



**SUBMISSION FORM 5**  
**Clause 6 of First Schedule, Resource Management Act 1991**

**Submission on publicly notified proposed  
District Plan Change 13 - Hazardous Substances.**

**Submissions can be:**

**Posted to:** Planning Policy Manager, Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

**Delivered to:** Planning Enquiries, Customer Service Centre, Civic Centre, 50 The Octagon, Dunedin

**Faxed to:** 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)

**Emailed to:** planning@dcc.govt.nz

**Note to Submitter:** The closing date for serving submissions on the Dunedin City Council is **12 December 2011.**

**Your name and contact details:**

Your Full Name: Scott Michael Kunac

ALLAN MILLAR'S HUNTING & FISHING  
922 GEORGE ST, DUNEDIN

Full Address: 52 TIRAHANUA RD  
RD 2 MOSGATE

PH (03) 477-6665  
FAX (03) 477-5871

Telephone: 03 477 6665 Facsimile: 03 477 5871

Email Address: allan.millar@extra.co.nz

I: ☒ **Do** / ☐ **Do Not** wish to be heard in support of this submission at the hearing

If others make a similar submission, I will consider presenting a joint case with them at a hearing.  
(Delete the above statement if you would not consider presenting a joint case at a hearing)

**The specific provisions of Proposed District Plan Change 13 that my submission relates to are:**  
(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

STORAGE OF SAFETY AMMUNITION FOR RE SALE  
IN A RETAIL STORE.

I PERSONALLY OPPOSE THE PROPOSED CHANGES TO  
THE DISTRICT PLAN # 13.

ALLAN MILLAR'S HUNTING & FISHING  
922 GEORGE ST, DUNEDIN  
PH (03) 477-6665  
FAX (03) 477-5871

**My submission is that:**

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

We Could Not Operate As A The Supplier of  
L.H.S SPORTING AMMUNITION WITH THE QUANTITIES  
THAT HAVE BEEN PROPOSED IN THE CHANGES  
TO THE DISTRICT PLAN, # 13

WE STRONGLY OPPOSE THESE CHANGES TO THE  
PLAN

ALLAN MILLAR'S HUNTING & FISHING  
922 GEORGE ST, DUNEDIN  
PH (03) 477-6665  
FAX (03) 477-5871

**I seek the following decision from the Council:**  
(Please give precise details.)

TO WITHDRAW SUGGESTED STORAGE QUANTITIES  
FOR L.H.S AMMUNITION AND SEEK A MORE  
REALISTIC SOLUTION THAT WILL NOT EFFECT OUR  
BUSINESS.

ALLAN MILLAR'S HUNTING & FISHING  
922 GEORGE ST, DUNEDIN  
PH (03) 477-6665  
FAX (03) 477-5871

Signature of submitter: 

(or person authorised to sign on behalf of submitter)

Date: 28-11-11

Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the plan change process.

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)

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**Teresa Gutteridge**

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**From:** Paul Freeland  
**Sent:** Thursday, 8 December 2011 09:18  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Submissions

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**From:** Vicki and Glen Miller [mailto:vgmiller@xtra.co.nz]  
**Sent:** Wednesday, 7 December 2011 10:11 p.m.  
**To:** pfreelan@dcc.govt.nz  
**Subject:** Submissions

Attn: Paul Freeland  
Re: Volumes of ammunition proposed by Plan Change 13  
I hear by wish to put forward the following Submission;

I request that the proposed plan volumes be the same as all other main cities in New Zealand then any uncertainty of that the allowable mount depending on which city you may be in would be taken away. I see no reason for the amount to be less than the other cities like Auckland , Christchurch and Wellington and it would be better also if other local bodies were encouraged to do the same .

Submission sent by;

Mr Glen I Miller 5 Canberra Place, Waldronville, Dunedin 9018.

Yours Sincerely  
G.I.Miller.

8/12/2011



**Teresa Gutteridge**

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**From:** Nic Jepson  
**Sent:** Thursday, 8 December 2011 08:30  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission  
**Follow Up Flag:** Follow up  
**Flag Status:** Purple  
**Attachments:** Submission-on-Dangerous-Goods-2011-DCC.doc

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**From:** David Holdsworth [mailto:david.holdsworth@otago.ac.nz]  
**Sent:** Wednesday, 7 December 2011 12:12 p.m.  
**To:** planning@dcc.govt.nz  
**Subject:** Plan Change 13 - Hazardous Substances Online Submission

FROM David Holdsworth

David Holdsworth has made a submission to the "Plan Change 13 - Hazardous Substances via the online application form. Below are the details of the feedback.

