

**KAIPARA DISTRICT COUNCIL**

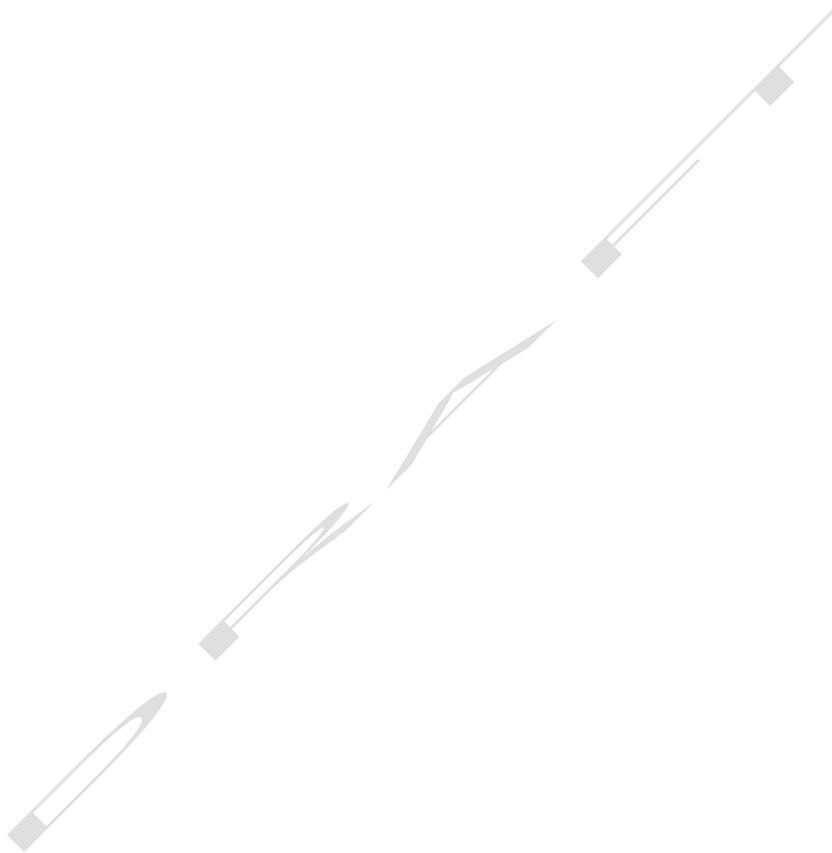
**IN THE MATTER**

of the Proposed District Plan

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

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To: Kaipara District Council - Proposed District Plan  
[districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz)

Submission from: NZ Agricultural Aviation Association (NZAAA)

Submitter contact details:

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Submissions due: 30 June 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.

Submissions are set out in the attached table.

Signature:



Date: 23/06/2025

## **1. 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 and commercial helicopter industry since 1983 completing 11,000+ hours of flying. In 2022 I sold my interests in the Company 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, pest eradication, search and rescue, commercial lifting and aerial transport.

## **2. ABOUT THE NZAAA**

The NZAAA, one of 6 divisions of the Aviation Industry Association (AIA NZ), represents fixed-wing and helicopter operators engaged in applying fertilisers, agrichemicals, and vertebrate toxic agents 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

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>

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

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

- a. 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
- 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. pest and disease outbreaks cannot always be forecast.
- e. helicopters are a critical tool in protecting horticultural crops from frost damage
- f. suitable weather conditions for the application of agrichemicals, fertilisers, and vertebrate toxic agents are variable and often unpredictable, so safe and effective applications require operational flexibility to optimise suitable conditions
- g. activities are part of the rural character of the rural environment and an ancillary activity to primary production activities

- h. activity is intermittent, infrequent or temporary. Multiple flights are undertaken over a relatively short timeframe with no subsequent activity for long periods; therefore, the overall effects are limited and minor

#### **NOTE FOR CLARIFICATION**

These submissions relate to the intermittent, infrequent or temporary use of rural airstrips and temporary helicopter landing areas.

