

BTW Reference : 230984

NPDC Reference : LUC24/48583

6th December 2024

Campbell Robinson Consultant Planner New Plymouth District Council Campbell.robinson@npdc.govt.nz

Tēnā koe Campbell,

Please find below and as attached a combined addendum and response to your request for further information (RFI) dated 12 September 2024. The following information is attached as appendices in support of the response:

Appendix A: Updated Plans

Appendix B: Updated Assessment of Environmental Noise Effects

Appendix C: Records of Consultation

Appendix D: Updated Rule Assessment

The applicant acknowledges the further request for information dated 2 December 2024 in relation to the Preliminary Site Investigation and will provide separate response in due course.

ADDENDUM

The applicant has taken into consideration RFI matters and feedback from Puketapu to redesign some of the proposed acoustic walls and fences. Of particular note, the extension to the eastern range 1 bund is no longer proposed, to be replaced by double stacked containers with timber roof set back a minimum distance of 10 m from the tributary (Figure 1).



Figure 1: Range 1 Bund

SURVEYING ENGINEERING PLANNING ENVIRONMENT Ngāmotu – New Plymouth P O Box 551, New Plymouth 4340. 179 Courtenay Street, New Plymouth 4310, New Zealand. Kirikiriroa – Hamilton P O Box 1229, Hamilton 3240. 517 Anglesea Street. Hamilton 3240, New Zealand. 07 595 0020

Taupō 12 Ashwood Avenue, Taupō 3330, New Zealar 0800 289 787 The earthworks plan demonstrates existing bunds to be removed to facilitate range redevelopment. Earthwork material is to be stored on site in a fill area located to the west of Range 7. The existing bunds contain a mix of tyres and soils. The tyres will be separated from the soil and stored in the proposed containers until such a time as they are disposed of at an appropriate facility. Tyres will not be stored outside.

Earthwork quantities are summarised in Table 1 below. The earthwork quantities cited include a mix of soil and tyres. Accordingly, the volume and height of the fill area cannot be determined until the time of development.

Feature	Volume (m ³)	Area (m²)	Maximum Depth/Height (m)
Range 1 Bund	395	140	3.8
Range 1/2 Bund	395	280	3.2
Range 4/5 Bund	504	297	3.3
Range 5/6 Bund	78	70	3.0
New Building Cut	53	369	0.15
New Building Fill (hardfill)	53	369	0.15
Fill Area	TBC	1,100	TBC

 Table 1:
 Estimated Earthwork Quantities

It is noted that the bund between Ranges 3 and 4 is to be retained in the first instance with a timber fence to be established on top of it. If the fence posts are unable to be established due to ground/bund conditions, then the bund may need to be temporarily removed to establish posts and then reinstated. Earthwork activity associated with this has not been included in the earthworks plan or table above. For avoidance of doubt, resource consent is sought for this earthwork activity if required.

The earthworks plan accounts for the removal of existing bunds to existing ground level only (as well as anticipated foundation works for the new two-storey building). Foundation design requirements and associated earthworks for the container walls and acoustic fences/walls will be confirmed at the time of detailed design.

The applicant is committed to establishing a landscaped riparian margin within their lease area between the Range 1 container wall and the tributary. The applicant offers that a landscaping plan and erosion and sediment control plan be provided as conditions of consent associated with Range 1 earthwork activity.

Updated Noise Assessment

An updated noise assessment is attached as Appendix B. The report has been prepared to include assessment against a Composite Noise Rating (CNR) 90 control.

In addition to the physical noise mitigation proposed, Section 5 sets out a framework for the management of use within the proposed 9 am to 9 pm Club hours to form as part of a Noise Management Plan. Section 6 sets out exemptions sought for Police and Armed Offender Squad use as well as Club events, to be captured as part of a Noise Management Plan. The applicant adopts the recommendations of the noise assessment and supports the requirement for a Noise Management Plan as a condition of consent.

Resource Consent Requirements

An updated rule assessment table is attached as Appendix D. The proposed changes do not result in any new non-compliances. The rules identified in Section 1.5 of the AEE remain as relevant, with resource consent required under the PDP as follows:

- GIZ-R15 Sport and recreation activities: *Non-complying*
- GIZ-R17 Building activities (including relocation of a building): *Restricted Discretionary*
- WB-R4 Earthworks on a site containing or adjoining a natural waterbody: *Restricted Discretionary*
- EW-R3 Earthworks for sport and recreation activities: *Restricted Discretionary*
- EW-R10 Earthworks for building activities: Restricted Discretionary
- TRAN-R1 Roads and vehicle access points: *Restricted Discretionary*
- TRAN-R10 Vehicle access points onto a state highway: *Discretionary*
- ECOR-R6 Building activities on sites adjoining an entrance corridor: *Restricted Discretionary*
- ECOR-R7 Outdoor storage on sites adjoining an entrance corridor: *Restricted Discretionary*

The overall activity status will remain non-complying under the PDP.

No changes are noted to the ODP assessment in the AEE. Resource consent is not required under the ODP where rules still have legal effect.

Assessment of Effects

The overall effects summary in Section 4.12 in the AEE is considered to remain relevant. Any adverse effects are considered to be appropriately avoided or mitigated. Any residual adverse effects will be no more than minor. Any adverse effects on persons in the surrounding area will be less than minor.

RFI RESPONSE

The following provides the applicant's response to the RFI points in turn.

 The proposal breaches Rule WB-R4 as it involves earthworks within 10m of a waterbody. The Waterbody is a tributary of the Mangaoraka Stream which is part of the Statutory Acknowledgement Area of Te Atiawa iwi. Consistent with advice provided during pre-application discussions, please provide information on the outcomes of any consultation with the relevant iwi and or hapu, including any expert cultural advice provided with respect to mitigation measures. This will allow the Council to determine effects on the statutory acknowledgement area (Step 1 s95B RMA 1991) and whether the proposal aligns with relevant Objective and Polices of the Proposed District Plan e.g. Policy WB-P3 (s104(1)(b) RMA 1991).

Response: The applicant acknowledges initial feedback provided by Puketapu hapū and has since sought to initiate consultation. The feedback received has been taken into consideration in preparing the proposed amendments, notably in respect of works within proximity to the tributary. With the proposed amendments, the applicant intends to provide a copy of this response and updated plans to Puketapu for further comment. Records of consultation to date are attached as Appendix C.

2. Consistent with the feedback provided during pre-application process, please provide feedback on the proposal from Waka Kotahi, administrators of the adjoining State

Highway Network. This will assist in determining effects of the development on the State Highway network.

Response: The applicant has initiated consultation with Waka Kotahi and is currently waiting on feedback from their Network and Safety Engineers. Records of consultation to date are attached as Appendix C.

3. Please provide a Preliminary Site Investigation which addresses the potential site contamination from use of the site as a gun range. This information will assist in determining the status of the application under the National environmental standard for assessing and managing contaminants in soil to protect human 2011.

Response: A PSI was submitted on 20 November 2024 with RFI matters dated 2 December 2024 to be addressed in due course. The PSI RFI response will include comment in regard to management of the proposed fill area.

4. Please provide a floor plan for the proposed two storied building which confirms the function of each floor.

Response: Attached is a ground floor plan prepared by Shed Ex which demonstrates the function of the floor. No first floor plan is currently available as the Club has no specific plans for use of this space at this stage.

5. Please confirm if shooting is to occur from the first floor of the new building.

Response: No shooting is to occur from the first floor of the new building.

6. Please provide an updated floor plan of the existing building on the site to be retained.

Response: The new two-storey building will replace the shooting facility consented under Permit No. 10829. The existing building and floor plan consented under BC67121P (club rooms and toilet block) will be retained as is (aside from internal connection to the new two-storey building integrating the acoustic wall into the design). Building consent plans were attached as Appendix F to the AEE and are not reattached here. Updated floor plans will be prepared at the time of detailed design for building consent purposes.

7. Please provide a further cross section of the proposed earth bund and fence to be constructed in relation to the unnamed tributary within the site. The cross section shall be aligned with the minimum setback from the tributary and show the bank of the tributary.

Response: An updated cross section is provided in the site plan set which demonstrates the existing bund extent to be removed and indicative new ground levels.

8. Please confirm the length of the tributary which is infringed under Rule WB-R4.

Response: The earthworks plan demonstrates the extent of earthworks to occur within the 10 m setback. This equates to an approximate 27.5 m length extent (when following the curve of the 10 m setback).

9. Please provide further construction details of the acoustic fences and walls to be provided. The proposed site plan shows 6 different fences/walls but only 2 different wall types.

Response: The Red Jacket Container Wall section and elevations confirm the construction details for the container walls to be constructed within the site (Appendix A).

The following consolidates remaining proposed fences and walls.



10. Please provide details of the proposed containers to be used on the site including dimensions.

Response: The Red Jacket Container Wall section and elevations confirm the construction details for the containers to include dimensions (Appendix A).

11. Please provide a site wide earthworks plan should show all proposed cuts and fills for all works including mitigations and building works. The plans shall also reflect any demolition works proposed.

Response: An earthworks plan is included in Appendix A.

12. Please provide further details as to how erosion, sediment and dust generated from site works would be mitigated.

Response: Site works will be undertaken consistent with best practice in accordance with the Waikato Regional Council guidelines which also apply in Taranaki. The applicant offers the requirement for an erosion and sediment control plan to be prepared as a condition of consent.

13. Please confirm that the activity can comply with the requirements of Effects Standard GIZ-S3 (minimum setbacks) noting the proposed acoustic fences/walls near the road boundary and eastern boundary would appear to breach the minimum setbacks of 5m and 8m respectively.

Response: The site plan demonstrates the new two-storey building and adjoining acoustic fence (existing, to be upgraded as required) to be setback approximately 8.5 m from the road boundary to comply. Range 1 has been redesigned so that the container wall is established a minimum setback distance of 9.8 m from the eastern boundary to comply.

14. Please provide further details showing how the development can credibly comply with the requirements of GIZ-S6.

Response: The updated site plan demonstrates a 10 m setback from the tributary within which planting will be established to comfortably comply with the requirements under GIZ-S6 (to reach a minimum height of 2m and a minimum depth of at least 2m from the side boundary within two years of planting).

15. Please provide further details of the increased bund feature between ranges 5 and 6. The further details shall be consistent with the details shown for range 1 on the site plan.

Response: The Red Jacket Container Wall section and elevations provide details accordingly.

NEXT STEPS

We look forward to confirmation as to whether this response satisfies the further information request.

Any queries please let me know.

Ngā mihi

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Aaron Edwards MNZPI Manager Planning





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PROPOSED CONTAINER	
PROPOSED 1.5m HEIGHT INCREASE ABOVE EXISTING BUND (DETAILS PROVIDED BY OTHERS)	
PROPOSED 7m HIGH ACOUSTIC FENCE (DETAILS PROVIDED BY RED JACKET)	
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PROPOSED ACOUSTIC WALLS (DETAILS PROVIDED BY OTHERS)	
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COMPANY

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8m max height.





PROPOSED FLOOR PLAN - 280SQM-Over foundation Scale 1:150



NEW BUILDING DEVELOPMENT - New Plymouth Pistol Club



DATE: 17/07/24 JOB No. 2407 REVISION. A DRAWING No.