**Your details**

- First name: David
- Last name: Holdsworth
- Organisation: N A
- Street address: 35 Greenacres street
- Suburb: Macandrew Bay
- Town / city: Dunedin
- Post code: 9014
- Email address: david.holdsworth@otago.ac.nz
- Day phone: 03 4761024
- Evening phone: 03 4761024

**Your submission**

- I Do/Do Not wish to be heard in support of this submission at the hearing: Do
- If others make a similar submission, I will consider Yes

8/12/2011

presenting a  
joint case  
with them at a  
hearing:

- The specific provisions of Proposed District Plan Change 13 that my submission relates to are::

I would like to ask the DCC why the proposed amount of sporting ammunition [Class 1.4S substance] to be stored in domestic households 15kg is not in harmony with HSNO regulation storage criteria which is 25kg. I'd also like to say the proposed 15kg Class 1.4S proposed amount is too small and inconvenient for regular competition and practice shooting. I'd also like to ask when sporting ammunition does not pose a fire or explosion risk and there has never been a safety issue with this in the past why suddenly now regulations are being brought in at all. DCC proposal is not in harmony with Hazardous Substances NO Legislation The proposed amount of sporting ammunition able to be stored in domestic households 15kg is not in harmony with HSNO legislation storage criteria. Table 7, page 125 of the Hazardous Substances (Classes 1 to 5 Controls) Regulations 2001; Schedule 2 [2003 SR 2003 / 177] specifies the quantities for Class 1.4S as 25kg and 15 kg for 1.1C & 1.3 and gunpowder of 1.1D as 15kg. Safety Factors and Class 1.4S substances Commercially available sporting ammunition, class 1.4S does not explode in bulk, is not explosive in fires or from other causes. The propellant, nitrocellulose which is a propellant does not detonate like a "high explosive" such as Trinitrotoluene [TNT]. It is very stable and small arms ammunition stored in collections or other since WWI or before is still perfectly shootable today. The behaviour of ammunition and its propellant in storage including in fires is well researched over the last 120 years by military, ammunition & chemical manufacturers and various other interested parties showing it does not explode in bulk and is not a significant danger in fires to personal nearby. In fact the net weight of explosives in small arms centrefire ammunition of most types is approximately 10% of the overall mass of the ammunition, making goods of class 1.4S so inert, they are suitable in military magazines for use as revetments (dividers) between bays containing high explosives as used in artillery and naval shells, mines etc. The non hazard nature of class 1.4S is comprehensively written up in the likes of Julian S. Hatcher [Major General USA retired] in "Hatchers Notebook" page 531 "small arms ammunition as a fire or explosion hazard". Hatchers Notebook, third edition 1966, Stockpole Printing, Harrisburg, PA. USA. This work shows that small arms ammunition in fires is not a danger and in fact the projectiles in the cartridges that flew off when the ammunition was cooked off in a fire would not even penetrate a cardboard carton sheet adjacent to the test. This was more recently demonstrated by a comprehensive programme in the TV series "Mythbusters". This programme is available online to view, <http://mythbustersresults.com/episode85> and shows a range of ammunition types placed in an oven and on an open fire and the non injury results of the ammunition popping. DCC proposal and Practical Use Issues with Class 1.4S substances For those shooters involved in practice and or competition [e.g. Masters Games shooting events], recreational and competitive shooting clubs e.g. Gun-club shotgun day events and pest control [Easter Bunny shots] the limited amount of ammunition 15kg proposed for storage could be consumed in a limited number of shooting events of one calibre. This does not allow for any other types of ammunition to be stored to be used in other calibre firearms the home owner may have. This proposal does not allow shooters to respond to

market opportunities. Ammunition has a very long shelf life 60 to 100 years. It's prudent to buy ammunition for future shooting events when special lower prices are offered, as the ammunition does not degrade over time. To respond to price offers if you own a shotgun and one or two rifles of different calibre becomes problematic under the 15kg proposal if you cannot store a reasonable amount of ammunition. This will impact on the costs for farmers, duck-shooters, small-bore ammunition officers, clay target clubs, rabbit shooters including those involved with the Easter Bunny Hunt, full bore rifle shooters, competitive shooting enthusiasts including those of Cowboy Action Shooting (CAS) persuasion, and others who participate in "three gun" matches of all descriptions. Competitive handgun shooters will be adversely affected by these proposals too. This limit will also affect cartridge collectors,

- My submission is that::

My grounds for objecting to the proposed storage weight of class 1.4S (sporting ammunition) are: (1) There has been no safety issues with sporting / small arms ammunition or propellants storage in the past in the Dunedin City Council area or New Zealand for that matter. (2) Sporting ammunition does not explode in bulk in fires or spontaneously in storage. (3) The proposed weight is out of harmony with HSNO regulations. (3) It is not consistent with other New Zealand city councils' storage criteria. (4) It is unenforceable, (5) It forces owners to self-incriminate should their purchases exceed the thresholds set by this proposal.

- I seek the following decision from the Council::

I'd like to submit that: 1. For Class 1.4S sporting ammunition the amount allowable to be stored in domestic housing be consistent with the HSNO regulations situations and set at 25kg. 2. For reloading smokeless propellants, the proposed threshold 15 kg max allowable in residential areas for items classed as 1.3C ("Smokeless ammunition reloading powder") should be keep in line with HSNO regulations allowing 15kg. 3) For class 1.1D (black powder), thresholds the proposed 5 kg for residential zones and "residential activities in all other zones" should stay at 5kg as proposed, as it can be dangerous in fires and is easily ignited.

