

# **Submission to the Moss Vale Plastics Recycling Facility Environmental Impact Statement**

## **SSD-9409987**

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### Suitability of the Site

1. The proposal relates to land contained in the Southern Highlands Innovation Park (SHIP) on the outskirts of Moss Vale. This precinct was previously known as the Moss Vale Enterprise Corridor (MVEC). The Moss Vale Enterprise Corridor Development Control Plan 2012 (MVEC DCP) has been adopted by Council to facilitate the development of this corridor. A copy of the MVEC DCP can be obtained on the Wingecarribee Shire Council website at the following address: <https://www.wsc.nsw.gov.au/files/assets/public/development/dcps/mvec6.pdf>
2. Council has considered the suitability of the proposed development and the proposed site in relation to the MVEC DCP and in particular the key aims, infrastructure, constraints and precinct concepts outlined in the MVEC DCP. These are relevant to this proposed development. THE MVEC DCP was prepared to ensure, among other things; the orderly and proper development of the enterprise corridor; provide adequate and essential physical infrastructure to service development; and to protect the amenity of surrounding rural and residential areas. The proposed development is inconsistent with the MVEC DCP in a number of key areas.
3. The proposed development is located in a precinct of the SHIP that is not planned for this type of activity. The subject site is part of transitional interface area of the SHIP classified as an *Enterprise Precinct*. This is outlined in the MVEC DCP **Land Use Precinct** map (Copy attached in Appendix 1).
4. As quoted in the MVEC DCP, “[t]he *Enterprise Precinct* includes land at, and near, the interface with the Moss Vale township. This precinct will facilitate a transition between residential uses and heavier industrial uses [planned] across the northern parts of the Enterprise Corridor. [The Enterprise Precinct] will accommodate a mix of light industrial and commercial office uses”.
5. The creation of this precinct foreshadowed the potential amenity conflict with the residential town fringe to the south, and it is very important.
6. The proposed development is neither light industrial or commercial office space. The nature and scale of the proposed development is not suited to the aims of the Enterprise Precinct, particularly in relation to the proposals size, footprint, visual impact, vehicle movements, hours of operation, and environmental emissions. Maintaining the integrity of the aims of this precinct is very important in the orderly development of the SHIP and protecting the amenity of the surrounding rural and residential area.
7. Council is also concerned that a development of the proposed nature may also affect the future development (i.e. future light industry / commercial office development) of the *Enterprise Precinct* in this location.
8. It is important for Council and the community to continue to develop the SHIP in an orderly and proper manner in live with the MVEC DCP, including the planning objectives of the *Enterprise Precinct* where the subject site is located.

### Traffic and Road Infrastructure

9. The nature and scale of the proposed development in its current location, and at this point of times, is out of sequence with the development of the SHIP. It is ahead of its time in terms of important infrastructure being developed for the SHIP, and for the Moss Vale area. This adds potential safety and efficiency risks to the current transport network.

10. The MVEC DCP outlines the Transport Infrastructure plan for the SHIP. A number of upgrades and new roads are required to facilitate and accommodate development in the SHIP. Some of this infrastructure has been completed, particularly to the north of the SHIP. But there are still significant roads, bridges and other infrastructure that is yet to be completed especially to the south and west of the SHIP, and in the vicinity of this proposal.
11. Importantly, new roads are planned which will eliminate the at grade crossings of the railway line in and around the SHIP. Currently three at grade railway crossings are situated on the planned transport route between the proposed site and the Hume Highway. When the MVEC DCP Traffic Infrastructure plan is completed, all of these at grade crossings will be removed.
12. In addition, the planned Moss Vale Bypass will remove significant existing inefficiencies currently in the road network around the Moss Vale township. The additional vehicle use with this proposed development will add pressure on the current network before the future infrastructure is in place.
13. Council advocates on the continued orderly development of the SHIP, in a sequence that does not add significant safety and inefficiency issues to the transport network.
14. Council does not support any access via Beaconsfield Road at any stage of the development. This is a significant issue for the community and Council. Council expects all development in the SHIP, not just this proposal, to be consistent with the infrastructure plans outlined in the MVEC DCP, and Beaconsfield Road does not feature in thin these Plans.
15. The MVEC DCP provides for access to the subject site across to Lackey Road via the future Braddon Road (currently unformed). The development proposal includes construction of this new road and a new connection to Lackey Road (the proposed Braddon Rd east extension).
16. Council is concerned that important details around the development of the unformed road are unclear and remain unresolved, especially as this such a significant issue for Council and community. Council is concerned that negotiations are still ongoing with adjoining landholders around purchasing of land for the road reserve and that the adjoining landholders consent was not included with the application.
17. There is insufficient detail in the EIS to determine if the proposed road and intersections can be built to Council's requirements. Council has not received enough information to determine if it is prepared to take over the completed road, or to enter into a voluntary planning agreement (involving the road). The proposal should not be approved until this has been resolved.
18. Levies through the MVEC Contributions Plan have been collected exclusively for land acquisition along identified road corridors, but not for the construction of the roads. The proponent would therefore need to construct the road at their expense, but to Council's standards, as a condition of consent.
19. The EIS provides a likely transport route for heavy vehicles travelling towards the proposed site via the Hume Highway (M31), Douglas Road, Collins Road, and Lackey Road. Currently this would be Council's preferred route until such time as the completion of the planned Moss Vale By Pass (which is still at an early planning stage), as this keeps vehicles away from Moss Vale township and other sensitive areas. If the development is approved, Council needs to know what controls will be put in place to control the transport to these routes.