APPENDIX B UPDATED NOISE ASSESSMENT



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File Ref: AC23328 - 02 - R3

6 December 2024

Mr M O'Sullivan President New Plymouth Pistol Club 1220 Devon Road Bell Block NEW PLYMOUTH 4373

Email: president@newplymouthpistolclub.org.nz

Dear Mike

Re: New Plymouth Pistol Club Assessment of Environmental Noise Effects

Acoustic Engineering Services Ltd (AES) have been engaged by New Plymouth Pistol Club (NPPC) to provide acoustic engineering advice to support a Resource Consent application for the club. The Applicant requires an assessment of environmental noise effects for the activity with regard to section 104 (1) of the Resource Management Act (RMA), which requires the actual and potential effects of the activity to be considered.

We have based our analysis on our correspondence to date. A draft version of this report was circulated to the New Plymouth District Council for comment 10 July 2024. Feedback was received after the Application was lodged in a memo from Marshall Day Acoustics dated 5 August 2024. This updated report integrates responses to that feedback where appropriate, and replaces the report submitted with the Application.

1.0 BACKGROUND

The NPPC is located at 1220 Devon Road (State Highway 3), and is located approximately 150 metres west of the closest dwelling, as shown below in figure 1.1. The land that is used by the Club is outlined in yellow.

The site is within the General Industrial Zone in the New Plymouth Proposed District Plan (Industrial C in the Operative District Plan). The land to the east of the site is zoned Rural Production Zone, and the land to the north across Devon Road is zoned Special Purpose – Future Urban Zone. The other land surrounding the site is also within the General Industrial Zone.



Figure 1.1 – Site and surrounding area

The Club is used by members for recreation, training for competitions, and for competitions. It is also used by schools, other shooting clubs, and open days for public or corporate events. The New Zealand Police | Ngā Pirihimana O Aotearoa and the Armed Offenders Squad will also use the facility for training and certification.

The Club currently has eight ranges, which are labelled in figure 1.1 above. Currently the following shooting disciplines are undertaken on each range:

Range	Shooting disciplines
1	Speed, IPSC
2	Speed
3	Cowboy Action Shooting, Speed
4	Cowboy Action Shooting, Speed, IPSC
5	Speed, Muzzle loading, ISSF
6	Action Shooting, Service Pistol, Speed
7	Action Shooting, IPSC, Speed, Multi Gun
8	Speed, Sighting in rifles

Table 1.1 -	Shooting	disciplines	by range
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An explanation of these disciplines can be found at the hyperlink below:

https://www.newplymouthpistolclub.org.nz/types-of-pistol-shooting/

The Club currently operates under conditions given in an abatement notice dated the 18th of August 2022, which limits shooting to the following times:

- Tuesday, between 9 am and 4 pm
- Wednesday between 9 am and 4 pm
- Thursday between 5 pm and 8 pm
- Saturday between 9 am and 4 pm
- Sunday between 10 am and 4 pm

Regular shooting events have historically been scheduled on Wednesday mornings, Thursday evenings, and Sunday mornings.

As part of this process to draft and apply for a new Resource Consent for the overall activity, extensive measurements, modelling, and consultation with the Club has been undertaken, to establish what the best practicable options are for managing the Club's noise effects within the constraints of the current site.

As a result, the following noise mitigation measures are to be implemented (also illustrated in figure 1.2 below):

Physical mitigation:

- A series of 20 foot containers stacked two containers high with a roof structure reaching at least 7.8 metres high to be placed to the east of Range 1. The sloped side of the roof is to face away from Range 1. Gaps between container stacks are to be welded closed.
- A 7 metre high acoustic fence between Ranges 1 and 2, extending to the back of Range 1.
- An additional 40 foot container stacked on top of the existing container behind Range 4, and two other stacks of 40 foot containers to the east and west of the existing container. A roof structure reaching at least 7.8 metres high is to be built on top of the container stacks. The sloped side of the roof is to face away from the ranges. An acoustic wall is to be installed above a gate between two of the stacks to ensure continuity of the barrier.
- Construct a 1.5 metre high acoustic fence above the existing bund between Ranges 3 and 4.
- A new two storey club building behind Ranges 5 and 6, which blocks the line of sight to 1222 Devon Road dwellings from all shooting positions. On Range 5 shooting bays will have a solid partition on each side of the bay and roof above, all lined with minimum NRC 0.6 noise absorbing material (for example Woodtex or mineral wool). The partitions will extend 1.5 m in front of the shooting position, and the distance between partitions should be no greater than 2 metres.
- A series of containers (a combination of 20 foot and 40 foot) including a roof structure extending to at least 7.8 metres high along the eastern side of Range 5. Where there is a gap between the new club building and containers, a 7 metre high acoustic fence will be established between the row of containers and the club building. Gaps between container stacks are to be welded closed.
- Two 40 foot containers stacked halfway down Range 6 on the eastern side. The containers are to have a roof structure reaching at least 7.8 metres high, with the sloped side facing towards Range 5 and the vertical side facing towards Range 6.
- Any gaps in the 3 metre high fence behind Range 7 filled and upgrades made as necessary to achieve acoustic specifications.



Figure 1.2 - Proposed physical noise mitigation at New Plymouth Pistol Club

We note that a wide range of other possible mitigation was also considered, but determined not to be practicable following engineering and other expert advice, for example:

- Increase in height of other existing bunds was not considered practicable, as the bund footprint would increase and intrude into the ranges.
- Gabion baskets on top of the existing bunds are not practicable, as the existing bunds are constructed from tyres and fill material, which is not a suitable foundation.
- Moving targets down the Range (to avoid shooters advancing down the range to less screened positions) is not possible due to safety and ammunition issues.
- Close proximity shooting shelters are not practicable in situations where shooters are required to move to different locations on each Range.

2.0 RECOMMENDED APPROACH TO NOISE MANAGEMENT

The Resource Management Act requires consideration of the significance of any adverse effects associated with the proposal. In this section we have discussed the recommended approach to noise management at the NPPC, to ensure noise effects are minimal.

2.1 New Plymouth District Plan

The underlying District Plan limits would often be a key point of reference in a Resource Consent noise assessment.

In this case the site is located in the General Industrial Zone in the New Plymouth Proposed District Plan. The New Plymouth District Plan is currently being revised, however rules relating to noise emissions from sites located in the General Industrial Zone are already operative. Therefore, the following noise limits from Rule NOISE-S1 will apply:

Table 2.1 - Evce	rnt from Rule I	NOISE-S1 of the	Proposed New P	Ivmouth District Plan
Table 2.1 - Exce	ipt nom kule i	NOISE-ST OF THE	FIDDOSED NEW F	Tymouul District Flatt

	1. Noise generated by any activity shall not exceed the following noise limits at any point within any other site in the General Industry Zone:
	a. All times – 70 dB L _{Aeq(15 min)}
(4)	b. All times – 80 dB L _{Amax}
General Industrial	2. Noise generated by any activity shall not exceed the following noise limits at any point within the notional boundary of any noise sensitivity activity on any site in the Rural Production Zone, Future Urban Zone:
Zone	a. 7am to 7pm – 55 dB L _{Aeq(15 min)}
	b. 7pm to 10pm – 50 dB L _{Aeq(15 min)}
	c. 10 pm to 7am – 45 dB L _{Aeq(15 min)}
	d. 10 pm to 7am – 75 dB L _{Amax}

Where $L_{Aeq(15 min)}$ is the average A-weighted noise level measured over a 15 minute period, and L_{Amax} means the maximum A -weighted sound level during a stated time period.

2.2 New Zealand Standard NZS 6802:2008

Another commonly cited reference is NZS 6802:2008 Acoustics – Environmental Noise which outlines a guideline daytime limit of 55 dB $L_{Aeq(15 min)}$ for the "reasonable protection of health and amenity associated with the use of land for residential purposes", however, we note that impulsive noise from gunfire is explicitly excluded from the scope of the Standard.

The Standard also describes how a – 3 dB adjustment may be applied to sound received for less than 50 % of the daytime period, and a – 5 dB adjustment may be applied to sound received for less than 30 % of the daytime period. A + 5 dB penalty is added to sound which contains Special Audible Characteristics.

Regarding maximum noise levels, NZS 6802:2008 states the following: "The intention of L_{max} (L_{AFmax}) noise limits is to provide protection against the effects of 'typical maxima' of the specific sound and not the 'absolute maxima'. A noise nuisance does not generally arise from a single isolated incident. A single isolated noise event which exceeds an applicable limit might not be representative of the sound under investigation and should not be used as the sole basis for compliance action."

2.3 Ambient noise environment

We consider the ambient noise environment in the vicinity of those receiving the noise to be a relevant matter when determining what effect the noise may have. Many shooting ranges are located in rural areas, away from sources of constant ambient noise such as busy roads. That is not the case here.

Measurements taken by Marshall Day Acoustics on 5 occasions between 20 February 2022 and 28 May 2022 indicated ambient noise levels between 56 dB $L_{Aeq(1 h)}$ and 58 dB $L_{Aeq(1 h)}$ at the secondary dwelling at 1222 Devon Road. The 'background' noise level (noise level at the quietest times) was consistently 48 dB L_{A90} or higher. It is expected that traffic noise levels will be in the order of 3 dB higher at the main dwelling at 1222 Devon Road, and up to 9 dB higher within the Future Urban Zone to the north based on traffic noise modelling in SoundPLAN v 8.2.

Noise logging equipment deployed under our supervision in May 2024 on the opposite side of Devon Road to the Club indicated noise levels in the order of 73 dB $L_{Aeq(1 h)}$, and background noise levels of 58 dB L_{A90} . At the closest possible dwellings in the Future Urban Zone, noise levels are expected to be in the order of 6 dB lower, based on modelling of traffic in SoundPLAN v 8.2.

2.4 Gunshot noise levels

In line with the scope of NZS 6802:2008, we consider that the District Plan limits are not suitable for determining potential noise effects of gunshot noise due to its impulsive nature. Many countries have criteria specifically for gunshot noise, usually expressed as either L_{peak} or L_{AFmax} if seeking to control the noise level of actual gun shots. These criteria are typically more stringent than generic L_{AFmax} values commonly encountered in District Plans throughout New Zealand.

In New Zealand, stringent L_{Aeq} limits, and the Composite Noise Rating (CNR) have also been used – these metrics are functions of both the noise level of gun shots, and how many shots occur in a day. We consider the initial focus of any control regime should be on limiting the noise level of actual gunshots. Using metrics which are a function of both the noise level of gun shots and how many shots occur in a day as a starting point can be problematic, as they suggest very loud sounds are permissible provided they occur infrequently enough, and so there is no 'line in the sand' when attempting to determine how far you should go with implementing physical mitigation. In addition, if the noise level of all gunshots is reduced far enough, the issue of how many shots occur becomes less critical.

A body of guidance is available which describes reasonable maximum noise emissions associated with shooting ranges, from the perspective of controlling the level of individual gunshots. A review of international shooting noise regulations¹ notes that typical noise limits at residential receivers generally fall between 50 to 60 dB L_{AFmax} , with some exceptions (both higher and lower limits). Other guidance² appears to indicate that the threshold for annoyance is in the order of 60 – 65 dB L_{AFmax} . We have undertaken work relating to noise emissions from several existing gun clubs in NZ and have typically recommended noise limits of between 50 – 65 dB L_{AFmax} at residential receivers, depending on the location, ambient noise levels, and situation.