- Attachment: Submission-on-Dangerous-Goods-2011-DCC.doc, type application/msword, 38.5 KB
- Attachment: No file uploaded





**Submissions Close: 5pm Monday 12 December 2011**

**Contact person: Kirstyn Lindsay, Planner (Policy), 477 4000**

**How to make a submission**

**Complete Form 5 of the Resource Management (Forms, Fees and Procedures)**

**Regulations 2003, which is available from DCC Customer Services Centres, Libraries or in the documentation section below, online or will be mailed to you if you phone 477 4000 or email [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz).**

**Submission can be:**

**Posted to: City Development Manager, Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058**

**Delivered to: Planning Enquiries, Customer Services Centre, Civic Centre, 50 The Octagon, Dunedin**

**Emailed to: [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)**

**Online: Plan Change 13 online submission form**

**After the closing date for submission, the Council will prepare a summary of the submissions and publicly notify the availability of that summary. There will be an opportunity for:**

Kirstyn Lindsay, Planner (Policy),  
Dunedin City Council

**Submission on District Plan Change 13; 2011 DCC**

Dear Kirstyn,

I would like to ask the DCC why the proposed amount of sporting ammunition [Class 1.4S substance] to be stored in domestic households 15kg is not in harmony with HSNO regulation storage criteria which is 25kg. I'd also like to say the proposed 15kg Class 1.4S proposed amount is too small and inconvenient for regular competition and practice shooting. I'd also like to ask when sporting ammunition does not pose a fire or explosion risk and there has never been a safety issue with this in the past why suddenly now regulations are being brought in at all.

#### **DCC proposal is not in harmony with Hazardous Substances NO Legislation**

The proposed amount of sporting ammunition able to be stored in domestic households 15kg is not in harmony with HSNO legislation storage criteria.

Table 7, page 125 of the Hazardous Substances (Classes 1 to 5 Controls) Regulations 2001; Schedule 2 [2003 SR 2003 / 177] specifies the quantities for Class 1.4S as 25kg and 15 kg for 1.1C & 1.3 and gunpowder of 1.1D as 15kg.

#### **Safety Factors and Class 1.4S substances**

Commercially available sporting ammunition, class 1.4S does not explode in bulk, is not explosive in fires or from other causes. The propellant, nitrocellulose which is a propellant does not detonate like a "high explosive" such as Trinitrotoluene [TNT]. It is very stable and small arms ammunition stored in collections or other since WWI or before is still perfectly shootable today.

The behaviour of ammunition and its propellant in storage including in fires is well researched over the last 120 years by military, ammunition & chemical manufacturers and various other interested parties showing it does not explode in bulk and is not a significant danger in fires to personal nearby.

In fact the net weight of explosives in small arms centrefire ammunition of most types is approximately 10% of the overall mass of the ammunition, making goods of class 1.4S so inert, they are suitable in military magazines for use as revetments (dividers) between bays containing high explosives as used in artillery and naval shells, mines etc. The non hazard nature of class 1.4S is comprehensively written up in the likes of Julian S. Hatcher [Major General USA retired] in "Hatchers Notebook" page 531 "small arms ammunition as a fire or explosion hazard". Hatchers Notebook, third edition 1966, Stockpole Printing, Harrisburg, PA. USA. This work shows that small arms ammunition in fires is not a danger and in fact the projectiles in the cartridges that flew off when the ammunition was cooked off in a fire would not even penetrate a cardboard carton sheet adjacent to the test.

This was more recently demonstrated by a comprehensive programme in the TV series "Mythbusters". This programme is available online to view, <http://mythbustersresults.com/episode85> and shows a range of ammunition types placed in an oven and on an open fire and the non injury results of the ammunition popping.

#### **DCC proposal and Practical Use Issues with Class 1.4S substances**

For those shooters involved in practice and or competition [e.g. Masters Games shooting events], recreational and competitive shooting clubs e.g. Gun-club shotgun day events and pest control [Easter Bunny shots] the limited amount of ammunition 15kg proposed for storage could be consumed in a limited number of shooting events of one calibre. This does not allow for any other types of ammunition to be stored to be used in other calibre firearms the home owner may have.

This proposal does not allow shooters to respond to market opportunities. Ammunition has a very long shelf life 60 to 100 years. It's prudent to buy ammunition for future shooting events when special lower prices are offered, as the ammunition does not degrade over time. To respond to price offers if you own a shotgun and one or two rifles of different calibre becomes problematic under the 15kg proposal if you cannot store a reasonable amount of ammunition. This will impact on the costs for farmers, duck-shooters, small-bore ammunition officers, clay target clubs, rabbit shooters including those involved with the Easter Bunny Hunt, full bore rifle shooters, competitive shooting enthusiasts including those of Cowboy Action Shooting (CAS) persuasion, and others who participate in "three gun" matches of all descriptions. Competitive handgun shooters will be adversely affected by these proposals too. This limit will also affect cartridge collectors,

I'd like to submit that:

1. For Class 1.4S sporting ammunition the amount allowable to be stored in domestic housing be consistent with the HSNO regulations situations and set at 25kg.

