

# Hill Top Residents Action Group, Inc.



23 December 2008

The Hon Kristina Keneally MP  
Minister for Planning and Redfern Waterloo  
Level 35 Governor Macquarie Tower  
1 Farrer Place  
SYDNEY NSW 2000.

Dear Minister,

## **Proposed Southern Highlands Regional Shooting Facility (MP 06\_0232)**

We write to thank you for the opportunity to meet with you on 9 December 2008 at Hill Top to discuss the concerns of the Hill Top Residents Action Group Inc (HTRAG) with the project application for the Southern Highlands Regional Shooting Facility.

We attach a copy of the notes and diagram given to you at that time.

At the meeting a number of additional points were raised. There are summarized below.

1. HTRAG reported that current illegal use of the existing range caused major distress to the community due to noise during accelerating unauthorised use. A development 20 times larger with 7 day a week usage would be a significantly increase to the detriment to the community's health.
2. HTRAG expressed concern that as the relocation of activities at the Anzac Rifle Range to Hill Top was now impossible, consolidation of ranges would not be achieved by supporting this application whilst the Anzac Rifle Range still required a site in the Sydney Basin. It was suggested that the two proposals should be joined on a suitable site such as Holsworthy or Belanglo and that there was \$9m available from the Federal Government for this purpose. We understand that there is sufficient room for the longer ranges at Belanglo, though not in the current location of the range there.
3. Shooting is heard at the local school and at residences, and noise assessments and operating conditions should be fully investigated and resolved as part of the assessment process.
4. HTRAG expressed its concern regarding the proposed closure of ranges documented to included ranges which are not in fact developed.
5. HTRAG noted that the Proponent's EA and Response documents are inaccurate or incomplete in dealing with the major issues and impacts associated with the proposed development. This was discussed in more detail in our letter to Minister on or about 13 November 2008. Any outstanding investigations into the impacts of the development (and there are several) need to be undertaken prior to a decision being made.

# Hill Top Residents Action Group, Inc.



6. HTRAG emphasised the need to conduct further detailed flora and fauna studies prior to any determination by the Minister. This should include further investigations into the Koala, Broad-Headed Snake, Yellow Bellied Glider and the Barking Owl which are known to be present on the site. Access to the site is requested if HTRAG is to undertake these studies.
7. HTRAG expressed its safety concerns with the proposed hours of use and consequent travel times of shooters coinciding with the peak travel times for children through the local village roads. HTRAG noted a 26% to 72% increase in traffic flows with the higher figure occurring at the more sensitive night-time period. The lack of footpaths and the narrow bridges through the village adds to safety concerns with the regional shooting facility.
8. HTRAG emphasised that the significant regional infrastructure costs required for the safety of the community should not be met by the local community. It was noted that telecommunications in the area are inadequate in case of emergency and there is no reliable mobile phone network access to the site.
9. HTRAG emphasised the need for a clear and unambiguous regime of standards for "any" proposed complex PRIOR TO DETERMINATION including a public reporting regime. Any such requirements must be enforceable with clearly identified penalties for non compliance readily capable of implementation.

10. HTRAG noted that the proposed method of cleaning-up the polluted waterways and land can increase the damage to the natural environment. The existing site is contaminated and remediation is required. Who will meet the costs of remediation and the on-going costs of remediation?

The site is in the water catchment area for Sydney and is about 40km from Lake Burragorang, which is the main water supply for Sydney. It is likely that both surface water and groundwater would be contaminated and, to date, effective and enforceable means of managing contamination have not been developed or applied. The proponent has noted that a requirement for the use of non-lead based shot would have practical difficulties and would not be readily enforceable.

It is further noted that considerable public expenditure has been required to clean up the Wakehurst Gun Club (\$3m). Similar contamination issues are associated with the Batemans' Bay Shooting Range (+\$250,000). The resolution of contamination management issues should not be dealt with by way of condition of approval. Management systems need to be identified prior to any approval and effective mechanisms to enforce regular clean up should be prepared. The authority responsible for the clean up should be identified.

Lead free ammunition should be a minimal requirement as suggested by the Sydney Catchment Authority.

# Hill Top Residents Action Group, Inc.



We confirm that a number of HTRAG documents were handed to you at the site visit:

1. A copy of its March 31, 2008 Objection to the Southern Highlands Regional Shooting Complex Project Application;
2. A copy of its submissions and subsequent additional studies to the Panel Hearing of 30.5.08.
3. A Petition with approx.750 signatures objecting to the proposed development from concerned community member.
4. A copy of a letter on or about 12.11.08 to the Minister following the 30 October, 2008 meeting in her office.
5. A copy of the letter to the Director General of the Department of Planning dated 22 August 2008 regarding alternative sites

At the site visit, you requested HTRAG forward a copy of the Malabar Alternative Site - Holsworthy Proposal, April 2005. This was supplied to your office on 10 December 2008. HTRAG also provided an updated list of active shooting ranges within the region at this time. This list is not definitive as other ranges in the area are not listed.

At the on site meeting, HTRAG again requested a copy of the IHAP Panel Report. We look forward to your response to this request.

It would be appreciated if you could acknowledge receipt of this correspondence and the attachments.

Yours sincerely

*Jodie Laing*

**Jodie Laing**  
**Hill Top Residents Action Group Inc.**