



## Online submission

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<b>Submitter No.</b>	S43
<b>Submitter Name</b>	New Zealand Agricultural Aviation Association
<b>Submitter Company/Group Name</b>	New Zealand Agricultural Aviation Association
<b>Submitter is contact</b>	Yes
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<b>Wish to be heard</b>	Yes
<b>Joint presentation</b>	Yes
<b>Trade competition</b>	I could not gain an advantage in trade competition through this submission.
<b>Directly affected</b>	N/A
<b>Withhold contact details?</b>	No

## Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
GENERAL DISTRICT-WIDE MATTERS	NOISE-S5	Oppose	<p>The clause seeks to limit agricultural aviation movements to 14 days in any calendar year. This is problematic on a number of fronts.</p> <p>Of 43 rural airstrips covered by our data, while the majority could fall under the 14 days per annum, a significant minority do not. Several rural airstrips serve a community of farms and are used by several agricultural aviation operators so will exceed the 14 day usage limit every year.</p> <p>Operational reasons may limit an airstrip to only a few movements on any day thus using up one 'day' of the 14 for no advantage to the farm.</p> <p>Seasonal weather changes see airstrips used intermittently and should not be restricted by regulation.</p> <p>The majority of the airstrips in the region are sufficiently 'remote' to pose a noise nuisance to rural residences so a 14 day usage would be an artificial impost for little amenity gain but potential financial cost.</p> <p>Most rural airstrips are used for agricultural aviation activity only so do not produce aircraft noise apart from when the airstrip is being used for productive work.</p>	<p>Amend NOISE-S5 (11) to unlimited days use for agricultural aviation activity.</p> <p>Amend NOISE-S5 (12) delete in toto.</p>
GENERAL DISTRICT-WIDE MATTERS	NOISE-S5	Amend	NOISE-S5 (13): As a consequence of changes sought in NOISE-S5 (11) the provision should be amended to delete reference to 14 days usage in a calendar year.	Amend NOISE-S5 (13) as follows: ....and agricultural aviation movements <del>for up to 14 days in any calendar year.</del>
GENERAL DISTRICT-WIDE MATTERS	NOISE-S5	Amend	As a consequence of changes sought to NOISE-S5 (11) the provision should be amended to delete reference to 14 days usage in a calendar year.	Amend NOISE-S5 (16) as follows.....and agricultural aviation movements <del>for up to 14 days in any calendar year.</del>
ZONES	GRUZ-R4	Support	We support a rule that provides for activities inherent in primary production.	Retain

Plan section	Provision	Support/oppose	Reasons	Decision sought
ZONES	GRUZ-R5	Amend	<p>It should be made clear that this does not apply to agricultural aviation movements ancillary to primary production activities.</p> <p>We do not support restrictions on movement numbers per annum where they apply to agricultural aviation.</p> <p>We do not support restricting the built footprint to 100 square metres where it applies to fertiliser storage on rural airstrips as keeping fertiliser properly stored in a dry environment without artificial constraints on the fertiliser heaps helps retain its flow qualities making for safer carriage and more even spread.</p>	<p>Clarify that the rule will not apply to facilities for agricultural aviation activity ancillary to primary production activities. In particular that the 1,000 movements does not apply to agricultural aviation activity and the 100 square metre footprint does not apply to the storage of fertiliser on rural airstrips.</p>
ZONES	RPROZ-R4	Support	<p>We support clear rules that provide for activities inherent to primary production.</p>	<p>Retain</p>
ZONES	RPROZ-R5	Amend	<p>It should be made clear that this does not apply to agricultural aviation movements ancillary to primary production activities.</p> <p>We do not support restrictions on movement numbers per annum where they apply to agricultural aviation.</p> <p>We do not support restricting the built footprint to 100 square metres where it applies to fertiliser storage on rural airstrips as keeping fertiliser properly stored in a dry environment without artificial constraints on the fertiliser heaps helps retain its flow qualities making for safer carriage and more even spread.</p>	<p>Clarify that the rule will not apply to facilities for agricultural aviation activity ancillary to primary production activities. In particular that the 1,000 movements does not apply to agricultural aviation activity and the 100 square metre footprint does not apply to the storage of fertiliser on rural airstrips.</p>

## Documents included with submission

None

## CONTACT

## Submission on agricultural aviation operations in CHBDC region

Provision	Support/ Oppose	Reason	Decision sought
Helicopter Landing Area	Oppose.	The draft plan had a definition of helicopter depot: a site regularly used as a base for the operation, servicing, refuelling and storage of helicopters. This definition was clearly linked to the regular use of an area as a depot. The proposed plan has amended the definition to helicopter landing area and included a wider range of areas including areas used for intermittent use for primary production activities. There should be a clear distinction in the definition and we urge the CHBDC to adopt the terms used by the Civil Aviation Authority (CAA); main base; remote base; aerodrome; airstrip; heliport; and landing zone.	Adopt the CAA definitions for primary and secondary operating bases, and operating areas for commonality of terminology across the country.
Definition of operating day for noise measurement being 07:00 to 19:00 hours.	Oppose.	Agricultural aviation in particular is dependent on relatively settled weather for the application of fertilizer or agrichemicals. Settled conditions usually occur early in the morning before thermal mixing brings higher winds from above down to ground level and again in the late afternoon when thermal mixing reduces again and settled conditions recur. Agricultural aviation operators will therefore, try to be ready for operation as early to first light as possible, not sit around until 07:00 and will try to operate until as late as possible returning to base right on last light. We would prefer to see the daylight tables published in the NZ Aviation	Adopt the CAA definition of Day and the daylight tables published in the NZAIP as the guide for daylight operations for agricultural aircraft operation.

		Information Publication (NZAIP) used as the guide for operations and the definition of Day adopted from the CAA Rule Part 1.	
General comments		<p>1. The NZAAA supports the overall thrust of the Draft Plan but have concern with the introduction of arbitrary operating constraints such as number of days and/or number of aircraft movements.</p> <p>2. We have 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.</p>	Note the comments.

## **Addendum to submission S43 on agricultural aviation operations in CHBDC region**

### **Background to agricultural aviation in Central Hawkes Bay**

1. Importance of agricultural aviation to the CHB as a production multiplier to agriculture in the district. The ability to apply fertilizer and agrichemicals to areas inaccessible to ground spreaders extends the productive areas in the district.
2. The NZAAA supports the overall thrust of the Draft Plan but has concern with the introduction of arbitrary operating constraints such as number of days and/or number of aircraft movements and potential restrictions on the floorplan area of fertilizer storage on rural airstrips.
3. We have 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.
4. CAA have a range of definitions that are more relevant to agricultural aviation movements than those in the Plan. Examples being the definition of daylight in the context of aircraft operating hours; helicopter operating bases/area etc.
5. Note that Aviation New Zealand, our parent organization, is submitting on behalf of other members on the Waipukurau aerodrome. NZAAA supports the request to extend the number of aircraft movements from 6,500 to 15,000 before further noise measuring requirements are triggered. Both fixed wing and helicopter agricultural aviation operators work from the aerodrome and we request that their operational movements be separated from other aircraft movements in the counting of movements.