

SUBMISSION ON THE PROPOSED TE O TAI POUTINI PLAN

2 November 2022

154 Queen Street

Westport

Westport Rifle Club Incorporated – Submission on the Proposed Te Tai o Poutini Plan TTPP with regard to the Westport Rifle Range

Rifle Shooting in Westport

Rifle shooting is an accepted recreational past time in New Zealand, whether it be hunting or target shooting on a range.

The Westport Rifle Club Incorporated leases the area known as the Westport Rifle Range which is adjacent to Pakihi Road, south of Westport. The Range is currently provided for as a rifle range in Buller District Council's operative District Plan. The range has been in existence since the First World War and was built by New Zealand Defence Forces.

It has been at that location for decades and is secure on a crown lease via concession arrangement with the Department of Conservation to The Westport Rifle Club Inc. The proposed stewardship land classification through the current crown review is General Purpose Reserve under the Reserves Act 1977 which would provide even more appropriate protection to support its current use. This draft recommendation recognises the important of the range and its longstanding use.

The range contributes to the wellbeing of the community through its recreational use and that the outdoor lifestyle (of which hunting and shooting is an integral part) is important to those who live here and for attracting others to live here.

Shooting Activities at The Range

The Westport Rifle Club primarily runs the range for the benefit of club members and other organisations who come to Westport to shoot at the range. Club members shoot at any time as long as they follow the Range Standing Orders. Currently, not counting events at the range and Westport Pistol Club shoots, our members use the range between 250 to 280 times a year based on figures from our range register. If there was not a designated range to test rifles then a large proportion of this usage would likely happen in areas that are far more unsafe to do so such as road ends, riverbeds and beaches.

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 Area'. 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 zone that we know as 'the Wineglass'. This defines 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. The range is presently zoned Open Space Zone in the proposed plan. The Rifle Range is provided for via the Protection Range Protection Area. **We SUPPORT this.**

Presently, the proposed TTPP Plan also appropriately maps the area known as the 3x paddocks (i.e. Lot 2 DP 404550, Pt Section 24 Blk VII Kawatiri SD and Lot 2 DP 418652) 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 General Residential Zone of Alma Road and the established and permitted activity of the Rifle Range is appropriate and workable.

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 proposed Te Tai o Poutini Plan is currently drafted it seeks to maintain this rural character adjacent to the range. **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 and Adjacency of General Residential and/or Future Urban Zone to the Rifle Range Protection Area

The Exposure Draft advocated a whole scale rezoning of the area colloquially known as the 3x paddocks to change this to an urban/residential zone.

It is inappropriate to extend an urban/residential zone so far south to Pakihi Road and it is grossly inappropriate to extend it into the present Rifle Range Protection Area. **We DO NOT SUPPORT this.**

It is important to limit General Residential Zone at Alma Road from nearing the Westport Rifle Range. Submissions on the Exposure Draft feedback requested the removal of urban/residential zoning too far south of Alma Road and the creation of 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 TTPP Committee met in its May 2022 sitting and 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 Plan Committee discussed the Exposure Draft submissions, and their resolution recommended and approved the rezoning of the land to General Rural Zone. **We SUPPORT this.**

Te Tai Poutini Plan Committee Submission

Since the plan has been advertised and opened for public consultation, the TTPP Committee met in its September 2022 sitting and was provided advice by staff that the drafting of the zoning maps for the areas in question along Pakihi Road was deemed an error. This is not correct. This decision was resolved by the Committee based on sound reasoning. The TTPP Committee now seeks to submit on its own plan rectifying this ‘error’.

This is not procedurally correct. The Committee discussed and passed a resolution across its whole panel to accept the appropriateness of adequacy including 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 the area adjacent to the Rifle Range Protection Area over Pakihi Road as General Residential Zone (or any other residential zone or potential residential zone such 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. Having this type of development and urban/residential activity right up to an active Rifle Range is totally 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 for the sustainable management of our resources. 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 General Residential Zone (or any other residential zone or potential residential zone such as Future Urban Zone) will not achieve this, therefore **We DO NOT SUPPORT this.**

The activities at the Rifle Range Protection Area are provided for under existing use rights (that, in fact, predate the Resource Management Act altogether). Returning to considering the remapping of this area to residential zoning as it was mooted in the Exposure Draft will contribute to 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 at 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:

We submit that the area between Pakihi Road, Gillows Dam and the 110Kv Transpower WMG-WPT-A line be **General Rural Zone** (i.e. Lot 2 DP 404550, Pt Section 24 Blk VII Kawatiri SD and Lot 2 DP 418652).

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. We support this rule as drafted with no limitations e.g. no limitations as to time of day.

NOISE – R3: : It makes no sense to constrain acoustic 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.

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 work 'Target' as not all Recreational Firearms Shooting is at targets, think 'clay birds,' for example. Easier to simply redraft to read: "Within the Rifle Range Protection Areas, Recreation Activities are restricted to Recreational Firearms Shooting."

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.

Rules related to the Rifle Range Protection Area for the General Rural Zone not duplicated for the Open Space Zone: GRUZ – R2, GRUZ – R3, GRUZ – R4, GRUZ – R5, GRUZ – R6, GRUZ – R23 and GRUZ – R33 are all rules that relate to the Rifle Range Protection Area. **We SUPPORT these.** In the case of the Westport Rifle Range, part of the Rifle Range Protection Area is zoned Open Space Zone and these rules are not duplicated appropriately for this zone. We request that these rules are duplicated. For clarity, it is particularly important that GRUZ – R2 2. is replicated within OSZ – R2 with the aforementioned deletion of 'Target' (i.e. "within the Rifle Range Protection Areas, Recreation Activities are restricted to Recreational Firearms Shooting").

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

Undersigned:

Bernard Menzies

President of the Westport Rifle Club Inc

Dean Phibbs

Secretary of the Westport Rifle Club Inc