximity to areas that consistently experience higher noise levels.</u>
NOISE	NOISE-R2	Support in part	NOISE-R2 sets out a range of activities which are permitted, including agricultural and horticultural noise. NZAAA seeks the addition of agricultural aviation activities to NOISE-R2 as it is noise as part of agricultural and horticultural activities which are intermittent and temporary.	<u>Amend NOISE-R2 by adding:</u> <u>i) agricultural aviation activities</u>
NOISE	NOISE-R10	Support in part	NZAAA supports the intent of NOISE-R10 however amendments to GRUZ-R15 and GRUZ-R16 are being sought through the AIANZ appeal to PC23 decisions	<u>Decision sought on appeal PC23:</u> <u>Add to GRUZ-R15 (1) as follows:</u> 1. Associated with purposes ancillary to: a. Agricultural Aviation Activities b. Personal transportation. c. Emergency services and civil defence. d. Non-commercial recreational purposes. e. Management purposes on land administered under the Conservation Act or its First Schedule. f. Activities of the New Zealand Defence Force. g. Commercial recreation within public conservation land undertaken in accordance with a concession held from the Department of Conservation

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				<p>h. Natural and physical resource monitoring required by statutory or regulatory instruments. Or i. <u>Temporary commercial helicopter activities</u></p> <p>Decision sought on appeal PC23:</p> <p>Add to GRUZ-R16 (4) as follows:</p> <p>4. The airfield or helicopter landing area is not used on a regular basis <u>as a depot or base</u> for commercial aviation activity</p>
NOISE	NOISE-R10	n/a Error	There appears to be an error in part 2 of the rule	<p>NOISE-R10 Confirm that the reference to the <u>ASPZ</u> is an error and should be the <u>AIRPZ</u>:</p> <p>Where the movements originate from any zone other than the GRUZ or <u>ASPZ AIRPZ</u></p>
NOISE	NOISE-R11	Support in part	<p>NZAAA supports in part the intent of NOISE-R11 as it relates to aircraft and helicopter bases/depots and the regular use of airfields, and helicopter landing areas.</p> <p>The temporary, infrequent use of rural airstrips and temporary commercial helicopter landing areas should be subject to GRUZ-R15 and GRUZ-R16 providing that the changes sought through the AIANZ appeal to PC23 decisions are</p>	<p>Retain the rule subject to acceptance on appeal to PC23 as sought:</p> <ol style="list-style-type: none"> 1. New definition for 'rural airstrips' 2. New definition of 'temporary helicopter landing area' 3. Amendments to the definition of an 'airfield' 4. Addition to GRUZ-R16 (4)

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
			<p>accepted (refer appeal decisions sought in NOISE-R10 above)</p> <p><i>Amendments to the definition of an 'airfield', GRUZ-R16 a new definition of 'rural airstrips' and a new definition of 'temporary helicopter landing area' are being sought through the AIANZ appeal to PC23 decisions</i></p>	
Natural Open Space Zone (NOSZ)	Introduction	Support	<p>NZAAA supports the inclusion of provisions under section 4(3) of the RMA, providing exemption for DOC's management activities. This is important for biodiversity activities and weed and pest control.</p>	Retain the provisions of section 4(3) of the RMA