Other guidance from the UK Chartered Institute of Environmental Health regarding Clay Target Shooting³, uses a Shooting Noise Level (SNL) to quantify noise effects, which is the average L_{AFmax} of the 25 loudest shots in a 30 minute period.

This guidance states that annoyance is less likely to occur at a mean SNL of below 55 dBA and highly likely to occur at a mean SNL above 65 dBA. This guidance quotes the following:

"At shooting noise levels below the mid 50's dB(A) there is little evidence of significant levels of annoyance at any site, whereas for levels in the mid to high 60's, significant annoyance is engendered in a majority of sites. For levels in between however, the extent of the annoyance varies considerably from site to site. Thus a level of, say, 60 dB(A) may be deemed acceptable at one site, but not at another."

The use of the SNL in itself is relatively peripheral to the issue of what L_{AFmax} level may be appropriate. The SNL has the effect of stabilising the L_{AFmax} parameter, which is appropriate in light of the cautions in NZS6802:2008. For a high number of shots in a 30 minute period, this metric actually becomes more conservative, compared to the log average of all shots, for example.

The studies reviewed generally indicate that the range in acceptable noise levels from gun club activities is dependent on local conditions, including community attitude to the club, cumulative shooting time, number of shooting days, time at which shooting occurs, predominant meteorological conditions and how the site is managed.

Considering the existing ambient noise environment in this case, the hours and intensity of use described below, and the above guidance, we consider that the design objective for the physical mitigation for the NPPC should be to endeavour to achieve in the order of 65 dB L_{AFmax} at the notional boundary of the residential dwellings at 1222 Devon Road, during representative high noise periods.

¹ V. Desarnaulds et al. Shooting noise regulation review of various national practices. Proceedings of Internoise 98, Christchurch.

² Sorensen, S. and Magnurror, J. Annoyance caused by noise from shooting ranges. Journal of Sound and Vibration, 62(3), pp 437 – 442, 1979.

³ Chartered Institute of Environmental Health (2003) Clay Target Shooting, Guidance on the Control of Noise [online]

If actual gunshot noise can be reduced to at or around this level, the individual gunshots will be approximately 10 dB higher than the 'average' ambient noise (56 dB L_{Aeq}), and 20 dB higher than the 'background' noise level (48 dB L_{A90}). In this context, the gunshots will still be readily audible, but will only 'emerge' over the ambient noise to a modest degree. We consider the situation in terms of potential annoyance to be similar to other more conventional situations where the Court has determined 50 – 55 dB L_{AFmax} to be appropriate for gunshot noise in the absence of constant road traffic noise. For example, in the Gisborne Pistol Club case background noise levels were recorded as low as 30 dB L_{A90} , and in Harvey vs Nelson City Council background levels were as low as 29 dB L_{A90} . In those settings, 50 – 55 dB L_{AFmax} would also be clearly audible – but was determined to be appropriate by the Court.

In this case we understand the 1222 Devon Road neighbour has found the current and historic gun club noise emissions to be very concerning. As discussed below, the neighbour has been experiencing levels of 72 to 80 dB L_{AFmax}, and so their experience will be significantly different once physical mitigation has been implemented and noise levels reduced as above.

For the purposes of assessing predicted noise emissions against this 65 dB L_{AFmax} mitigation design objective, we recommend the adoption of the UK Chartered Institute of Environmental Health SNL processing technique (the average L_{AFmax} of the 25 loudest shots in a 30 minute period), as this produces a more stable result, addressing the concerns expressed in section 7.2 of NZS 6802:2008 regarding the inherent variability often evident in L_{AFmax} levels.

3.0 DEVELOPMENT OF PHYSICAL NOISE MITIGATION APPROACH

SoundPLAN computational noise modelling based on ISO 9613 Acoustics – Attenuation of sound outdoors – Part 2: General method of calculation has been used to calculate the propagation of gunshot noise from the site, taking into account the topography of the area, and sound power levels for each of the noise sources.

The L_{AFmax} noise levels have been modelled based on data gathered during a structured shooting exercise (a selection of firearms, fired from each Range in turn) using noise logging equipment deployed under our supervision at three locations simultaneously on the 25th and 26th of May 2024, and on measurements taken by Marshall Day Acoustics at five different times between 20 February 2022 and 28 May 2022, primarily at the notional boundary of the 1222 Devon Road secondary dwelling. We have also compared the data to our own measurements undertaken at several gun ranges around the country, and there is a high level of correlation.

A 'representative high noise scenario' has been considered which is typical of the outcomes of Marshall Day Acoustics testing during periods where 9 mm pistols were in regular use, and occasional 'black powder' shooting. Our detailed measurements confirmed that in general terms, firearms such as a 0.44 black powder revolver and 0.38 handgun were 3 – 7 dB quieter on an L_{AFmax} basis than a 9 mm standard load pistol. 0.22 firearms are at least 11 dB quieter. Therefore in reality, based on the manner of use outlined in section above, there are expected to be extended periods where quieter firearms are in use (for example .22 calibre firearms) and noise levels are 5 – 10 dB lower than those predicted below. From the Marshall Day Acoustics measurements on the 11th of April 2022, the suppressed .223 firearms used by the Police were also have a shooting noise level of 60 dB L_{AFmax} without any other mitigation.

Noise levels from each Range have been predicted – both based on the current configuration and implementation of the new mitigation outlined in section 1.0 above. Range 6 has multiple shooting positions down the Range, as shown below in figure 3.1. In our analysis, these have been grouped as northern (50 yards), central (25 yards), and southernmost (10 and 7 yards) shooting positions – as mitigation needed to be developed specifically for each position. Range 8 has not been modelled in detail as its location, orientation and use, result in potential noise effects that are low.



Figure 3.1 - Range 6 shooting positions

Expected noise levels as received at the notional boundary of the secondary dwelling at 1222 Devon Road are presented below in table 3.1.

Range	Noise levels without mitigation (dB L _{AFmax})	Noise levels with mitigation (dB L _{AFmax})
Range 1	75	67
Range 2	80	64
Range 3	74	63
Range 4	77	63
Range 5	74	64
Range 6 – northern shooting positions	72	62
Range 6 – central shooting positions	74	61
Range 6 – southern shooting positions	73	64
Range 7	72	65

Table 3.1 – Expected Shooting Noise Levels received at the notional boundary of the secondary dwelling	g at
1222 Devon Road	

Based on this analysis, noise levels in all scenarios meet (or are within 2 dB of, in the case of Range 1) the 65 dB L_{AFmax} physical mitigation design objective. As described above, numerous other possible physical mitigation measures have been examined, but ultimately the Club is constrained by the physical layout of the existing facility and the shape and topography of the site, and neighbouring sites. The physical mitigation which is to be implemented is logistically complex, and will come at a significant capital cost. Therefore, we

consider the 'with mitigation' levels presented in table 3.1 represent the best outcome which is practicable to achieve, for the Club operating on this site.

Noise levels received at the notional boundary of the main dwelling at 1222 Devon Road are typically between 0 to 2 dB lower than the levels outlined in table 3.1 above, and the existing ambient noise from traffic is between 3 - 6 dB higher.

4.0 CONTROL OF SHOOTING INTENSITY

We consider that the above approach to mitigation design will reduce gunshot noise levels to a point where the intensity of shooting is less critical. Marshall Day Acoustics have discussed the concept of a CNR 90 control in their memos from February 2022 onwards. Such a control would be one way to prevent the intensity of shooting from escalating significantly.

Based on discussions with Marshall Day Acoustics, with respect to 1222 Devon Road, the CNR could potentially be calculated as follows:

 $CNR = (Y - A) + 10 \log_{10} N + 10 \log_{10} T - 12$

where:

Y is the log average L_{Zpeak} level of gunshots occurring that day

A is 13, which is the most pessimistic 'community adaption factor' allowed by the method

N is the number of gunshots occurring that day

T is the proportion of the 'daytime' period in the underlying District Plan noise limits, represented by the period between when the first and last shot is fired on the day

When applied as above in this receiving context, a CNR 90 control appears to generally provide a reasonable outcome. The approach for the Future Urban Zone is discussed separately below.

5.0 HOURS AND DAYS OF USE

Other than the activity outlined under exemptions and events in section 6.0 below, we understand:

- The Club has historically had 'scheduled activities' (i.e. appearing on the calendar on the Club website) on Wednesday mornings, Thursday evenings and Sundays.
- The Club is otherwise available for casual use / training use by Club members, any time during the permitted hours of operation.
- Use by other shooting clubs and open days for public or corporate events occurs occasionally.

The Club requests the flexibility of an overall operating envelope of 9 am to 9 pm on any day. Within these hours the Club proposes to manage levels of activity to provide periods of low or no noise, which will be notified in advance via the calendar on the Club website.

Specifically, it is proposed that a Noise Management Plan will outline a process by which the club will nominate seven contiguous 4-hour periods on each week, within the overall 9 am to 9 pm hours, where there will low or no noise, and display these periods on their website calendar, 1 week in advance. A period of 'low or no noise' shall be defined as a period where any outdoor shooting is restricted to range/firearm combinations which produce a noise level of 55 dB L_{AFmax} or less at the notional boundary of the 1222 Devon Road secondary dwelling. The Noise Management Plan will outline a process via which range/firearm combinations are reviewed and approved with respect to this requirement. It is likely that most silenced firearms, and unsilenced 0.22's will meet this requirement.

6.0 EXEMPTIONS AND EVENTS

Police use

The New Zealand Police have historically booked the range up to 10 times per year, for a three-day period on each occasion. Particular considerations around police use are:

- The Police sometimes must undertake low-light training, however the Club insists this is conducted during winter months only, so as to stay within an operating window of 9 am to 9 pm.
- The intensity of shooting during police use is typically relatively low, compared to scheduled Club activities, and is conducted on the Ranges towards the western end of the site. However, the Club has no control over the specifics of how many shots are fired and from where.
- The Police currently train with both suppressed .223 firearms, and 9 mm Glock pistols. Monitoring undertaken by Marshall Day Acoustics suggests an approximate 50/50 spit between use of these firearms during training. Suppressed .223 firearms currently have a low shooting noise level of 60 dB L_{AFmax} at the 1222 Devon Road dwellings (i.e. even without the physical mitigation which would be implemented as part of this Consent).

Based on the above (and our CNR analysis outlined in section 7.0 below) we expect Police use to readily comply with a CNR 90 requirement. However, we can understand the Club's desire for a CNR exemption for Police use (as ultimately aspects of it are not under their immediate control).

An appropriate approach may be to permit an exemption to the CNR controls for Police use up to 10 times per year, for a three-day period on each occasion, provided those periods (including the expected hours of shooting) are published on the calendar on the Club website, at least 1 month in advance. As discussed below, a Noise Management Plan held by the Club is likely to be the most appropriate way to record the processes, personnel and responsibilities around that aspect.

Armed Offender Squad (AOS) use

We understand that the AOS has historically used the Club approximately five times per year. However, unlike use by the New Zealand Police, use by the AOS is less structured with little forewarning, as it typically involves specific training or exercises in response to recent national armed offender events, or in anticipation of upcoming heightened national security issues.

For those reasons, consistent with the general approach to noise generated by 'emergency response' activities evident across New Zealand, it may be appropriate for use of the Club facilities by the AOS to be generally exempt from any CNR and hours of shooting requirements. Where there is some forewarning of AOS use and where it is appropriate to do so from a security perspective, this could be signalled on the calendar on the Club website.