### Water Supply

20. The proposed development will be a large consumer of water with a daily demand of 43.5 kL. This equates to about 16,900 kL/annum.
21. In the short term, it is shown there is capacity in the water networks to support the facility. However, there are known capacity issues in the Moss Vale water supply network in the near future. This will occur when plan development and infill demands come on line from 2026. Modelling in the EIS shows the water network cannot meet the demand in 2026.
22. Council does have various capital works projects planned to upgrade the water network infrastructure within Moss Vale to ensure adequate supply is maintained for future. These are still in design phase with an estimate budget of \$20M, but this is subject to change once the route and design is confirmed. While the estimated timeframe sees the delivery in the next three years, this again is still dependent on the confirmation of routes, designs and budget.
23. Council is concern about approving an additional major water user to the water network, until there is more certainty about completion timeframes of these large scale essential water supply projects.

### Waste Water Treatment

The subject site is serviced by the Moss Vale Waste Water Treatment Plant. As the EIS mentions, this facility is currently operating at capacity. Council has committed to an upgrade of the facility, but it will be several years before it is completed. Although the impact from the proposal is relatively small on a percentage basis of overall capacity, the Department should be advised that discharges from the proposed development will contribute to the Council's facility operating at, and over, capacity for several years.

24. Details on the quality of the wastewater is not provided in the EIS, therefore it is not possible to confirm if this can meet Council's trade waste requirements. There may be potential for microplastics and nanoplastics to be present in the liquid waste stream. No consideration has been given on the implications of this type of waste at Council's waste water treatment plant, and its ability to treat it. This requires further investigation, as additional onsite treatment processes may be needed prior to discharge.

### Air Quality

25. Air quality from the proposed development is a major concern to the community. A thorough and transparent assessment is required to ensure confidence can be built amongst the community.
26. The EIS focuses on specific volatile organic compounds (VOCs) and particulate matter but does not include a justification for the selection of only these parameters. A variety of plastic materials are proposed to be processed which may generate a range of other air pollutants not specified in the EIS (eg. the processing of plastics such as acrylonitrile butadiene styrene). This should be fully considered and justified
27. Processing of plastics (including PVCs) under heat has the potential to generate persistent organic pollutants such as dioxins. The EIS does not assess the potential risk of emissions of persistent organic pollutants.



28. The EIS discusses emissions of particulate matter, but there is no information about the makeup of these particles. As these are generated from processes such as the granularization of plastics, there is likelihood they contain microplastics and nanoplastics. There is no consideration of the cumulative effect of microplastics and nanoplastics as the particulate matter settles and contaminates the landscape.
29. The build-up of microplastics and nanoplastics contamination across a large area over the course of time is potentially alarming. Council and the community would like to know what impact this contamination could have on human health, local agriculture (livestock, crops, and feed supplies), food chains, nearby land uses, water catchments, water courses, ecology and the local economy. This potential impact must be fully explored and assessed.
30. There is limited information in the EIS on odour emissions and control apart from a general claim that the emission of odour is low, unlikely and minor. An odour assessment does not appear to have been conducted. There would appear to be a number of processes and stages where odours could potentially be generated (eg. waste water treatment, residues on the plastics, the disinfection process and impact of impurities during the heating process). There is also little detail on the localised air treatment systems to control air pollution and how they might control odours. This needs further investigation and detail.

#### Noise

31. Council is concerned that there are properties predicted to be impacted during the construction phases of the project. The community is already very wary of the proposed development and this is unlikely to be accepted. It is unclear how this noise source will be controlled and regulated.
32. Within the EIS there appears to be some inconsistency where some receivers are identified as residential receivers, however, the residential project noise trigger levels do not appear to be assigned to them (Appendix G of the Air Quality and Odour Technical Report). This should be reviewed.
33. The EIS mentions the potential for low frequency noise to be experienced at the nearest sensitive receivers. This adds annoying characteristics to the noise which may affect the receivers. More detail should be provided on how these annoying characteristics can be mitigated.

#### Waste Storage

34. The EIS states that the facility will only have 3 days capacity of plastic storage at the point of receipt. There is concern that in the event of a process failure plastic would need to be stored outside of the enclosed facility which would have associated risks. Management controls need to be factored into this process.

#### Landscape and Amenity

35. Council is concerned the proposed development relies heavily on screening plantings to be undertaken on an adjoining site and not on the proposal site itself. The landscape design has been prepared in part to compensate for the unavoidable negative visual impact of the development, and the visual impact photo montages appear to rely on the plantings proposed on a neighbouring property.

