



## THE COLONG FOUNDATION FOR WILDERNESS LTD.

Tuesday 17<sup>th</sup> January, 2017

Tourism and Recreation Projects  
NSW Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Sir/Madam,

### **Submission as an objection to Southern Highlands Shooting Complex (06\_0232 MOD 5)**

The Colong Foundation for Wilderness strongly objects to Modification 5 for the Southern Highlands Shooting Complex. The current shooting ranges are bare earth with faulty geometry making them unsuitable and dangerous to use. The ranges receive little use because of these serious faults. The ranges should not be upgraded but removed, and Bargo State Conservation Area reinstated.

### **Public not notified of extended operating hours**

The Department of Sport has failed to adequately notify the public regarding the significant extension of operating hours proposed by this modification.

Modification 5 should have clearly explained the extension of operating times for the outdoor ranges from four days a week to seven days and three nights per week. The operation of the outdoor ranges, with the addition of night time operating hours, will extend from 10am to 10pm. The current conditions specify hours of 10am to 5pm. Further, under this modification the EPA may consider extension of operating hours for Special Events on public holidays, including at night.

The types of weapons used on the range under Table A1 can generate up to 105dB(L), which I assume is a military weapon or similar, to generate that amount of noise.

The Department of Sport as the proponent has failed in its duty of care as a public authority to clearly explain to the community these proposed changes regarding the operation of this facility. It has not properly done so and the Minister for Sport should be accountable for this failure.

The Colong Foundation asks that Modification 5 be readvertised with an adequate and clear explanation of the proposed changes to the hours of operation.

### **The current 500 metre and 50 metre ranges are dangerous and must not be used**

On page 30 of the Section 75W Modification Report it states that the stop butts for these ranges have a 2:1 slope. The report then states that 'At this angle, incidences of ricochet are not appropriately reduced or eliminated.' The current stop butts are NOT consistent with the Firearms

Registry (NSW Police) Range Users Guide. In other words **these ranges are dangerous and must not be used.**

Further it is proposed to lower by 2.84m the firing line of the 500m range. This is also to make the range safe for use as it lowers the firing line toward the range floor. This will help stop bullets shooting over the stop butt at the end of the range.

There is nothing in the Modification Report to state that these are essential works to make the ranges safe for use. This is also a major omission in the report and the Minister for Sport should be held accountable for failing to explain the need to establish new measures to make the range safe.

Nothing is said regarding the 800m range and whether the stop butts, intermediate bullet catchers, bunds and other geometry have been redesigned in line with best practice and to be consistent with the Firearms Registry (NSW Police) Range Users Guide. Existing use does not condone unsafe operation, and this range must also comply with the Users Guide.

The remediation measures vindicate the Colong Foundation remarks made to the Public Hearing on the ranges in 2008 – that *'It is self-evident that when projectiles are fired from a hilltop range they can travel further than when fired into a hillside from a midslope position or even when fired from the same position downslope into a valley side.*

*So from a topographic consideration, the proposed facility is located in the worst position as far as minimizing the safety zone around the facility is concerned.'* The Colong Foundation warned regulatory authorities of the problem in 2008 and it has taken the Department of Sport nine years to address the matter.

### **Lead Waste not recycled**

Proposals to improve on-site lead management clearly illustrate current management is not best practice. All ranges at this shooting facility should implement an effective lead recycling plan, but such a plan is absent from modification 5.

With regard to lead run-off from the shooting facility, the Department of Sport has failed to demonstrate compliance with the neutral or beneficial water pollution test in the State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011. The Department must consider this test and apply it to the lead treatment and stormwater measures that are proposed.

### **Stormwater management undersized**

Water management facilities at the ranges are undersized and are proposed to be significantly expanded to protect Sydney's drinking water. This again is another failure of the approval and illustrates why the expenditure of \$7.7 million was insufficient to establish these ranges on an inappropriate site that now requires costly retrofitting and earthworks.

### **Other adverse outcomes of this range**

Approval of the development would install a major shooting facility within the Bargo Reserve and set an appalling precedent of handing over public bushland (a former reserve established under the National Parks and Wildlife Act, 1974) to an interest group for its exclusive development and use.

The development will cause a cascade of impacts that will erode conservation values in the adjoining reserves over time.

Modification 5 retrospectively recognises the development is in the catchment of Warragamba Dam and 16 kilometres from stored water, however it ignores the fact that the site adjoins the Greater Blue Mountains World Heritage Area and Nattai Wilderness. All the noise attenuation measures are for residents to the east, the noise impact on the wilderness property to the south, west and north has been of no concern to the Department of Sport. It should be, as the range compromises wilderness and the integrity of the World Heritage Area.

This range was part of an important linkage that connected large tracts of extant vegetation on the Woronora Plateau with the Nattai Plateau, and ultimately the entire southern Blue Mountains. These areas were high quality habitat for the Powerful Owl, Rosenberg's Goanna, Glossy Black-Cockatoo and the Koala. The continuity and connectivity of this temperate forest bushland link has international significance, for clearing the site has compromised the ecological linkages of diverse sclerophyll habitats for above mentioned threatened species within the World Heritage Area.

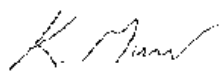
The Department of Sport has not considered other options, including closure of these ranges. Development of the site through fencing, clearing and over-burning of the bushland for property protection has already alienated ten square kilometres of pristine bushland from the wildlife link in the centre of the Bargo State Conservation Area reserve.

The alleged compensatory habitats are not of the same high-quality or types which comprise the Bargo Faunal Linkage.

No shooting facility should need to take 10 square kilometres of a former conservation reserve and set it aside for its exclusive use. The proposed facility would be better located on a smaller, more appropriately located site.

The proposal has been a blunder from the start. The site remains inappropriate and the shooting ranges should be relocated to a less environmentally sensitive site.

Yours sincerely,



Keith Muir  
Director  
The Colong Foundation for Wilderness Ltd