We note that whatever AOS activity does occur going forward, the actual gunshot noise levels will be considerably reduced compared to the historic situation due to the implementation of the proposed physical mitigation measures.

Club events

Up to 8 times a year the Club may operate a local or national competition with up to 160 attendees for up to three days (Friday to Sunday).

These events will typically comply with a CNR 90 requirement, and the general hours of shooting outlined above, with the following exceptions:

 Two events per year would not comply with a CNR 90 requirement on some days of the event. Specifically – events involving IPSC or Speed Competitions, as these may involve in the order of 7,000 shots per day from higher noise firearms. On the other hand, the Monday to Thursday before an event the Club will be closed for set-up, and so this provides a period of respite.

An appropriate approach may be to provide an exemption to the CNR controls twice per year, for a three-day period on each occasion, provided those events are published on the calendar on the Club website, at least 1 month in advance, and the proceeding week days have no shooting. As discussed below, a Noise Management Plan held by the Club is likely to be the appropriate way to manage this aspect.

7.0 CNR OUTCOMES AND MANAGEMENT

We have reviewed the typical club schedule based on the calendar on the Club website and calculated a number of indicative CNR's for real days of scheduled shooting, as shown in table 7.1, using the formula outlined in section 4.0 above. Generally, the number of shots involved with scheduled activities can be estimated with sufficient certainty in advance, as each discipline proceeds in a set, structured way.

	Sunday example 1	Sunday example 2	Sunday example 3	Sunday example 4	Thursday Club night	Wednesday Cowboy Action Shooting
Number of hours between first and last shot of the day	6	6	6	6	12	7
	Black Powder / Muzzle loading (Back powder, Range 5, 548 shots)	CAS (Black powder, Range 4, 600 shots)	Black Powder / Muzzle loading (Black powder, Range 5, 548 shots)	CAS (Black powder, Range 4, 600 shots)	Club night (.22, Range 5, 1719 shots)	CAS (Black powder, Range 4 all day, 2,500 shots)
Activity over the course of the day	IPSC (9 mm, Range 3, 1440 shots)	ISSF (9 mm, Range 5, 600 shots)	Speed (9 mm, Range 3, 600 shots)	ISSF (9 mm, Range 5, 600 shots)		
	ISSF (9 mm, Range 5, 600 shots)	Service (9 mm, Range 6, 720 shots)	Service 25 yd (9 mm, Range 6, 720 shots)	Service (9 mm, Range 6, 720 shots)		
	Service (9 mm, Range 6, 720 shots)	1 Gun (9 mm, Range 3, 600 shots)				
CNR	87	86	85	83	76	83

Table 7.1 - Calculated CNR's from examples of scheduled Club activities

Based on the above, in the case of pre-scheduled shooting (including by other shooting clubs and open days for public or corporate events), we are satisfied that the Club can readily comply with a CNR 90 requirement. We note that this outcome has only been achieved due to the implementation of the significant physical mitigation described above. We also consider that it is realistic for the Club to manage these events in a way that there is good certainty of compliance, as the disciplines are structured and what is likely to take place is known in advance. We have already provided the Club an example of a calculation tool which they could use to manage this aspect themselves – and check expected compliance with a CNR 90 requirement as scheduled events are loaded into the calendar on the Club website.

The practicality of managing casual / unscheduled use by Club members must also be considered. Our CNR analysis indicates that over 2,500 shots per day of the loudest firearms would be required to approach CNR 90. We understand this would generally be an unrealistic combined level of 'casual' Club use over the course of any day. However, some basic measures may be appropriate to ensure the Club are confident that they are working within the CNR 90 requirement. We understand that all members access the facilities by individual electronic access cards. A simple and practical approach may be to conduct an initial survey over a number of weeks to establish how many shots an average Club member typically fires during a 'casual use / training' visit to the Club. An alert level could then be set in terms of 'number of Club member visitors per day' via the electronic access card system, such that club officials were alerted if the number of visiting members in a day meant it was possible the combined number of shots was approaching 2,500. Apon receiving that alert, the person responsible for the noise management system could then conduct a more detailed review based on their knowledge of who specifically had accessed the site and the types of shooting they are known to participate in, to determine if in fact there was any risk of the CNR 90 level being approached on that day.

Technology solutions are available which could either assist with counting shots over the course of a day, or also measure noise levels for a more direct derivation of CNR. However, based on the above, we consider the situation will be realistic to manage based on simpler controls.

Overall, a Noise Management Plan is appropriate which would set out the following, in relation to compliance with CNR 90:

- The detailed process whereby a person responsible for the noise management system uses a calculation tool to check expected compliance with a CNR 90 requirement as scheduled events are loaded into the calendar on the Club website.
- The details around the system to be used to monitor casual / unscheduled Club use by members, whereby the person responsible for the noise management system is alerted when there has been sufficient use in day so as to potentially approach CNR 90, and what actions they will take.

As above, the Noise Management Plan would also cover the following in relation to Police and AOS use, and events:

- The processes to be used to ensure periods of Police use (including the expected hours of shooting) are published on the calendar on the Club website, at least 1 month in advance.
- The processes to be used to ensure periods of AOS use (including the expected hours of shooting) are published on the calendar on the Club website in advance, where possible and as appropriate from a security perspective.
- The processes to be used to ensure details of the two events per year with no CNR restriction are published on the calendar on the Club website.

As is conventional, the Noise Management Plan should also address:

- Hours of use A process by which the club shall nominate seven contiguous 4-hour periods on each week, within the overall 9 am to 9 pm hours, where there will low or no noise, and display these periods on their website calendar, 1 week in advance. A period of 'low or no noise' shall be defined as a period where any outdoor shooting is restricted to range/ firearm combinations which produce a noise level of 55 dB L_{AFmax} or lower at the notional boundary of the 1222 Devon Road secondary dwelling. The Noise Management Plan will also outline a process via which range/firearm combinations are reviewed and approved with respect to this requirement.
- Procedures for handling noise complaints.
- Measures for educating Club executives and members as appropriate on noise measurement, management and ensuring they are familiar with the requirements of the NMP.

- Processes to be used by a nominated Noise Control Officer when measuring or monitoring noise and related controls including measurement equipment, location, methods to be used, documentation, and any corrective action that may be required to prevent non-compliance with the noise limits provided by the consent.
- Methods of dealing with any unusual member activity which may exacerbate noise effects such as unconventional firearms, shooting locations or intensity of shooting.
- Any other general noise mitigation measures available to minimise noise emissions.
- Specify or name people responsible for the implementation of the plan and handling complaints, along with contact details.

8.0 FUTURE URBAN ZONE

We have also considered noise levels on the opposite side of Devon Road, at the edge of the Special Purpose – Future Urban Zone. In this location, the traffic noise levels are 9 dB higher than those experienced at the key receiving location on the notional boundary of the secondary dwelling at 1222 Devon Road, with 'background' levels of 58 dB L_{A90} or higher.

The expected shooting noise levels in this location are presented below in table 8.1. These predicted noise levels relate to the worst-case receiving locations along the Special Purpose – Future Urban Zone boundary. The exact location of worst noise levels varies depending on which range is in use, and which shooting position is used on some ranges.

Range	Noise levels without mitigation (dB L _{AFmax})	Noise levels with mitigation (dB L _{AFmax})
Range 1	67	61
Range 2	64	58
Range 3	71	65
Range 4	70	61
Range 5	67	66
Range 6 – northern shooting positions	70	64
Range 6 – central shooting positions	77	74
Range 6 – southern shooting positions	78	74
Range 7	84	77

Table 8.1 – Expected Shooting Noise Levels received across Devon Road at the edge of the Special Purpose – Future Urban Zone

Given the existing ambient environment in this location as described above, these predicted levels are not expected to be of concern, potentially with the exception of Range 6 (74 dB L_{AFmax} associated with the use of central and southern shooting positions) and Range 7 (77 dB L_{AFmax}).

Due to the elevated traffic noise levels in this area, and the fact that any future residents will then be choosing to live in the vicinity of a well-defined, consented noise producing activity, we consider that an appropriate control in this area may be to require compliance with CNR 90, but calculated with the community adaption factor 'A' set to 19, which is the 'moderately adapted communities' adjustment outlined by the method.

With that requirement in place, in the event that dwellings are constructed within the adjacent *Special Purpose – Future Urban Zone* sites, to continue operating at the shooting intensities outlined in section 4.0, the Club would need to implement further physical mitigation with respect to Ranges 6 and 7, to reduce

shooting noise levels by in the order of 5 dB. We have discussed various options with the Club, and understand this is expected to be practicable.

9.0 COMPARISON WITH THE DISTRICT PLAN NOISE LIMITS

As outlined above, the NZS 6802:2008 Standard warns against assessing gunshot noise against 'general noise limits' which use L_{Aeq} metrics. This is primarily because for this type of noise, the L_{Aeq} will correlate poorly with actual noise effects – and therefore there is a risk of over or understating the noise effects.

In the case of gunshot noise, our experience is that L_{Aeq} levels understate the potential noise effect – and in many situations noise levels comply with 'general activity' L_{Aeq} noise limits, but are still problematic.

Based on the Marshall Day Acoustics measurements, where there are periods with a high number of rounds in one hour and 'black powder' gunshots which influence the L_{Aeq} more than other types, we would expect a L_{Aeq} noise level that is more than 15 dB below the L_{AFmax} Shooting Noise Levels reported above. During periods of lower intensity shooting, the difference will be greater.

This means that the Club as it has been operating historically may not have been compliant with a 55 dB $L_{Aeq(15 min)}$ (daytime) and 50 dB $L_{Aeq(15 min)}$ (evening) New Plymouth Proposed District Plan notional boundary noise limits in some instances, but with the mitigation as outlined above, full compliance will be achieved – both at the notional boundary of both dwellings at 1222 Devon Road and at the notional boundary of future dwellings in the Special Purpose – Future Urban Zone.

10.0 CONCLUSION

We have been engaged by New Plymouth Pistol Club to provide acoustic engineering advice to support a Resource Consent application for the Club. Extensive measurements, modelling and consultation with the Club has been undertaken, to establish what the best practicable options are for managing the Club's noise effects within the constraints of the current site.

As a result, extensive physical mitigation is to be implemented including a series of stacked containers with a roof structure to the east of Range 1, a new 7 metre high fence between Ranges 1 and 2, additional containers behind Ranges 2, 3 and 4, a 1.5 metre fence on top of the existing bund between Ranges 3 and 4, four stacks of containers with a roof structure to the east of Range 5, including a 7 m high fence between the new building and row of containers, a new two storey club building behind Ranges 5 and 6, two containers with a roof structure stacked on the side of Range 6, and acoustic upgrades to the fence behind Range 7.

Based on the above, and considering the existing ambient noise environment in this case and the hours and intensity of use described above, we consider that the noise will be acceptable and effects minimal.

While less relevant with regard to noise effects, with the mitigation as outlined above, full compliance will be achieved with the District Plan noise limits – both at the notional boundary of both dwellings at 1222 Devon Road, at the notional boundary of future dwellings in the Special Purpose – Future Urban Zone.

Please do not hesitate to contact us to discuss further as required.

