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## Submission on Napier City Proposed District Plan

### Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Napier City Council - Planning Unit

**Date received:** 06/12/2023

**Submission Reference Number #:**73

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

**Submitter:**

NZ Agricultural Aviation Association (NZAAA)

**Address for service:**

Tony Michelle  
NZ Agricultural Aviation Association  
NZ Agricultural Aviation Association PO Box 2096 Wellington 6140  
New Zealand

**Email:** eonzaaa@aviationnz.co.nz

**Attachments:**

NZAAA Submissions Napier PDP\_PDF.pdf

**I wish to be heard:** Yes

**I am willing to present a joint case:** No

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

### Submission points

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**Point 73.1**

**Section:** Definitions

**Sub-section:** Definitions

**Provision:** General

**Sentiment:** Amend

**Submission:**

**Insert new definition:**

**Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area 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)**

**Relief sought**

Napier City is surrounded by rural areas that provide supporting a regional economy that is linked to viticulture, horticulture, and primary production.

Agricultural aviation is a critical tool supporting farmers and growers to protect and maintain primary production therefore NZAAA seeks to have agricultural aviation recognised and provided for in the plan.

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**Point 73.2**

**Section:** Definitions

**Sub-section:** Definitions

**Provision:** General

**Sentiment:** Amend

**Submission:**

**Insert new definition:**

**Helicopter landing area means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing**

**Relief sought**

NZAAA seeks to have a helicopter landing area defined for the purposes of agricultural aviation in the plan.

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**Point 73.3**

**Section:** Definitions

**Sub-section:** Definitions

**Provision:**

| means:

PRIMARY PRODUCTION

- a. any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and
- b. includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);
- c. includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but
- d. excludes further processing of those commodities into a different product.

**Sentiment:** Support

**Submission:**

**Retain the definition**

**Relief sought**

Inclusion of the NPS definition is appropriate

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**Point 73.4**

**Section:** Definitions

**Sub-section:** Definitions

**Provision:** General

**Sentiment:** Amend

**Submission:**

**Insert new definition:**

**Rural airstrip means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area.**

**Relief sought**

NZAAA seeks to have a rural airstrip defined for the purposes of agricultural aviation in the plan.

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**Point 73.5**

**Section:** SD - Sustainability, Resilience, and Climate Change

**Sub-section:** Strategic Objectives

**Provision:** General

**Sentiment:** Amend

**Submission:**

The plan should recognise that to sustain Primary production for the economic and social wellbeing of the region the rural character must be maintained.

**Relief sought**

**Insert new Strategic Objective:**

**Character of the rural environment.**

**The character of the rural environment is maintained and enhanced.**

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**Point 73.6**

**Section:** SD - Sustainability, Resilience, and Climate Change

**Sub-section:** Strategic Objectives

**Provision:** General

**Sentiment:** Amend

**Submission:**

Primary production is important to the economic and social wellbeing of the region therefore should be recognised in the plan.

**Relief sought**

**Insert new Strategic Objective:**

**Social and economic wellbeing.**

**Napier's rural environment contributes positively to the district's economic and social wellbeing.**

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**Point 73.7**

**Section:** SD - Sustainability, Resilience, and Climate Change

**Sub-section:** Strategic Objectives

**Provision:** General

**Sentiment:** Amend

**Submission:**

The plan should recognise that primary production is important to the economic and social wellbeing of the region therefore productive capacity should be protected.

**Relief sought**

**Insert new Strategic Objective:**

**Productive capacity - The General Rural Zone remains available for primary production activities and productive capacity is protected.**

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### Point 73.8

**Section:** HAZS - Hazardous substances

**Sub-section:** HAZS - Hazardous Substances - Rules Table

**Provision:**

HAZS-R2: The storage, handling or use of hazardous substances in all other zones (excepting significant hazard facilities)

**Activity Status:** Permitted

NA

**Sentiment:** Support

**Submission:**

Hazardous substances (excepting significant hazard facilities) are adequately controlled by the HASNO Act.

