

Unsuitability of site selected

1. Site is not suitable for a shooting complex - the site fails to meet relevant site selection criteria for rifle ranges as presented in Chapter 2 of the NSW Police Range Users Guide:

| Users Guide Requirement | Compliance | Comment |
|--|------------|---|
| Wherever possible, ranges should be constructed so that the range danger areas are contained fully within the area closed to public use. | No | It would appear that the safety templates applied to the new ranges would not be satisfied by the existing range. |
| Sites should be studied to select the best two or three options on the basis of access, shape of terrain, availability of services, direction of fire, multiple usage etc. | No | The site has poor access and is virtually inaccessible. There are no services available at all. The shape of the terrain is hilly and unsuitable. |
| As a general rule, sites should be level or slightly hollow (concave), and preferably dry and above flood lines. | No | The site is not level and is not concave. the ranges are located on a convex slope |
| Sites on rocky, marshy, uneven, rising or falling terrain create difficulties in both construction and use. | No | As indicated in the EA the site contains Igneous/Metamorphic rock formations. |
| Rocky ground should be avoided because of the increased danger of ricochets and the cost of removing exposed rocks. | No | As indicated in the EA the site contains Igneous/Metamorphic rock formations. |

2. There are potentially significant bushfire impacts caused by sparks. The solution not to shoot on high fire danger days is an indication of the inadequacy of the site for the shooting complex.
3. Poor security - The proponent ignores the only recommendation of the Local Area Command of the NSW Police and failed to make adequate provision for security fencing.
4. The development will have an adverse social impact on the residents of Hill Top as this community would be associated with the shooting range and would suffer because of this stigma.
5. The lead from bullets and other contaminants from the clay shooting can potentially enter the waterways. The site is located in the catchment of Warragamba Dam. Inadequate consideration has been given to means to ensure that there would be no adverse impacts on Sydney's drinking water.
6. There is no evidence that the existing rifle range meets current design standards for safety. Inadequate consideration has been given to the range danger area to the existing range.

Summary

The site is not suitable for the proposed regional sporting facility (shooting complex) because:

1. It is of high conservation significance as it contains threatened fauna species and intact bushland;
2. It adjoins the World Heritage listed site and requires approval under the Commonwealth environmental protection legislation;
3. It has poor access and has no utility services;
4. There will be unacceptable noise impacts on the existing community;
5. It relies on access through a small rural village that will be impacted by this incompatible development;
6. It does not meet key site selection criteria identified by the NSW Police;
7. It poses a bushfire risk;
8. It is located in Sydney's drinking water catchment and drains to Warragamba Dam. No adequate measures have been identified to manage lead contamination which can enter the water supply.
9. Council recognises the environmental significance of the site by proposing to upgrade the environmental zoning of the site which prohibits the use of the site as a shooting complex.
10. The proposal is prohibited development pursuant to Council's current planning controls and by Council's recently exhibited draft Local Environmental Plan which identifies the site as having a high conservation value. The application currently before the Minister, if approved, will be contrary to the Council's own planning control and frustrate the local authority's strategic planning process.