

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S336
Submitter Name	Westport Pistol Club
Submitter Company/Group Name	Westport Pistol Club
Submitter is contact	Yes
Email	woodstockrally@hotmail.com
Wish to be heard	Yes
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	I am directly affected by an effect of the subject matter of the submission that— (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Whole Plan	Whole plan	Oppose in part	As per Emailed copy of: Westport Pistol Club Inc Society - submission on zoning around Westport Rifle Range.	Westport Pistol Club Inc Society - submission on zoning around Westport Rifle Range.

Documents included with submission

Document name	SUBMISSION INTO THE TE TAI POUTINI ONE DISTRICT PLAN - Westport Pistol Club
File	submissionintothetetaipoutinionedistrictplanwestportpistolclub.pdf
Description	SUBMISSION INTO THE TE TAI POUTINI ONE DISTRICT PLAN - Westport Pistol Club Incorporated Society
Document name	SUBMISSION INTO THE TE TAI POUTINI ONE DISTRICT PLAN - Westport Pistol Club
File	submissionintothetetaipoutinionedistrictplanwestportpistolclub.docx
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SUBMISSION INTO THE TE TAI POUTINI ONE DISTRICT PLAN

9 November 2022

Westport

Westport Pistol Club Incorporate Society Inc – Submission into the TToPP and the Zoning adjacent to the Westport Range

Pistol Shooting in Westport

Pistol shooting is an accepted recreational past time in New Zealand. All pistol clubs are affiliated to a National Sporting Body; this is Pistol New Zealand.

Target pistol shooting was introduced in New Zealand in 1968. By 1972 New Zealand had top ranked world shooter representing NZ at the Olympic Games. Since that time target pistol shooting has developed in numbers and the types of events shot. Pistol NZ shooters have competed successfully in many international events, winning many medals at Commonwealth Games, as well as World Championship medals in other pistol disciplines.

Pistol New Zealand has 88 affiliated clubs located throughout New Zealand. The Westport Pistol Club is one of those.

The Westport Pistol Club is an active club that has 28 members. The location for the range is at Pakihi Road, south of Westport.

Due to the high level of licensing requirements, that are administer by NZ Police, our members are some of the most vetted and secure members of society. Our members represent a cross section of our community. They are business owners, contractors, mine managers, farmers, conservationists, first responders, entrepreneurs, and engineers.

Our range is a NZ Police Certified shooting range. It has been at that location for decades and is secure on a crown lease via concession arrangement with the Department of Conservation. The proposed stewardship land designation through the current crown review is Local Purpose Reserve under the Reserves Act 1977, providing even more appropriate protection to support its current use.

Shooting Activities

Our club is active in holding shoots. Club shoots are each Sunday morning. Other times can see our club members shoot at any time, as they hold certified Range Officer Qualifications. Many do so and shoot at any and all times of a day.

The club is able to hold inter-club events. This means that other clubs can come to the Westport Pakihi Rd Range and shoot. These events can get sizeable in nature depending on the discipline.

The Club intends to actively continue its investment in the range to allow more and diverse shoots to be held at the site.

Current allowable activity – Permitted Activity

The current Buller District Plan, operative since January 2000, allows Recreational Sport Shooting as a Permitted Activity under Clause 7.9.5 which specifically spells out what we know as the 'Rifle Range Protection' zone. There are no constraints on this activity in regard to noise, hours of operation, nor activity.

The rifle range is established and further protected by a designated exclusion zone that we know as 'the Wineglass'. This is a planning overlay that maps an area around and behind the range for the sole protection of the range activities.

Te Tai Poutini Plan – proposed zoning and rules

The Te Tai Poutini Plan takes into account the operative BDC District Plan around Permitted Activity and provides for the Rifle Range Protection Zone. **We SUPPORT this.**

The new TToPP Plan also appropriately maps the area known as the paddocks to the North of Pakihi Road as General Rural Zone (GRUZ). **We SUPPORT this.**

Providing an area of buffer, by way of zoning, between the new proposed Urban Zone of Alma Road and the established and permitted activity of the Rifle Range is appropriate and smart.

