

## **MOSS VALE PLASTICS RECYCLING FACILITY Amended Application SSD-9409987**

### **Issue**

**Objection** to the proposed Moss Vale Plastics Recycling Facility (SSD-9409987).

### **Background**

I am a resident of Moss Vale. Irrespective of the proponent's 'amendments' to the proposal following Government advice and community opposition, the proposed recycling facility remains too close to the town of Moss Vale; the proposed factory is not suitable for the proposed location.

The proponent continues to show contempt for the Moss Vale and wider community in further attempts to make this proposed factory 'fit' into a site which is not suitable and defies common sense. Plasrefine constantly 'moves the goalposts', and so clearly demonstrates how it currently operates and how it will operate and treat the local community into the future.

It is understood that the owner/operator of this proposed factory has no experience or corporate history in plastics recycling. The Moss Vale community cannot therefore have any confidence in the proponent, more so given the proponent's history of 'moving the goalposts'. How could a safe and viable factory of any kind be approved when the owner/operator has no prior experience in managing and operating such a facility and who continues to, in a series of applications and amendments, change proposed facility details? The proponent appears to have made a number of desperate attempts in order to have the project approved.

Plasrefine continues to mislead in stating that many details of the application will be provided once approved (eg construction and vibration management plan; fire safety system; compliance with building codes; soil and water management plan; riparian vegetation management plan; etc). The proponent's approach, as evidenced in previous 'community engagement' meetings, is unscrupulous and unethical. It appears that the proponent has included anything however ridiculous in order to have its application approved, eg Wingecarribee Shire Council will assist with Plasrefine's employment strategy and complaints handling (Council has its own issues in recruitment and complaints management). Should the application be approved, I believe the proponent, given its past behaviour, would discard elements of the application that did not suit, were 'too hard' or would involve too much effort. And who would be responsible for compliance issues? No one.

The Southern Highlands is a regional and semi rural community where clean air and water and green space is valued. People move to and live in the Highlands because of these features and its rural characteristics. The community has witnessed that the proponent has little interest in the natural environment of the

Highlands or in the health and wellbeing of the community. Moss Vale and its surrounds are seen by the proponent as a place where it can pollute the air, land and water to the detriment of residents' quality of life and as well as the livelihoods of local businesses, primary producers and those in associated agritourism businesses.

Plasrefine's proposed operations will have negative impacts upon Moss Vale and the wider community: pollution, dust, noise, vibrations, toxicity, traffic impacts and a potential fire hazard. The proposed factory is intended to be only 200 metres from people's homes. It will be a 24 hour, 7 days a week operation. People's lives and amenity will be negatively affected. The pollution - due to the area's high winds occurring over many months - will travel and impact upon residents and agricultural producers via land and water pollution. The waste from the factory will impact upon the local sewerage system. The pollution and other residues from the proposed factory (including microplastics) will affect the Wingecarribee River, part of the Sydney Water Catchment Area as well as the land utilised by our local livestock, equestrian and wine industries.

The proposed factory should not be approved; it would not only affect public amenity but quite simply destroy residents' health, residents' livelihoods and residents' lives.

I cannot understand how the NSW State Government promotes local tourism via Destination NSW/Destination Southern Highlands and on the other hand would deliberately destroy that industry (and livelihoods) through the approval of inappropriate and totally unsuitable industry in the same area.

## **Comment**

### **1. Change in haulage route and site access road**

Plasrefine continues to change proposed haulage routes in an attempt to make the site 'workable'.

As per the amendment, there would be a negative impact to the residents of New Berrima through the cumulative impact of numerous heavy haulage vehicles passing through the Taylor Street, the main street of New Berrima, from the Hume Highway to reach Douglas Road. I doubt whether the residents of New Berrima have been consulted.

Plasrefine has not provided real information about the number of heavy haulage vehicles it would expect to travel to and from the site. Will there be up to 100 truck movements per day in addition to 280 additional light vehicles? Or more?

There is little or no suitable road infrastructure in the proposed haulage route of Berrima and Douglas roads, certainly nothing that would be appropriate for up to and including 100 heavy haulage trucks per day plus a high number of light vehicles travelling to and from the one site.

The proponent proposes the relocation of the crossing on the Berrima Road Branch Line. Who do they intend to move the crossing, to what location and who will provide the required funding? And what about the (long term) inconvenience to users of the crossing? What does the proponent suggest? How does the proponent think this is going to work? This should not have been suggested as it is not a viable proposition.

There has been no community consultation in the proposal to move the current Douglas and Collins roads railway crossing, including how this may impact upon the businesses currently situated on Douglas Road.