Airfields, aircraft depots/bases, and heliports that are used on a regular basis are not part of the permitted activity that is sought.

#### **4. GENERAL FEEDBACK TO THE PROPOSED PLAN**

- a. There are no specific definitions proposed in the PDP that clearly identify the difference between intermittent, infrequent or temporary use of rural airstrips and temporary helicopter landing areas vs airfields, aircraft depots/bases, and heliports that are used on a regular basis.
- b. The proposed rules NOISE-R1 and NOISE-S3 provide for agricultural aviation activities to support primary production in the General rural zone and Māori purpose zone however:
  - i) They do not provide for agricultural aviation activities in the Rural lifestyle zone
  - ii) They do not provide for conservation and biosecurity activities such as weed and pest control
- c. The risks relating to hazardous goods are adequately managed by the EPA Hazardous Property Notices, HSNO, and the HSWA Hazardous Substances Regulations. If council seeks to manage the risks, then it should ensure that it only manages risks that are not already managed under other regulation.
- d. Proposed rules that manage Ecosystems and Indigenous Biodiversity are overly restrictive when considering pest control activities that support restoration and enhancement taking into consideration the Regional Policy Statement for Northland (NRPS):

##### **Policy 4.4.2: Supporting restoration and enhancement**

##### **Method 4.4.3: Statutory plans and strategies**

- (3) In implementing Policy 4.4.1 regional and district plans shall:
  - (a) Allow activities undertaken for the purposes of pest control or habitat maintenance or enhancement;

## 5. NZAAA SPECIFIC SUBMISSIONS RELATING TO THE PDP

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	Agricultural aviation Activity  New	n/a	The inclusion of a specific definition for agricultural aviation activities future proofs the plan by including UAV's (unmanned aerial vehicles) and provides clarity for the scope of the activity and that the activity is the intermittent, infrequent or temporary use of rural airstrips and helicopter landing areas NOT airfields or heliports used on a regular basis or as fixed location aircraft bases.	<u>Add new definition</u>  <u>Agricultural aviation activity means the intermittent, infrequent or temporary use of a rural airstrip or temporary helicopter landing area by an aircraft for primary production, frost mitigation, biosecurity, or biodiversity purposes including 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)</u>
Definitions	Aircraft  New	n/a	UAV's are an 'aircraft' by definition (RMA). It is appropriate to include UAV's where they have similar effects to conventional aircraft however council should not manage small UAV's that have minimal effects.	<u>Add new definition</u>  <u>Aircraft means any machine that can derive support in the atmosphere from the reactions of air otherwise than by reactions of the air against the surface of the earth excluding kites.</u>  <u>Note: this definition excludes drones and unmanned aerial vehicles (UAV's) that weigh less than 200 kgs.</u>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	Airfield  New	n/a	It is important to have specific definitions that clearly define the difference between 'airfields' that are used on a regular basis or as a fixed location base compared to a 'rural airstrip' that its used on an intermittent, infrequent or temporary basis.	<u>Add new definition:</u>  <u><b>Airfield means any area of land intended or designed to be used, whether wholly or partly, for aircraft movement or servicing, and may include aircraft passenger terminals, administration, freight, refuelling, aircraft parking or hangaring, and aircraft maintenance and servicing excluding rural airstrips.</b></u>
Definitions	Conservation activity	Support	The intent of the definition is supported.	Retain the definition as notified
Definitions	Fertiliser	Support	The scope of the definition is supported.	Retain the definition as notified
Definitions	Hazardous facility	Oppose	The definition is confusing as it includes both activities and premises, which includes vehicles. HSNO and HSWA manage hazardous substances and are not contingent on a definition of 'hazardous facility'.	<u>Delete</u> the definition:  <del><b>HAZARDOUS FACILITY</b></del> <del><b>Means activities involving hazardous substances and premises at which these substances are used, stored or disposed of. Storage includes vehicles for their transport located at a facility for more than short periods of time and excludes:</b></del>  <ul style="list-style-type: none"> <li><del>• fuel stored in mobile plants,</del></li> <li><del>• motor vehicles, boats and small engines;</del></li> </ul>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				<ul style="list-style-type: none"> <li><del>the incidental use and storage of hazardous substances in domestic scale quantities;</del></li> <li><del>activities involving sub-classes not included in the Activity Status Table.</del></li> </ul>
Definitions	Heliport  New	n/a	<p>Inclusion of a definition for a 'heliport' clarifies the difference between a 'temporary helicopter landing area' that is used on an intermittent, infrequent or temporary basis compared to a 'heliport' that is used on a regular basis or as a permanent helicopter base.</p> <p>The definition sought is the NZS 6807 Management of Helicopter Noise definition for a 'heliport'.</p>	<p><b><u>Add new definition:</u></b></p> <p><b><u>Heliport means a facility for helicopter movements including support services for passengers or aircraft. A heliport may include passenger terminals, administration, freight, refuelling, helicopter parking or hangaring, and helicopter maintenance and servicing.</u></b></p>
Definitions	Improved pasture  New	n/a	A definition of Improved Pasture is sought to clarify rules providing for native vegetation clearance.	<p><b><u>Add a new definition:</u></b></p> <p><b><u>Improved Pasture means an area of land where exotic pasture species have been deliberately sown or maintained for the purpose of pasture production, and species composition and growth has been modified and is being managed for livestock grazing</u></b></p>
Definitions	Maintenance of improved pasture  New	n/a	The inclusion of the definition from National Policy Statement for Indigenous Biodiversity 2023 provides clarity.	<p><b><u>Add new definition:</u></b></p> <p><b><u>Maintenance of improved pasture includes the removal of indigenous vegetation for the purpose of maintaining the improved</u></b></p>