**Relief sought**

**Retain the rule**

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### Point 73.9

**Section:** SUB - Subdivision

**Sub-section:** Objectives

**Provision:**

SUB-O6: Subdivision in rural zones

Subdivision of rural land:

- a. protects highly productive land;
- b. ensures rural lifestyle subdivision is contained within the Rural Lifestyle Zone and avoided within the highly productive land in the Rural Productive Zone, and
- c. avoids reverse sensitivity effects between rural activities and sensitive activities.

*Relates to SUB-11, SUB-12, SUB-17*

**Sentiment:** Support

**Submission:**

Protection of highly productive land from subdivision and reverse sensitivities is important to maintain primary production and primary production ancillary activities such as agricultural aviation.

**Relief sought**

**Retain the objective**

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### Point 73.10

**Section:** SUB - Subdivision

**Sub-section: Policies**

**Provision:**

SUB-P19: Highly productive land

Ensure subdivision avoids, if possible, or otherwise mitigates any actual loss or potential cumulative loss of the availability or productive of highly productive land by:

- a. providing for the amalgamation of smaller holdings on highly productive land.
- b. avoiding subdivision for the purpose of rural lifestyle.
- c. allowing subdivision in accordance with Section 3.8 of the National Policy Statement for Highly Productive Land 2022.
- d. providing for subdivision where:
  - i. highly productive land is subject to permanent or long-term constraints in accordance with Section 3.10 of the National Policy Statement for Highly Productive Land 2022;
  - ii. it avoids any significant loss of productive capacity;
  - iii. it avoids the fragmentation of large or geographically cohesive area of highly productive land, and
  - iv. the environmental, social, cultural, and economic benefits outweigh the long-term environmental, social, cultural, and economic costs associated with the loss of highly productive land, taking into account both tangible and intangible values.

Relates to SUB-O6

**Sentiment:** Amend

**Submission:**

The policy should provide protection for primary production and ancillary activities.

**Relief sought**

**Amend the policy by adding:**

**e. enabling primary production and ancillary activities.**

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**Point 73.11**

**Section:** NOISE - Noise

**Sub-section:** Objectives

**Provision:** General

**Sentiment:** Amend

**Submission:**

It is important to recognise in the plan the benefits of appropriate noise generating activities whilst balancing the health and wellbeing of people and communities.

**Relief sought**

**Insert new objective:**

**The benefits of activities that generate noise are recognised, where the adverse effects from noise are compatible with the anticipated purpose, character, and amenity values of the relevant zone(s) and do not compromise public health, safety, and wellbeing of people and communities.**

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**Point 73.12**

**Section:** NOISE - Noise

**Sub-section:** Objectives

**Provision:**

NOISE-O3: Reverse sensitivity

Existing and authorised activities that generate high levels of noise are protected from reverse sensitivity effects.

*Relates to NOISE-I3 and NOISE-I4*

**Sentiment:** Support

**Submission:**

It is important to protect existing and authorised activities from reverse sensitivity effects.

**Relief sought**

**Retain the objective**

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**Point 73.13**

**Section:** NOISE - Noise

**Sub-section:** Policies

**Provision:** General

**Sentiment:** Amend

**Submission:**

NZAAA seeks inclusion of a policy that enables noisy equipment and recognises agricultural aviation as an ancillary activity supporting primary production

**Relief sought**

**Insert new policy:**

**The use of noisy equipment that has a limited duration and frequency (in particular, audible bird scaring devices, agricultural aviation and frost protection devices, and harvesters) that supports primary production in the rural environment is enabled by exempting these activities from noise limits, subject to reasonable use.**

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**Point 73.14**

**Section:** NOISE - Noise

**Sub-section:** NOISE - Noise - Rules Table

**Provision:**

NOISE-R1: Noise generation (general)