I understand that the proponent still desires a new access road to be built on land owned by the Gavin Institute? If so, I am dumbfounded by the proponent's attitude. Does the proponent think this land will simply be 'handed over' despite the fact that the Garvan Institute legally owns the land? I understand that the Garvan Institute does not agree to the proposed facility.

It is noted that Appendix A (Hours of Operation) mentions that waste delivery operation would not occur at certain periods at the school zone on Innes Road, Moss Vale. Does this mean that the proponent still intends to use Innes Road to access the site?

## **2. Reduced maximum building height**

The proposal is not appropriate for the site. The bulk and scale of the buildings remains too big for the location. There are apparently over 22 metre exhaust stacks however the architectural drawings provided do not adequately show details of the stacks and venting. Again, the proponent has not provided sufficient detail.

The proposal's scale would negatively impact upon the neighbouring Garvan operated Australian Bio Recourses operations and staff as well as nearby residential homes. Any proposed 'colour and finishes' choices as well as landscaping will not enable the buildings to 'blend with the existing landscape'.

## **3. Reduced water demand during operations**

The proponent appears to have little idea of the impact of drought in this country let alone what the Southern Highlands (and wider community) experienced during the drought of 2016-early 2020 followed by the devastating bushfires.

Wingecarribee Shire forms part of the Sydney Water Catchment Area. During the drought (and subsequent bushfire period) our local water went to Sydney (and Goulburn and elsewhere) given low water supplies and water restrictions. There was no rain in these areas, so no water.

The proponent states that there will be rainwater tanks on the factory site with additional roof water storage potentially available underneath Building 1 (but this is not a certainty). '80 per cent of net water requirements could be sourced from rainwater and ground surface runoff'. However - if there is no rain, there's no water

in the water tanks. Water is not an unlimited resource in this part of the world. We are already feeling the impact of drought in the Southern Highlands and in other parts of NSW.

Elsewhere in the supplied documentation however (Technical report 10), the proponent states that in dry periods, the site will have secured an appropriate external potable water supply. So much for 'reduced water demand during operations'.

The proponent proposes, in times of drought to use the mains water supply. How is this even feasible?

It is noted that elsewhere in the documentation (Technical Report 10), that, during the facility's construction, water demands would be for dust suppression and would be sourced by the potable water connection. It is my understanding however that in times of drought, dust suppression via water usage during construction is not permitted.

The proponent has bullied this community in all 'community engagement' meetings. The proponent doesn't care about the local community so I don't believe the proponent will care about excess water usage and its connection to the mains water supply irrespective of indicating a 'reduced water demand' in the current amendments to its application.

#### **4. Reduced discharge of wastewater to sewer**

Moss Vale's sewerage works is already at capacity. A new residential development Ashbourne, is underway that will see perhaps up to 2,500 new homes in Moss Vale. Wingecarribee Shire Council is the local water and sewerage authority and Moss Vale residents pay increased water and sewerage access rates to cover costs for our local sewerage upgrade. We pay the costs associated with the upgrade required for 2,500 new homes - who will pay for the capacity that Plasrefine allegedly requires, ie approximately 2.5 kilometres (or as mentioned elsewhere 2.3 kilometres per day) discharged into our local sewerage system?

#### **5. Amended stormwater management strategy (basin layout)**

The mitigation strategy fails to consider that the proposed site is ecologically sensitive land, with a watercourse that flows directly to the Wingecarribee River, part of the Sydney Water Catchment Area.

There is the potential for severe and irreversible damage to the Catchment Area. Surely there is a duty of care to protect the sensitivity of the catchment area for all residents reliant on the water (Highlands residents as well as the residents of greater Sydney, Goulburn, Lithgow, Wollongong, the Blue Mountains and Nowra).

The documentation states that 'there would be a relatively large area of disturbance during construction, located adjacent to a waterway and significant erosion and sediment control measures would be required to manage the disturbance associated with site clearing and construction works'.

There is no detail on these measures but the proponent reassures the community that there will not a 'significant impact in relation to soil and water'. The proponent's vague reassurances do not suffice.

### **Additional concerns**

**a) Fire.** Wingecarribee Shire has limited resources to deal with a potential fire in the proposed facility and the release of hazardous materials into the environment would be detriment to our water, landscape, native wildlife, livestock as well as residents.

There is evidence of an increasing number of fires in waste recycling facilities akin to the proposal. Our regional fire services are not to equipped to cope with such fires or HAZMAT situations. A report in the media of 23 October 2023 described a fire in a recycling facility in Picton (not that far from Moss Vale). It took many hours for Fire and Rescue appliances from **across South Western Sydney and Wollongong as well as Rural Fire Service volunteer brigades and aerial appliances and specialist HAZMAT operators** to extinguish the fire.