2. For reloading smokeless propellants, the proposed threshold 15 kg max allowable in residential areas for items classed as 1.3C ("Smokeless ammunition reloading powder") should be kept in line with HSNO regulations allowing 15kg.

3) For class 1.1D (black powder), thresholds the proposed 5 kg for residential zones and "residential activities in all other zones" should stay at 5kg as proposed, as it can be dangerous in fires and is easily ignited.

My grounds for objecting to the proposed storage weight of class 1.4S (sporting ammunition) are:

- (1) There has been no safety issues with sporting / small arms ammunition or propellants storage in the past in the Dunedin City Council area or New Zealand for that matter.
- (2) Sporting ammunition does not explode in bulk in fires or spontaneously in storage.
- (3) The proposed weight is out of harmony with HSNO regulations.
- (3) It is not consistent with other New Zealand city councils' storage criteria.
- (4) It is unenforceable,
- (5) It forces owners to self-incriminate should their purchases exceed the thresholds set by this proposal.

Sincerely David K Holdsworth MBA, PhD sci.  
[david.holdsworth@otago.ac.nz](mailto:david.holdsworth@otago.ac.nz)  
03 4761024



DCC

-7 DEC 2011

Business Information  
ServicesPC - X- **4**  
(Office Use Only)DUNEDIN CITY  
COUNCIL  
*Kaitiaki-o-rohe o Otago*

## SUBMISSION FORM 5

Clause 6 of First Schedule, Resource Management Act 1991

Submission on publicly notified proposed  
District Plan Change 13 - Hazardous Substances.

## Submissions can be:

Posted to: Planning Policy Manager, Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

Delivered to: Planning Enquiries, Customer Service Centre, Civic Centre, 50 The Octagon, Dunedin

Faxed to: 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)

Emailed to: planning@dcc.govt.nz

**Note to Submitter:** The closing date for serving submissions on the Dunedin City Council is **12 December 2011**.

## Your name and contact details:

Your Full Name: LINDSAY DONALD STRONGFull Address: 29 CHURCH STMOSCIEL 9024Telephone: 0274 990076

Facsimile: \_\_\_\_\_

Email Address: lindsay@hyslopeelectric.co.nzI: **Do/Do Not** wish to be heard in support of this submission at the hearingIf others make a similar submission, I will consider presenting a joint case with them at a hearing.  
(Delete the above statement if you would not consider presenting a joint case at a hearing)The specific provisions of Proposed District Plan Change 13 that my submission relates to are:

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

I oppose the change to 15 Kg limit for ammunition on the basis that by adopting the lower level Dunedin will be out of step with the rest of the country. HAZNO cites 25 Kg, why not go with that. As a competitive shooter, hunter, reloader and collector of ammunition I feel that I would at times be hard pressed to meet the 15 Kg limit. Being of Scots ancestry and very canny I buy ammunition and powder when it is at best price plus with all the different calibres I shoot the varieties I use are quite numerous. Different calibres require different powders of different burn rates and one buys different powders trying to produce the "perfect" load for the same calibre.

**My submission is that:**

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

**I seek the following decision from the Council:**  
(Please give precise details.)

That the levels allowed/proposed for Domestic Storage of safety  
ammunition raise from 15 Kg to the Hazno cited 25 Kg.  
to be in line with the rest of the country.

Signature of submitter: \_\_\_\_\_

(or person authorised to sign on behalf of submitter)

Date: \_\_\_\_\_

6/12/11

Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the plan change process.

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)



## Teresa Gutteridge

**From:** Nic Jepson  
**Sent:** Friday, 9 December 2011 08:37  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

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**From:** Stewart Bayne [mailto:sjbayne@ihug.co.nz]  
**Sent:** Thursday, 8 December 2011 08:36 p.m.  
**To:** planning@dcc.govt.nz  
**Subject:** Plan Change 13 - Hazardous Substances Online Submission

FROM Stewart Bayne

Stewart Bayne has made a submission to the "Plan Change 13 - Hazardous Substances via the online application form. Below are the details of the feedback.

### Your details

- First name: Stewart
- Last name: Bayne
- Organisation: Antique Arms Assn Otago Branch
- Street address: 68 Skibo Street
- Suburb: Kew
- Town / city: Dunedin
- Post code: 9012
- Email address: sjbayne@ihug.co.nz
- Day phone: 4775882
- Evening phone: 4879151

### Your submission

- I Do/Do Not wish to be heard in support of this submission at the hearing: Do Not
- If others make a similar submission, I will consider presenting a joint case with them at a hearing: No
- The specific provisions of Proposed District Plan Change 13 that my submission relates to are:: Table 17.1 relating to quantities of black powder, smokeless powder and ammunition quantities.

