

**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: 25 MAY 2026**

## Evidence Heard and Verbal Comments at the Hearing

### Strategic Importance of the FUZ

- [1] Paragraphs 137–144 of my officer’s report confirm the current position in relation to FUZ land known as Area R, namely that it is intended to be developed for residential purposes in the short term.
- [2] In response to questions put to Mr Edwards and Ms Ongley, I have further considered the strategic importance of the FUZ and its relationship with higher-order planning documents, including the NPS-UD 2022.
- [3] The NPS-UD requires councils to provide an ongoing supply of well-located, infrastructure-ready urban development capacity. It therefore informs both the identification and release of FUZ land. In practical terms, the NPS-UD provides the strategic direction, while the FUZ functions as the implementation mechanism.
- [4] In this context, the NPDC uses the FUZ to:
- Demonstrate compliance with long-term capacity requirements under the NPS-UD,
  - Ensure there is always a pipeline of urban land beyond currently zoned areas.
- [5] Within the New Plymouth context, FUZ land plays an important role in ensuring that the strategic objectives for urban form and development planning in the PODP are achieved, including UFD-19 set out below.

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| <b>UFD-19</b> | <p><i>There is sufficient land available to meet the short, medium and long-term housing demands of the district, as follows:</i></p> <ol style="list-style-type: none"><li><i>1. in the short to medium-term (in no particular time priority order):</i><ol style="list-style-type: none"><li><i>a. infill;</i></li><li><i>b. undeveloped residential zones, particularly the Structure Plan Development Areas;</i></li><li><i>c. residential intensification in and around the city centre, town centres, local centres and key transport routes where there will be increased housing densities.</i></li></ol></li><li><i>2. in addition to the above, in the long-term in Future Urban Zones that have been zoned for urban development through a plan change process.</i></li></ol> |
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[6] Without an effective FUZ, the Council faces the following risks:

- Failing the NPS-UD requirement to maintain a 30-year development horizon;
- development occurring in locations where existing or planned infrastructure does not exist or cannot be efficiently provided;
- ad hoc development which results in inefficient infrastructure planning; and
- reverse sensitivity issues.

#### Effects of Ricochets'

[7] The issue of firearm ricochets was addressed by Mr O'Sullivan, Mr Phillips, and Mr Ellerton at the hearing. In my view, this effect remains difficult to quantify. While the applicant strongly maintains that ricochets do not occur, that position must be considered alongside the firsthand accounts given by both Mr Ellerton and Mr Phillips.

[8] I acknowledge that ricochet effects may be infrequent; however, the potential consequences are significant. For that reason, if consent were to be granted, I would recommend the inclusion of a review condition. In my opinion, such a condition would provide the consent authority with an appropriate mechanism to respond to any unexpected or unforeseen effects by amending existing conditions or imposing further conditions as required.

#### Changes to Proposed Mitigation

[9] Revised conditions Rev1B and 1C were introduced on days 1 and 2 of the hearing. These revisions propose additional mitigation intended to reduce effects on both the Mr Phillips property and the affected FUZ properties. Mr Edwards also identified in his evidence in chief several amendments made in response to the concerns raised in my s42A report.

- The reduction of shooting hours on Sunday
- The reintroduction of low-noise periods
- Certification of firearms as low noise or other (to manage firearm use during low noise periods).

- A requirement for a permanent sound level meter capable of capturing real-time data
- For Mondays to Saturdays, a requirement for the NMP to include limits on the number of rounds fired to ensure the CNR 90 control is not exceeded (2,700)

[10] While I acknowledge the additional mitigation proposed in response to noise effects, some mitigation previously relied upon to provide relief from those effects appears to have been removed. At the same time, the number of events giving rise to more intensive noise effects has increased. In my view, these changes warrant careful scrutiny.

*Removal of relief prior to three-day events*

[11] Paragraphs 37 and 38 of my evidence address the special events proposed to be held at the club. My assessment of effects proceeded on the basis that there would be two three-day events per year during which the CNR control would not apply. At that time, the application proposed a degree of relief from the effects of those events by providing that no shooting would occur at the club during the preceding three days.

[12] Paragraph 51 of Mr Edwards' evidence in chief indicates that this relief is no longer proposed, and that shooting at the club prior to those events would instead be managed through the CNR restriction. In my view, that amendment has the effect of increasing both the scale and intensity of the resulting noise effects, particularly given that these events may involve up to 30,000 rounds<sup>[1]</sup>.

*Introduction of 2-day events*

[13] Draft condition 14<sup>1</sup> provides that the club may hold four two-day events per year during which the "low or no noise" restrictions set out in draft condition 12 do not apply. In my view, this change also increases the scale and intensity of effects.

*Outstanding concerns regarding "low or no noise" controls, including Police use*

[14] Section 3.0 of the draft NMP states that the "Police and Armed Offenders Squad ...shall comply with the requirements of this NMP other than in circumstances

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<sup>1</sup> Mr Edwards evidence in chief.

*related to an emergency.*” This contrasts with draft condition 12 set out in Mr Edwards’ evidence in chief, which states: *“The periods of low noise do not apply to Police and Armed Offenders Squad training.”* In my view, this inconsistency highlights not only the removal of mitigation measures, but also a broader question as to whether the consent holder can effectively manage and control the effects of police activities.

[15] While the Club has provided certainty as to when the low or no-noise periods would occur, the practical management of those periods remains a concern in my view. As I set out in my evidence, I do not consider those concerns to have been adequately addressed. They include:

- The practicality of a mechanism that relies on club members knowing whether the firearm being used is on the low- or no-noise list; and
- The lack of clarity as to the immediate consequences if the mechanism is ignored by a club member

#### Case Law Referred to by Mr Trevathan

[16] Mr Trevathan’s evidence in chief refers to several cases that may assist the Panel in considering the current application. If it would be of assistance, I can prepare a brief comparative analysis of those cases against the current proposal, including:

- Predicted or requested LAFmax dB
- CNR limit
- Estimated total number of rounds fired per week
- Hours of shooting
- Nearest dwelling
- Activity status

[17] I would welcome input from the other planning experts in preparing that material.

Updated Position

[18] Considering Mr Ellerton’s verbal comments on noise effects, and having considered the evidence, questioning, and responses presented at the hearing, my position remains as set out in the s42A report: the application should be declined.

**Next Procedural Steps**

[19] Conferencing between the planning experts is scheduled for Wednesday, 27 May 2026. Consistent with paragraph 8(a) of Minute 3, a joint witness statement is to be provided to the panel no later than 2 June 2026.



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Campbell Robinson

Dated: 25.5.26