

Online Further Submission

Further Submitters Name NZ Agricultural Aviation Association

Further Submitter #109

Further Submitter Number FS109

Wish to be heard Yes

FS qualifier a person who has an interest in the proposal that is greater than the interest the general public has (e.g. land owner, resource user)

FS qualifier reason NZAAA is the membership organisation representing the NZ agricultural aviation industry

Joint presentation No

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Online further submitter? Yes

Date raw FS lodged 02/09/2023 12:02pm

Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	SupportOppose	FS Decision requested	Reasons
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FS109.1	Ballance Agri-Nutrients Limited	S143.001	Definitions	New Definition	<p>Insert new definition</p> <p>Agricultural aviation activities;</p> <p>means the intermittent operation of an aircraft (including fixed-wing aeroplanes and helicopters) from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's).</p>	Support	Allow	<p>The definition is consistent with NZAAA's submission and provides clarity specifically identifying the scope of agricultural aviation activities. It future proofs the plan with the inclusion of emerging technologies (UAV's)</p>
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FS109.2	Horticulture New Zealand	S159.003	Definitions	New Definition	<p>Insert a definition of 'agricultural aviation movements' as follows:</p> <p>Agricultural aviation movements mean intermittent aircraft and helicopter movements for purposes ancillary to primary production activities, including topdressing, spraying, stock management, fertiliser application, and frost mitigation, and associated refuelling.</p>	Support in part	Allow in part	NZAAA supports the intent of the submitter but prefers the specific definition in NZAAA's own submission, and, S143.001. NZAAA supports the addition of "Frost Mitigation activities" to the NZAAA definition
FS109.3	Horticulture New Zealand	S159.007	Definitions	New Definition	<p>Include a definition of 'reverse sensitivity' as follows:</p> <p>Reverse sensitivity means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained</p>	Support	Allow	It is important to protect existing activities from the effects of reverse sensitivity

FS109.4	P S Yates Family Trust	S333.002	Definitions	New Definition	<p>Insert the following new definition:</p> <p>“Helicopter landing areas means an identified landing area for helicopter landing, loading and take-off but does not include refuelling, servicing, a hangar, or a freight handling facility”.</p>	Oppose	Disallow	<p>Refueling and servicing are critical functional elements when operating helicopters from helicopter landing areas undertaking agricultural aviation activities therefore NZAAA seeks to have the definition submitted by NZAAA in S182.006 accepted to include refueling and servicing (it is assumed that the term "servicing" includes refueling). Further, the definition sought relates to helicopter landing areas used on an infrequent, intermittent basis NOT fixed location bases.</p>
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FS109.5	Setar Thirty Six Limited	S168.002	Definitions	New Definition	<p>Insert the following new definition for 'Helicopter landing areas':</p> <p>Helicopter landing areas means an identified landing area for helicopter landing, loading and take-off but does not include refuelling, servicing, a hangar, or a freight handling facility.</p>	Oppose	Disallow	<p>Refueling and servicing are critical functional elements when operating helicopters from helicopter landing areas undertaking agricultural aviation activities therefore NZAAA seeks to have the definition submitted by NZAAA in S182.006 accepted to include refueling and servicing (it is assumed that the term "servicing" includes refueling). Further, the definition sought relates to helicopter landing areas used on an infrequent, intermittent basis NOT fixed location bases.</p>
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FS109.6	Matauri Trustee Limited	S243.003	Definitions	New Definition	<p>Insert the following new definition for helicopter landing areas:</p> <p>Helicopter landing areas means an identified landing area for helicopter landing, loading and take-off but does not include refuelling, servicing, a hangar, or a freight handling facility.</p>	Oppose	Disallow	<p>Refueling and servicing are critical functional elements when operating helicopters from helicopter landing areas undertaking agricultural aviation activities therefore NZAAA seeks to have the definition submitted by NZAAA in S182.006 accepted to include refueling and servicing (it is assumed that the term "servicing" includes refueling). Further, the definition sought relates to helicopter landing areas used on an infrequent, intermittent basis NOT fixed location bases.</p>
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FS109.7	The Shooting Box Limited	S187.002	Definitions	New Definition	<p>Amend to add the following new definition:</p> <p>“Helicopter landing areas means an identified landing area for helicopter landing, loading and take-off but does not include refuelling, servicing, a hangar, or a freight handling facility”.</p>	Oppose	Disallow	<p>Refueling and servicing are critical functional elements when operating helicopters from helicopter landing areas undertaking agricultural aviation activities therefore NZAAA seeks to have the definition submitted by NZAAA in S182.006 accepted to include refueling and servicing (it is assumed that the term "servicing" includes refueling). Further, the definition sought relates to helicopter landing areas used on an infrequent, intermittent basis NOT fixed location bases.</p>
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FS109.8	Wendover Two Limited	S222.002	Definitions	New Definition	Insert the following new definition Helicopter landing areas means an identified landing areas for helicopter landing, loading and take-off but does not include refueling, servicing, a hangar, or a freight handling facility.	Oppose	Disallow	Refueling and servicing are critical functional elements when operating helicopters from helicopter landing areas undertaking agricultural aviation activities therefore NZAAA seeks to have the definition submitted by NZAAA in S182.006 accepted to include refueling and servicing (it is assumed that the term "servicing" includes refueling). Further, the definition sought relates to helicopter landing areas used on an infrequent, intermittent basis NOT fixed location bases.
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FS109.9	Horticulture New Zealand	S159.018	Definitions	PRIMARY PRODUCTION	Retain definition of 'Primary production'	Support	Allow	The definition is consistent with the NPS
FS109.10	Horticulture New Zealand	S159.052	Ecosystems and indigenous biodiversity	IB-P7	Amend Policy IB-P7 as follows: Encourage and support active management of pest plants and pest animals. Provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.	Support	Allow	The amended policy sought provides clarity
FS109.11	Director-General of Conservation (Department of Conservation)	S364.044	Ecosystems and indigenous biodiversity	IB-R1	Insert clarification within Rule IB-R1 for the inclusion of vegetation clearance for biosecurity reasons. Insert a definition for "biosecurity reasons", if appropriate.	Support	Allow	It is important to allow provisions for the clearance of weeds and pests
FS109.12	Royal Forest and Bird Protection Society of New Zealand	S511.069	Ecosystems and indigenous biodiversity	IB-R4	Amend Per-1(2)(l) to limit permitted clearance to 500 square meters every 5 years or restrict it to clearly defined purposes e.g., maintaining cleared pasture and fence lines.	Oppose	Disallow	NZAAA seeks to have the limits in the current operative plan retained