The quantities be raised to match that of HSNO law. For our members, many of whom shoot competitively, and also have

- My submission is that:: cartridge collections, the volumes of powder are too low to cover both aspects of our interests. Gun powder in private dwellings in Dunedin has not caused a problem in the past, and I see no reason why we should have them set lower than the law allows.
- I seek the following decision from the Council:: That class 1.1D gun powder be set at 15 kg. That class 1.3C smokeless reloading powder be set at 15 kg. That class 1.4S safety ammunition be set at 25 kg. That net explosive quantity be used as the unit of measure for these quantities.
- Attachment: No file uploaded
- Attachment: No file uploaded



**Teresa Gutteridge**

**From:** Nic Jepson  
**Sent:** Thursday, 8 December 2011 16:39  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission  
**Attachments:** Submission-to-Dunedin-City-Council-on-District-Plan-Change-13.doc

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**From:** Philip Cregeen [mailto:[oilyrag@xtra.co.nz](mailto:oilyrag@xtra.co.nz)]  
**Sent:** Thursday, 8 December 2011 02:54 p.m.  
**To:** [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)  
**Subject:** Plan Change 13 - Hazardous Substances Online Submission

FROM Philip Cregeen

Philip Cregeen has made a submission to the "Plan Change 13 - Hazardous Substances via the online application form. Below are the details of the feedback.

**Your details**

- First name: Philip
- Last name: Cregeen
- Organisation: New Zealand Antique & Historical Arms Association Inc.
- Street address: 57A Riverside Drive
- Suburb: Riverside
- Town / city: WHANGAREI
- Post code: 0112
- Email address: [oilyrag@xtra.co.nz](mailto:oilyrag@xtra.co.nz)
- Day phone: 09 430 6588
- Evening phone: 09 430 6588

**Your submission**

- I Do/Do Not wish to be heard in support of this submission at the hearing: Do Not
- If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes
- The specific provisions of Proposed District Plan Change 13 that my submission relates to are: Rule 17.5.1 (vi) Permitted Activities I appose the provisions set out in Table 17.1 for limits of certain explosive material in Residential properties.

Our objection is for the following reasons: • They are too low for the

- My submission is that::
    - practical requirements of many shooters/retailers. • These substances have not been shown to be a problem in the past. • Setting limits different to HSNO Act limits will lead to confusion by users and enforcers. • In practical terms they are impossible to police and enforce. • For any Local Body Council to set limits at variance with National standards will cause chaos within affected industries. (such as retailers of ammunition & powder) • It could adversely affect Insurance claims if Dunedin limits are followed by the Insurance industry.
- I seek the following decision from the Council::
    - Limits for explosives listed in Table 17.1 should be set to the same as HSNO limits. • Limit for ammunition should state that it is the weight of powder contained therein only, since the weight of ammunition is made up mainly of inert objects, case and projectile.
- HSNO LIMITS: Black Powder 15 Kg Smokeless Powder 15 Kg Safety Ammunition 25 Kg
- Attachment: Submission-to-Dunedin-City-Council-on-District-Plan-Change-13.doc, type application/msword, 346.5 KB
- Attachment: No file uploaded



# NEW ZEALAND ANTIQUE & HISTORICAL ARMS ASSOCIATION (INC.)

DEDICATED TO THE PRESERVATION OF ARMS ART HISTORY & TECHNOLOGY

MEMBER OF THE N.Z. COUNCIL OF LICENCED FIREARMS OWNERS (COLFO)

P O Box 275  
Whangarei 0140  
New Zealand  
Tel: 64-9 430 6588  
Email: [info@nzahaa.org.nz](mailto:info@nzahaa.org.nz)

8 December 2011

## Submission to Dunedin City Council on Proposed Change 13 to the District Plan

This organisation, which represents collectors and shooters of all types of firearm, has a nationwide membership of 900 with 64 members living in Dunedin.

We object to the limits set in Table 17.1 of the proposed change for the following items listed under Explosives:

Black Powder	HNSO Class 1.1 A-G, J.L	Group 1:- 5 Kg
Smokeless Powder	HNSO Class 1.3 C, F-L	Group 1:-15 Kg
Safety Ammunition	HNSO Class 1.4 B-G,S	Group 1:- 15 Kg

Our objection is for the following reasons:

- They are too low for the practical requirements of many shooters/retailers.
- These substances have not been shown to be a problem in the past.
- Setting limits different to HSNO Act limits will lead to confusion by users and enforcers.
- In practical terms they are impossible to police and enforce.
- For any Local Body Council to set limits at variance with National standards will cause chaos within affected industries. (such as retailers of ammunition & powder)
- It could adversely affect Insurance claims if Dunedin limits are followed by the Insurance industry.

We recommend that:

- Limits for explosives listed in Table 17.1 should be set to the same as HSNO limits.
- Limit for ammunition should state that it is the weight of powder contained therein only, since the weight of ammunition is made up mainly of inert objects, case and projectile.