Kind regards,

Dr Jeremy Trevathan Ph.D. B.E.(Hons.) Assoc. NZPI® Principal Acoustic Engineer Acoustic Engineering Services

APPENDIX C RECORDS OF CONSULTATION

Aaron Edwards

From: Sent: To: Subject:	Sam Kay <sam.kay@nzta.govt.nz> Thursday, 21 November 2024 2:10 pm Aaron Edwards RE: [#BTW230984.00] 1206 Devon Road (SH3) Bell Block, New Plymouth, Taranaki - Application-2024-0960 CRM:0486000008</sam.kay@nzta.govt.nz>
Follow Up Flag:	Follow up
Flag Status:	Completed

EXTERNAL MESSAGE

Hi Aaron,

Thanks for sending this through.

I have sent this through to our Network and Safety Engineers and will get back to you with any comments they have.

Ngā mihi,

Sam Kay (she/her)

Planner - Poutiaki Taiao (Environmental Planning) Environmental Planning | Transport Services | Te Toki Tārai

Email: sam.kay@nzta.govt.nz Phone: 021 241 9126

NZ Transport Agency Waka Kotahi

Tauranga, Level 3, Harrington House, 32 Harington Street PO Box 13055, Tauranga Central, Tauranga 3141, New Zealand





From: Aaron Edwards <aaron.edwards@btw.nz>
Sent: Friday, November 15, 2024 1:15 PM
To: Sam Kay <Sam.Kay@nzta.govt.nz>
Subject: RE: [#BTW230984.00] 1206 Devon Road (SH3) Bell Block, New Plymouth, Taranaki - Application-2024-0960
CRM:0486000008

Kia ora Sam

Apologies for the delay in responding here.

The club advises the following:

Traffic Movements

Regular traffic movements are limited to private vehicles only. The activity involves no regular heavy vehicle movements.

Regular shooting events have historically been scheduled on Wednesday mornings, Thursday evenings, and Sunday mornings. The club currently operates under an abatement notice, which limits shooting to the following times:

- Tuesday, between 9 am and 4 pm
- Wednesday between 9 am and 4 pm
- Thursday between 5 pm and 8 pm
- Saturday between 9 am and 4 pm
- Sunday between 10 am and 4 pm

Average movements are as follows (which include the regular shooting events on a Wednesday, Thursday and Sunday):

- Tuesday and Wednesday 5 cars on average (10 vehicle movements)
- Thursday evening 15 cars on average (30 vehicle movements)
- Saturday 12 cars on average (24 vehicle movements)
- Sunday up to 18 cars on average (36 vehicle movements)

These are observed movements based on club log in records (with vehicles requiring swipe card access to enter). These vehicle movements are based on regular club operations/activities (excluding competition events, discussed further below).

Consent is sought to operate from 9 am to 9 pm 7 days a week. Vehicle movements are not expected to vary significantly from recorded movements above. The extended hours are primarily intended to give members more flexibility in the hours within which they can access and use the range and the club does not anticipate any significant increase in the number of users and/or number of vehicle movements.

Signs Existing and Proposed

Signage (aside from necessary health and safety signage) is limited to the club sign at the entrance. The club notes that a member of the public has removed the "Pistol Club" sign. The club intends to replace this. No further signage is proposed.



Competition Parking

Resource consent is sought to operate up to 8 local or national competitions a year with up to 160 attendees for up to three days (Friday to Sunday). The club currently hosts up to 8 competitions per year - the resource consent application seeks to maintain this number of events.

As per Section 2.3.3 in the AEE, informal parking is available onsite. The club estimates the site has capacity to accommodate up to approximately 40 vehicles onsite if required. As it stands, the club does not rely on onsite parking for the competition events. The club hires an industrial site on De Havilland Drive for parking and runs a mini bus service for participants to and from the club grounds.

Next Steps

Feel free to contact me with any further queries. Look forward to feedback.

Ngā mihi

AARON EDWARDS Manager Planning – Pou Whakamāhere Taiao Matua MNZPI M: +64 275 521 561

BTW info@btw.nz | www.btw.nz | +64 6 759 5040

From: Sam Kay <<u>Sam.Kay@nzta.govt.nz</u>>
Sent: Monday, 5 August 2024 8:36 am
To: Aaron Edwards <<u>aaron.edwards@btw.nz</u>>
Subject: [#BTW230984.00] 1206 Devon Road (SH3) Bell Block, New Plymouth, Taranaki - Application-2024-0960
CRM:0486000008

Good morning Aaron,

I hope you had a nice weekend. I am the planner assigned to this case. In order to proceed, NZ Transport Agency, Waka Kotahi requires the following information:

- Could you please advised how many vehicle movements would be utilising the crossing per day (one vehicle entering and exiting equate to 2 vehicle movements) and how many of these vehicles are heavy.
- Are there any signs proposed?
- Is there sufficient onsite parking for the local and national competitions?

Ngā mihi,

Sam Kay (she/her)

Planner - Poutiaki Taiao (Environmental Planning) Environmental Planning | Transport Services | Te Toki Tārai

Email: <u>sam.kay@nzta.govt.nz</u> Phone: 021 241 9126

NZ Transport Agency Waka Kotahi Tauranga, Level 3, Harrington House, 32 Harington Street PO Box 13055, Tauranga Central, Tauranga 3141, New Zealand



www.nzta.govt.nz

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Aaron Edwards

From:	Raukura Salisbury <puketapu.taiao@gmail.com></puketapu.taiao@gmail.com>
Sent:	Thursday, 28 November 2024 1:33 pm
To:	Aaron Edwards
Subject:	Re: FW: [#BTW230984.00] Pistol Club
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE

Kia Ora Aaron,

Thanks for your email.

Thank you for contacting Nga Kaitiaki O Puketapu Hapu Trust. We appreciate your commitment to environmentally responsible practices. To ensure a thorough and efficient review process, all application details and required information must be fully completed.

The following important information will provide the review process and the cost recovery mechanism for all resource consent applications received by Nga Kaitiaki O Puketapu Hapu Trust. **Pre-application process**: Before formally submitting your resource consent application to the relevant local authority, we encourage you to engage in consultation with Nga Kaitiaki O Puketapu Hapu to discuss your project's details and potential environmental and cultural impacts. This early dialogue can help identify any potential issues. Ensure application forms are filled out accurately and completely. Incomplete/insufficient information may result in delays in the review process. **Initial Administration Fee**: Please be informed that an initial administration fee of \$250 is applicable to all resource consent applications requiring Hapu engagement. This covers the necessary administrative actions such as data entry, document sorting, and record creation. Upon receipt of the initial fee, applications are formally introduced into the review process.

Review Fee: Nga Kaitiaki O Puketapu Hapu Trust will conduct an initial review of your application as mana whenua. A review fee of \$150 per hour will be charged for this process. An indication of the cost of this entire process can be provided once we have assessed the resources required to undertake this review. This fee compensates for the time, expertise and cultural insights invested by experts, possessing deep traditional knowledge about the areas in which proposed activities or developments are intended.

Alignment with Taiao Values: It is important for you to assess how your proposed activity aligns with Te Atiawa's Tai Whenua, Tai Tangata, Tai Ao values. This alignment is an important aspect of our evaluation process.

Processing Timeframes: Our current processing time for resource consent applications is a minimum of 6 weeks, please note that the actual processing time can vary depending on the complexity of the proposed activity and any engagement work required with the activity's location. We encourage applications to be submitted as early as possible to ensure sufficient time for processing.

Please note the timeframes may have delays due to the time of year.

Nga Mihi Raukura Salisbury Consents Lead Nga Kaitiaki o Puketapu Hapu Trust



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On Fri, Nov 1, 2024 at 1:19 PM Aaron Edwards <<u>aaron.edwards@btw.nz</u>> wrote:

Kia ora Raukura

As below, Campbell has forwarded comments through in regard to the New Plymouth Pistol Club resource consent application.

The club acknowledges feedback and would like to arrange for a hui to discuss the club membership and activities further.

Club members are generally available and would be happy to host a hui at the club or meet where suits.

Please let me know when might work.

Ngā mihi nui

AARON EDWARDS Manager Planning – Pou Whakamāhere Taiao Matua MNZPI **M:** +64 275 521 561

BTW info@btw.nz | www.btw.nz | +64 6 759 5040

From: Campbell Robinson <<u>Campbell.Robinson@npdc.govt.nz</u>> Sent: Friday, 11 October 2024 9:04 am To: Aaron Edwards <<u>aaron.edwards@btw.nz</u>> Subject: FW: [#BTW230984.00] Pistol Club

EXTERNAL MESSAGE

Kia Ora Aaron,

Please find attached comments from Puketapu hapu in relation to the NPPC land use consent.

Hapu have raised concerns with a range of aspects of the proposal including the engagement process, lack of information and possible adverse effects.

Ngā mihi

Campbell Robinson

Senior Planner (Consultant)

New Plymouth District Council

From: Raukura Salisbury <<u>puketapu.taiao@gmail.com</u>> Sent: Thursday, October 10, 2024 3:06 PM To: Campbell Robinson <<u>Campbell.Robinson@npdc.govt.nz</u>> Subject: Pistol Club

[EXTERNAL EMAIL] CAUTION: This email is from an external sender. To minimise cyber security risks, do not click on any links or open any attachments unless you are certain that the sender is legitimate. Please note that no legitimate sender will ever ask you for password details.

Kia Ora Campbell,

I hope this email finds you well. On behalf of Puketapu, I am writing to provide our initial feedback regarding the application at the Pistol Club. The application site falls within the ancestral lands of Puketapu hapu and impacts the Mangaoraka.

Our key points of feedback are attached.

Look forward to hearing from you.

Nga Mihi

Raukura Salisbury

Consents Lead

Nga Kaitiaki o Puketapu Hapu Trust



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Statements in this email and any attachments do not necessarily reflect the views of New Plymouth District Council.

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Aaron Edwards

From: Sent: To: Subject:	Raukura Salisbury <puketapu.taiao@gmail.com> Friday, 9 August 2024 2:58 pm Aaron Edwards RE: [#BTW230984.00] Resource Consent Application - New Plymouth Pistol Club - 1206 Devon Road, New Plymouth</puketapu.taiao@gmail.com>
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL MESSAGE

Kia Ora Aaron,

Thank you for contacting Nga Kaitiaki O Puketapu Hapu Trust. We appreciate your commitment to environmentally responsible practices. To ensure a thorough and efficient review process, all application details and required information must be fully completed.

The following important information will provide the review process and the cost recovery mechanism for all resource consent applications received by Nga Kaitiaki O Puketapu Hapu Trust. **Pre-application process**: Before formally submitting your resource consent application to the relevant local authority, we encourage you to engage in consultation with Nga Kaitiaki O Puketapu Hapu to discuss your project's details and potential environmental and cultural impacts. This early dialogue can help identify any potential issues. Ensure application forms are filled out accurately and completely. Incomplete/insufficient information may result in delays in the review process. **Initial Administration Fee**: Please be informed that an initial administration fee of \$250 is applicable to all resource consent applications requiring Hapu engagement. This covers the necessary administrative actions such as data entry, document sorting, and record creation. Upon receipt of the initial fee, applications are formally introduced into the review process. **Review Fee**: Nga Kaitiaki O Puketapu Hapu Trust will conduct an initial review of your application as mana whenua. A review fee of \$150 per hour will be charged for this process. An indication of

the cost of this entire process can be provided once we have assessed the resources required to undertake this review. This fee compensates for the time, expertise and cultural insights invested by experts, possessing deep traditional knowledge about the areas in which proposed activities or developments are intended.