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				<u>pasture, whether the removal is by way of cutting, crushing, applying chemicals, draining, burning, cultivating, over-planting, applying seed of exotic pasture species, mob stocking, or making changes to soils, hydrology, or landforms.</u>
Definitions	Primary production	Support	The inclusion of the definition from the National Planning Standards is supported.	Retain the definition as notified.
Definitions	Reverse sensitivity  New	n/a	Inclusion of definition for reverse sensitivity is important for clarity and ensuring that existing lawfully established activities are protected.	<b><u>Add a new definition:</u></b>  <b><u>Reverse sensitivity means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing activity.</u></b>
Definitions	Residual risk  New	n/a	The focus of the hazardous substance chapter should be on the residual risk when all other regulations are complied with.	<b><u>Add a new definition:</u></b>  <b><u>This definition only applies to the Hazardous Substances Chapter of the District Plan</u></b>  <b><u>Residual risk</u></b>

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				<u>means any risk of an adverse effect after other industry controls, legislation and regulations, including the Hazardous Substances and New Organisms Act 1996, the Land Transport Act 1998, the Health and Safety at Work Act (2015) and regional planning instruments, have been complied with.</u>
Definitions	Rural Airstrip  New	n/a	<p>It is important to have specific definitions that clearly define the difference between ‘airfields’ that are used on a regular basis or as a fixed location base compared to a ‘rural airstrip’ that is used on an intermittent, infrequent or temporary basis.</p> <p>Airfields will often include facilities for ticketing, passenger management, aircraft storage and servicing. Inclusion of ‘no commercial aviation infrastructure or facilities’ ensures that the permitted activity is specific to the intermittent, infrequent or temporary use for agricultural aviation activities (noting that fertiliser bins are excluded from the infrastructure referenced)</p>	<p><u>Add a new definition:</u></p> <p><u>Means any area of land used, whether wholly or partly, for the landing and departure of fixed wing aircraft, where there is no commercial aviation infrastructure or facilities in the rural area and excludes airfields.</u></p>
Definitions	Temporary helicopter landing area  New	n/a	It is important to provide a definition of a ‘temporary helicopter landing area’ that can be used to clarify the difference between a landing area used on an intermittent, infrequent or temporary basis compared to a permanent	<p><u>Add new definition:</u></p> <p><u>Temporary helicopter landing area means any area of land, building, or structure</u></p>

