

Proposed Waimakariri District Plan – Submission

Submission from: NZ Agricultural Aviation Association (NZAAA)

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

NZAAA is directly affected by an effect of the subject matter of this submission that:

- a) Adversely affects the environment; and
- b) Does not relate to trade competition or the effect of trade competition.

NZAAA wishes to speak in support of our submission.

Signature: Bill MacGregor, 26 Nov 2021

Background to NZ Agricultural Aviation Association (NZAAA)

NZAAA is the industry organisation representing agricultural aviation operators – both fixed wing and helicopter – who provide services to primary production and conservation activities such as weed and pest management, application of fertiliser and frost protection.

Agricultural aviation is important as a production multiplier to agriculture in the district. The ability to apply fertiliser and agrichemicals to areas inaccessible to ground spreaders extends the productive areas in the district.

NZAAA supports the overall thrust of the Proposed Plan but has concern with the introduction of arbitrary operating constraints such as timing of aircraft movements and restrictions on areas where agriculture aviation can operate in the rural district.

NZAAA has a close association with the NZ Ground Spread Fertilizer Association (NZGFA) and both associations are concerned that if aircraft are restricted from agricultural operations the ground spreaders will have pressure on them to put their spreader vehicles onto rugged country not suited to them. This can only lead to an increased accident rate amongst their members which they do not wish to see.

It is important to note the distinction between the intermittent use of aircraft for primary production purposes and the ongoing use of an airstrip or heliport as a base for the operations. In Waimakariri many operators are based at Rangiora airfield and provisions in the plan support the continued use of the airfield in the district.

Specific submission points

Provision	Support/ Oppose	Reason	Decision sought
NOISE-R4 Helicopter movements	Oppose in part	It should be made clear that this should not apply to intermittent agricultural aviation movements ancillary to primary production activities. See below for further details.*	Amend NOISE-R4 by adding an exclusion: Except that NOISE-R4 will not apply to intermittent helicopter movements for primary production activities such as application of fertilisers, spray or frost protection.
NOISE-R7 Temporary, mobile or intermittent agriculture activities	Support in part	Recognition of temporary mobile or intermittent agriculture activities that generate noise is supported but there should be explicit recognition of noise from agricultural aviation activities.	Amend NOISE-R7 by adding Temporary, mobile or intermittent agriculture activities emitting noise for cultivation, application of fertiliser, planting, harvesting, use of agricultural vehicles or equipment, <u>including aircraft</u> , and movement , handling and transport of livestock
NOISE-R13 Aircraft operations at Rangiora Airfield	Support in part	The rule lists purposes for the use of Rangiora Airfield. Agricultural aviation should be listed as an activity that operates from rangiora Airfield.	Amend NOISE-R13 (1) by adding: e) as a base for agricultural aviation operations
RURZ-O2 Activities in Rural Zones	Support	Inclusion of activities that directly support primary production is supported.	Retain RURZ-O1
RURZ-P1 – Amenity values and character	Support	Recognition that there can be seasonal, short term or intermittent noise as a result of primary production activities is supported.	Retain RURZ-P1 (2)
GRUZ-R2 Primary production	Support in part	Provision for primary production as a permitted activity is supported. However there should also be inclusion of activities that are ancillary to primary production as a permitted activity. Ancillary activity is defined in the Plan. Agricultural aviation operations are ancillary to primary production and need to be provided for in the Plan.	Amend GRUZ-R2 Primary production by adding 'and ancillary activities' GRUZ-R2 Primary production <u>and ancillary activities</u>
RLZ – R2 Primary production	Support in part	Provision for primary production as a permitted activity is supported. However there should also be inclusion of activities that are ancillary to primary production as a permitted activity. Ancillary activity is defined in the Plan. Agricultural aviation operations are ancillary to primary production and need to be provided for in the Plan	Amend RLZ-R2 Primary production by adding 'and ancillary activities' RLZ-R2 Primary production <u>and ancillary activities</u>

*Provisions in Proposed Plan relating to NOISE-R4

In the Proposed Plan Helicopter movements is defined as: means the take-off or landing of a helicopter. For example when a helicopter land and takes off this constitutes two movements.

Noise R4 limits helicopter movement to:

- Between 8am and 6pm unless further that 450m from any residential unit or minor residential unit
- Within 25m of any residential unit or minor residential unit no helicopter movement shall take place unless the residential unit or minor residential unit; or
- is on the site on which the landing or take off occurs.

The default rule is RDA with Matters of discretion:

- MD1 Noise – General noise Matters of discretion
- MD4 Helicopter noise – Assessment in accordance with NZS6807:1994 Noise management and land use planning for Helicopter Landing areas and the findings of that assessment.

Implications for rural activities

- Helicopters for intermittent use for primary production would not be able to operate outside of 8am and 6pm without resource consent unless more than 450m from residential unit or minor residential unit.
- Nor could they operate within 25m of a residential unit or minor residential unit unless on the site.

This would be extremely limiting for helicopters operating in the rural zone as weather conditions mean that many operations occur before 8am or after 6pm.

The Rural Zone objectives and policies provide for activities that directly support primary production and have a functional need to be located within the Rural Zones.

RURZ-P1 also recognises there may be seasonal, short term or intermittent noise effects.

Agricultural aviation supports primary production and has a functional need to operate in the Rural Zone and creates short-term and intermittent noise effects so it is consistent with the policy framework for the Rural Zone. Given the direction of the Rural Zone objectives and P1 there should be an exclusion for helicopter movements for intermittent primary production activities such as application of fertilisers, spray or frost protection.

Decision sought

Amend NOISE-R4 by adding an exclusion:

Except that NOISE-R4 will not apply to intermittent helicopter movements for primary production activities such as application of fertilisers, spray or frost protection.