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Parliament House
Macquarie St
Sydney NSW 2000

Mr Sam Haddad
Director-General
NSW Department of Planning
GPO Box 39
Sydney NSW 2001

14 Jul 2011

Dear Mr Haddad,

Re: Modification 4 of the Hilltop shooting range (MP 06-0232)

Thank you for this opportunity to make a submission in relation to the Modification 4 of the Hilltop shooting range, in the NSW highlands (MP 06-0232).

This Greens submission mainly concerns the impact of noise levels on the surrounding residents as well as the methods use to measure the noise impacts.

HISTORICAL BACKGROUND

The previous government gave a grant of \$6 million to massively expand an existing but small, and little used range complex near the small village of Hill Top in the Southern Highlands of NSW.

This development has resulted in the removal from Conservation Area status of 1000ha of E1-zoned high environmental value Bargo State Conservation Area, pristine bushland adjoining the Nattai National Park and Blue Mountains World Heritage area, and its handover from the Department of Environment to the Department of Sport. The new complex will have 224 shooting points and cater for 14,000 shooters a year on six ranges up to 800m long.

The residents of the village of Hill Top have opposed this project from its inception. The development is environmentally destructive and totally incompatible with a small rural village. It can only be approached via an unsafe bridge with no pedestrian crossings, traffic lights, or footpaths and children gathering around the local shops.

In 2007, to avoid having to deal with the concerns of the residents, the then NSW Planning Minister, Mr. Frank Sartor announced that the whole project would be determined under Part 3A of the EPA Act. This gave almost total control to the Minister for Planning. Part 3A effectively precluded any real consultation with the community and allowed the over-riding of environmental and other regulations.

NOISE LEVELS

The residents have been notified that noise levels from the shooting range are proposed to be effectively doubled from those originally approved (up from 75 db to 85 db) and that acoustic protection to reduce the impact of noise from the shooting range will not be built.

This change follows the replacement of the Department of Sport's original acoustic consultants with a new expert who has had long association with shooters groups and has represented them in negotiations with the State Pollution Control Commission. The residents claim that this expert's method of interpreting the guidelines differs from those of three other independent acoustic groups, to the detriment of the amenity of local residents.

NOISE MEASUREMENT

The new measurement method that has been adopted would allow more extensive use of the range than would have been possible under the original standard procedure. This is a source of significant concern.

The standard methods initially adopted by the consultants first retained by the Department of Sport recognised that a maximum sound level of 75dB was appropriate where this was taken to be the loudest point of sound occurring during the time of measurement.

The proposed new method of measurement has two effects:

- First, it effectively changes the scale of measurement to allow a greater level of sound; 85dB, this represents a doubling of the sound levels originally approved.
- Second, it measures the amount of sound averaged over a period of time, so that periods of heavy and continuous firing can be offset with periods of light or inaudible gunfire.

From the perspective of people exposed to the sound, the use of this method of measurement appears to undermine the intention of the noise restriction – namely protecting nearby residents from the damaging sounds of excessive gunfire.

This mode of measurement only became available to the Department of Sport when it retained the services of Mr Steven E Cooper of The Acoustic Group Pty Ltd. Over the last two decades Mr Cooper has been frequently employed by Shooters groups to represent them in matters relating to noise pollution and compliance.

FREQUENCY OF FIRING

The measurement procedures do not appear to take into account the frequency of firing over short periods, nor what occurs when there is simultaneous firing.

It is a physical fact that two equal sound sources placed next to each other will increase sound by 3 dB, while ten equal sound sources placed next to each other will increase sound by 10 dB. In the latter case a person with normal hearing will perceive noise to have doubled.

There are 224 shooting positions planned for this shooting range, so it is obvious that these situations will occur quite frequently. However all of the measurements taken in the testing to date have been of one gun at a time, with no consideration for the effects of repetitive and cumulative firing.

In support of the application the proponent points to the fact that a shooting range already exists on this site. Given that this proposal increases the previous maximum of 10 shooting positions to 224 positions there will be a more than a twenty-fold increase in the number of shots fired and, in the case of simultaneous firing, a possible quadrupling of the intensity of sound. In effect this higher intensity means that this proposal is for a substantially different use of the site.

PROTECTION FROM NOISE

The fact that existing plans for the shooting range include a requirement for sound screening in the form of an earth mound around the 800m firing point is an indication that under the former DECCW's Industrial Noise Policy, noise levels from the shooting range will be too high. Even the Acoustic Group states that "The reality of having a 800 m big bore rifle range operating over its entire length will result in noise levels greater than 75 dB(Linear) Peak Hold at 400m."

It is clear that an acoustic screen at the 800m range should be retained. However the Department of Sport is applying to be released from its obligation in this regard. In its application the Department argues that the schedule of shooting organisations will lead to the screening being used only once every two months. However this schedule is not imposed by condition and provides no ongoing protection for residents.

In light of the concerns raised in this submission it is recommended that that this application be refused. Existing conditions should be retained for the site.

Any further application should not be refused unless the proponent can satisfy all the concerns raised regarding noise impacts on the surrounding community.

Thank you for considering this submission.

Yours sincerely,

David Shoebridge, Greens MLC