## HSNO LIMITS:

Black Powder	15 Kg
Smokeless Powder	15 Kg
Safety Ammunition	25 Kg

Yours sincerely,

Phil Cregeen  
National Secretary



**Teresa Gutteridge**

**From:** Nic Jepson  
**Sent:** Friday, 9 December 2011 08:37  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

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**From:** Joanne Bayne [mailto:sjbayne@ihug.co.nz]  
**Sent:** Thursday, 8 December 2011 08:56 p.m.  
**To:** planning@dcc.govt.nz  
**Subject:** Plan Change 13 - Hazardous Substances Online Submission

FROM Joanne Bayne

Joanne Bayne has made a submission to the "Plan Change 13 - Hazardous Substances via the online application form. Below are the details of the feedback.

**Your details**

- First name: Joanne
- Last name: Bayne
- Organisation: Otago Shooting Sports Rifle & Pistol Club Inc
- Street address: 68 Skibo Street
- Suburb: Kew
- Town / city: Dunedin
- Post code: 9012
- Email address: sjbayne@ihug.co.nz
- Day phone: 4879151
- Evening phone: 4879151

**Your submission**

- I Do/Do Not wish to be heard in support of this submission at the hearing: Do Not
- If others make a similar submission, I will consider presenting a joint case with them at a hearing: No
- The specific provisions of Proposed District Plan Change 13 Table 17.1 relating to quantities of black powder, smokeless powder

9/12/2011

that my and ammunition quantities.  
 submission relates  
 to are::

- My submission is that::

The quantities of powder allowed should be in line with HSNO provisions. Many of our members shoot competitively, and the proposed levels are too low for them to hold sufficient quantities for major matches. I shoot 2 National events that are only 6 - 8 weeks apart and I am required to have enough powder on hand to compete in these events. In particular, black powder is infrequently shipped to the South Island, so I have to purchase it when it is available, and hold enough to last me until the next shipment. We also often host matches, and have people staying with us for these events. They bring with them their own ammunition, which we store for them while they are here. As you will be aware, ammunition must be stored safely e.g. cannot be left unattended in a vehicle parked on the street overnight.
- I seek the following decision from the Council::

That class 1.1D gun powder be set at 15 kg. That class 1.3C smokeless reloading powder be set at 15 kg. That class 1.4S safety ammunition be set at 25 kg. That net explosive quantity be used as the unit of measure for these quantities.
- Attachment: No file uploaded
- Attachment: No file uploaded

**Teresa Gutteridge**

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**From:** Nic Jepson  
**Sent:** Monday, 12 December 2011 08:45  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Hazardous substances District plan change 13

**Attachments:** SUBMISSION DCC HSNO Ammo.docx; ATT00001.txt



SUBMISSION DCC ATT00001.txt (117  
HSNO Ammo.docx .. B)

-----Original Message-----

From: Ross Dungey [mailto:ross.d@slingshot.co.nz]  
Sent: Monday, 12 December 2011 08:40 a.m.  
To: planning@dcc.govt.nz  
Subject: Hazardous substances District plan change 13

To whom it may concern.

Attached is my Submission on the proposed changes as the relate to ammunition for citizens.

## Teresa Gutteridge

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**From:** Nic Jepson  
**Sent:** Monday, 12 December 2011 08:45  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Hazardous substances District plan change 13

**Attachments:** SUBMISSION DCC HSNO Ammo.docx; ATT00001.txt



SUBMISSION DCC ATT00001.txt (117  
HSNO Ammo.docx .. B)

-----Original Message-----

**From:** Ross Dungey [mailto:ross.d@slingshot.co.nz]  
**Sent:** Monday, 12 December 2011 08:40 a.m.  
**To:** planning@dcc.govt.nz  
**Subject:** Hazardous substances District plan change 13

To whom it may concern.

Attached is my Submission on the proposed changes as the relate to ammunition for citizens.



This is in lieu of **SUBMISSION FORM 5**, cited under Clause 6 of the First Schedule of the Resource Management Act 1991, as being the prescribed form for making submission on publicly notified proposed **District Plan Change 13 – Hazardous Substances**

Ross Dungey  
109 Benhar Rd  
Balclutha  
9272

Telephone: 03 4182233      Email: [ross.d@slingshot.co.nz](mailto:ross.d@slingshot.co.nz)

Re Dunedin City Council **District Plan Change 13 – Hazardous Substances**.

I wish to be heard in support of this submission.

The meeting at Waldronville re **District Plan Change 13 – Hazardous Substances** was attended by a wide range of recreational interests and the people present were highly skilled and motivated. Many have represented their country in their chosen field of shooting sports. There were Patrons and life members of clubs and many many years of experience. They attended because they were alarmed at the DCC proposal.

The proposed review of clause thirteen was ill-conceived, lacked any research base, and was poorly communicated. It unnecessarily alarmed and aggravated a group of citizens who would generally support the DCC. In addition many affected parties were unaware of what DCC were about to do and the potential to adversely affect their legitimate activities.

For future reviews I suggest an approach below that would more likely keep the citizenry in support of DCC rather against them.

**With regard to the proposed changes to the District Plan as it relates to ammunition;**

1. DCC failed to establish that there is a problem that needs to be addressed by the proposed change to the DCC district Plan.

2. DCC did not provide evidence for a need to change existing allowable amounts of ammunition.

3. the DCC starting point of 15kgs appears to be an arbitrary figure

4. the current system is a working example of ammunition requirements and use and was coasting along nicely providing for recreational sporting and other activities such as pest control, there was no need to alter it.