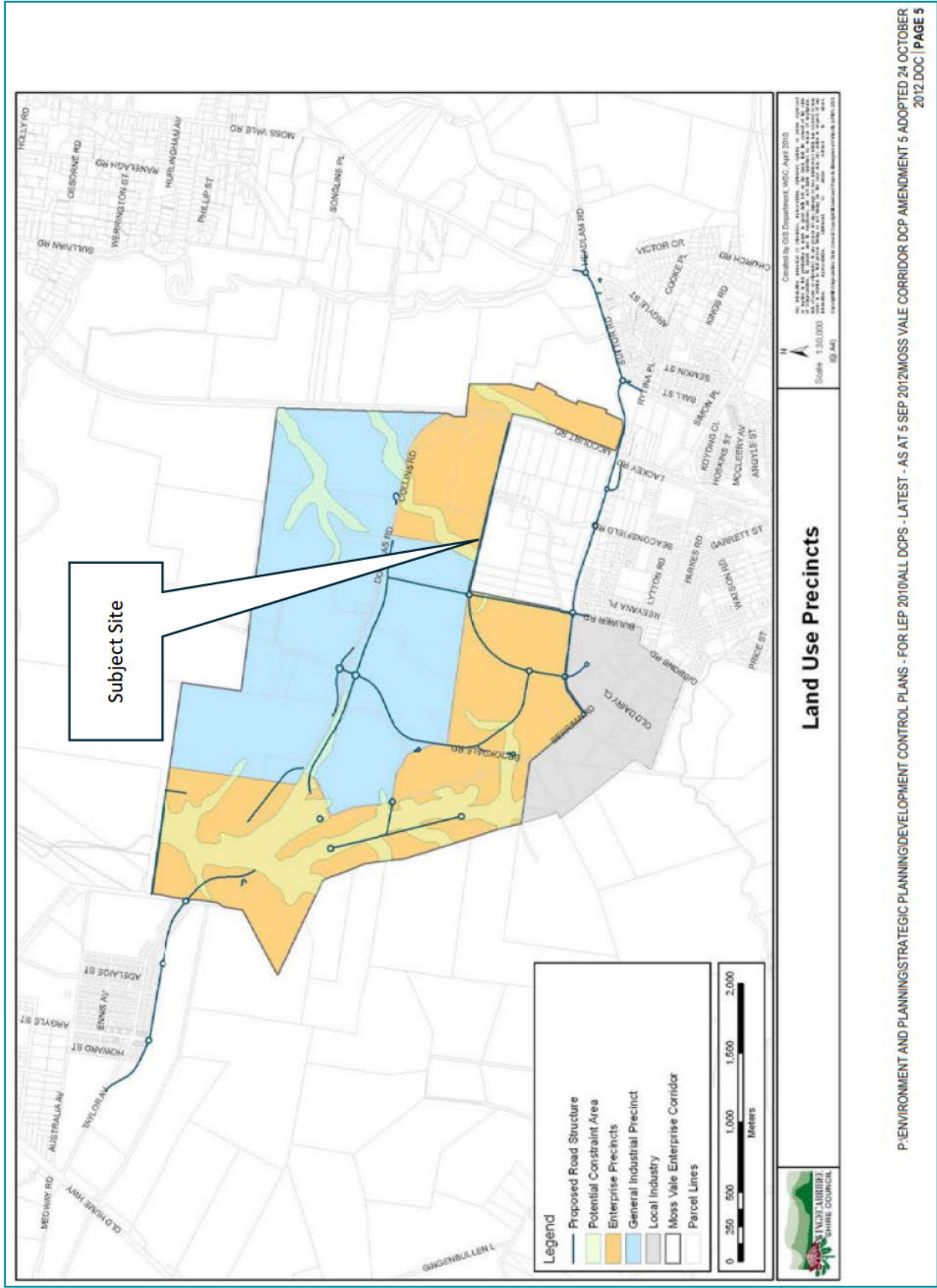
36. It is unclear if the neighbouring property is included in the proposal site being considered in this application. It is also unclear how approval and enforcement may actually occur on the neighbouring site. Will restrictions be placed on the neighbouring property to ensure the long term retention of this screening? Visual amenity and the transition between the SHIP and the adjoining residential and rural areas (as outlined in paragraphs 3-6 above), are significant issues to the community and Council, and this needs to be reviewed.

#### Social impact

37. The proposed development has generated a high level of opposition from the community. Council has received a lot of feedback from the community on their perceptions of the proposal. Prior to the submission of the EIS, Council advocated to the proponent for the inclusion of a social impact assessment with the EIS. This has not been included.
38. Attached to this report as Appendix 2 is a copy of correspondence that Council has received on this matter. Names and personal details have been redacted.

Appendix 1.

Moss Vale Enterprise Corridor Development Control Plan – Land Use Precincts



## APPENDIX 2

### Correspondence from the Community Received by Council

**From:** [REDACTED]  
**Sent:** Wed, 23 Mar 2022 17:06:15 +1100  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>  
**Subject:** Plasrefine

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

This morning 8.50 to 9.10 Blue Circle Train holds up traffic on the Berrima road. It would appear that Plasrefine trucks could be not only road blocked, water blocked, community blockedbut rail blocked too!!!

Attention [REDACTED] please.







This submission refers to the proposed **Moss Vale Plastics Recycling Facility (SSD—9409987)**.

The submission is made by [REDACTED] on behalf of the *Moss Vale Matters Community Group*, a not-for-profit group of community members and sensitive receivers formed as a result of the significant community concern at the proposal, proposed site and lack of due diligence of EIS process, consultation and documentation.

We declare that no reportable political donations have been made to the above.

We strongly **object** to this proposal for the reasons outlined below:

EIS Issues	Details of objection
<b>EIS certification</b>	
Concerns regarding EIS certification/sign off	<ul style="list-style-type: none"> <li>- Noting the complexities of the myriad legacy planning and zoning issues in and around the proposed site, the suitability of the EIS being certified by someone without formal strategic planning qualifications is noted as of concern.</li> <li>- This is in circumstances where an inadequate assessment has been carried out in respect of the suitability of the site, considering the complex (and inconsistent) strategic planning considerations, and the bulk, scale and intensity of the proposed development and its adverse and irreversible impacts on the environment and amenity of the surrounding residential and rural land uses.</li> </ul>
<b>EIS Lack of appropriate rigour</b>	
EIS documentation does not contain enough detail to fully understand the true nature of the proposal, how it will operate, how impacts will be mitigated	<ul style="list-style-type: none"> <li>- Architectural documentation provides no real developed information—it is schematic and inadequate.</li> <li>- No land surveys have been provided, which is inadequate for the purposes of the EIS.</li> <li>- There is no civil or stormwater documentation which depicts the major construction challenges or mitigation approaches.</li> <li>- Detail provided about plant design is wholly inadequate and impacts ability to understand related impacts, e.g. noise (how will it be managed/mitigated), air quality (what equipment will be used to manage air quality impacts—only details vague reference to ‘state of the art technology’, but not how or what this comprises), noise, site access (many and often conflicting options put forward by the proponent provides neither clarity nor confidence)</li> <li>- Noise and pollution impact from both construction and operation of the plant, as well as noise and pollution from hundreds of truck movements per week along narrow, unsurfaced (in places) country roads (servicing multiple residential properties), are inadequately examined or explained.</li> </ul>
<b>Proposal justification</b>	
EIS assessment of justification for the project is unsatisfactory and fails to demonstrate merit or support	<ul style="list-style-type: none"> <li>- The proposal is inconsistent with local strategic planning objectives</li> <li>- The proposal design fails to adequately identify, or demonstrate a viable response/mitigation for: <ul style="list-style-type: none"> <li>→ opportunities and constraints of the site, e.g. legacy zoning issues, topography</li> <li>→ accessibility, traffic and transport constraints</li> <li>→ environmental impacts associated with construction and operational phases of development.</li> </ul> </li> </ul>
Claims that the proposal is suitable for the site are demonstrably incorrect and misleading	<ul style="list-style-type: none"> <li>- The scale and purpose of the proposal is highly unsuitable for the site, situated as it is: <ul style="list-style-type: none"> <li>→ adjacent to sensitive land uses (Garvan, residential, childcare centre, school,</li> </ul> </li> </ul>

cattle  
farming  
land)