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			<p>heliport used on a regular basis or as a helicopter base.</p> <p>Heliports will often include facilities for ticketing, passenger management, aircraft storage and servicing. Inclusion of 'no commercial aviation infrastructure or facilities' ensures that the permitted activity is specific to intermittent, infrequent or temporary helicopter use.</p>	<p><u>intended or designed to be used, whether wholly or partly, for helicopter movement where there is no commercial aviation infrastructure or facilities and excludes heliports.</u></p>
Hazardous Substances	Overview	Oppose in part	<p>NZAAA supports provisions for Hazardous Substances based on NOT duplicating existing regulations under HSNO and HSWA. The approach in the plan includes rules which duplicate such regulations and NZAAA opposes that approach.</p> <p>Recent district plans have focused on residual effects that should be managed. The Waikato District Plan notified a similar approach to the PKDP, but through submissions was substantially modified to ensure that there is not duplication of existing regulations.</p> <p>Whangarei District has also amended the hazardous substances provisions in its plan to also reflect that intent. Whangarei District is similar to Kaipara, and more akin than the Auckland Region which the s32 Report refers to.</p>	<p><del>Delete</del> Para 6 in the Overview and <u>replace with:</u></p> <p><del>The rules control quantities of defined hazardous substances classes that are significant enough to potentially pose a significant risk to public safety and the environment with respect to the various zones across the Kaipara District. The sites where such activities take place are defined as significant hazardous facilities. These provisions assist other legislation in the management of hazardous substances in significant quantities, taking location into account.</del></p> <p><u>Because the District Plan seeks to avoid duplication of requirements that arise under other legislation and regulations the provisions of this chapter are designed to</u></p>

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			The Auckland provisions are outdated and do not reflect best practice in terms of managing hazardous substances under the RMA. The Kaipara district plan needs to be updated to ensure an approach consistent with hazardous substance regulations and legislation.	<u>manage the effects of use, storage or disposal of hazardous substances, only to the extent that those effects are not within the scope of existing legislation and regulation, such as residual risk and reverse sensitivity</u>
Hazardous Substances	HS-O1  Risks associated with hazardous substances	Oppose in part	An objective acknowledging the benefits of hazardous substances where the risks are acceptable is supported. However, the risk should refer to residual risks arising from the use, storage or disposal of hazardous substances.  A definition of residual risk is sought (similar to the Whangarei District Plan).	Amend the objective by <b>deleting</b> and <b>adding</b> :  Hazardous substance use, storage <b>or transport and disposal activities are located, designed and are</b> managed, so that the <b>residual</b> risk to people, property and the environment is acceptable, while recognising the benefits of those activities.  <b><u>Accept the new definition as sought for: Residual risk</u></b>
Hazardous Substances	HS-P1  Hazardous facilities	Oppose	NZAAA considers that the focus should be on hazardous substances use, storage and disposal as opposed to hazardous facilities as defined in the plan.	Amend the policy by <b>deleting</b> and <b>adding</b> :  <b><del>Hazardous facilities must minimise the risk to the environment (including people and property) by:</del></b>  <b><u>Storage of hazardous substances: minimise the residual risk to the environment by:</u></b>  1. Siting new significant hazardous facilities in appropriate locations that are separated

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				<p>from incompatible activities, such as sensitive land use and infrastructure, and sensitive environments;</p> <p>2. <del>Designing, constructing and operating hazardous facilities in a manner</del>  <b><u>Managing hazardous substance storage facilities</u></b> that ensures the adverse effects of the operation or an accidental event involving hazardous substances can be contained within the site; and</p> <p>3. Disposing hazardous <del>wastes to authorised disposal or treatment facilities that have appropriate management systems in place and avoiding the storage, processing or disposal of hazardous wastes in sensitive environments.</del>  <b><u>substances using best practice and meeting regulatory standards</u></b></p> <p><b><u>Accept the new definition as sought for: Residual risk</u></b></p>
Hazardous Substances	HS-P2  Assessment of risk	Oppose	The focus should be on significant hazardous facilities.	<p>Amend the policy by <del>deleting</del> and <b><u>adding</u></b>:</p> <p><b><u>Ensure facilities for the use, storage or disposal of hazardous substances in significant quantities identify and assess potential adverse effects (including cumulative risk and potential effects of identified natural hazards) to prevent</u></b></p>