## NOISE-R1A

**Activity Status:** Permitted

**Where:**

1. For all activities other than those specifically addressed in NOISE-R2 - NOISE-R8 (inclusive), NOISE-S1 and NOISE-S2 apply.
2. The noise and vibration standards in any part of the District Plan do not apply to the following, unless the District Plan specifically states otherwise. The activities listed below are therefore considered permitted activities in terms of the noise standards:
  - a. the noise from the use of vehicles, mobile machinery, or other mobile or portable equipment where they are used on a seasonal or intermittent basis for agricultural, horticultural, viticultural, or forestry activities that are permitted by the Plan;
  - b. the noise from animals on farms unless they are confined within a building or enclosure on a permanent or semi-permanent basis. This does not apply to dog breeding, kennels, or dog-stay facilities;
  - c. the noise from normal residential activity that is part of a residential land use, such as children's play, informal social activities, lawnmowing, and home maintenance work undertaken by the occupier, provided the activity is undertaken during reasonable hours and is of reasonable duration;
  - d. the noise of individual vehicles on public roads;
  - e. the noise of trains travelling on designated railway land, and
  - f. the noise of sirens used for emergency purposes.

**Sentiment:** Amend

**Submission:**

NZAAA seeks to have agricultural aviation provided for as a permitted activity in the plan.

**Relief sought**

**Amend the rule by adding:**

1. the [noise](#) from the use of vehicles, mobile machinery, **agricultural aviation activity** or other mobile or portable equipment where they are used on a seasonal or intermittent basis for agricultural, horticultural, viticultural, or forestry activities that are permitted by the Plan;

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**Point 73.15**

**Section:** NOISE - Noise

**Sub-section:** NOISE - Noise - Rules Table

**Provision:**

NOISE-R3: Noise generated from helicopter landing areas

NOISE-R3A

## NOISE-R1B

**Activity Status:** Restricted Discretionary

**Matters of discretion are:**

1. Public health;
2. Amenity values, and
3. Functional and operational requirements.

NOISE-R3B



**Activity Status:** Permitted

**Activity Status where activity conditions are not met:**

**Where:**

1. Use of the helicopter landing area must not exceed any of the following:
  - a. two return flights per day;
  - b. five return flights per week, and
  - c. 12 return flights per month.
  
2. The helicopter landing area must be located (as illustrated below):
  - a. a minimum distance of 275 m from the notional boundary of any noise-sensitive activity not located on the same site, and
  - b. within 275 m of the helicopter landing area, flight paths must be a minimum of 250 m from the notional boundary of any noise-sensitive activity not located on the same site.

1. Restricted Discretionary where:

- a. Noise generated from helicopter landing areas received in Residential zones or the nominal boundary of a residential unit in the Rural zones shall not exceed 40 dB Ldn, and
- b. Noise received from helicopter landing areas received in all other zones shall not exceed 50 dB Ldn.

2. Non-complying (where clause 1 above is not met).

**Matters of discretion are:**

1. Public health, and
2. Amenity values.

**Figure 1 - Helicopter Landing Areas**

**Note:**

1. Helicopter landing areas are also subject to the activity tables of the relevant zone, precinct and/or development area. Compliance with this rule does not protect any helicopter landing area from the lawful

encroachment of noise-sensitive activities.

2. Rules must be in accordance with NZS 6807:1994 *Noise Management and Land Use Planning for Helicopter Landing Areas* - excluding 4.3 Averaging.

**Sentiment:** Oppose

**Submission:**

NZAAA seeks clarity that helicopters undertaking agricultural aviation activities are provided for in **NOISE- R1 2) a)**.

**Relief sought**

**Amend the rule by adding to the notes:**

**3. Helicopters undertaking agricultural aviation activities are provided for in NOISE- R1 2) a)**

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**Point 73.16**

**Section:** RPROZ - Rural Production Zone

**Sub-section:** Objectives

**Provision:**

RPROZ-O1: Activities on highly productive land

Highly productive land is protected for use in land-based primary production, both now and for future generations.

*Relates to RPROZ-I1, RPROZ-I2, and RPROZ-I3*

**Sentiment:** Support

**Submission:**

Objectives in the plan that protect primary production are important.

**Relief sought**

**Retain the objective.**

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**Point 73.17**

**Section:** RPROZ - Rural Production Zone

**Sub-section:** Objectives

**Provision:**

RPROZ-O2: Activities on non-highly productive land

Versatile soil is retained for agriculture, horticulture, and farming and used primarily for food production and ancillary activities that rely on primary production.