Alignment with Taiao Values: It is important for you to assess how your proposed activity aligns with Te Atiawa's Tai Whenua, Tai Tangata, Tai Ao values. This alignment is an important aspect of our evaluation process.

Processing Timeframes: Our current processing time for resource consent applications is a minimum of 6 weeks, please note that the actual processing time can vary depending on the complexity of the proposed activity and any engagement work required with the activity's location. We encourage applications to be submitted as early as possible to ensure sufficient time for processing.

Nga Mihi Raukura Salisbury Consents Lead Nga Kaitiaki o Puketapu Hapu Trust



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On Fri, Aug 2, 2024 at 1:15 PM Aaron Edwards <<u>aaron.edwards@btw.nz</u>> wrote:

Tēnā koe

Following on from below, please find attached a copy of the resource consent application for the New Plymouth Pistol Club.

The club would be happy to meet to discus the application in further detail.

Ngā mihi nui

AARON EDWARDS Manager Planning – Pou Whakamāhere Taiao Matua MNZPI **M:** +64 275 521 561

BTW <u>info@btw.nz</u> | <u>www.btw.nz</u> | +64 6 759 5040

From: Aaron Edwards Sent: Saturday, July 27, 2024 11:54 AM To: Jonathan Marshall <<u>treasurer@newplymouthpistolclub.org.nz</u>> Cc: Martin Phillips <<u>secretary@newplymouthpistolclub.org.nz</u>>; Mike O'Sullivan <<u>gandoff@xtra.co.nz</u>>; Avin Panchorie <<u>admin@newplymouthpistolclub.org.nz</u>> Subject: FW: [#BTW230984.00] Resource Consent Application - New Plymouth Pistol Club -1206 Devon Road, New Plymouth The following provides a planning overview of the resource consent application in support of consultation with Te Atiawa lwi.

BTW Company (BTW) is assisting New Plymouth Pistol Club (NPPC) in preparing a land-use resource consent application to be submitted to New Plymouth Distrcit Council (NPDC) for the continued operation of the club as a sport and recreation activity on the site at 1206 Devon Road, Bell Block (legally described as: Lot 1 DP 19854) (Figures 1 and 2). Resource consent is sought in part on a retrospective basis. The application is to be lodged with NPDC on or before 2 August 2024 in order to comply with Environment Court proceedings.



Figure 1: Site location



Figure 2: NPPC footprint

Background

The NPPC first established on the site in 1983. The club has since developed overtime with currently eight (8) outdoor ranges and one (1) indoor range in use and membership in the order of 150 members.

In or around August 2021, NPDC began receiving regular noise complaints from the neighbouring site at 1222 Devon Road. NPDC concluded the club did not have resource consent on the understanding noise generated from outdoor shooting activities did not comply with District Plan noise standards and that the club did not enjoy existing use rights pursuant to section 10 of the RMA. NPDC issued an abatement notice in August 2022, restricting NPPC hours to the following:

- Tuesday, between 9 am and 4 pm
- Wednesday, between 9 am and 4 pm
- Thursday, between 5 pm and 8 pm
- Saturday, between 9 am and 4 pm
- Sunday, between 10 am and 4 pm.

The abatement notice is currently under appeal.

The applicant applied to NPDC for an Existing Use Certificate for the activity in February 2023 (CRT23/44925). The application was refused on 22 June 2023 on the basis that the application did not satisfy the relevant tests under section 139A of the RMA. The NPDC decision report concluded the NPPC was lawfully established in 1983 with the scope of the activity involving up to three shooting ranges and approximately 30 members.

Current Proposal

As above, NPPC is seeking resource consent (in part retrospective) for the continued operation of the club as a sport and recreation activity on the site.

NPPC acknowledges NPDC's position that the club was lawfully established in 1983 with the scope of the activity involving up to three (3) ranges and approximately 30 members. This forms as the existing environment against which the continued operation of the NPPC is to be assessed. With eight outdoor ranges and one indoor range in use and membership in the order of 150 members the NPPC activity has increased when compared to the existing environment.

The current proposal has largely been developed on the basis of the recommended noise mitigation measures as set out in a noise report prepared in support of the application (attached). Figure 3 demonstrates proposed noise mitigation measures.



Figure 3: Proposed physical noise mitigation measures

NPPC seeks resource consent to undertake shooting during opening hours from 9:00 am to 9:00 pm seven days a week (to include public holidays).

Intensity of use is noted as follows on pages 4-5 in the Noise Report:

- Typically, daily use may be 4 8 hours per day for all club and training use, with club members also using the facility on weekends, especially on Sunday when most events are held.
- Use by other shooting clubs and open days for public or corporate events occur occasionally and is often on weekends or evenings.
- Police will use the facility for training and certification as required, which is typically three days per month. The Armed Offenders Squad uses the Club approximately five times per year.
- Between 6 8 times a year the Club may operate a local or national competition with up to 160 attendees for an average of three days. The competitions typically run between 0900 to 1700 hours with some set-up testing from 0800 hours and some repairs and testing after 1700 hours in preparation for the competition on the next day.

It is noted that the NPPC serves as the only outdoor shooting range available for police training purposes within the New Plymouth District.

The NPPC currently has approximately 150 members. Membership numbers fluctuate over time. The number of members does not directly correlate to the intensity of use for the shooting ranges. The intensity of use is dictated by regular club activities and events. An increase in membership does not directly equate to an expansion of the activity. Accordingly, no limit to membership numbers is proposed or sought as part of the resource consent application.

Proposed Works

Proposed physical mitigation measures are as demonstrated in Figure 3. Site plans are currently being finalised to capture the mitigation measures and will be submitted in support of the application.

Earthwork activity will be required to establish the mitigation measures. Estimated earthwork quantities are to be confirmed (following on from a recently completed topographic survey). Of particular note, the site plan set is to include a concept design for the 3m increase in height and extension for the bund along the eastern boundary adjoining the unnamed tributary (described further below). The concept design is to include an acoustic fence along the top of the bund to reduce the volume of earthworks required.

Erosion and Sediment controls will be installed prior to commencement of any areas being disturbed to prevent any sediment discharges leaving the area of works. All exposed areas will be stabilised upon completion of earthworks by spreading topsoil and planting grass or covering with mulch or hardfill.

District Plan

The New Plymouth District Plan is currently under review with the Proposed District Plan – Appeals Version (PDP) to replace the Operative District Plan (ODP). The majority of PDP rules relevant to the NPPC activity are not under appeal and are operative. The following focuses on the PDP only.

The site is located in the General Industrial Zone under the PDP (Figure 4).



Figure 4: PDP planning map. Wider site marked in black and white dash.

The following overlays apply to the site:

- Site of Significance to Māori and Archaeological Sites (Site ID: 566)
- Entrance Corridor
- Noise Control Boundary
- Water Body (unnamed tributary)
- Airport Flight Path Surface
- Gas Transmission Pipeline
- Gas Transmission Pipeline Corridor
- State Highway Limited Access
- Indicative Road Transport Network
- Designation (FGL-1 and NZTA-1).

Waterbodies

An unnamed tributary of the Mangaoraka Stream (Waiongana) runs parallel to the eastern boundary of the NPPC site before flowing through a culvert under SH3 (Figure 5). The tributary is not listed as a Schedule 9 waterbody in the PDP. The Waiongana Stream and its tributaries are listed as an area subject to statutory acknowledgement under the Te Atiawa Claims Settlement Act 2016.



Figure 5: Unnamed tributary viewed from the road boundary (source: BTW, July 2024)

Cultural and Historic Heritage Sites

The surrounding area features a number of cultural and historic heritage sites recorded in the PDP to include the following as listed in Table 1 and shown in Figure 6 below. Site ID:448 is the closest recorded site with the verified extent located approximately 23 m from the NPPC site boundary.

Site ID	Location	Site Description	Mana Whenua	Silent File	Verified	NZAA Ref
448	Devon Road, Bell Block	Rongonui Pā or Rongorongonui Pā	Puketapu	No	Yes	Q19/113
451	Devon Road, Bell Block	Pahau Pā	Puketapu	No	Yes	Q19/116
566	Devon Road, Bell Block	Ikamoana Pā	Puketapu	No	No	Q19/243

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Figure 6: Sites of Significance to Māori and archaeological sites in proximity to the site

Resource Consent Requirements

Overall resource consent is required as a non-complying activity in accordance with Rule GIZ-R15 for a sport and recreation activity in the General Industrial Zone (on the basis of an expansion to the activity when compared to the existing environment).

Of note, resource consent will be required as a restricted discretionary activity under the following rules:

- WB-R4 Earthworks on a site containing or adjoining a natural waterbody
 - Earthworks will be undertaken within 10m of the bank of the unnamed tributary associated with the extension and height increase for the Range 1 bund.
- EW-R3 Earthworks for sport and recreation activities and EW-R10 Earthworks for building activities
 - Earthwork activity will not comply with the 1.5m fill height or cut depth standard under EW-S2.

Resource consent is not expected to be required in relation to sites and areas of significance to Māori. No earthwork activity is expected to occur within 50 m from the recorded extent for Site ID: 448 (Figure 7).



Figure 7: PDP map showing 50 m extent for Site ID: 448.

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS) controls the activities on land where an activity on the

Hazardous Activities and Industries List (HAIL) is being carried out, has been carried out, or is more than likely than not have been carried out. Outdoor shooting ranges are included on the HAIL (*C.2. Gun clubs or rifle ranges, including clay targets clubs that use lead munitions outdoors*). The NES-CS is a relevant matter. A PSI is currently being prepared and will be submitted in support of the application once finalised. Depending on the PSI findings, resource consent may be required under the NES-CS. Any earthwork activity will be managed in accordance with the recommendations of the PSI.

Next Steps

As noted, NPPC is working toward lodgement of the consent application on or before 2 August 2024. A copy of the application is able to be forwarded at the time of lodgement.

Look forward to feedback. Feel free to contact me with any queries.