The General Rural Zone provides for primary production, such as pastoral farming, livestock, horticulture and forestry. The zone is characterised by an open, vegetated landscape that is interspersed with low density buildings and structures that are predominantly used for rural activities, such as barns and sheds. This is entirely appropriate bordering an active shooting range. It is consistent with the current land use and the current Buller District Plan.

As the Te Tai o Poutini Plan is currently drafted it seeks to maintain this rural character. **We SUPPORT this.**

We particularly believe GRUZ – R2.2 and GRUZ – R3.2 are appropriate.

Likewise GRUZ – R33 is entirely appropriate to ensure no residential housing is established in the Rifle Range Protection Area.

Incursion of General Residential and Future Urban zone onto the Rifle Range Protection Area

A pre-exposure draft advocated a whole scale rezoning of the area colloquially known as the paddocks to change this to Urban Residential zone bringing inappropriate housing developments right up to the boundary of the Rifle Range. We did not support this and

provided a pre-exposure draft submission. This submission focussed on the whole scale inappropriateness of planning to place Urban zone up to Pakihi Road, and in some instances even into the Rifle Range Protection area.

The submission sought to exclude General Residential Zone at Alma Road from nearing the Westport Rifle Range. It requested the removal of all Residential Zone south of Alma Road and create a lateral buffer zone to the north and northwest side of the Rifle Range and Pakihi Road to provide a lateral use protection buffer of Natural Open Space Zone.

The TToPP Joint Committee in its May 2022 sitting considered staff advice, which read: “While staff consider that the Alma Road terrace is undoubtedly the most suitable location for a progressive managed retreat for Westport, the issues raised around retaining the quarries and rifle range are important. As a consequence, a reduction in the area to be rezoned as General Residential Zone is recommended”.

The Te Tai Poutini One District Plan Joint Committee discussed these pre-exposure draft submissions, and their resolution recommended and approved the rezoning of the land to General Rural Zone. **We SUPPORT this.**

Te Tai Poutini One District Plan Joint Committee’s Submission – procedural errors

Since the plan has been advertised and opened for public consultation, the TToPP Joint Committee met in its September 2022 sitting and was provided advice by staff that the draughting of the zoning maps for the areas in question along Pakihi Road was deemed ‘an error’. This is not factually so; it was passed by resolution of Joint Council. The TToPP Joint Committee now seeks to submit on its own plan rectifying this ‘error’.

This is not procedurally correct. The Joint Committee discussed and passed a resolution across its whole panel to accept the appropriateness to adequately include and plan for appropriate buffer zones to protect existing use rights and guard against reverse sensitivity issues.

The passing of a resolution that seeks to redress this as an error is neither procedurally correct nor in line with the Committees’ own Standing Orders. **We DO NOT SUPPORT this.**

Buffer Zone and Reverse Sensitivity

Mapping this area adjacent to the Rifle Range Protection area as Future Urban Zone is entirely inappropriate. This zone would set in place the construction of high use urban housing, town planning, roads, footpaths, cul de sacs and family homes with backyards and children on trampolines. As General Residential Zone seeks to pertain to areas used predominantly for residential activities with a mix of building types, and other activities. Having this type of development and urban activity right up to an active Rifle Range is inappropriate. **We DO NOT SUPPORT this.**

It seems at direct odds with National Planning Standards and the Resource Management Act which seek to create and adopt appropriate land use zoning plans that are appropriate to providing buffers to differing land uses in order for the sustainable management of our resources. This best practice planning should encourage us (as communities and as individuals) to plan for the future of our environment and its social, economic, and cultural wellbeing all the while avoiding, remedying, or mitigating any adverse effects of activities or direct conflict. Zoning this area as Residential will not achieve this, therefore **We DO NOT SUPPORT this.**

The activities at the Rifle Range Protection area is managed under existing use rights, predating the Resource Management Act. Returning to considering the remapping of this area to Residential Use zoning as it was mooted in the pre-exposure draft will provide for significant reverse sensitivity issues and acceptability challenges.