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				<del>unacceptable levels of risk to human health, safety, property and the natural environment.</del> <u>Ensure that significant hazardous facilities are appropriately site and managed in order to reduce risks to the environment and community to acceptable levels</u>
Hazardous Substances	HS-P3  Reverse sensitivity effects	Support	Separation of sensitive land use activities from lawfully established significant hazardous facilities is supported.	Retain the policy as notified.
Hazardous Substances	HS-R1  The use, storage or disposal of any hazardous substance	Oppose	NZAAA does not support the inclusion of quantity tables and seek the deletion to avoid duplication of regulation. Where such regulations are met there is no need for additional rules in the district plan.	Amend the rule by <del>deleting</del> and <u>adding</u> :  <del>a. The aggregate quantity of any hazardous substance of any hazard classification on a site does not exceed the quantity specified for the applicable zone in HS-S1.</del>  <u>a. The storage, use and disposal of hazardous substances not otherwise specified within the Hazardous substances chapter rules</u>
Hazardous Substances	HS-R3  Fertiliser storage	Oppose	On farm storage of fertilisers are regulated under HSNO and HSWA and associated regulations so there is no need for duplication in the district plan which imposes additional regulatory burden and confusion.	<del>Delete HS-R3</del> <del>Fertiliser storage</del>  <del>General rural zone</del>

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			The s32 Report notes that public ‘ <i>feedback also identified concerns about use and storage of fertilisers</i> ’. The report does not provide analysis of the actual risks of fertiliser stored in purpose built farm fertiliser bins.	<p><del>Activity status: Permitted</del></p> <p><del>Where:</del></p> <ul style="list-style-type: none"> <li><del>a. Fertiliser is temporarily stored for rural production activities and is classed as sub-class 6.3, 6.4 and 6.5; and</del></li> <li><del>b. The storage location is more than 30m from a watercourse; and</del></li> <li><del>c. the duration of the storage does not exceed 28 days within any 12-month period; and</del></li> <li><del>d. The substance stored is intended for rural production use and not for retail sale.</del></li> </ul>
Hazardous Substances	<p>HS-R4</p> <p>Use, storage and disposal of hazardous substances subclasses 1.4, 1.5, 1.6, 6.1D, 6.1E, 9.1D and 9.2D</p>	Oppose	NZAAA opposes this rule as the use, storage and disposal of hazardous substances are regulated under HSNO and HSWA and associated regulations therefore the rule is unnecessary and will create confusion and regulatory overlap.	<p><del>Delete HS-R4.</del></p> <p><del>Use, storage and disposal of hazardous substance subclasses 1.4, 1.5, 1.6, 6.1D, 6.1E, 9.1D and 9.2D</del></p> <p><del>All zones</del></p> <p><del>Activity status: Permitted</del></p> <p><del>Where:</del></p> <p><del>The hazardous substance is in subclasses 1.4, 1.5, 1.6, 6.1D, 6.1E, 9.1D and 9.2D.</del></p>

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Hazardous Substances	HS-S1  Hazardous substances permitted activity thresholds	Oppose	NZAAA opposes the standards as the use, storage and disposal of hazardous substances are regulated under HSNO and HSWA and associated regulations therefore the standards and associated rule is unnecessary and will create confusion and regulatory overlap.	<b>Delete HS-S1 in entirety</b>
Ecosystems and Indigenous Biodiversity	ECO-O3 Restoring indigenous biodiversity	Support	Restoring indigenous biodiversity provides social and economic benefits.	Retain the objective as notified
Ecosystems and Indigenous Biodiversity	ECO-P3  Protection and maintenance of indigenous biodiversity	Support	Maintaining indigenous biodiversity in a way that does not unreasonably restrict existing primary production activities is important for the local economy.	Retain the policy as notified
Ecosystems and Indigenous Biodiversity	ECO-P4  Restoring and enhancing indigenous biodiversity	Support	The removal or management of pest plant and animals and enabling biosecurity works are critical for restoring and enhancing indigenous biodiversity.	Retain the policy as notified
Ecosystems and Indigenous Biodiversity	ECO-R1  Indigenous vegetation clearance and any associated	Support in part	Provisions that permit the removal of pests is supported.	Amend the rule by <b>adding</b> :  i. The removal or clearance of indigenous vegetation from land that was previously cleared, <b>or for the maintenance of</b>