- away from appropriate services and infrastructure required to operate a facility of this scale and type
- away from the area it will be servicing—i.e. requires unacceptable level of heavy truck movements daily to and from the site along roads not built or situated for use of this type.
- The proposal *does not* demonstrate public interest:
  - Any local/regional employment or economic stimulation impacts will be negligible due to automation of operation
  - EIS fails to demonstrate that local and regional benefits have been appropriately identified or evaluated
  - The development *cannot* be suitably serviced by essential infrastructure without unreasonable demands on local networks
  - Community and stakeholder consultation has been sub-par and neither accurately reflects nor attempts to address in any meaningful way the significant lack of support/opposition to the proposal (as evidenced by number of objections, almost 5,000 signatories to a change-org petition, lack of support by local community groups (e.g. WinZero) or Wingecarribee Shire Council, lack of support by Local Member of Parliament Wendy Tuckerman)
  - NSW Government support of a plastics recycling facility within the Parkes Special Enterprise Zone demonstrates a facility of this kind is already supported and suitably located elsewhere within NSW.

#### Proponent corporate history

The EIS provides scant information about the proponent, Plasrefine Recycling Pty Ltd

The proponent has been largely absent from the pre-EIS and EIS exhibition consultation phases, except for attending a few recent information sessions

- The Australian Government expects all entities operating in Australia to maintain the highest standards of corporate behaviour, irrespective of whether those entities are Australian or foreign owned.
- Persons involved in operating these entities are expected to understand Australia's regulatory environment and abide by all relevant requirements, including corporate governance principles, directors' obligations, market activities, compliance and reporting obligations.
- The Plasrefine Pty Ltd website does not provide evidence of the above considerations, e.g. governance, previous annual reports. Information about the proponent as a company and individuals is perfunctory.
- Plasrefine Recycling Pty Ltd was registered in Australia in 2020 specifically for this proposal.
- By the director's own admission, she has no experience in plastic recycling, neither does the Chief Technical Operator noted in the scope (Mr Lyu Yalin).
- In a recent engagement session (held March 2022) the Director of Plasrefine Nanxi Zheng, admitted that she and her uncle Mr Lyu only visited recycling facilities in China, this is their only experience of the industry. This lack of experience does not inspire confidence in the company's ability to navigate the myriad complexities and difficulties of an operation of this scale and nature on the selected site.
- Noting that the proposal requires an Environmental Protection Licence (EPL) to be obtained, and that the Environmental Protection Authority will need to take into consideration when assessing the proponent's application for such a licence whether the applicant is considered to be a fit and proper person (including in particular those matters under section 83 of the Protection of the Environment Operations Act 1997), there is no evidence to indicate that the proponent will be able to satisfy this test and will be successful in securing an EPL.
- Finally, we note a similar enterprise has recently been announced in Parkes by the NSW Government. US-based recycling company Brightmark is investing \$260 million to build the recycling plant in Parkes with capacity to recycle



200,000 tonnes  
of plastic per  
year—

making it among the largest in the world. It will use advanced technology and be situated within the Parkes Special Activation Precinct in the state's central west.

- In contrast, this proposal is for an operation of similar size and scale (i.e. 120,000 tonnes at full production per year and therefore, like Parkes, among the largest in the world) but to be delivered by an untested, newly established company with little to no staff, corporate history or relevant experience.

#### Owners' consent

Lack of owners' consent for access road to and from the site

- This proposal provides that a new access road be provided that extends from the plastics recycling and reprocessing facility site to Lackey Road via the currently unformed Braddon Road (paper road), traversing Lot 1 DP 26490 (77 Beaconsfield Road) and Lot 10 1084421 (owned and occupied by the Garvan Institute of Medical Research).
- Prior to the lodgement of the development application, the consent of the owners of these properties was not obtained.
- As of the date of this submission, it is understood that the proponent has still not secured the consent of the owners of all land to which the development application relates.
- A development application "relates" to any land on which development particularised in the application is to take place (*Al Maha Pty Ltd v Huajun Investments Pty Ltd* [2018] NSWCA 245 at [9]. The above-mentioned properties (77 Beaconsfield Road and the land owned by the Garvan Institute) is referred to in the EIS on multiple occasions leaving no doubt that this land is a critical component to the proponent's development application.
- By way of example, we refer to Parts 1.2.1 and 2.1.3 in addition to Figures 4.1, 4.2 and 4.3 of the 'Main EIS' which indicate that the proposal seeks to develop an access road over 77 Beaconsfield Road.
- We also refer to Part 1.2.1 of 'Technical Report 6' (Traffic and Transport) which states:
 

*"The new access road which would extend from the plastics recycling and reprocessing facility to Lackey Road via:*

  - *the currently unformed Braddon Road*
  - *Lot 1 DP 26490 and Lot 10 DP 1084421 (the 'Braddon Road east extension')."*

Part 1.2.2 of *Technical Report 6* further states that a "key feature" of the proposal is a new access road from the plastics recycling and reprocessing facility to Lackey Road via part of Braddon Road.
- Obtaining the consent of *all landowners* to which the development application relates is a prerequisite requirement to the lodgement of a development application.
- Although recent amendments to the *Environmental Planning and Assessment Regulation 2021* no longer require written owner's consent, the requirement for such a consent to be obtained has not gone away as far as we are aware.
- It is unclear how in these circumstances, where the consent of all landowners was not obtained by the proponent before lodgement, that the application was able to progress.
- Importantly, the requirement for the consent of all landowners to be obtained before the consent authority has the jurisdiction to determine the application remains, otherwise the result is invalidity of any consent given.
- Any decision to grant consent to a development application with such deficiencies would be *legally unreasonable* by virtue of it lacking in certainty and finality (this is particularly so in circumstances where the access arrangement to the subject site is dependent on the development of these properties being undertaken).