*Relates to RPROZ-I1, RPROZ-I2, RPROZ-I3, and RPROZ-I7.*

**Sentiment:** Support

**Submission:**

Objectives in the plan that protect primary production and ancillary activities are important.

**Relief sought**

**Retain the objective**

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**Point 73.18**

**Section:** RPROZ - Rural Production Zone

**Sub-section:** Objectives

**Provision:**

RPROZ-O4: Reverse sensitivity

Non-rural activities must support primary production and avoid or otherwise mitigate reverse sensitivity effects that may compromise rural activities.

*Relates to RPROZ-I5, RPROZ-I6, RPROZ-I7, and RPROZ-I8*

**Sentiment:** Support

**Submission:**

It is important to protect primary production activities from reverse sensitivity effects.

**Relief sought**

**Retain the objective**

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**Point 73.19**

**Section:** RPROZ - Rural Production Zone

**Sub-section:** Objectives

**Provision:** General

**Sentiment:** Amend

**Submission:**

Objectives in the plan should recognise activities that support primary production or have a functional need to be located in the RPROZ.

**Relief sought**

**Insert new objective:**

**Non-primary production activities that support primary production or rely on a rural location or have a functional or operational need to locate in the Rural Production Zone are provided for.**

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## Point 73.20

**Section:** RPROZ - Rural Production Zone

**Sub-section:** Policies

**Provision:**

RPROZ-P6: Reverse sensitivity

Manage the establishment, design, and location of new sensitive activities and other non-productive activities in the Rural Production Zone to avoid where possible, or otherwise mitigate any actual or potential reverse sensitivity effects on primary production activities and land-based primary production activities.

*Relates to RPROZ-O5 and RPROZ-O6*

**Sentiment:** Support

**Submission:**

The policy provides protection for primary production and ancillary activities and provides for protection from reverse sensitivity effects.

**Relief sought**

**Retain the objective.**

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## Point 73.21

**Section:** RPROZ - Rural Production Zone

**Sub-section:** Policies

**Provision:** General

**Sentiment:** Amend

**Submission:**

Policies in the plan should enable activities that support primary production or have a functional need to be located in the RPROZ.

**Relief sought**

**Insert new policy:**

**Compatible activities.**

**a. Enable primary production activities that are compatible with the purpose, character, and amenity values of the Rural Production Zone.**

**b. Provide for other activities that have a functional need or operational need to be located in the Rural Production Zone that are not incompatible with primary production.**

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## Point 73.22

**Section:** RPROZ - Rural Production Zone

**Sub-section:** RPROZ - Rural Production Zone - Rules Table

**Provision:**

RPROZ-R1: Primary production activities outside highly productive land

**RPROZ-R1A**

**RPROZ-R1B**

**Activity Status:** Permitted

**Activity Status where conditions and standards are not met:** Restricted Discretionary

**Where:**

**Matters of discretion are:**

1. The activity and any building or structure comply with all the Rural Production Zone Standards.

1. Rural characteristics and economic values;
2. Risk to public health and safety and the environment;
3. Fire and pest control;
4. Nature, scale, and intensity of land use;
5. Ecological, aquatic, and natural values;
6. The cumulative effect of non-compliance with more than one standard;
7. The effects on the open rural character of the zone;
8. The effects on the safety of people and property;
9. Cultural, ecological and aquatic values;
10. The effects on the maintenance, use, and development of a watercourse or open drain, and
11. Cumulative effects.

**Sentiment:** Amend

**Submission:**

It needs to be clear that ancillary activities to primary production are included in RPROZ-R1 otherwise RPROZ-R19 Noncomplying would apply as there is no other specific rule providing for ancillary activities to primary production.

**Relief sought**

**Amend title to:**

Primary Production **and ancillary** activities outside highly productive land

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**Point 73.23**

**Section:** RPROZ - Rural Production Zone

**Sub-section:** RPROZ - Rural Production Zone - Rules Table

**Provision:**

RPROZ-R2: Primary production activities within highly productive land

**RPROZ-R2A**

**RPROZ-R2B**

**Activity Status:** Permitted

**Where:**

1. The activity and any building or structure complies with all the Rural Production Zone Standards, and
2. The activity is a land-based primary production activity.