The club appreciates the strategic desire to appropriately plan for Westport's managed retreat from natural hazards. Many of our club members were directly affected in the flood and many more members were directly involved in our community response to man Civil Defence, help provide law and order, man comms radios and lifeline telecommunications and generally help and support our community in a time of need. So, while appreciating there may be some grounds for appropriate zone development along selected parts of Alma Road that plans for this future township resilience, we simply ask that this is deemed not appropriate for the area directly south of the power lines leading towards the range.

RECOMMENDATION:

Keep the area between Pakihi Road, Gillows Dam and the 110Kv Transpower WMG-WPT-A line as General Rural Zone.

Other Matters

Other matters in the plan that we wish to see changed and clarified:

Noise: We wish to have the words 'Rifle Range' added to the list of potentially affected activities in para 2 in Overview statement on Pg 263:

"Where noise sensitive activities are established near existing noise-generating activities, or areas where higher noise levels are to be expected, reverse sensitivity effects can arise, potentially resulting in the existing noise-generating activities being constrained, in terms of their ongoing operation or expansion. This is a particular concern for important services and community facilities, including Airports and Heliports, Sports Grounds and Stadiums, **Rifle Ranges**, the State Highway, Railway Corridors and the Ports, which could be constrained if reverse sensitivity effects arise."

Noise R2: We support Noise R2.14 as a permitted activity at any time. Noting it shall have no limitations to time of day.

Noise R3 – Acoustic Insulation: It makes no sense to constrain Noise Insulation requirements only to commercial or accommodation providers as it pertains to noise insulation for habitable rooms and not have this in effect for residential building requirements. We require all Sensitive Activities, such as residential activity; visitor accommodation; retirement home; healthcare facility; community facility; and education facility to hold this level of acoustic insulation.

Noise R4: allows for Temporary military training activities with a minimum separation distance from houses of 500m during the hours of 7am to 7pm, but then reduces that minimum distance to just over 1m for night times. We suspect this is a drafting error and it should have the inclusion of a capital 'K' to read 1.250Km (as in Kilometres)

GRUZ - R2 Conservation and Recreation Activities: In GRUZ – R2.2 delete the word 'Target' as not all Recreational Firearms Shooting is at set targets, think claybirds for example. Easier to simply redraft to read: "Within the Rifle Range Protection Areas, Recreation Activities are restricted to Recreational Firearms Shooting."

GRUZ – R3 Residential Activities and Residential Units: add a point: vi to read 250m from a Rifle Range Protection Area then the acoustic insulation requirements as set out in Rule NOISE - R3 will apply.

MPZ – R4 Residential Activities: should add a point: vi. to read 250m of a Rifle Range Protection Area identified in the Rifle Range Protection Area overlay then the acoustic insulation requirements as set out in Rule NOISE - R3 will apply.

MPZ – R8 Visitor Accommodation that is not in a Marae Complex: Point vi. Should be redrafted to read 250m of a Rifle Range Protection Area identified in the Rifle Range Protection Area overlay.

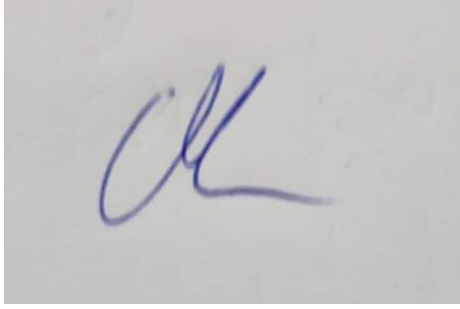
At the TTOPP Hearings: We wish to be **HEARD** in support of this submission.

Undersigned:



Eric de Boer

President of the Westport Pistol Club Inc

A square image showing a handwritten signature in blue ink on a light-colored background. The signature is stylized and appears to be the initials 'CH'.

Chris Hartigan

Secretary of the Westport Pistol Club Inc