### Unsuitable site and location

The proponent has stated that this site was selected mainly due to the fact the land was for sale and affordable.

EIS states that this site is suitable due to being zoned for industrial use and its proximity to transport infrastructure

- Neither the EIS nor the proponent has adequately explained how or why this site was selected as suitable for a plastics recycling facility of this scale, other than that it was available land at the right price and situated within the Moss Vale Enterprise Corridor (MVEC).
- There is no supporting evidence that an operation of this size and scale in this location provides a good outcome for waste recycling or is in the public interest.
- If due diligence had been conducted early in the scoping process, it would have been apparent that other land parcels in Moss Vale (i.e. within MVEC) would have been more suitable for a proposal of this size and scale.
- It appears this site was purchased based on affordability and availability rather than suitability.
- Just because a site is zoned industrial use, it does not follow that any type of industrial use is appropriate or desirable for that site, as is clearly the case here.

### Traffic and Access

The requirement to adequately assess impacts on the existing local road network are not met by the documents submitted.

- The SEARS clearly identifies that works beyond the development site boundary required to allow the development to proceed are to be identified. This has not occurred.
- We are not satisfied that the proponent has provided sufficient evidence for the consent authority to conclude that the proposed development would not have an unacceptable impact on both the natural and built environments in the vicinity of the site by way of:
  - the operation and management of the proposed development;
  - the safe movement of the numerous large vehicles to and from the site.

### Water and wastewater

Lack of detail provided + lack of understanding of site

- The EIS provides an estimate of the required volume of potable water for the operations at the site.
- A limited rainwater retention system is shown which equates to three days operational supply. During extended dry periods, all water will need to come from the main potable water supply. A scenario exists where the rainwater tanks are never filled due to water draw off.
- A calculation needs to be provided showing the volume of water collected over a year and how the tanks are contributing beyond a token gesture.
- The EIS does not provide detail on the waste treatment plant and water balance to sewer
  - e.g. treatment plant appears to be a filter only; no indication of a biological treatment to remove nutrients, organic compounds and bacteria/pathogens likely to generate odorous recycled water. Is the recycled water from the plant fit for purpose/does it meet relevant guidelines?
- Sludge: water residue and sludge is greater than 15% of inputs. Is there landfill capacity for this sludge and residue? What is the chemical composition of the sludge and dry solids content? Does this sludge contain hazardous waste material and therefore not acceptable for standard landfill?
- What category of trade waste guidelines is the proposed facility? Can the proponent provide the chemical composition of water quality to be discharged to sewer?
- What water quality monitoring regime will be imposed on the facility to monitor compliance with trade waste limits?

- Can proponent confirm that wastewater does not contain prohibited substances e.g. POPs(Persistent Organic Pollutants), PFAS etc.?
- The EIS relies heavily on desktop analysis with very high assumptions versus the provision of actual data required prior to providing actual approvals eg no odour model,



associated with the recycled water. Reference : Protection and Biodiversity Conservation Act 1999 : 4.3 5.11

- Can GHD/proponent advise of any test work/trials to demonstrate waste water quality e.g. given residential recycling bins can be contaminated with a range of wastes, pesticides prohibited under NSW trade waste guidelines. EIS trade waste assessment does not address this aspect of trade waste and assumes that it will be standard waste versus a more likely high-risk category (category C) requiring more attention. (Noting acceptance that some industrial waste discharges may require modifications to sewage treatment works or transportation system and related ministerial approvals under Section 60 of the Local Government Act.)
- Independent Industry Assessment indicates a sewage treatment plant with capacity for 10,000 people will produce less than 1,000 tonnes of residue a year for transport to end use or disposal. On this basis, the EIS indicates the Plasrefine facility would produce more waste/sludge than the Moss Vale Sewage Treatment Plant. (Reference Item 6 and 21 WATER Meeting Minutes response to questions.)
- Water Balance: The EIS indicates that Plasrefine would require 46 kilolitres of water per day from an external water source while discharging less than 20 kilolitres per day. On these figures, there is a 20 kilolitres per day discrepancy suggesting a discharge of greater than 20 kilolitres per day requiring a Category C High Risk Trade Waste Discharge.
- Water Source and Usage (In reference to quote from GHD Minutes, Item 21 under Water): "About 46.3 kilolitres per day of water would be sourced from a combination of rainwater harvesting and potable water supply connection to the mains. Approximately 80% of the site water needs can be captured from rainwater captured on site." This does not account for predicted increased frequency of drought associated with climate change and assumes dependency on the Moss Vale potable water supply. Note: there are three water storage tanks on the proposal with a total capacity of 150 kilolitres which is just over three days' supply.
- Trade Waste Guidelines: Can GHD provide details as to how they have determined that wastewater from the Plasrefine operation meets Trade Waste requirement for discharges to sewer for contaminants e.g. evidence of independent test work (GHD Minutes, Item 21 under Water).
- Risk Assessment: Can GHD provide evidence of and the basis for how they scored risk? Can GHD verify that the Risk Assessment has been undertaken by an independent entity and on a quantitative versus qualitative assessment/analysis?