**Activity Status where conditions and standards of RPROZ-R2A are not met:** Restricted Discretionary

**Where:**

1. The activity is a supporting activity, and
2. The application complies with RPROZ-R2-REQ1.

#### **RPROZ-R2-REQ1**

1. Any application under rule RPROZ-R2A must include a productive capacity assessment report prepared by a suitably qualified and experienced soil scientist which shall address the following matters:
  - a. a plan identifying the productive capacity of the site, and
  - b. evaluation and evidence to confirm that the subdivision will not result in the cumulative loss of the availability and productive capacity of highly productive land within the district.

**Matters of discretion are:**

1. Scale and intensity of land use;
2. Rural characteristics and economic significance;
3. Ecological, aquatic, cultural and natural values;
4. Risk to public health and safety, and the environment;
5. Fire and pest control;
6. Cumulative effects;
7. Setback distances from the property boundary, Ahuriri Estuary, any watercourse or open drain;
8. The effects on the shading, outlook and amenity of the neighbouring properties;
9. The effects on the open rural character of the zone; and
10. The effects on the maintenance, use and development of a watercourse or open drain.

**Activity Status where conditions and standards of RPROZ-R2B are not met: Non-complying.**

**Sentiment:** Amend

**Submission:**

It needs to be clear that ancillary activities to primary production are included in RPROZ-R2 otherwise RPROZ-R19 Noncomplying would apply as there is no other specific rule providing for ancillary activities to primary production.

**Relief sought**

**Amend title to:**

Primary Production **and ancillary** activities within highly productive land

**Napier City Proposed District Plan**

To: Napier City Proposed District Plan  
[districtplanreview@napier.govt.nz](mailto:districtplanreview@napier.govt.nz)

Submission from: NZ Agricultural Aviation Association (NZAAA)

Submitter contact details:

Tony Michelle  
Executive Officer  
NZ Agricultural Aviation Association



Email: [eonzaaa@aviationnz.co.nz](mailto:eonzaaa@aviationnz.co.nz)

Postal address:

NZ Agricultural Aviation Association  
PO Box 2096, Wellington, 6140

Submissions due: 15 December 2023

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 would not consider presenting a joint case.

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

A handwritten signature in black ink, appearing to be 'Tony Michelle', written over a faint, illegible stamp or watermark.

Signature:

Date: 07/12/23



## Background

### **1. ABOUT NZAAA**

1.1 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
- Forestry production
- Crop protection and disease control
- Weed and pest control
- Biosecurity threats
- Biodiversity and conservation values
- Frost control

1.2 The industry is made up of circa 109 Civil Aviation Authority (CAA) certified organisations operating circa 76 fixed-wing aircraft and 248 helicopters. Services provided by our industry add an estimated \$2.7BN annually to primary production for the NZ economy alone.

1.3 Agricultural aircraft 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.

1.4 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>

### **2. EXECUTIVE OFFICER QUALIFICATIONS AND EXPERIENCE**

#### **Tony Michelle, Executive Officer (EO) NZAAA**

My name is Tony Michelle, and I am the EO of NZAAA. I have been in the agricultural aviation industry since 1983 completing 11,000+ hours of flying as a helicopter pilot. I have recently sold my interests in a Company that I owned and managed for 33 years specializing in agricultural aviation activities including land and aquatic weed control, crop protection, fertiliser application, and pest eradication (including International and NZ offshore islands).

