

**BEFORE THE NEW PLYMOUTH DISTRICT COUNCIL  
INDEPENDENT HEARINGS COMMISSIONERS**

**UNDER  
REFERENCE**

the Resource Management Act 1991  
LUC24/48583

**IN THE MATTER**

Application by the New Plymouth Pistol Club Inc to operate a gun club as a sport and recreation activity within the General Industrial Zone under the Part Operative District Plan 2025, including the construction of new facilities comprising a two-storey shooting range, multiple acoustic barriers, and all associated site mitigation works, earthworks, and remediation of known soil contaminants.

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**STATEMENT OF CAMPBELL ROBINSON – FUTURE PROOF PLANNING  
LTD ON BEHALF OF NEW PLYMOUTH DISTRICT COUNCIL**

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**DATED: 4<sup>TH</sup> JUNE 2026**

## Response to Puketapu Hapū statement 26th May 2026

- [1] As directed by Panel Minute 4, I have considered the further statements of Puketapu Hapū, which responded to condition sets Revision 1B and 1C. These conditions have since been superseded by condition sets Revision 2 and 2B.
- [2] Annexure A contains the Joint Witness Statement (JWS), which addresses the latest set of conditions and identifies the areas of agreement and disagreement.
- [3] The concerns outlined through the Puketapu statements have been partially addressed by agreed changes to conditions including:
- Condition 4 requires consultation with Puketapu Hapū before any management plan is certified by the Council. This provides for the ongoing and active participation of Puketapu Hapū in the implementation and operation of the consent, should it be granted.
  - Condition 19 which requires that the acoustic wall must be set back a minimum distance of 10 m from the true left bank of the unnamed tributary of the Mangaoraka Stream.
  - Condition 46 requires planting and fencing within the riparian margin to be established in the first planting season (May–October) following completion of Range 1 bund removal in Stage/Year 1, rather than following the Range 1 acoustic improvements. This provides certainty that the stream interface would be remediated sooner.
  - Condition 63 which requires all monitoring results must be provided to Council AND Puketapu Hapū on a quarterly basis for the duration of the monitoring period.
- [4] As outlined in the JWS, areas of disagreement remain on the conditions proposed to address Hapū concerns. These are generally targeted, including the request for a new condition 61. That proposed condition would provide for Puketapu to undertake annual Cultural Health Index assessments and cultural monitoring of the unnamed tributary and receiving environments for the duration of the consent.
- [5] I agree with Puketapu that some further oversight is appropriate, given the historical contamination at the site. In my view, such a condition aligns strongly with Strategic Objective HC-3, Objectives WB-O1 and WB-O4, and Policies WB-

P7 and WB-P9. The outcome sought by Puketapu could also be achieved by amending condition 62.

**Matter of Procedure**

[6] The JWS sets out the timeline for the provision of condition sets. Officials have used their best endeavours to respond promptly to the applicant’s changing position, noting that Mr Ellerton has not been able to provide substantive comments on condition set 2B. The Panel will also be aware that Mr Philipps has not been provided with copies of condition sets 2 and 2B.

**Updated Position**

[7] Although the expert planners’ JWS records many areas of agreement, I consider the conditions, viewed as a whole, to be overly complex and insufficient to address the substantive issues raised during the hearing.

[8] Consistent with my statement at the hearing and my statement of 26 May, I consider that the application should be declined.



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Campbell Robinson

Dated: 4.6.26