### Topographical suitability

EIS provides little to no analysis of the topographical difficulties this site will present to constructing and operating a plant of this size and footprint

EIS is lacking in detail, rigour and demonstrates a concerning lack of familiarity with the site

- With no detailed site surveys included in the EIS, it is difficult to understand how the proposal will navigate the difficulties of this site without causing significant and ongoing impacts on surrounding land uses, e.g. how proponent safeguard Garvan site from possible truck impact should a truck leave the road?
- No cut and fill plan.
- No engineering drawings. Beaconsfield Road (686 to 679) to Garvan site is a 7m drop and will require engineered retaining wall drawings and safety measures.
- As noted in the EIS, the site is undulating; however, this is not the impression that the supplied drawings give, with the assessment providing little more than perfunctory measurements which are misleading at best.
- Only available contours are in section 2 of main document (2.1-2.10).
- Contours indicate that no safe access to Beaconsfield Road on to Braddon is possible, yet this was mooted at the online engagement session which was held by GHD on Tuesday 8 March 2022.
- Natural ground level on the contour plans is 682ahd at Braddon Road and

drops to  
676ahd at  
building 2  
(smaller  
southern  
building) with  
no detail as to  
how this will be  
retained and/or  
how stormwater  
will be  
managed.  
Again, no  
detailed plans  
have been  
supplied.



- There is a 4m RL deviation between building 1 and 2, but again no engineering detail is provided.
- Building 2 measurements are given as 72m x 118m; however, EIS drawings have not included the workshop or office, which would give a total length of 136m x 72m, not 118x 72m. Height is 12m + 4.5m, given the contour of the land.
- No detail has been provided as to how this will be retained and afforded protection from stormwater?
- New access road from Beaconsfield Rd to Lackey is 686m to 662m = 24m fall in the topography of the land but no stormwater management or detailed design engineering is supplied.
- Lackey road has a 5m elevation increase to the north when leaving the Garvan driveway(hill) failing to provide adequate line of sight for vehicles entering or leaving the site.
- Lack of suitable drawings showing the buildings situated with the available contour or cut and fill is not at a standard expected for an EIS process.

### Visual Impact Assessment

EIS provides little to no detail or assessment of visual impacts

- The visual impact assessment that has been provided in support of the proposal is completely inadequate in identifying and assessing the impact on existing views from surrounding and nearby development. (See also notes in this objection regarding social impact assessment.)
- Technical Report 7 (Landscape and Visual) fails to adequately assess the acceptability of the impact of a proposal on the views enjoyed from all impacted private properties ('i.e. the nearby private receivers') in the vicinity of the facility.
- This means the well-established planning principle for considering the acceptability of the impact of a proposed development on the views enjoyed from private properties in the vicinity of the proposed development *has not been addressed* (per *Tenacity Consulting v Warringah* [2004] NSWLEC 140; (2004) 134 LGERA 23).
- Similarly, the visual impact assessment fails to satisfactorily address the acceptability of the impact of the private development on all views from the public domain in the vicinity of the development ('i.e. the nearby public receivers') in accordance with the planning principle established by the Court in *Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor* [2013] NSWLEC 1046, which sets out the steps to be followed to properly identify and analyse the impacts.
- It is highly questionable that only a very minimal number of photomontages have been included in the visual impact assessment and absolutely none of these show the visual impact that will be experienced by multiple nearby private receivers.
- As far as we are aware, based on our enquiries, the proponent/GHD made no effort to obtain access to the private residences of any such nearby (affected) private receivers and there is no explanation for this provided in the EIS.
- Despite it being an *express requirement of the SEARs*, the EIS does not address the visual impacts associated with the proposed lighting that will be required or generated by the development. This means there is insufficient information available to enable the consent authority to be satisfied that there will be no adverse impact on the amenity of residences in the vicinity of the subject site due to lighting/illumination of the facility itself and generated by the countless trucks constantly accessing and existing in the morning and afternoon.

We refer to *Technical Report 7 (Landscape and Visual Impact)*, which specifically states on page 2 "This assessment does not include landscape and visual impacts from lighting and any possible visual impacts from lighting or light spill are excluded from this assessment, and with the exception of suggested mitigation measures outlined in section 8, external lighting has not been assessed."

- An incredibly limited number of viewpoints were used to assess the visual impact of the proposed facility, particularly given the multiple residences to be affected. Overall, the Technical Report 7 appears to be very carefully curated to avoid accurately and



transparently addressing the full extent of the visual impacts that will result from the development.

- The visual impact assessment also fails to identify the impact on existing views from surrounding and nearby development without addressing directly or even indirectly addressing the well-established and important Land and Environment Court Planning Principles relating to the assessment of visual impacts and how this should be done.
- The proposed mitigation measures, which rely totally on vegetative screening, are inadequate and unreliable.

Consistent with the Court's findings in *Sturt v Shoalhaven City Council* [2021] NSWLEC 1698 at [90] we submit that the consent authority cannot be "...persuaded that it is appropriate to allocate definitive weight to the mitigation effect of the existing screen trees and revegetation on the adverse visual impact of the proposed development" in circumstances where "...the vegetative screening is critical to a conclusion of compatibility and acceptability of the proposed development.

The existing trees are a natural element, subject to the frailty of weather, disease and bushfire risk. It is this uncertainty that is the relevance of the Courts Planning Principle: *Super Studio v Waverley* [2004] NSWLEC 91 at [6]."

### Noise impacts

EIS provides little to no detail or assessment of noise impacts

- The proposal will change the noise environment for residents and visitors of the surrounding residential properties and businesses.
- Disturbingly, *Part 5 of Technical Report 2 (Noise and Vibration)* states that "The design of the facility is still in an early stage of development and as such, noise modelling has been based on information provided thus far. As further detail is provided, the operational noise model should be updated to account for potential changes in the design or operating conditions to ensure compliance with the noise limits can be met at all sensitive receiver locations."
- There can be no doubt that there is insufficient information before the consent authority to know and assess the full extent and acceptability of the noise impacts associated with the facility's operations. Consideration of these impacts cannot be deferred to a later stage post determination of the application.