Ngā mihi

AARON EDWARDS Manager Planning – Pou Whakamāhere Taiao Matua MNZPI

Office: +64 6 759 5040 | Mobile: +64 275 521 561



Ngāmotu – New Plymouth 179-181 Courtenay Street, PO Box 551, New Plymouth 4340, +64 6 759 5040

Kirikiriroa – Hamilton 517 Anglesea Street, PO Box 1229, Hamilton 3240, +64 7 595 0020

Taupō 12 Ashwood Avenue, Taupō 3330

info@btw.nz | www.btw.nz





CREATIN BETTER FI SINCE 1



APPENDIX D UPDATED RULE ASSESSMENT

Rule	Rule Parameter	Original Assessment	Updated Assessment
GIZ - General Indus	trial Zone		
GIZ-R15	Sport and recreation activities	Non-complying: The NPPC meets the definition of a sport and recreation activity. The proposal involves an expansion of the activity when compared to the existing environment. Resource consent is therefore required as a non-complying activity.	No change – Non-complying
GIZ-R17	 Building activities (including relocation of a building) Activity status: PER Where: 1. the building activity is associated with a building used for or to be used for a permitted activity; and 2. all General Industrial Zone Effects Standards are complied with 	Restricted Discretionary: Building activity will meet the General Industrial Zone Effects Standards (see assessment below) however the building activity is not associated with a permitted activity.	No change – Restricted Discretionary
GIZ-S1	Maximum Structure Height Buildings: 12m above ground level All other structures: 15m above ground level	Complies : New buildings will not exceed 12m in height.	Complies The container walls will have a maximum height of 8m.
GIZ-S2	Height in relation to boundary No part of any building shall project beyond the height to boundary plane from points 3m above a site boundary where that boundary adjoins a site in the following zones: Bural Zones	Complies: New buildings will not project beyond the height to boundary plane relative to the adjoining Rural Zone boundary to the east.	No change - Complies The range 1 container wall will be set back a minimum distance of 9.8m from the Rural Zone side boundary and will comply with height in relation to boundary requirements

Table D 1: Proposed District Plan Rule Assessment

SURVEYING	Ngāmotu – New	/ Plymouth	Kirikiriroa – Hamilton	Taupō	
ENGINEERING	P O Box 551, N	ew Plymouth 4340.	P O Box 1229, Hamilton 3240.	12 Ashwood Avenue,	
PLANNING	179 Courtenay : New Plymouth	street, 1310, New Zealand.	517 Anglesea Street, Hamilton 3240, New Zealand.	1 aupo 3330, New Zealand. 0800 289 787	
ENVIRONMENT	06 759 5040		07 595 0020		

Rule	Rule Parameter	Original Assessment	Updated Assessment
GIZ-S3	Minimum building and structure setbacks from a boundary: From a road boundary: 5m From the Rural Zone boundary: 8m	Complies: New buildings and structures (to include acoustic walls/fencing) will comply with the minimum setback requirements from boundaries.	Complies The range 1 container wall will be set back a minimum distance of 9.8m from the Rural Zone side boundary and will comply with the 8m setback requirement. The new building will be set back a minimum distance of 8.5m from the road boundary (no change) and will comply with the 5m setback requirement.
GIZ-S4	Landscaping requirements on a road boundary For all structures, carparking areas or yard areas that are visible from an adjoining road, the road boundary must be screened from the road with landscaping and planting that will, within two years after planting, reach a minimum height of 1m and, with the exception of vehicle crossings, be a minimum depth of 2m from the road boundary.	Complies: Existing planting is assessed as compliant with this standard aside from the road boundary east of the vehicle crossing. Planting can be established to comply.	No change - Complies
GIZ-S6	 Landscaping or fencing requirements on a side boundary The side boundary of a site that adjoins a site zoned as Rural must: 1. be planted or landscaped with planting that will, within two years of planting, reach a minimum height of 2m and a minimum depth of at least 2m from the side boundary; or 2. be fenced with a solid, close-boarded enclosed fence made with a minimum height of 1.2m above ground level and a maximum height of 2m above ground level. 	Complies : Existing planting is assessed as compliant with this standard along the adjoining eastern boundary. New planting can be established on the Range 1 bund to comply.	Complies Planting will be established along the range 1 boundary to comply.
GIZ-S7	 Outdoor storage screening requirements Any outdoor storage area visible from an adjoining property or road must be screened from the property or road by: planting or landscaping that will, within two years of planting, reach a minimum height of 2m and a minimum depth of at least 2m from the site boundary; or a solid, close-boarded enclosed fence made with a minimum height of 1.2m above ground level and a maximum height of 2m above ground level. 	Complies : All outdoor storage areas are screened from view from neighbours and the road.	No change - Complies

Rule	Rule Parameter	Original Assessment	Updated Assessment
GIZ-S8	Minimum permeable surface area At least 20% of the site shall be planted in grass, vegetation or landscaped with permeable materials.	Complies: The majority of the site consists of permeable surfaces.	No change - Complies
WB - Waterbodies			
WB-R1	Erection of a building on a site containing or adjoining a natural waterbody:	Permitted: No buildings are proposed within 10m of the unnamed tributary running along the eastern boundary of the	No change – Permitted The range 1 container wall will be established in excess of 10m
WB-R2	Relocation of a building onto a site containing or adjoining a natural waterbody	site.	from the unnamed tributary.
WB-R3	Addition to a building on a site containing or adjoining a natural waterbody1. the building is set back at least 10m from the natural waterbody.		
WB-R4 (under appeal)	 Earthworks on a site containing or adjoining a natural waterbody: 1. the earthworks are set back at least 10m from any the natural waterbody. 	Restricted Discretionary: Earthworks will be undertaken within 10m of the bank of the unnamed tributary associated with the extension and height increase for the Range 1 bund.	Restricted Discretionary Earthworks will be undertaken within 10m of the bank of the unnamed tributary associated with the removal of the existing range 1 bund.
EW – Earthworks			
EW-R3	Earthworks for sport and recreation activitiesPermitted where:all Earthworks Effects Standards are complied with.	Restricted Discretionary: Earthwork activity associated with the Range 1 berm extension will not comply with the fill height standard under EW-S2.	Restricted Discretionary Earthwork activity associated with the removal of existing bunds will not comply with the fill height standard under EW-S2 with a maximum cut depth of 3.8m.
EW-R10	 Earthworks for building activities (1) Permitted where: the building activity is authorised by a building consent; the earthworks are not for the purpose of constructing a driveway, right of way or accessway; the total earthworks area does not exceed 150% of the area of the building activity; and EW-S2, EW-S3, EW-S4 and EW-S5 are complied with. 	Restricted Discretionary: Earthwork activity associated with building activity (for building activity requiring or not requiring building consent) will not comply with the fill height or cut depth standard under EW-S2.	Restricted Discretionary Earthwork activity associated with the removal of existing bunds to facilitate buildings will not comply with the fill height standard under EW-S2 with a maximum cut depth of 3.8m.

Rule	Rule Parameter	Original Assessment	Updated Assessment
	 (2) Permitted where: the building activity does not require a building consent; the earthworks are not for the purpose of constructing a driveway, right of way or accessway; the total earthworks area does not exceed 150% of the area of the building activity; and all Earthworks Effects Standards are complied with. 		
EW-R13(2) (under appeal)	 Earthworks not otherwise provided for in this table General Industrial Zone 1. in any 12 month period, the total volume of earthworks does not exceed 1,000m³ per site; and 2. all Earthworks Effects Standards are complied with. 	N/A: It is assumed in the first instance that earthwork activity is covered under EW-R3 and EW-R10.	No change – N/A
EW-S1	Instability of land Earthworks or land disturbance must not result in any instability of land or structures at or beyond the boundary of the site where the earthworks occur.	Complies: Earthworks will be suitably designed and managed so as not to result in any instability of land at or beyond the property boundary.	No change - Complies
EW-S2	 Maximum cut depth or fill height The cut depth or fill height (measured vertically) shall not exceed: outside the minimum building setback for the underlying zone: 1.5m; and inside the minimum building setback for the underlying zone: 0.5m. 	 Does not comply: Earthwork activity will exceed the standard. Up to 4.21 m of fill activity will be required for the Range 1 bund formation (occurring both inside and outside of the minimum 8 m building setback). Up to 2.5 m of cut and fil activity will be required for the acoustic wall construction and the placement of the container between Range 5 and 6 (occurring outside of the minimum 8 m building setback). 	Does not comply Up to 3.8m of cut activity will be required with the removal of bunds (to include removal of the range 1 bund which is in part located within the 8m minimum building setback). The height of fill within the fill area is currently unknown (as tyres will be removed from cut material). Resource consent is applied for to exceed the 1.5m fill height standard.
EW-S3	Site reinstatement As soon as it is practicable, but no later than six months from the commencement of earthworks or land disturbance: 1. the earthworks area shall be stabilised, filled, recontoured and revegetated to achieve 80% ground cover in a manner consistent with the surrounding land; or	Complies: Earthworks will be stabilised and achieve 80% ground cover in a manner consistent with the surrounding land within 6 months of commencement.	No change - Complies

Rule	Rule Parameter	Original Assessment	Updated Assessment
	2. sealed, paved, metalled or built over.		
EW-S4	Control of Silt and Sediment For the duration of earthworks or land disturbance, measures must be implemented to prevent silt or sediment from entering the stormwater system, waterbodies, overland flow paths, or roads. The measures must be installed prior to the commencement of earthworks or land disturbance and maintained until the site of the earthworks or land disturbance has been reinstated in accordance with EW-S3.	Complies: Silt and sediment control measures will be implemented for the duration of works to comply.	No change - Complies
EW-S5	Requirements for discovery of sensitive material during earthworks or land disturbance	Complies: Discovery protocols will be followed under EW-S5 if sensitive material is found during site development.	No change - Complies
NOISE - Noise			
NOISE-R1	Emission of noise (not otherwise provided for in this chapter) Permitted where: 1. all Noise Effects Standards are complied with.	Permitted: Following implementation of proposed mitigation measures noise generated by shooting activity is expected to comply with maximum noise levels under NOISE-S1.	No change – Permitted
NOISE-R2	Emission of noise from construction, maintenance and demolition activities Permitted where: 1. the noise generated complies with NOISE-S2.	Permitted: Construction activity will be managed to comply with NOISE-S2.	No change – Permitted
NOISE-S1(4)	 Maximum noise levels - zone specific (4) General Industrial Zone 1. Noise generated by any activity shall not exceed the following noise limits at any point within any other site in the General Industry Zone: a. All times - 70 dB LAeq(15 min). b. All times - 80 dB LAmax. 2. Noise generated by any activity shall not exceed the following noise limits at any point within the notional boundary of any noise sensitivity activity on any site in the Rural Production Zone and Future Urban Zone: 	Complies: The Acoustic Report concludes that with mitigation as proposed, noise generated by the NPPC activity will comply with maximum noise levels under NOISE-S1.	No change - Complies

Rule	Rule Parameter	Original Assessment	Updated Assessment
	 a. 7am to 7pm – 55 dB LAeq(15 min). b. 7pm to 10pm – 50 dB LAeq (15 min). c. 10pm to 7am – 45 dB LAeq (15 min). d. 10pm to 7am – 75 dB LAmax. 		
NOISE-S2	Maximum noise levels - activity specific	Complies: Construction activity will be managed to comply.	No change - Complies
(under appeal)	 Construction work: The noise from any construction, maintenance, and demolition activity must be measured, assessed, managed, and controlled in accordance with the requirements of NZS 6803:1999 Acoustics Construction Noise. t 		
TRAN - Transport			
TRAN-R1	 Roads and vehicle access points 1. the following are complied with: a. the standards set out in Council's Land Development and Subdivision Infrastructure Standard Local Amendments; and b. the vehicle access point dimensions required for fire appliances for developments in SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where a fire appliance is not able to reach either a house or the source of a firefighting water supply from a public road; and 2. all Transport Effects Standards are complied with. 	Restricted Discretionary: Not all transport effects standards will be complied with. See assessment below.	No change – Restricted Discretionary
TRAN-R9	High Trip Generator Activities Permitted where: 1. For existing activities: a. no change or variation to an existing lawfully established activity listed in TRAN – Table 1. Threshold: Sport and recreation activities: Accommodating in excess of 200 people at any one time.	N/A: The NPPC does not accommodate more than 200 people on site at any one time.	No change – N/A