					<p>Delete Per-1(2)(i) references to clearance within a remnant forest</p> <p>Amend Per-2(2) to limit clearance of up to 50m² every 5 years.</p> <p>Delete Note</p>			
FS109.13	Kapiro Conservation Trust	S442.088	Ecosystems and indigenous biodiversity	IB-R4	<p>Amend Per-1(2)(l) to limit permitted clearance to 500 square meters every 5 years or restrict it to clearly defined purposes e.g., maintaining cleared pasture and fence lines.</p> <p>Delete Per-1(2)(i) references to clearance within a remnant forest</p> <p>Amend Per-2(2) to limit clearance of up to 50m² every 5 years.</p> <p>Delete Note.</p>	Oppose	Disallow	NZAAA seeks to have the limits in the current operative plan retained
FS109.15	Ballance Agri-Nutrients Limited	S143.008	Noise	NOISE-O2	retain the objective NOISE -O2	Support	Allow	It is important to ensure that new sensitive activities are located and designed to avoid reverse sensitivity effects.

FS109.16	Horticulture New Zealand	S159.085	Noise	NOISE-O2	Retain Objective NOISE-O2	Support	Allow	It is important to ensure that new sensitive activities are located and designed to avoid reverse sensitivity effects.
FS109.17	Top Energy Limited	S483.182	Noise	NOISE-P2	<p>Amend Policy NOISE – P2 as follows, to achieve better alignment with the RPS objective 3.6 and policy 5.1.1:</p> <p>Ensure noise sensitive activities ... having regard to:</p> <p>a. any existing lawfully established noise generating activities and the level of noise that will be received within any noise sensitive building;</p> <p>b. the need to avoid any reverse sensitivity effects on lawfully established noise generating activities.</p> <p>c. the primary purpose ...</p> <p>d. the ability to design ...</p>	Support	Allow	Existing lawfully established noise generating activities should be protected from reverse sensitivities

FS109.17	Bentzen Farm Limited	S167.087	Noise	NOISE-R7	Amend Rule Noise-R7 as follows (adding "Or"):	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021
					Activity status: Permitted			
					Where:			
					PER-1			
					Flight movements are for emergency purposes such as medical emergencies, search and rescue or firefighting purposes;			
					Or			
					PER-2			
					The helicopter landing site complies with standard:			
					NOISE-S4 Helicopter landing areas.			
					This standard does not apply to:			
					i. Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitaia Hospital (excludes established helicopter bases on hospital land).			
					ii. Emergency or rescue helicopter landings, departures, overflights or activity during operations that occur			

away from the permanently established helicopter base.

iii. Cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a period up to 30 days in any 12 month period.

FS109.18	P S Yates Family Trust	S333.077	Noise	NOISE-R7	Amend Rule Noise-R7 as follows: <i>Activity status: Permitted</i> <i>Where:</i> <i>PER-1</i> <i>Flight movements are for emergency purposes such as medical emergencies, search and rescue or firefighting purposes;</i> Or <i>PER-2</i> <i>The helicopter landing site complies with standard:</i> <i>NOISE-S4 Helicopter landing areas.</i>	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021
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This standard does not apply to:

i. Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitaia Hospital (excludes established helicopter bases on hospital land).

ii. Emergency or rescue helicopter landings, departures, overflights or activity during operations that occur away from the permanently established helicopter base.

iii. Cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a period up to 30 days in any 12 month period.