**b) Emissions from the proposed factory.** Despite the applicant's claims, there will be emissions from this proposed factory. These emissions will contain microplastics and other health impacting chemicals, all of which will accumulate in the environment. There will be toxins released into the local and wider community (including the Sydney Water Catchment Area).

**c) Process wastes.** The proponent claims that approximately 10,000 tonnes of residue from the plastic sorting process per year would require off-site landfill disposal; and a further 9,000 tonnes per year of 'filter cake residue' from the onsite wastewater treatment plant would also be (possibly) disposed at landfill (if it could not be converted to product onsite). **What landfill and where?**

**d) Decommissioning of the proposed factory** (end of life). Given the community's experience in dealing with the proponent, the proponent's claims that an environmental management plan (including the rehabilitation of the landscape) would be prepared prior to any commencement of decommissioning work (Appendix A) cannot be believed.

**e) Construction traffic.** The proponent states that there will be up to 40 heavy vehicle movements per day with up to 60 light vehicle movements, to and from the site. Moss Vale residents living near the new Ashbourne residential development have received notification of heavy vehicle movements along their street due to the earthworks and then construction of homes, for a prolonged period of time. The main street, Argyle Street, Moss Vale is currently past traffic capacity and will have trouble managing the number of heavy vehicles associated with the Ashbourne development (signed off by the former Secretary NSW Department of Planning, ignoring the objections of Council and the community). Moss Vale local streets designed 30-40 years ago for light traffic do not have the capacity for further heavy vehicles associated with the proposed facility construction.

**f) A proposed 'Community and Stakeholder Engagement Plan'** (Appendix C) . This would apparently be developed in order to build 'relationships and trust', with the local community. This is a farce. Residents (myself included) who attended the community engagement meetings of June 2023 held at the Moss Vale Community Centre were bullied. We were treated like fools. We were deceived and lied to, eg claims about our MP (easily checked with the MP's office). The proponent did not want our feedback or input. Despite what appears in Appendix C (SE1) the community does not trust the proponent now and would not trust that the proponent to provide 'accurate and accessible information' and 'opportunities for input' into the future.

Wingecarribee Shire Council does not approve this application and so it is difficult to understand why the proponent believes that Council would to be involved in Plasrefine's communication and engagement with the local community, namely complaints management, education and traineeships (SE10). This is not the role of local government.

The proponent's suggested Community Consultative Committee (SE11) is a ludicrous proposition, given its past performances in 'consulting and engaging' with the Moss Vale community.

**g) Biodiversity.** Given what has occurred to the local biodiversity during the earthworks for the NSW Department of Planning approved Ashbourne (Moss Vale) residential development, the proponent cannot be believed in its proposed biodiversity management strategies. At Ashbourne, native wildlife habitat has been wilfully destroyed, native wildlife has been killed (kangaroos shot, wombat hollows bulldozed over and dams and ponds filled in, killing the native long necked turtles).

Given the application's status as 'state significant' - I cannot see that the proponent will care about the site's biodiversity.

**h) Appendix C Introduction:**

'In addition to incorporating several new mitigation measures, a number of the existing mitigation measures have been brought forward into an earlier phase to demonstrate that these mitigation measures will be prepared/completed ahead of the phase they will be implemented in'.

The proponent's lack of experience in project management is clearly demonstrated in this sentence. Poor sentence construction doesn't provide confidence in what the proponent hopes to achieve in a given timeframe.

**i) Proposed Procurement Strategy.** The proponent states that employment for the proposal will occur by way of a local procurement strategy prepared in consultation with a variety of stakeholders, including Wingecarribee Shire Council.

**Wingecarribee Shire Council is not supportive of this application.** It is not clear why the proponent believes Council would be involved in this project unless it is attempting to convince NSW Planning that all sectors of the community are on side with the proposal. It should be noted that Wingecarribee Shire Council is rebuilding

itself as an organisation and restoring its relationship with the community following the recent Public Inquiry into Council.

### **Recommendation**

it is recommended that the proposed Moss Vale Plastic Recycling Facility (Amended Application SSD-9409987) is **not** approved. It does not belong in a location so close to town. It will not benefit the community. A plastics recycling facility with its associated risks, managed by an owner/operator with no experience in the industry and located within a local neighbourhood should not be allowed to proceed. It will harm the Moss Vale and wider community and blemish Wingecarribee's Shire's reputation as a place for residents and visitors alike to enjoy its villages and towns set amongst a beautiful natural environment.

Yours sincerely

Sandra Jones  
26 October 2023