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	land disturbance for specified activities		Provisions that permit the maintenance of improved pasture are important. Clarification of this is specifically sought.	<b>improved pasture</b> , and where the indigenous vegetation to be cleared is less than 10 years old;  <b><u>Accept the new definitions as sought for: Improved pasture, and Maintenance of improved pasture</u></b>
Natural Character	NATC-P2  Indigenous vegetation clearance and earthworks	Support	It is important to allow for the clearance of native vegetation for biosecurity reasons when pest weeds that are intermingled with native vegetation are being removed to preserve and protect the natural character.	Retain the policy as notified
Natural Character	NATC-R4  Indigenous vegetation clearance in wetland, lake and river margins	Support in part	Eradicating pest weeds for biosecurity purposes is important for preserving and protecting the natural character.	Amend the rule by <b><u>adding</u></b> :  b. The indigenous vegetation clearance is for the maintenance of lawfully established roads, fences, utility connections, driveways, parking areas, effluent disposal systems, swimming pools, walking or cycling tracks, or farm and forestry tracks, <b><u>or the eradication of pests for biosecurity purposes</u></b> .
Natural Features and Landscapes	NFL-O2  Maintenance and enhancement of Outstanding Natural	Support in part	Activities that maintain and enhance ONF's and ONL's should be provided for as well as promoted.	Amend the objective by <b><u>adding</u></b> :  The maintenance and enhancement of the characteristics, qualities and values of Outstanding Natural Features and Outstanding

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	Features and Outstanding Natural Landscapes			Natural Landscapes is promoted <b><u>and provided for.</u></b>
Natural Features and Landscapes	NFL-P1  Activities that maintain, restore or enhance characteristics, qualities and values	Support	The restoration and enhancement of Outstanding Natural Features and Landscapes, is important for community wellbeing.	Retain the policy as notified
Natural Features and Landscapes	NFL-R7 Indigenous vegetation clearance and earthworks associated with conservation activities  ONL and ONF	Support in part	Eradicating pests for conservation biosecurity purposes is vital for the restoration and enhancement of Outstanding Natural Features and Landscapes.	Retain the rule and amend NFL-S5 as follows in the following line.....
Natural Features and Landscapes	NFL-S5 Indigenous vegetation clearance	Oppose in part	Eradication of invasive pest weeds requires total removal regardless of the quantum of invasion therefore restricting the area of clearance can compromise the objectives to restore and enhance ONF and ONL's.  Often pest weeds are intermingled with indigenous vegetation.	Amend the standard by <b><u>adding:</u></b>  1. The indigenous vegetation clearance must not exceed 150m <sup>2</sup> in any 12-month period per site <b><u>except when the clearance of indigenous vegetation is for the purposes of eradicating pest weeds.</u></b>