5. adopting the approach of "establishing a balance" is an erosion of our existing position. Our existing limit is established by HSNO, whereas the DCC's 15kg limit is an arbitrary figure. It is very difficult to negotiate from this fixed position to protect the 25kgs allowed.

6. there needs to be an adjustment to allow for black-powder. (if we follow any USA trends this field of endeavor may increase dramatically in popularity.)

7. we need to protect future opportunities for hunting/shooting etc, just because at this point a certain amount of ammunition is deemed adequate, establishing restrictions may limit future recreational and sporting opportunities and this is not desirable or necessary.

8. our ammunition is not explosive, its a propellant which therefore changes its status under the current classifications.

**A Preferred Approach.**

I worked for Fish and Game Otago for 16 years. Our responsibilities were defined in the Conservation Act of 1987. In that Act there was a clause that said we were required to "manage, maintain, and enhance recreational opportunity". If when doing reviews of the district plan DCC was able to adopt a similar approach such support for community

interests would be much appreciated. DCC would then not have to face aggrieved citizens whose recreational activities were unnecessarily threatened and an atmosphere of working together could be fostered.

**Other territorial local authorities** position on “controls on hazardous goods”:

**Central Otago District:** as set by the Explosives Act (1957), and refers to EPA for further advice (email of 08DEC2011 from Felicity Couper refers).

**Clutha District:** all class 1 goods are at levels set by HSNO Act (1996) and Regulations, (telecon Forsyth/Brass of 1630/05DEC2011.)

**Queenstown Lakes District:** advises that HSNO levels prevail (email of 08DEC2011 from Keri Harrison).

**Christchurch City Council:** all class 1 goods for residential areas are at levels set by HSNO Act (1996) and Regulations (telecom L Osmer 1010/05DEC2011).

**New Plymouth District Council:** all class 1 goods are at levels set by HSNO Act (1996) and Regulations.

**Wellington City Council:** all class 1 goods are at levels set by HSNO Act (1996) and Regulations.

**Many Local authorities find the current HSNO limit of 25kgs acceptable so DCC could choose to join these ranks and contribute to the maintenance and enjoyment of shooting activities for their citizens by adopting the same.**

**I seek the following decision from the Council**

- Support for the provisions in Table 17.1 as it deals with goods of class 1.3C, namely smokeless ammunition reloading powder in Group 1 zones, we want the Council to retain the measures as proposed by District Plan Change 13.
- Objects to Table 17.1 page 17:38 as it deals with goods of class 1.1D ("Gunpowder and blackpowder"), we want the Council to change the quantity lawfully able to be held by residents in Group 1 zones from 5 kg to **15 kg in accord with the HSNO Regulations (2003).**
- Objects to Table 17.1 page 17:38 as it deals with goods of class 1.4S ("safety ammunition"), want the Council to change the quantity lawfully able to be held by residents in Group 1 zones from the suggested (DCC)15 kg to **25 kg in accord with the HSNO Regulations (2003).**

Ross Dungey

10/12/11

9

**Teresa Gutteridge**

**From:** John Osborne [jcosborne@xtra.co.nz]  
**Sent:** Monday, 12 December 2011 18:05  
**To:** planning@dcc.govt.nz  
**Subject:** FW: Submission - District Plan Change 13 – Hazardous Substances - Propellants  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Further to my submission of 10 December 2012 below, **I do wish to have a friend speak in support of this submission.**

I hope this acceptable.

Would you please confirm.

Best regards,

John Osborne.

Dr John Osborne M6 DTT PhD FSG | PO Box 52 | Kaitia 0441 | New Zealand | + 64 9 409 3835 |

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**From:** john osborne [mailto:jcosborne@xtra.co.nz]  
**Sent:** Saturday, 10 December 2011 10:06 a.m.  
**To:** planning@dcc.govt.nz  
**Cc:** jcosborne@xtra.co.nz  
**Subject:** Submission - District Plan Change 13 – Hazardous Substances - Propellants

This is in lieu of **SUBMISSION FORM 5**, cited under Clause 6 of the First Schedule of the Resource Management Act 1991, as being the prescribed form for making submission on publicly notified proposed **District Plan Change 13 – Hazardous Substances**

Dr John Charles Osborne PhD FSG

PO Box 52,

Kaitia,

0441.

Telephone (landline): 09 409 3835

Email: [jcosborne@xtra.co.nz](mailto:jcosborne@xtra.co.nz)

**I do not wish to be heard in support of this submission.**

**Specific provisions of Proposed District Plan Change 13 to which my submission relates are:**

Table 17.1 Explosives, p 17:38

13/12/2011

## My submission is that:

### Preamble

I am the National President of the New Zealand Society of Gunsmiths Inc, I hold all the NZQA Master Gunsmithing Qualifications including the Sub Domain Qualification 'Ammunition Advisor' comprising a Firearms Licence and Unit Standards 9127, 9128 and 9129, I hold a Ph.D in Mechanical Engineering / Gunsmithing Technology and I am a warranted firearm safety instructor of the New Zealand Mountain Safety Council. I am a Fellow of the New Zealand Society of Gunsmiths. I own and Manage since 1969 'South Pacific Armoury New Zealand' SPANZ which includes the manufacture of ammunition and components for use in NZ and Export.

