

SUBMISSION on the Draft SEPP (Infrastructure) Amendment (Shooting Ranges) 2013

GENERAL COMMENTS

I object to the Draft SEPP (Infrastructure) Amendment (Shooting Ranges) 2013 (the draft SEPP).

The type of development regulated by the Infrastructure SEPP 2007 (the Infrastructure SEPP) should be restricted to development that provides public services or infrastructure. Shooting ranges are privately owned or operated and do not provide services or infrastructure to the general community.

The SEPP also purports to regulate all existing lawful shooting ranges whether or not they are existing uses. Under the EP&A Act only the Act or a regulation can regulate existing uses.

If shooting ranges are made permissible on adjacent land, it will enable shooting ranges, including those that are existing uses, to expand. The zonings of land and uses of land contiguous with this expanded area may be totally incompatible with having a shooting range adjoining. For example, the land adjoining the expanded area could be a cemetery, a national park or residential development.

Given that shooting ranges are controversial having significant environmental impacts and are hazardous to the general public (see below), it is not sound planning practice to attempt to regulate uniformly as proposed by the SEPP. There should be consideration of each shooting range. It should be determined whether:

1. it is appropriate for a shooting range to become a permissible use;
2. land use conflicts would occur with existing uses within the expanded area on which shooting ranges are proposed to be made permissible;
3. land use conflicts would occur with land adjoining this expanded area.

In addition to these general comments, I have a number of specific comments.

SPECIFIC COMMENTS

Environmental impacts of shooting ranges

The most significant environmental impacts from shooting ranges are:

1. **Lead contamination of water and soil** can result in lead being incorporated into the food chain. This poses the risk of lead being ingested by domesticated animals or wildlife. This in turn poses the risk of ingestion of lead by humans or predators that consume animals contaminated by lead. Lead may be transported outside the shooting range and range danger area

because animals are mobile or because of transport of lead particles by water.

2. **Stray shots using live ammunition** are a hazard to people, domesticated animals and wildlife within the range danger area. Stray shots may also extend outside the range danger area particularly if high-powered weapons are used.
3. **Noise** from firing of weapons can cause severe disturbance to humans and wildlife.
4. **Live ammunition can cause fires**, and therefore, poses a bushfire hazard.

Zonings of Land

It is totally inappropriate to make shooting ranges permissible on E2 Environmental Protection and E3 Environmental Management Zones because it is inconsistent with sound environmental protection or management - the reasons for these zonings. Not only are there environmental and safety issues associated with shooting ranges, there is also the possibility that threatened species may occur on this land.

Allowing shooting ranges on these zones and other zones, potentially could undermine identified wildlife corridors.

Although not identified as being as environmentally significant, the same environmental impacts and hazards would occur on land with the other zonings making it also inappropriate to permit shooting ranges on such land. There is also the possibility that threatened species may occur on this land.

.