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NOISE	NOISE-O1  Manage noise effects	Support in part	<p>Recognising the benefits of appropriate noise generating activities is important to the economic and social wellbeing of the district. An amendment is sought to ensure that the benefits are recognised.</p> <p>Receiving environment is not defined or described so it is better to refer to the zone in which the activity occurs.</p>	<p>Amend the objective by <b>deleting</b> and <b>adding</b>:</p> <p><del>Adverse effects of noise on amenity values and the health, safety and wellbeing of people and communities are managed to be reasonable and consistent with the anticipated outcomes for the receiving environment.</del></p> <p><u>The benefits of activities generating noise and vibration are recognised where the adverse effects are compatible with the purpose, character and amenity values of the zone and the zone in which the activity occurs and do not adversely affect the health, safety or wellbeing of people and communities.</u></p>
NOISE	NOISE-O2  Reverse sensitivity effects	Support	Protecting existing and lawfully established noise generating activities from reverse sensitivities is supported.	Retain the objective as notified
NOISE	New policy  Recognising existing lawfully established noise emitting activities	n/a	Providing for existing and lawfully established noise generating activities and providing areas where high noise generating activities can operate is important .	<p><u>Add new policy:</u></p> <p><u>NOISE-P# Recognising existing lawfully established noise emitting activities</u></p> <p><u>Provide for adequate areas where activities generating higher levels of noise can</u></p>

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				<u>operate, subject to appropriate controls and where the special characteristics of noise generating activities are accommodated to reflect the function, character and amenity values of each zone including existing lawfully established activities that are high noise generators.</u>
NOISE	New Policy  Manage reverse sensitivity	n/a	There should be a policy that reduces the potential for reverse sensitivity and gives effect to NOISE-O2 and manages new noise-sensitive activities in proximity to areas that consistently experience higher noise levels.	<u>Add new policy:</u>  <u>NOISE-P# Manage reverse sensitivity</u>  <u>Reduce the potential for reverse sensitivity effects by employing land use controls that manage the design and/or location of new noise sensitive activities in proximity to areas that consistently experience higher noise levels.</u>
NOISE	NOISE-R6  Noise levels from a helicopter landing area	Support in part	NOISE-R6 is an appropriate rule for helicopters using a heliport as defined in the new definition for a heliport that is sought  NZAAA seeks that use of temporary helicopter landing areas for agricultural aviation are provided for in NOISE-RX – a new rule.  It needs to be clear that use of such temporary helicopter landing areas are not included in NOISE-R6	Amend the rule title by <b>deleting</b> and <b>adding</b> :  Noise levels from a <b>helicopter landing area heliport</b>  Amend the note by <b>adding</b> :  <u>Use of temporary helicopter landing areas for agricultural aviation are managed through NOISE-RX and are exempt from NOISE-R6.</u>

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				Accept new definitions as sought: <u>Heliport</u> , and <u>Temporary helicopter landing area</u>
NOISE	NOISE-S3  Noise levels in the General rural zone and Māori purpose zone	Oppose in part	<p>In addition to primary production, (not just land based primary production) it is important that agricultural aviation activities supporting biosecurity and conservation are provided for.</p> <p>1. The scope proposed in the standard does not include the full range of agricultural aviation activities as sought in the new definition for agricultural aviation activities.</p> <p>2. Agricultural aviation activities are undertaken in the Rural Lifestyle Zone to support primary production and in the Natural Open Space Zone (NOSZ) to support biosecurity and conservation activities.</p> <p>As a consequence, a specific rule (new) is sought to provide for agricultural aviation activities in the appropriate zones.</p>	<p>Amend the standard by <b>deleting</b>:</p> <p>a. The noise is from: <b>Land Based</b> Primary Production activities undertaken for a limited duration using agricultural vehicles, mobile machinery or equipment used on a seasonal or intermittent basis, <b>including noise from cropping, top dressing and spraying carried out on a seasonal, temporary or intermittent basis for a period up to 30 days in any 12-month period</b>; or,</p> <p><b>Accept a new rule as sought:</b> <b><u>NOISE-RX Noise from agricultural aviation activities</u></b></p>
NOISE	New rule  NOISE-RX	n/a	It is also important that agricultural aviation activities supporting primary production and conservation are provided for.	<p><b>Add a new rule:</b></p> <p><b><u>NOISE-RX</u></b></p> <p><b><u>Noise from agricultural aviation activities</u></b></p>