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

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

3.1 Agricultural aviation adds significant value to farming and primary production for the NZ economy.

3.2 Animal welfare is dependent on timely applications of fertiliser at critical seasonal feed deficit crunch points.

- 3.3 Aircraft are used for application of fertilisers and agrichemicals in areas where the safety risks are too high for ground application.
- 3.4 Rapid responses to biosecurity threats are critical.
- 3.5 Pest and disease outbreaks cannot always be forecast.
- 3.6 Agricultural aviation is critical in maintaining and enhancing NZ's biodiversity values.
- 3.7 Helicopters are a critical tool in protecting horticultural crops from frost damage.
- 3.8 Suitable weather conditions for the application of agrichemicals, fertilisers, and vertebrate toxic agents (VTA's) are variable and often unpredictable. Safe and effective applications require operational flexibility to optimise suitable conditions.
- 3.9 Agricultural aircraft operate in a highly regulated environment and additional regulation will have a detrimental effect on primary production, ability to respond to biosecurity threats, and enhancing NZ's biodiversity values.
- 3.10 Agricultural aviation activities are part of the rural character of the rural environment and an ancillary activity to primary production activities.
- 3.11 Agricultural aircraft activity is intermittent or infrequent – multiple flights are usually undertaken over a relatively short period with no subsequent activity over long periods, therefore, the overall effects are limited and minor.
- 3.12 NOTE: submissions relate to rural airstrips and helicopter landing areas used on an intermittent basis. Aircraft depots/bases that are used on a regular basis are not part of the permitted activity that is sought.

#### **4. SPECIFIC FEEDBACK TO THE PDP**

- 4.1 The district description identifies the importance of primary production in that "***Napier*** has a low-scale built environment, ***surrounded by rural areas that provide for*** rural lifestyles and form an important backdrop to the city, ***as well as supporting a regional economy that is linked to viticulture***, manufacturing, ***and primary production***".

**Specific submissions of NZAAA**

Definitions Agricultural aviation activity	New	<b>Insert new definition:</b> <b><u>Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area 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></b>	Napier City is surrounded by rural areas that provide supporting a regional economy that is linked to viticulture, horticulture, and primary production.  Agricultural aviation is a critical tool supporting farmers and growers to protect and maintain primary production therefore NZAAA seeks to have agricultural aviation recognised and provided for in the plan.
Definitions Helicopter Landing Area	New	<b>Insert new definition:</b> <b><u>Helicopter landing area means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing</u></b>	NZAAA seeks to have a helicopter landing area defined for the purposes of agricultural aviation in the plan.
Definitions Primary production	Support	<b>Retain the definition</b>	Inclusion of the NPS definition is appropriate
Definitions Rural airstrip	New	<b>Insert new definition:</b> <b><u>Rural airstrip means any defined area of land intended or designed to be used, whether wholly or partly, for the</u></b>	NZAAA seeks to have a rural airstrip defined for the purposes of agricultural aviation in the plan.

		<b><u>landing, departure, movement, or servicing of aircraft in the rural area.</u></b>	
Strategic Direction SD - Sustainability, Resilience, and Climate Change	New	<b><u>Insert new Strategic Objective: Social and economic wellbeing. Napier's rural environment contributes positively to the district's economic and social wellbeing.</u></b>	Primary production is important to the economic and social wellbeing of the region therefore should be recognised in the plan.
Strategic Direction SD - Sustainability, Resilience, and Climate Change	New	<b><u>Insert new Strategic Objective: Character of the rural environment. The character of the rural environment is maintained and enhanced.</u></b>	The plan should recognise that to sustain Primary production for the economic and social wellbeing of the region the rural character must be maintained.
Strategic Direction SD - Sustainability, Resilience, and Climate Change	New	<b><u>Insert new Strategic Objective: Productive capacity - The General Rural Zone remains available for primary production activities and productive capacity is protected.</u></b>	The plan should recognise that primary production is important to the economic and social wellbeing of the region therefore productive capacity should be protected.
HAZS-R2: The storage, handling or	Support	<b>Retain the rule</b>	Hazardous substances (excepting significant hazard facilities) are adequately controlled by the HASNO Act.

use of hazardous substances in all other zones (excepting significant hazard facilities)			
SUB-O6: Subdivision in rural zones	Support	<b>Retain the objective</b>	Protection of highly productive land from subdivision and reverse sensitivities is important to maintain primary production and primary production ancillary activities such as agricultural aviation.
SUB-P19: Highly productive land	Support in part	<b>Amend the policy by adding: <u>e. enabling primary production and ancillary activities.</u></b>	The policy should provide protection for primary production and ancillary activities.
NOISE - Objective  Noise generation	New	<b>Insert new objective: <u>The benefits of activities that generate noise are recognised, where the adverse effects from noise are compatible with the anticipated purpose, character, and amenity values of the relevant zone(s) and do not compromise public health, safety, and wellbeing of people and communities.</u></b>	It is important to recognise in the plan the benefits of appropriate noise generating activities whilst balancing the health and wellbeing of people and communities.
NOISE-O3: Reverse sensitivity	Support	<b>Retain the objective</b>	It is important to protect existing and authorised activities from reverse sensitivity effects.

