

## Further Submission on Proposed Kaipara District Plan

(Closing date: 5pm Monday 15 December 2025)

To: Kaipara District Council  
Private Bag 1001, Dargaville 0340

Email: [districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz)

Further Submission from: NZ Agricultural Aviation Association (NZAAA)

Submitter contact details:

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I am a person representing a relevant aspect of the public interest as a representative of an organisation operating within the Kaipara District.

NZAAA wishes to speak to this submission.

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

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

Signature:



Date: 11/12/2025

### Further submissions from NZ Agricultural Aviation Association

	Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
FS83.1	Federated Farmers	136.156	Federated Farmers seek retention of NOISE-S3 as notified in the PDP	Oppose in part	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.  As a consequence, a specific rule (new) is sought by NZAAA to provide for agricultural aviation activities in the appropriate zones.	Reject in part 136.156 as sought by Federated Farmers; Accept the amendment sought by NZAAA 146.39
FS83.2		136.168	GRUZ-P2 Adverse effects of primary production. Federated Farmers supports in part the inclusion of policy GRUZ-P2 as notified as it supports primary production as the dominant rural activity and recognises the reality of rural effects, which is critical for managing reverse sensitivity. Amendments have been recommended in order to make the policy more concise and to improve readability.	Support	NZAAA sought a similar amendment however the Federated Farmers amendment sought is more appropriate	Accept the amendment as sought by Federated Farmers 136.168
FS83.3		136.169	GRUZ-P3 Reverse sensitivity effects. Federated Farmers support inclusion of policy GRUZ P3 as it acknowledges and manages reverse sensitivity, which is important in the GRUZ.	Support in part	It is also important that ancillary activities that support primary production are protected from reverse sensitivities	Retain the policy as sought by Federated Farmers 136.169 and accept the addition as sought by NZAAA 146.45

	Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
FS83.4		136.170	GRUZ-P4 Rural character and amenity values. Federated Farmers supports in part the inclusion of policy GRUZ-P4 as notified as it characterises rural character and amenity and promotes the continuation of primary production. Amendments have been recommended to make the policy more concise, improve readability and align with requested amendments to GRUZ-P2.	Support	NZAAA sought a similar amendment however the Federated Farmers amendment sought is more appropriate	Accept the amendment as sought by Federated Farmers 136.170
FS83.5 FS83.6	Kaipara District Council	222.8 222.9	Sport and Active Recreation Zone; Open Space Zone. Conservation Activities should be permitted within all zones to be consistent with NOSZ-R3.	Support	NZAAA considers that conservation Activities should be permitted within all zones	Accept the amendments as sought by Kaipara DC 222.8 and 222.9
FS83.7		222.43	NOISE-R6. Rule needs to differentiate between residential use of helicopters and rural use such as agricultural/horticultural spraying. Amend rule to differentiate helicopter use for residential purposes as opposed to agricultural or horticultural use.	Support	NZAAA agrees that there needs to a differentiation between private/permanent helicopter activities and temporary helicopter activities noting that helicopters are critical for use to support primary production, conservation and biodiversity	Accept the amendments as sought by Kaipara DC 222.43
FS83.8	NZDF	284.7	Reverse sensitivity (New definition) NZDF requests the inclusion of a definition of reverse sensitivity.	Support	NZAAA has sought the same definition	Accept the new definition as sought by NZDF 284.7 and NZAAA 146.11

FS83.9

Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
	284.26	<p>NZDF seeks an amendment to NOISE-R6 to clarify that it applies to permanent helicopter landing areas excluding temporary helicopter landings including those associated with temporary military training activities,</p> <p>OR</p> <p>ADD a definition for "Helicopter landing area"  <i>Helicopter landing area means any are of land, building or structure intended or designed to be used whether wholly or partly, for helicopter movement or servicing, other than:</i>            1. <i>Helicopter landings for emergencies by New Zealand Defence Force.</i>            2. <i>Helicopter landings associated with temporary military training activities.</i></p>	Support in part	<p>As sought by the Kaipara DC (222.43) and NZDF; NZAAA agrees that there needs to a differentiation between private/permanent helicopter activities and temporary helicopter activities.</p> <p>Helicopter landings for emergencies should be provided for all helicopters not just NZDF.</p> <p>NZAAA considers it would be better to include specific conditions relating to helicopter activities in the rules rather than the definition.</p> <p>The definitions sought by NZAAA for 'temporary helicopter landing areas' and permanent 'heliports' provides the clarity sought by Kaipara DC, NZDF and NZAAA.</p>	<p>Provide for the provisions as sought by NZDF 284.26 with a <b>deletion</b>:</p> <ol style="list-style-type: none"> <li>1. Helicopter landings for emergencies <b>by New Zealand Defence Force</b>;</li> <li>2. Helicopter landings associated with temporary military training activities</li> </ol> <p>Accept the definition for a 'temporary helicopter landing area' and permanent 'heliport' as sought by NZAAA 146.14</p>

	Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
FS83.10	Department of Conservation	304.30	DOC seeks a new definition: <i>Pest / Pest Organism</i> <i>These include any unwanted living organism including micro-organisms, pest agents, plants, animals, and marine pests and any genetic structure that is capable of replicating itself (whether that structure comprises all or only part of an entity, and whether it comprises all or only part of the total genetic structure of an entity) that may affect plants, animals, or raw primary produce; and</i> <i>a. Includes any entity declared to be a pest in the northland Regional Pest Management Strategies or otherwise by Northland Regional Council for the purposes of the Biosecurity Act 1993;</i> <i>b. Does not include, any human beings; or living organism which affects only human beings; or any living organism declared not to be a pest for the purposes of the Biosecurity Act.</i>	Support	NZAAA agrees that there should be specific provisions for the management of pests and the definition helps to provide clarity.	Accept the definition as sought by DOC 304.30
FS83.11		304.73	ECO-R1. The Director-General seeks to delete the provision ' <i>i. The removal or clearance of indigenous vegetation from land that was previously cleared and where the indigenous vegetation to be cleared is less than 10 years old;</i> '	Oppose in part	Provisions that permit the maintenance of improved pasture are important.	Reject the deletion as sought of: ' <i>i. The removal or clearance of indigenous vegetation from land that was previously cleared and where the indigenous vegetation to be cleared is less than 10 years old;</i> ' that is sought by DOC 304.73

	Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
FS83.12	Horticulture NZ	140.24	HS-R3 HortNZ seeks to delete HS-R3.1c or amend the text regarding fertilisers.	Oppose in part	NZAAA seeks that HS-R3 is deleted in its entirety as it is not necessary to regulate fertiliser storage which is already regulated under HSNO and HSWA and does not need to duplicate regulation.	Accept NZAAA submission to delete HS-R3 in its entirety 146.19
FS83.13	Ravensdown Ltd	229.4	Definition hazardous facility. The submitter seeks to amend the definition of hazardous facility to only premises, not activities.	Oppose	NZAAA seeks that the definition of hazardous facility is deleted.	Reject submission 229.4 to amend the definition of hazardous facility and delete the definition of hazardous facility as sought by NZAAA 146.6
FS83.14	Ravensdown Ltd	229.7	HS-O2 the submitter seeks that HS-O2 be retained. NZAAA supports retaining the objectives as it ensures activities are not compromised by new sensitive activities.	Support	NZAAA supports retaining the objectives as it ensures activities are not compromised by new sensitive activities.	Retain HS-O2 as sought 229.7
FS83.15	Ravensdown Ltd	229.8	HS-P1. The submitter seeks to amend HS-P1 1 by deleting 'significant ' hazardous facility.	Oppose in part	NZAAA seeks changes to HS-P1 that focus on minimising residual risk and hazardous substances.	Reject 229.8 and amend HS-P1 as sought by NZAAA 146.17.
FS83.16	Ravensdown Ltd	229.11	HS-R1 The submitter seeks amending HS-R1 to not refer to HS-S1.	Support	The approach sought is the same sought in the submission of NZAAA	Accept 229.11
FS83.17	Silver Fern Farms	287.4	Definition hazardous facility. The submitter seeks to amend the definition.	Oppose	NZAAA seeks that the definition of hazardous facility is deleted.	Reject submission 287.4 to amend the definition of hazardous facility and delete the definition of hazardous facility as sought by NZAAA 146.6
FS83.18	Silver Fern Farms	287.6	HS-R1. The submitter seeks to retain HS-R1.	Oppose	NZAAA opposes the approach in HS-R1 and has sought that it be amended with no reliance on HS-S1.	Reject 287.6

	Original Submitter	Sub No.	Submission Point Made	Support/ Oppose	Reason for support or opposition	Decision sought
FS83.19	Transpower NZ Ltd	292.6	Definition hazardous facility. The submitter seeks to amend the definition of hazardous facility	Oppose	NZAAA seeks that the definition of hazardous facility is deleted.	Reject submission 292.6 to amend the definition of hazardous facility and delete the definition of hazardous facility as sought by NZAAA 146.6
FS83.20	Fire and Emergency NZ	308.38	HS-R1. The submitter seeks to retain HS-R1.	Oppose	NZAAA opposes the approach in HS-R1 and has sought that it be amended with no reliance on HS-S1.	Reject 308.38
FS83.21	Fuel Companies (BP, Mobil & Z Energy)	311.7	Definition significant hazardous facility. The submitter seeks to define based on a specific list of facilities.	Support in part	The definition should be consistent with Major Hazardous facility under the Health and Safety at Work Major Hazard Facilities Regulations and not linked to HS-S1.	Amend the definition of significant hazardous facility by accepting change sought in 311.7 clause a) Any major facility designated under the Health and Safety at Work (Major Hazard facilities ) Regulations 2016
FS83.22	Fuel Companies (BP, Mobil & Z Energy)	311.29	HS-R1. The submitter seeks to delete HS-R1 in its entirety.	Support in part	NZAAA supports the deletion of the framework in HS-R1 but considers it is important to include a permitted activity rule for storage use and disposal of hazardous substances but with no attached standard.	Delete HS-R1 and replace with permitted activity rule as sought by NZAAA 146.20.
FS83.23	Fuel Companies (BP, Mobil & Z Energy)	311.30	HS-R4. The submitter seeks to delete HS-R4 in its entirety.	Support	NZAAA seeks the deletion of HS-R4 for the reasons set out in the submission.	Delete HS-R4 as sought 311.30
FS83.24	Fuel Companies (BP, Mobil & Z Energy)	311.31	HS-S1. The submitter seeks to delete HS-S1 in its entirety.	Support	NZAAA seeks the deletion of HS-S1 for the reasons set out in the submission.	Delete HS-S1 as sought 311.31