We refer to *Table 4.2 on page 37 of Technical Report 2 (Noise and Vibration)* which indicates that the project's amenity noise level will exceed the "intrusive noise level" during the day for all rural residential receivers. There is information provided which supports the acceptability of this exceedance.

- Concerningly, in respect of the sleep disturbance impacts discussed at *Part 4.1.8 of Technical Report 2*, there is no certainty provided as to whether the project can and will ensure the screening criteria will be met.

Instead, the report simply and indifferently states that "should maximum noise level events during operation exceed the screening criteria, a detailed maximum noise assessment should be undertaken.

- This offers no certainty in relation to the full extent of the noise impacts and whether these can be effectively and satisfactorily managed.
- There is no noise management plan before the consent authority that could give it any confidence that shut down procedures or alike might be implemented should the noise levels exceed whatever levels are ultimately deemed to be satisfactory.
- Regardless of whether the proposal can meet the recommended amenity noise levels for each of the relevant categories of residential receivers, it still remains the case that the proposal will negatively impact on the receiving residents' acoustic amenity as the impact of an 'intrusive noise' is directly dependent on the environment in which it is being experienced.
- Consideration must be given to the fact that the background noise level for all rural residential receivers is significantly lower than the "minimum assumed rating

backgroundlevels”  
in the Noise Policy  
for Industry.



As a direct result of this, noise levels from the facility will have a greater propensity to “emerge” from the background noise level than if the measured background noise levels were actually the minimum assumed rating background levels. Therefore, the presence of the existing very low background noise level in combination with the predicted noise levels (which are not even certain as noted above) will likely cause an unacceptable noise impact for nearby residents. It is submitted that the proposed facility’s noise emissions constitute an “offensive noise” as defined in the Protection of the Environment Operations Act 1997:

*“offensive noise means noise—*

*(a) that, by reason of its level, nature, character or quality, or the time at which it is made, or any other circumstances—*

*(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or*

*(ii) interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted, or*

*(b) that is of a level, nature, character or quality prescribed by the regulations or that is made at a time, or in other circumstances, prescribed by the regulations.”*

- Another key factor that will exacerbate the impact of the facility’s noise impacts on residents, is that the noise emitted will be a noise source that is new and heard by residents for the first time.

Furthermore, most (if not all) of the residents who will hear the facility’s operations are not in favour of the facility which also adds to the impact felt.

- The combination of all the above-mentioned factors means residents will be *adversely affected acoustically*. These impacts contribute to adverse social impacts that will be suffered by the local community.

#### Air quality and odour impacts

EIS fails to demonstrate it has adequately considered, understood or addressed issues related to air quality and odour because of the proposal

- We hold considerable concerns in relation to the odour impacts that will be generated from the site’s proposed operations.
- If the proposal is approved, the community holds no confidence that the facility will be appropriately managed and that the odours emitted will be monitored/addressed.
- The effectiveness and reliability of the vaguely referenced ‘emissions control systems’ referred to in Technical Report 3 (Air Quality and Odour) is questionable.
- We urge the consent authority to read papers and articles such as the following which reveal the significant odour that results from plastic recycling facilities:

→ ‘Evaluating the Effects of Air Pollution from a Plastic Recycling Facility on the Health of Nearby Residents’ by Zhao Xin, Toshihide Tsuda and Hiroyuki Doi dated June 2017, published by National Library of Medicine (National Center for Biotechnology Information) <<https://pubmed.ncbi.nlm.nih.gov/28655940/>>

See the following extracts:

“Abstract

We evaluated how exposure to airborne volatile organic compounds emitted from a plastic recycling facility affected nearby residents, in a cross-sectional study. Individuals >10 years old were randomly sampled from 50 households at five sites and given questionnaires to complete. We categorized the subjects by distance from the recycling facility and used this as a proxy measure for pollutant exposure. We sought to improve on a preceding study by generating new findings, improving methods for questionnaire distribution and collection, and refining site selection. We calculated the odds of residents living 500 or 900

m away from the facility reporting mucocutaneous and respiratory symptoms using a reference group of residents 2,800 m away. Self-reported nasal congestion (odds ratio=3.0, 95% confidence interval=1.02-8.8), eczema (5.1, 1.1-22.9), and sore throat (3.9, 1.1-14.1) were significantly higher among

residents 500 m from the facility. Those 900 m away were also considerably more likely to report experiencing eczema (4.6, 1.4-14.9). Air pollution was found responsible for significantly increased reports of mucocutaneous and respiratory symptoms among nearby residents. Our findings confirm the effects of pollutants emitted from recycling facilities on residents' health and clarify that study design differences did not affect the results."

- *"The pollution characteristics of odor, volatile organochlorinated compounds and polycyclic aromatic hydrocarbons emitted from plastic waste recycling plants" by Chung-Jung Tsai, Mei-Lien Chen, Keng-Fu Chang, Fu-Chang and I-Feng Mao dated February 2009, published by National Library of Medicine (National Center for Biotechnology Information)*  
<https://pubmed.ncbi.nlm.nih.gov/19091382/>>

See the following extracts:

