

SSAA Illawarra Submission re Sound Limit Modifications Southern Highlands Shooting Complex

1.0 Background

The Sporting Shooters Association of Australia Illawarra Branch has been using the 800 metre range at Hilltop for club events for the last 12 years in its present form, and individual members have been shooting with other clubs at the range since its opening in 1987.

The events and disciplines shot, have complied with the range approval issued at that time by NSW Police Firearms Registry.

The majority of the events and shooting has been for calibres of not greater than 7.62mm, and at distances generally up to 300 metres; however our members have, on occasion, used centrefire calibres up to 11.6m, and occasionally at distances of up to 500 metres.

A few shotgun demonstration events have been held over the past twelve years, as well as 2 or 3 black powder shoots with large diameter, low velocity projectiles.

The use of certain recently developed, high powered, centrefire rifles on the range has been excluded by the latest range approval, by the removal of the “military exempt” clause which was contained within previous range approvals.

Our members have participated in the majority of sound testing carried out on the 800m range as a pre-cursor to the expanded shooting complex, and have shot a wide range of firearms using rimfire, pistol, and shotgun calibres, centrefire rifle calibres from 0.22 inch to 0.405 inch, and a 0.54 inch muzzle loader.

Testing was carried out in many and varied weather conditions, both in daylight and at night. Firing positions ranged from effectively zero distance at the target mound, to up to 800m, both during competitions, and also separately to carry out measurements at specific firing mounds / distances.

The results provided to us, indicated that the 0.308 (7.62mm), which is one of the calibres most commonly used on the existing range, was consistently returning the highest readings on the monitoring instruments.

We understand that the Department of Sport and Recreation has made an application to the NSW Department of Planning to modify the noise limits set down in the conditions attached to the development consent, on the basis that these limits arose from test results obtained using the instrumentation operated and analysed by persons inexperienced in such measurements.

2.0 Submission

SSAA Illawarra provides a delegate to the Range Management Committee of the Southern Highlands Regional Shooting Complex, on behalf of its own branch members, and also on behalf of SSAA NSW which has a membership of some 35,000 persons.

Some of our members have participated in shooting activities at the 800m range at Wattle Ridge Road for about 24 years, without being regarded as a public nuisance.

At a public meeting of Wingecarribee Shire Council in April 2008, Council Officers advised the meeting that no complaints regarding the range operation had been received over the past 20 years, and the recent rash of complaints can therefore be viewed as opportunistic and primarily to oppose the proposed expansion of the shooting complex.

Recent sound testing by The Acoustic Group has recorded the actual noise level of firearms which have been used on the range for more than 20 years, and described the noise levels in a format which we understand is consistent with that used in the approval of many shooting ranges. Contrary to claims by certain members of the public the change in the noise limit does not mean an increase in noise from the existing range. There are no changes proposed to the firing position or calibres presently used, and only the methods of measurement, description and analysis have changed.

We understand that the application for modification of the noise limits seeks to permit an average level of 85 dB Lin Peak Hold for the existing 800 metre range and an average level of 75 dB Lin Peak Hold for the future ranges. The application nominates the average to be a logarithmic average, consistent with the practice of the NSW State Shooters Liaison Committee convened by the State Pollution Control Commission in the early 1980's for the development of the SPCC target shooting guidelines.

SSAA Illawarra supports the application by the Department of Sport and Recreation to have the noise limits contained in the approval for the existing 800m range amended, such that they properly reflect the previously acceptable noise levels, and which can continue to be monitored using a technically correct approach.

While the matter of the shooting times imposed on us by recent decisions by Council and the Minister are not part of the submission by Sport and Recreation, the delay in starting times from 8am to 10am, has significantly impacted on the ability to programme events, and to take advantage of the commonly present lower wind strengths in the mornings.

We trust that our entitlement to continue to enjoy our sport at the Hill Top range in the same manner as which we have for the past 24 years, despite wasting an unnecessary portion of our Government grant on legal costs, will be considered in support of the present submission for modification of the noise conditions included in our Development Approval.

Lex Welham
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