



27 March 2014

Our ref: DHB/08025

Executive Director
Sport and Recreation
Office of Communities
Locked Bag 1422
SILVERWATER NSW 2128

Dear Sir,

re: Application to Modify Approval to Southern Highlands Regional Shooting Complex (MP 06_0232 - Mod 4) – Preferred Project Report

We write on behalf of the Hill Top Residents Action Group Inc (HTRAGI) in response to your letter dated 17 March 2014 to Matt Handbury and Clare Strang advising of noise testing to be undertaken at the Southern Highlands Regional Shooting Complex (SHRSC) on 5 or 12 April 2014. We also refer to your letter dated 20 December 2013 advising of the outcomes of the testing undertaken on 27 September 2013 and the operational purported to be enabled based on the outcomes of that testing.

We note that as a consequence of the results of the testing on 27 September 2013 that, with the assistance of certain specified acoustic measures, Sport and Recreation are of the view that certain shooting operations can take place at SHRSC.

We are of the view that the results of the testing on the 27 September could not have provided any specific guidance as to the effectiveness of certain measures of the compliance of the specified shooting operations with Condition A9 of the approval to MP 06_0232 for the Southern Highlands Regional Shooting Complex granted for the second time by the Minister for Planning on 1 March 2010 (the approval).

This is because the tests were invalid due to excessive wind.

As noted on page 15 (para 2) of the Cooper Report (letter from The Acoustic Group to Sport and Recreation dated 1 November 2013) refers to the EPA Industrial Noise Policy the presence of winds up to 5 m/s is satisfactory for ambient background noise measurements but that testing found wind of 5 m/s unsuitable for the measuring of rifle shooting in that the peak hold level measurements were controlled in many cases by the wind and not the shooting.

Wind on the day was consistently higher than 5m/s (18kph) - average wind speed on the day was 24-25kph with higher gusts

Cooper goes on to say on pages 16 and 17 that the *in our opinion the variable wind occurring on the day was unsuitable to fully understand the effect of each control device.*

The Department of Sport is relying on the September test results even though your own consultant says the results are “unsuitable to fully understand the effect of each control device”.

HTRAGI is of the view that the only tests which resulted in a set of 6 or more measurements that were 75dB or under are tests 17, 20, 23 at the 400m firing line. These tests are identical to tests that showed non-compliance at the same firing line for the same gun with the same acoustic wall (shipping containers). They cannot be relied upon to open the range. The 800m range is therefore being reopened based on severely wind affected non compliant limited shots data sets with only 3 test firings of 10 shots (28 shot measured at residences), out of 31 sets. **That is only 10% of the testing being compliant on this occasion).**

Consequently Sport and Recreation are requested to undertake additional testing of all the guns and screening tested on 27 September 2013 to gain sufficient acceptable information on which to base decisions on the effectiveness of certain screening techniques.

In this regard we draw your attention to Condition A9 of the approval which states:

A9 Firearm Noise Limits

The noise from firearms or use of the site must not exceed 75dB(L) peak hold at the boundary to any existing private property with a residential dwelling, or where this is more than 30 metres from a dwelling, at the most affected location within 30 metres of the dwelling. This is to apply during prevailing weather conditions.

It is requested that Sport and Recreation takes the following into consideration is facilitating the testing:

- The noise from firearms should be measured *at the boundary to any existing private property with a residential dwelling, or where this is more than 30 metres from a dwelling, at the most affected location within 30 metres of the dwelling.*
- Only audible or measured noise levels should be included (and not inaudible or unmeasurable shots).
- In averaging the measured noise levels, those levels that are “*clearly not representative*” should be excluded. Therefore, it is a requirement that noise levels that are significantly different to the majority of the other noise levels for that type of firearm should be excluded from the average.
- The noise levels measured should be “*representative of the type of firearm being used*”. The average should not include measurements of mixed types of firearm.
- The final noise level should be based on up to 50 shots.
- Tests should be undertaken for all firearms being used.



We thank you for the opportunity to comment and look forward to scientifically accurate and useable data being obtained on the noise created by the use of the SHRSC and its effect on residents.

Yours faithfully
BBC Consulting Planners

Dan Brindle
Director

Email dan.brindle@bbcplanners.com.au



ATTACHMENT 1

Original Consent



ATTACHMENT 2

Advice from Renzo Tonin & Associates





ATTACHMENT 3

Press Release – Minister for Sport