

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of hearings on the Proposed Timaru District  
Council District Plan

**Submission from:**

New Zealand Agricultural Aviation Association  
(NZAAA)

**To:**

Hearing Commissioners, Timaru District Council  
Plan

**Date:**

01/07/2024

**1. Introduction**

- 1.1 I am Tony Michelle, Executive Officer of the New Zealand Agricultural Aviation Association.
- 1.2 I recently retired after 38 years as an agricultural helicopter pilot and CEO of my own helicopter company in North Canterbury.
- 1.3 The New Zealand Agricultural Aviation Association (NZAAA), a division of Aviation New Zealand (AvNZ), represents fixed-wing and helicopter operators engaged in applying fertilisers, agrichemicals, and vertebrate toxic agents (VTA's) for the purposes of:
- Primary production
  - Biosecurity threats
  - Biodiversity and conservation values

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 \$2.75BN annually to primary production for the NZ economy alone.

Agricultural aircraft are crucial in maintaining and enhancing primary production, responding to biosecurity threats, and protecting biodiversity values.

Restrictive district plan requirements can adversely affect the ability of aerial operators to undertake and respond to farmer/grower pests/diseases, and biosecurity and biosecurity threats, so the industry seeks to ensure that the use of airstrips and helicopter landing areas for agricultural aviation activities on an intermittent basis are adequately provided for in plans.

## **2. NZAAA's submissions**

### General

- 2.1 The notified Timaru PDP does not adequately provide for agricultural aviation activities.
- 2.2 NZAAA acknowledges that if accepted, the recommendations in the S42A Rural Zone report would adequately provide for agricultural aviation activities through GRUZ-R10 'Conservation activities General Rural Zone' and the proposed GRUZR14A 'Aircraft and Helicopter Movements.'

### Rural Zone

- 2.3 The S42A point #10.22.7 that recommends that GRUZ-R10 be amended to include 'equipment, machinery, vehicles and aircraft', and 'weed' control is supported.
- 2.4 The S42A point#10.25.32 recommending the inclusion of a definition for 'Aircraft and helicopter movement' is supported.
- 2.5 The S42A point #10.25.22 that rejects the introduction of a specific definition of 'Agricultural aviation activities' is not supported.
- 2.6 For clarity, NZAAA seeks to have agricultural aviation activities defined to prevent future ambiguity, noting that an amendment of the definition originally sought, is included to allow for the S42A recommendation for a definition of 'Aircraft and helicopter movement'.
- 2.7 Selwyn, Wellington City, Wairarapa combined, Central Hawkes Bay and Gore have all included specific definitions for agricultural aviation activities to future proof their district plans.
- 2.8 The S42A point #10.25.36 that recommends the amendment to GRUZ-R14 PER-2 is supported in part; and
- 2.9 It is noted that the s42A Report recommends that the term 'rural production' is used in PER-2. 'Rural production' is not defined in the plan. Primary production is the term that is used throughout the plan and the wording sought in the submission of NZAAA. So NZAAA seeks that the rewording sought in GRUZ-R14 PER-2 uses the term primary production rather than rural production.
- 2.10 NZAAA seeks to have the wording amended in accordance with the definition of 'agricultural aviation' as sought.

## **3. Decisions sought**

- 3.1 NZAAA seeks to have the proposed amendment to GRUZ-R10 accepted:

### **GRUZ-R10 Conservation activities General Rural Zone**

Activity status: Permitted Where:

PER-1

Land, buildings, and structures, **equipment, machinery, vehicles and aircraft** are used for:

1. preservation, protection, restoration, promulgation or enhancement of indigenous species or habitats of indigenous fauna; or
2. **weed or** pest control; or
3. conservation education; or
4. observation or surveying; or
5. walking tracks, board walks, pedestrian bridge.

3.2 NZAAA seeks to have the proposed definition of 'Aircraft and helicopter movement' accepted:  
**Aircraft and helicopter movement - means a single aircraft flight operation (landing or departure). Maintenance procedures are excluded.**

3.3 NZAAA seeks to have a revised definition of 'agricultural aviation activities' accepted:  
**Agricultural aviation activities mean an intermittent aircraft or helicopter movement 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)**

3.4 NZAAA seeks to have the proposed amendment to GRUZ-R14A PER 2 accepted in part and further amended:

**GRUZR14A Aircraft and Helicopter Movements**  
**Activity status: Permitted Where:**

**PER-2**  
**Agricultural Aviation Aircraft and Helicopter Movements associated with purposes ancillary to ~~rural~~ primary production.**

Thank you for the opportunity to present this statement in support of the NZAAA's submissions and further submissions.



Tony Michelle  
Executive Officer  
NZ Agricultural Aviation Association