NOISE-Policy  Noise effects from the rural environment	New	<b>Insert new policy:</b> <b><u>The use of noisy equipment that has a limited duration and frequency (in particular, audible bird scaring devices, agricultural aviation and frost protection devices, and harvesters) that supports primary production in the rural environment is enabled by exempting these activities from noise limits, subject to reasonable use.</u></b>	NZAAA seeks inclusion of a policy that enables noisy equipment and recognises agricultural aviation as an ancillary activity supporting primary production
NOISE-R1: Noise generation (general)  NOISE-R1A	Support in part	<b>Amend the rule by adding:</b>  a. the noise from the use of vehicles, mobile machinery, <b><u>agricultural aviation activity</u></b> or other mobile or portable equipment where they are used on a seasonal or intermittent basis for agricultural, horticultural, viticultural, or forestry activities that are permitted by the Plan;	NZAAA seeks to have agricultural aviation provided for as a permitted activity in the plan.
NOISE-R3: Noise generated from helicopter landing areas  NOISE-R3A	Oppose	<b>Amend the rule by adding to the notes:</b>  <b><u>3. Helicopters undertaking agricultural aviation activities are provided for in NOISE- R1 2) a)</u></b>	NZAAA seeks clarity that helicopters undertaking agricultural aviation activities are provided for in <b><u>NOISE- R1 2) a)</u></b> .

RPROZ-01: Activities on highly productive land	Support	<b>Retain the objective</b>	Objectives in the plan that protect primary production are important.
RPROZ-02: Activities on non-highly productive land	Support	<b>Retain the objective</b>	Objectives in the plan that protect primary production and ancillary activities are important.
RPROZ-04: Reverse sensitivity	Support	<b>Retain the objective</b>	It is important to protect primary production activities from reverse sensitivity effects.
RPROZ Objective	New	<b>Insert new objective:</b> <b><u>Non-primary production activities that support primary production or rely on a rural location or have a functional or operational need to locate in the Rural Production Zone are provided for.</u></b>	Objectives in the plan should recognise activities that support primary production or have a functional need to be located in the RPROZ.
GRUZ-P6	Support	<b>Retain the policy:</b>	The policy provides protection for primary production and ancillary activities and provides for protection from reverse sensitivity effects..
RPROZ Policies	New	<b>Insert new policy:</b> <b><u>Compatible activities.</u></b> <b><u>a. Enable primary production activities that are compatible with the</u></b>	Policies in the plan should enable activities that support primary production or have a functional need to be located in the RPROZ.

		<b><u>purpose, character, and amenity values of the Rural Production Zone.</u></b> <b><u>b. Provide for other activities that have a functional need or operational need to be located in the Rural Production Zone that are not incompatible with primary production.</u></b>	
RPROZ-R1: Primary production activities outside highly productive land  RPROZ-R1A	Support in part	<b>Amend title to:</b> Primary Production <b><u>and ancillary</u></b> activities outside highly productive land	It needs to be clear that ancillary activities to primary production are included in RPROZ-R1 otherwise RPROZ-R19 Noncomplying would apply as there is no other specific rule providing for ancillary activities to primary production.
RPROZ-R2: Primary production activities within highly productive land  RPROZ-R2A	Support in part	<b>Amend title to:</b> Primary Production <b><u>and ancillary</u></b> activities within highly productive land	It needs to be clear that ancillary activities to primary production are included in RPROZ-R2 otherwise RPROZ-R19 Noncomplying would apply as there is no other specific rule providing for ancillary activities to primary production.