

Cathy Temple
Lot 2816 Mona Vale Rd
Terrey Hills NSW 2084

Department of Planning and Infrastructure
GPO Box 39, Sydney 2001

2nd November, 2013

Dear Sir/Madam

Re: State Environmental Planning Policy (Infrastructure) Amendment (Shooting Ranges) 2013

Thank you for the opportunity to comment on the draft amendment to the State Environmental Planning Policy (Infrastructure) Shooting Ranges 2013.

I understand that the above changes apply to any existing lawful outdoor shooting range across NSW and allows for adjacent non-urban land regardless of it's local council zoning to be considered under a consent process for the development of further shooting facilities.

Having recently engaged with Warringah Council over the consent of a new outdoor rifle facility immediately adjacent to our property, the amendments to the act alarm me. In the FAQ document the planning department justify the changes as follows:

"Shooting ranges are a specific land-use and it is important there are clear and consistent planning controls for these facilities."

It is our sad experience that the guidelines by which Council assesses compliance and approval are not equally *"clear and consistent"*!

I quote from the FAQ document *"The council would consider the development application, the suitability of the site for expansion, and the issues associated with these activities such as noise, safety, amenity and environmental impacts and then determine the application."*

One of our biggest frustrations was that the EPA guidelines for noise from shooting ranges has been superseded by a very subjective "Offensive Noise Test" (Noise Guide for Local Government, Part 2 Noise assessment). Many of the objections to the shooting facility would have been addressed had the facility been enclosed. The planning amendment only applies to open outdoor facilities which have greater noise, safety, amenity and environmental impacts.

Sydney has a large urban interface. There are many areas that are locally zoned as non-urban categories listed in the amendment and they are not far from urban areas. Being zoned non-urban does NOT mean that the effect on residents is negated. Our land is E3 environmental management and it shares a valley with the suburb Duffys Forest zoned RU4. The capacity for noise to travel from the St Ives Pistol Club next to us and the Duffys Forest Gun Club to residents both sides of the valley is already well known. Yet the escalation in noise from the approved new louder rifle range adjacent to the St Ives Pistol Club, was not deemed by council to be offensive to residents.

I do not believe that outdoor shooting facilities have a place in the metropolitan footprint. We are merely 15 mins to the northern beaches, 25 mins to the CBD and about 15 mins from Premier Barry O'Farrell's electoral office in Wahroonga! With the pressure to increase housing densities in Sydney, conflict between shooting ranges and residents will only get worse. I learnt today of a couple of recreational shooters that travel down from Winmalee in the Blue Mountains to a Sydney shooting facility because there is nothing closer. Instead of expanding facilities next to residential areas in the city it would seem more logical to promote new sites outside the metropolitan area.

I do not support the draft amendment to the act. As it stands, the developer again has the greater recourse to "clear and consistent" planning guidelines at the expense of local residential amenity.

Yours sincerely

Cathy Temple