FS109.19	Horticulture New Zealand	S159.088	Noise	NOISE-R7	<p>Amend Rule PER-2 of NOISE-R7 as follows:</p> <p>PER-2</p> <p>The helicopter landing site complies with standard:</p> <p>NOISE-S4 Helicopter landing areas.</p> <p>This standard does not apply to:</p> <ol style="list-style-type: none"> 1. Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitaia Hospital (excludes established helicopter bases on hospital land). 2. Emergency or rescue helicopter landings, departures, overflights or activity during operations that occur away from the permanently established 	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021
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helicopter
base.

3. Cropping, top
dressing, and
spraying for
the purpose of
farming or
conservation
carried out in
the Rural
Production,
Horticulture
zones, or
within
Significant
Natural Area
on a seasonal,
temporary, or
intermittent
basis for a
period up to
30 days in any
12 month
period.

Insert:

PER-3

**Cropping, topdressing
and spraying and the
use of drones for the
purpose of farming or
conservation carried
out in the Rural
Production,
Horticulture zones or
within Significant
Natural areas on a
seasonal, temporary
or intermittent basis
for a period up to 30**

days in any 12-month period.

Activity status where compliance does not achieve with PER-3: Restricted discretionary

FS109.22	Matauri Trustee Limited	S243.105	Noise	NOISE-R7	Amend Rule Noise-R7 as follows: Activity status: Permitted Where: PER-1 Flight movements are for emergency purposes such as medical emergencies, search and rescue or firefighting purposes; Or PER-2 The helicopter landing site complies with standard: NOISE-S4 Helicopter landing areas. This standard does not apply to: i. Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitaia Hospital	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021
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(excludes established helicopter bases on hospital land).

ii. Emergency or rescue helicopter landings, departures, overflights or activity during operations that occur away from the permanently established helicopter base.

iii. Cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a period up to 30 days in any 12 month period.

FS109.23	The Shooting Box Limited	S187.076	Noise	NOISE-R7	Amend Rule Noise-R7 as follows: Activity status: Permitted Where: PER-1 Flight movements are for emergency purposes such as medical emergencies, search and rescue or firefighting purposes;	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021
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Or

PER-2

The helicopter landing site complies with standard:

NOISE-S4 Helicopter landing areas.

This standard does not apply to:

- i. Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitaia Hospital (excludes established helicopter bases on hospital land).
- ii. Emergency or rescue helicopter landings, departures, overflights or activity during operations that occur away from the permanently established helicopter base.
- iii. Cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a

period up to 30 days in any 12 month period.

FS109.24	Northland Federated Farmers of New Zealand	S421.198	Noise	NOISE-R7	Amend PER-2 of Rule NOISE-R7 to clarify the third exception and how Council intends to apply and enforce exception	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021
FS109.25	Wendover Two Limited	S222.079	Noise	NOISE-R7	Amend Rule Noise-R7 as follows: Activity status: Permitted Where: PER-1 Flight movements are for emergency purposes such as medical emergencies, search and rescue or firefighting purposes; Or PER-2 The helicopter landing site complies with standard:	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021

NOISE-S4 Helicopter landing areas.

This standard does not apply to:

i. Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitaia Hospital (excludes established helicopter bases on hospital land).

ii. Emergency or rescue helicopter landings, departures, overflights or activity during

operations that occur away from the permanently established helicopter base.

iii. Cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a period up to 30 days in any 12 month period.

FS109.26	Ngā Tai Ora - Public Health Northland	S516.068	Noise	NOISE-R7	<p>Delete the following text from Rule NOISE-R7:</p> <p>This standard does not apply to:</p> <p>i. Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitaia Hospital (excludes established helicopter bases on hospital land);</p> <p>ii. Emergency or rescue helicopter landings, departures, overflights or activity during operations that occur away from the permanently established helicopter base;</p> <p>iii. Cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a period up to 30 days in any 12 month period.</p>	Oppose	Disallow	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021
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FS109.26	Ballance Agri-Nutrients Limited	S143.010	Temporary activities	TA-R5	Amend to unsure TA-R5 does not apply to agricultural aviation. as per new rule NOISE-RX Agricultural aviation activities	Support	Allow	NZAAA seeks a new rule as sought in S182.021
FS109.27	Horticulture New Zealand	S159.092	Noise	NOISE-S4	Amend Standard NOISE-S4 to clarify that it does not apply to activities exempted in Rule NOISE-R7	Support in part	Allow in part	Agricultural aviation activities that include fixed wing and helicopters and ALL agricultural aviation activities should be provided for in the plan as sought in S182.021. Further, NOISE-S4 should include the note sought by the submitter relating to the new rule sought in S182.021

FS109.27	Ballance Agri- Nutrients Limited	S143.015	Rural production	RPROZ-P2	retain the Policy RPROZ- P2	Support in part	Allow in part	It is important to have agricultural aviation acknowledged as part of the rural character as sought in S182.029
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