In partnership with NZQA and Competenz, NZSG offers education, training and workplace assessment to qualify people in Ammunition Manufacture and ammunition reloading for recreational use, 'target shooting including Olympic, World and Commonwealth Games, target shooting was New Zealands first organised recreational Sport in 1860 and ammunition manufacture and reloading dates back to the 1790s in NZ. Target Shooting and Hunting are part of our NZ culture (Taonga) and Central and Local Governments should promote not stifle all recreational activities in NZ including shooting.

Otago has a proud history of recreational shooting success and offers world class hunting including pest destruction.

Shooting is in the top 15 'all age groups' of all recreational activities in New Zealand and central and local government has a responsibility to provide facilities and support to this end.

### Support:

I support the DCC proposing to bring their bylaws in line with and not inconsistent with the HSNO Act and Regulations.

### Objections:

I have two objections:

1. I object to that portion of **Table 17.1 page 17:38 as it deals with goods of class 1.1D ("Gunpowder and blackpowder"**. In particular, although this is the substance with which Guido Fawkes is reputed to have accumulated under the English Houses of Parliament more than four centuries ago, its hazard, clearly considered by the Hazardous Substances and New Organisms Act (1996) and subsequent Regulations, remains fixed at 15 kg nationwide.

Accordingly, my objection to this quantity, 5 kg, as proposed by Plan Change 13, is because it is only a third of what is allowed under the aforementioned regulation 23 of the hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177), this being found on p. 125 of the consolidated volume headed "SR 2001/116".

2. I also **object** to that portion of **Table 17.1 page 17:38 as it deals with goods of class 1.4S, "safety ammunition"**.

My reason for objecting to this part of the proposed Plan Change 13, is because it is only 40% of what is allowed under the aforementioned regulation 23 of the hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177), this being found on p. 125 of the

consolidated volume headed "SR 2001/116".

9.

**I seek the following decision from the Council**

- In connection with my **support for the provisions in Table 17.1 as it deals with goods of class 1.3C**, namely smokeless ammunition reloading powder in Group 1 zones, I would like the **Council to retain the measures as proposed** by District Plan Change 13.
- In connection with my **objection to that portion of Table 17.1 page 17:38 as it deals with goods of class 1.1D ("Gunpowder and blackpowder")**, I would like the **Council to change the quantity lawfully able to be held by residents in Group 1 zones from 5 kg to 15 kg** in accord with the HSNO Regulations.
- In connection with my **objection to that portion of Table 17.1 page 17:38 as it deals with goods of class 1.4S ("safety ammunition")**, I would like the **Council to change the quantity lawfully able to be held by residents in Group 1 zones from 15 kg to 25 kg** in accord with the HSNO Regulations.

Dr John Osborne Ph.D FSG.

10 DEC 2011





**Teresa Gutteridge**

10

**From:** Nic Jepson  
**Sent:** Monday, 12 December 2011 08:29  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission

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**From:** john Fooks [mailto:mknswdst@yahoo.co.nz]  
**Sent:** Sunday, 11 December 2011 10:11 p.m.  
**To:** planning@dcc.govt.nz  
**Subject:** Plan Change 13 - Hazardous Substances Online Submission

FROM john Fooks

john Fooks has made a submission to the "Plan Change 13 - Hazardous Substances via the online application form. Below are the details of the feedback.

#### Your details

- First name: john
- Last name: Fooks
- Organisation: dunedin clay target club
- Street address: 20a Brighton Rd
- Suburb: Green Is
- Town / city: Dunedin
- Post code: 9018
- Email address: mknswdst@yahoo.co.nz
- Day phone: 488 1006
- Evening phone:

#### Your submission

- I Do/Do Not wish to be heard in support of this submission at the hearing: Do Not
- If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes
- The specific provisions of Proposed District Plan Change 13 that my submission relates to are:: Quantities of gun powder or black powder that can be held  
Quantities of smokeless powder that can be held

1 I oppose the restriction of 5kg of black powder as this quantity

12/12/2011

- My submission is that::

does not appear to take into account, the requirements of sportsmen and women who use it, thus potentially forcing law abiding citizens outside the law when attending major competitions. 2 I oppose the 15kg N.E.Q limit on safety ammunition for the following reasons 1 As this level is a 40% reduction in the levels set by HSNO, it becomes an erosion of civil rights. 2 To buy ammunition at the best price to pass on to our members, we now have to buy in minimum lots of 30 slabs, running our stock down to 7 slabs is not practical
- I seek the following decision from the Council::

To raise the permitted levels of both black powder and smokeless powder to the levels set by HSNO. To specify the ' conditions ' which may be imposed on our club, in the event of us having to relocate to a new ground.
- Attachment:

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- Attachment:

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