Rule	Rule Parameter	Original Assessment	Updated Assessment
TRAN-R10	 Vehicle access points onto a state highway Activity status: RDIS Where: 1. an activity requires a new vehicle access point or an alteration or increase in the use of an existing vehicle access point onto a state highway; 2. traffic generation in relation to a site is less than 60 vehicle movements per day; and 3. all Transport Effects Standards are complied with. 	Discretionary: The proposal results in an increase in the use of the existing access point when compared to the existing environment. Traffic generation may exceed 60 vehicles movements per day.	No change – Discretionary
TRAN-S1	Design standards for vehicle access points onto a state highway that is not a limited access road Minimum sight distance: 300 m Minimum distance of vehicle access point relative to intersections: 200 m Minimum spacing between vehicle access points on same or opposite frontages: 200 m	N/A: The vehicle access point is onto a state highway that is a limited access road.	No change – N/A
TRAN-S2	Design standards for vehicle access points onto a local road, collector road or arterial road	N/A: The vehicle access point is onto a state highway.	No change – N/A
TRAN-S3	Vehicle access points All new vehicle access points must comply with the standards set out in section 3 of Council's Land Development and Subdivision Infrastructure Standard Local Amendments.	N/A: The vehicle access point is existing.	No change – N/A
TRAN-S4	Minimum distance between vehicle access points and transport corridor intersections	N/A: The vehicle access point is onto a state highway. The vehicle access point would comply regardless.	No change – N/A
TRAN-S5	Maximum width of vehicle access points 9m	Does not comply: The existing access point is approximately 10.8m in width.	No change – Does not comply
TRAN-S7	Minimum number of on-site vehicle parking spaces for people with disabilities	Does not comply: No dedicated vehicle parking spaces for people with disabilities are provided.	No change – Does not comply

Rule	Rule Parameter	Original Assessment	Updated Assessment
TRAN-S8	Minimum number of on-site bicycle parking spaces	Does not comply: No dedicated on-site bicycle parking spaces are provided.	No change – Does not comply
TRAN-S10	Requirements for on-site vehicle parking spaces - dimensions	N/A: No marked parking spaces are proposed.	No change – N/A
TRAN-S11	Minimum vehicle parking space and manoeuvring dimensions	N/A: No marked parking spaces are proposed.	No change – N/A
TRAN-S12	 Requirements for on-site vehicle parking spaces - construction and formation General Industrial Zone 1. For sites with four or more on-site vehicle parking spaces, where the site is not adjacent to a residential zone: a. the area must be formed, to an all weather standard; and b. the gradient of the parking area must be a maximum of 1:20; and c. the area over which vehicles obtain access to the parking area must be sealed from the vehicle access point for 5m into the site. 	Does not comply: Although there are no marked parking spaces, the activity provides parking for four or more vehicles. This standard is conservatively assessed as applicable. The existing parking area is not formed to an all weather standard, meaning a pavement that is useable by motor vehicles under all weather conditions. The parking area is in gravel and not pavement. The existing parking area complies with gradient requirements. A minimum 5m seal between the access and parking area is provided (approximately 13 m).	No change – Does not comply
TRAN-S13	Requirements for on-site vehicle parking spaces - people with disabilities	N/A: No parking spaces for people with disabilities are proposed.	No change – N/A
TRAN-S14	Requirements for on-site bicycle parking spaces	N/A: No bicycle parking spaces are proposed.	No change – N/A
TRAN-S15	 Minimum number of on-site loading and standing spaces One loading space must be provided per site; and Where more than one service vehicle or bus will be on- site at any one time, one standing space must be 	N/A: The activity does not generate any service vehicle or bus movements.	No change – N/A

Rule	Rule Parameter	Original Assessment	Updated Assessment
	provided per site for every service vehicle or bus on-site in addition to the loading space.		
TRAN-S16 (under appeal)	Requirements for on-site loading and standing spaces - design	N/A: No loading or standing spaces are proposed.	No change – N/A
TRAN-S17 (under appeal)	Requirements for on-site loading and standing spaces – construction and formation	N/A: No loading or standing spaces are proposed.	No change – N/A
TRAN-S18	 Requirements for driveways - design Every parking, loading and standing space must have driveways and aisles for entry and exit of vehicles to and from the road, and for vehicle manoeuvring within the site. Access and manoeuvring areas must accommodate the 85th percentile car tracking curves in TRAN - Figure 7 in TRAN-S10. The required driveway must not include any space used for on-site parking, loading or standing space, or vehicle access point; Where an activity or subdivision involves the creation of a vehicle access point, the formation of the vehicle access point must be compliant with TRAN-S4. 	Complies: The existing driveway is assessed as compliant.	No change – Complies
TRAN-S19	 Requirements for driveways- construction and formation All driveways must comply with the following standards: 1. Minimum width of the driveway: 3.5m; and 2. Maximum gradient of the driveway: 1:5; and 3. A passing bay(s) must be provided in compliance with Council's Land Development and Subdivision Infrastructure Standard Local Amendments where the driveway length is 50m or longer and is spaced at no more than 50m intervals; and 4. A turning area(s) must be provided in compliance with TRAN-S22 where the driveway length is 50m or longer. 	Complies: The existing driveway is assessed as compliant. No passing bay or turning area is required as the driveway is less than 50 m in length.	No change – Complies

Rule	Rule Parameter	Original Assessment	Updated Assessment
TRAN-S21	 Requirements for on-site manoeuvring space – provision On-site manoeuvring spaces must be provided where: a single vehicle access point serves four or more required parking spaces; access to a site is obtained from a state highway, arterial road or collector road; or a site has two tandem parking spaces which comply with TRAN-S13. 	Complies: On-site manoeuvring space is available.	No change – Complies
TRAN-S22	Requirements for on-site manoeuvring space - design	Complies: On-site manoeuvring space is available.	No change – Complies
TRAN-S23	 Requirements for on-site queuing space - provision and design On-site queuing space must be provided when six or more, but 30 or less, parking, loading or standing spaces combined are provided on-site. On-site queuing lengths, measured from the commencement of the driveway at the site boundary, must comply with the following: 6m into the site if the largest vehicle to visit the site is a car; or 8m into the site if the largest vehicle to visit the site is a medium service vehicle; or when the largest vehicle to service the site is greater than a medium service vehicle, then this vehicle must be able to be accommodated within the site. 	Complies: On-site queuing space in excess of 13 m is provided.	No change – Complies
ECOR – Entrance C	Corridors	-	-
ECOR-R6 (under appeal)	Building activities (excluding demolition or removal of a structure) on sites adjoining an entrance corridor Permitted where: 1. all Entrance Corridor Effects Standards are complied with.	Restricted Discretionary: New building activity does not comply with all ECOR effects standards. See assessment below.	No change – Complies

Rule	Rule Parameter	Original Assessment	Updated Assessment
ECOR-R7 (under appeal)	Outdoor storage on sites adjoining an entrance corridor Permitted where: 1. all Entrance Corridor Effects Standards are complied with.	Restricted Discretionary: Outdoor storage areas will not comply with all ECOR effects standards. See assessment below.	No change – Complies
ECOR-S1 (under appeal)	Minimum setback from the road boundary for structures on sites adjoining an entrance corridor General Industrial Zone: 20m.	Does not comply: The new two-storey building will be established in part within 20m of the road boundary (approximately 8.5m at the closest point). The existing fence within the 20m setback may be upgraded as part of noise mitigation measures to achieve a 3m high acoustic fence.	No change – Does not comply
ECOR-S2 (under appeal)	Minimum landscaped setback area on sites adjoining an entrance corridor At least 60% of the setback area specified in ECOR-S1 shall be landscaped with trees and shrubs, with or without grass.	Does not comply: Less than 60% of the 20m setback area from the road boundary is landscaped with trees and shrubs.	No change – Does not comply
ECOR-S3 (under appeal)	Outdoor storage on sites adjoining an entrance corridor Outdoor storage: 1. must not be located within the setback area specified in ECOR-S1; and 2. must not be visible from an entrance corridor; or 3. must be screened from the entrance corridor by planting and landscaping, or a combination of planting, landscaping and a wall or fence, provided that: a. the planting and landscaping must, within two years, reach a minimum height of 2m; and b. any wall or fence must be solid or close-boarded with a height of: i. Residential Zones: 1.2m - 1.4m above ground level;	Complies: Any outdoor storage areas located within the 20m setback area will be screened.	No change – Complies

Rule	Rule Parameter	Original Assessment	Updated Assessment
	ii. All other zones: 1.2m - 2m above ground level.		
HH - Historic Herita	ge		
HH-R14	Land disturbance (excluding earthworks) within the extent of a scheduled archaeological site, or within 50m of the extent of a mapped archaeological site	N/A: No land disturbance will occur within 50 m of the extent of AS:448.	No change – N/A
HH-R24	Erection of a structure and associated earthworks within the extent of a scheduled archaeological site, or within 50m of the extent of a mapped archaeological site	N/A: No structures will be established within 50 m of the extent of AS:448.	No change – N/A
HH-R25	Additions to a structure and associated earthworks within the extent of a scheduled archaeological site, or within 50m of the extent of a mapped archaeological site		
HH-R26	Relocation of a structure and associated earthworks to within the extent of a scheduled archaeological site, or to within 50m of the extent of a mapped archaeological site		
HH-R30	Earthworks within the extent of a scheduled archaeological site, or within 50m of the extent of a mapped archaeological site	N/A: No earthworks will occur within 50 m of the extent of AS:448.	No change – N/A
SASM - Sites and A	reas of Significance to Māori		
SASM-R1	Land disturbance (excluding earthworks) within the extent of a scheduled site or area of significance to Māori, or within 50m of the extent of a mapped SASM	N/A: No land disturbance will occur within 50 m of the extent of SASM:448.	No change – N/A
SASM-R4	Erection of a structure within 50m to 100m of a scheduled site or area of significance to Māori	Permitted: No building or structure within 50-100 m of SASM:448 will exceed 10 m in height.	No change – Complies
SASM-R5	Additions to a structure within 50m to 100m of a scheduled site or area of significance to Māori		

Rule	Rule Parameter	Original Assessment	Updated Assessment
SASM-R6	Relocation of a structure to within 50m to 100m of a scheduled site or area of significance to Māori		
	Permitted where:		
	 the building or structure does not exceed 10m in height or the maximum height permitted in the underlying zone, whichever is the lesser. 		
SASM-R11 (under appeal)	Erection of a structure and associated earthworks within the extent of a scheduled site or area of significance to Māori, or within 50m of the extent of a mapped SASM	N/A: No structures will be established within 50 m of the extent of SASM:448.	No change – N/A
SASM-R12 (under appeal) SASM-R13	Additions to a structure and associated earthworks within the extent of a scheduled site or area of significance to Māori, or within 50m of the extent of a mapped SASM		
(under appeal)	Relocation of a structure and associated earthworks to within the extent of a scheduled site or area of significance to Māori, or to within 50m of the extent of a mapped SASM		
SASM-R17	Earthworks within the extent of a scheduled site or area of significance to Māori, or within 50m of the extent of a mapped SASM	N/A: No earthworks will occur within 50 m of the extent of SASM:448.	No change – N/A
NU – Network Utilit	ies		
NU-R39 (under appeal)	Land disturbance within the Gas Transmission Pipeline Corridor	N/A: No land disturbance or earthworks will occur within the Gas Transmission Pipeline Corridor.	No change – N/A
NU-R40 (under appeal)	Earthworks within the Gas Transmission Pipeline Corridor (not covered by NU-R39)		