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	<p>Noise from agricultural aviation activities</p> <p>General rural zone Rural lifestyle zone Māori purpose zone Natural open space zone</p>		<p>1. The scope proposed in the standard NOISE-S3 does not include the full range of agricultural aviation activities defined in the new definition for agricultural aviation activities that is sought.</p> <p>2. Agricultural aviation activities are undertaken in the Rural Lifestyle Zone to support primary production and in the Natural Open Space Zone (NOSZ) to support biosecurity and conservation activities.</p> <p>A specific rule (new) is sought to provide for agricultural aviation activities in the appropriate zones.</p>	<p><b><u>1. Activity status: Permitted</u></b></p> <p><b><u>2. Where:</u></b></p> <p><b><u>Aircraft used for agricultural aviation activities carried out on a seasonal, temporary or intermittent basis for a period up to 30 days in any 12-month period</u></b></p> <p><b><u>Accept new definitions as sought for:</u></b>  <b><u>Airfield</u></b>, and  <b><u>Agricultural aviation</u></b>, and  <b><u>Heliport</u></b>, and  <b><u>Rural airstrip</u></b>, and  <b><u>Temporary helicopter landing area</u></b></p>
General Rural Zone	<p>GRUZ-01</p> <p>Purpose of the General rural zone</p>	Support	There are ancillary activities that support primary production, biosecurity and conservation in the GRUZ. Recognition of these ancillary activities is important.	Retain the objective as notified.
General Rural Zone	<p>GRUZ-02</p> <p>Primary production activities</p>	Support in part	It is also important that ancillary activities that support primary production are protected from reverse sensitivities.	<p>Amend the objective by <b><u>adding:</u></b></p> <p>Primary production activities <b><u>and ancillary activities supporting primary production</u></b> are the predominant land use in the General rural zone and are protected from reverse sensitivity</p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				effects that may constrain their effective or efficient operation.
General Rural Zone	GRUZ-P1  Activities that require a rural location	Support	A policy that enables primary production activities and ancillary activities is supported.	Retain the policy as notified
General Rural Zone	GRUZ-P2  Adverse effects of primary production	Support in part	Recognising that dust, odour, fertiliser application and crop spraying should be accepted is supported however the scope of agricultural aviation is wider than just fertiliser application and crop spraying.	Amend the policy by <b>deleting</b> and <b>adding</b> :  Enable primary production activities while recognising that adverse effects associated with a typical rural working environment, such as odour, noise, dust, heavy traffic movements, <b>fertiliser application, crop spraying</b> <b>agricultural aviation activities</b> and forestry harvesting, occur, and should be accepted, in the General rural zone.
General Rural Zone	GRUZ-P3  Reverse sensitivity effects	Support in part	It is also important that ancillary activities that support primary production are protected from reverse sensitivities	Amend the policy by <b>adding</b> :  Manage the establishment, design and location of new sensitive activities and other non-productive activities in the General rural zone to avoid where practicable, or otherwise mitigate, reverse sensitivity effects on primary production activities, <b>and ancillary activities supporting primary production</b> including through methods such as no-complaints covenants, landscaping, screening or siting of buildings.

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
General Rural Zone	GRUZ-P4  Rural character and amenity values	Support in part	The scope of agricultural aviation is wider than just fertiliser application and crop spraying	Amend the policy by <b>deleting</b> and <b>adding</b> :  3. Typical adverse effects from primary production activities such as odour, noise, dust, heavy traffic movements, <b>fertiliser application, crop spraying</b> <u>agricultural aviation activities</u> and forestry harvesting associated with a rural working environment.
General Rural Zone	GRUZ-R7  Conservation activity	Support	Enabling conservation activities as a permitted activity is supported.	Retain the rule as notified.
Natural open space zone	NOSZ-P3  Implementation of plans and strategies	Support	Enabling activities that are included in a conservation or reserve management plan are supported.	Retain the policy as notified
Natural open space zone	NOSZ-R2  Activities authorised by strategies and plans	Support	Enabling conservation activities as a permitted activity in accordance with a conservation management strategy, conservation management plan or a reserve management plan is supported.	Retain the rule as notified.
Natural open space zone	NOSZ-R3  Conservation activities	Support	Providing for conservation activities as a permitted activity is supported.	Retain the rule as notified.

