



1. On behalf of the Rifle Rod and Gun Club (RRGC), Mr Hunt and Mr Jepsen have re-considered our evidence presented on December 7 2023, and have further regard to the evidence of Ms Coplestone of 28 November 2023.
2. We note that the Coplestone evidence, which revisited the earlier planners evidence, was only made public 5 working days ago.
3. In our [7.12.2023] evidence, we requested that New Clause (6) to Rule R6.15.4.1 be replaced with:

*Any subdivision in the Rural Zone or in the Rural Residential Overlay that will create lots within the 55 dB LAFmax contour identified on Map 7A.4B of the Aokautere Structure Plan except subdivision for the purposes of accommodating any network utility, is a **Non-Complying Activity**.*

4. Commissioner McMahon at the hearing today [7.12.2023] helpfully explained the differences between a non-complying activity and a prohibited activity to Mr Hunt and explained why the latter was rarely used and asked Mr Hunt if he agreed that 'non-complying' was more appropriate, to which Mr Hunt replied yes.
5. In hindsight, we retract this view and request that our original evidence stand.
6. Our reasons are as follows:
7. Mr Hunt is not a planner and is not expert in the complexities of the types of RMA or Plan activities and was today, not given the opportunity to seek further guidance or consultation with his club colleagues in this matter.
8. The changed evidence of Ms Coplestone (November 28 2023) was made public only 5 days ago, and RRGC has not had

sufficient time to consider this in isolation, or subsequent to the commissioner's views on non-complying and prohibited activities.

9. Clause 14 of the planning evidence of Ms Copplestone recommends that any subdivision within the 55 dB L<sub>max</sub> contour identified on map 7A.4B is non-complying but then progresses to assessment criteria for granting consent, which include:
  - Noise mitigation the effectiveness of reducing noise levels at the receiving property.
  - The extent to which reverse sensitivity effects on the RRGC are avoided.
  
10. In our view, it is not practical to 'reduce the noise levels at any receiving property' unless the activities of RRGC are confined within a building or undergrounded. This would be at unachievable cost to the club.
  
11. The measures given in our earlier evidence will reduce the scale of the noise but not the intensity or character; The measurement metric in Mr Lloyds recommendation, accepted by Council is L<sub>Amax</sub>, which is a measurement of intensity.
  
12. The reverse sensitivity effects are as a result of noise complaints. Noise complaints will arise irrespective of any noise mitigation measures such as double glazing, insulation, dwelling orientation etc which can only reduce noise a dwelling and will have little effect on outside noise. Given that RRGC does not operate after 6pm on any day, noise does not intrude on evening TV or sleep, and mitigation such as double glazing or insulation is of little benefit.

13. We have concerns in regard to clause 14 of Ms Copplestnes evidence, which on the one hand in Policy 3.9 recommends avoiding subdivision within the 55dB contour, but then states '*in which case Policy 3.8 will apply.*'
14. It is not clear to us if this means when noise is above 55dB or below 55dB LAmax.
15. Policy 3.8 outlines ways in which dwellings **can** be built inside the 55dB contour, which is directly contrary to policy 3.9.
16. Policy 3.8 goes on to *support* subdivision within the 55dB contour provided a title consent notice is recorded, which in our view will not achieve any positive outcome, and that dwellings are built to face north. This will have little effect on outdoor noise levels. A no complaints covenant is not suggested which we are surprised at.
17. We believe that the proposed rule and assessment criteria, together with Policies 3.8 and 3.9 provide a blueprint for ways to achieve subdivision within the 55dB LAmax contour.
- 17 Rifle Rod and Gun Club submit that the recommendations and policies in the format as proposed by the Copplestone planning report will result in an avalanche of dwellings inside the 55dB LAmax contour and will create serious reverse sensitivity effects on the operation of the Rifle Rod and Gun Club.
- 18 RRGc request that we be given the opportunity to speak to this addendum on December 8 2023.