"Plastic waste treatment trends toward recycling in many countries; however, the melting process in the facilities which adopt material recycling method for treating plastic waste may emit toxicants and cause sensory annoyance. The objectives of this study were to analyze the pollution characteristics of the emissions from the plastic waste recycling plants, particularly in harmful volatile organochlorinated compounds, polycyclic aromatic hydrocarbons (PAHs), odor levels and critical odorants. Ten large recycling plants were selected for analysis of odor concentration (OC), volatile organic compounds (VOCs) and PAHs inside and outside the plants using olfactometry, gas chromatography-mass spectrometry and high performance liquid chromatography-fluorescence detector, respectively. The olfactometric results showed that the melting processes used for treating polyethylene/polypropylene (PE/PP) and polyvinyl chloride (PVC) plastic waste significantly produced malodor, and the odor levels at downwind boundaries were 100-229 OC, which all exceeded Taiwan's EPA standard of 50 OC. Toluene, ethylbenzene, 4-methyl-2-pentanone, methyl methacrylate and acrolein accounted for most odors compared to numerous VOCs. Sixteen organochlorinated compounds were measured in the ambient air emitted from the PVC plastic waste recycling plant and total concentrations were 245-553 microg m(-3); most were vinyl chloride, chloroform and trichloroethylene. Concentrations of PAHs inside the PE/PP plant were 8.97-252.16 ng m(-3), in which the maximum level were 20-fold higher than the levels detected from boundaries. Most of these recycling plants simply used filter to treat the melting fumes, and this could not efficiently eliminate the gaseous compounds and malodor. Improved exhaust air pollution control were strongly recommended in these industries."

- *'The odour of burning wakes us': inside the Philippines' Plastic City' by Carmela Fonbuena, dated 8 July 2019, published by The Guardian, <<https://www.theguardian.com/global-development/2019/jul/08/waste-recycling-smell-pollution-philippines-plastic-city>*

See the following extracts:

"Two months after environmental officers visited Cunumay West, residents are still suffering from the pungent smell. "The odour is repulsive," says Benjamin Lopez, 50. "It woke us up at 2am one time. I had to spray perfume in the room. Others had taken to spreading Vicks VapoRub under their noses." Residents believe the smell is responsible for five-year-old girl Shantal Marcaida contracting pneumonia, which led to her hospitalisation.

- *'Bowral waste facility fined by EPA for poor management practices', dated 23 June 2021 published by the NSW Environmental Protection Authority*

*<<https://www.epa.nsw.gov.au/news/media-releases/2021/epamedia210623-bowral-waste-facility-fined-by-epa-for-poor-management-practices>>*



See the following extracts:

“Residents living near the Kiama Street waste centre in Bowral have complained to the EPA about offensive ‘rotten egg’ odours since late May this year. During the most recent inspection on 18 June 2021 EPA officers also detected the odours.

“During the inspection EPA officers observed a large area of uncovered waste at the southwestern corner of the landfill,” EPA Executive Director Steve Beaman said.

“The company’s licence requires exposed waste to be covered at the end of each day. This requirement reduces the chance that odours can escape offsite and impact nearby homes and businesses.

“The EPA expects all licensees to comply with the requirements of their environment protection licence and make sure their operations do not impact on the community.”

#### Inconsistency with objectives of the IN1 General Industrial Zone

Inconsistent with local planning and LEP

- In accordance with section 2.3(2) of the Wingecarribee LEP, the consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.
- The proposal should be refused as it is inconsistent with the following objectives of the IN1 General Industrial zone:
  - *To minimise any adverse effect of industry on other land uses.”*
  - *To ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential impacts on neighbourhood amenity and character, or the efficient operation of the local or regional road system.*
  - *To encourage employment opportunities.”*
- The proposal, due to its nature, scale and intensity, is unable to effectively minimise the adverse impacts that it will impose on the surrounding residential land uses. As a result the proposal does not minimise the adverse effect of industry on the surrounding land uses.
- Whilst it is understood that when considering consistency with the zone’s objectives, it is not necessary to show that the proposed development is compatible with the objectives for the proposal to be considered “generally consistent” with the objectives, this is only so long as the proposal is not antipathetic to them (per Schaffer Corporation v Hawkesbury City Council (1992) 77 LGRA 21).
- We submit that there is sufficient evidence available to demonstrate that the proposal is *antipathetic to the above-mentioned objective taking into account the adverse impacts and concerns raised in this submission.*



## Social impacts and amenity

The EIS misleadingly (and inconsistent with information provided in the multiple technical reports provided) states in its conclusion that while the proposal has *'the potential to result in minor increases in traffic, noise, air quality and amenity impacts, it is a suitable development for the site'*.

It is submitted that this statement is incorrect and that the proposal will have major, adverse and irreversible traffic, noise, air and amenity impacts rendering the site unsuitable given the nature, scale and intensity of development proposed. As such, it is not in the public interest.

- As noted previously, the SEARs for this proposal did not require the proponent to undertake a Social Impact Assessment for the proposal.
- The SEARs did, however, provide very specific instructions around the level and type of community and stakeholder engagement required to support development of the proposal and the EIS.
- The community and Wingecarribee Shire Council have repeatedly requested that the proponent/GHD conduct an adequate assessment of the social impacts of a proposal of this size and scale, preferably via a social impact assessment process or via an enhanced engagement program.
- This request was denied and GHD representatives stated in its online engagement session of 8 March 2022 that it believed Section 18.2 (Socio-economic) of the EIS document adequately canvassed potential socio-economic impacts.

*This submission/objection categorically refutes this assessment.*

- Section 18.2 of the EIS provides a rudimentary overview of Moss Vale, its location and population, a very high-level demographic profile, and a summary of socio-economic impacts (both negative and positive) of construction and operation.
  - It notes that long-term positive impacts are 'generally more likely to be regional' (with little detail of what those positive impacts might be beyond, 'provision of goods and services of nearby businesses to support the operation of the proposal, such as kitchen supplies and office goods...' and indirect benefit of plant employees 'spending their wages').
  - On the subject of community perception, and with a notable lack of attention to specifics, this section also states that, 'public perception... may include uncertainty and concerns regarding the nature of the proposal and its potential impact', and that, 'consultation undertaken for the EIS indicated that the vast majority of local residents and community members support local plastics recycling, but were uncertain about the proposal's potential impacts and benefits as there are limited facilities with similar operations currently in Australia'.
  - Section 18.2 is problematic for many reasons:
    - Its analysis of the community and the people living close to or nearby the proposed site is undeveloped and demonstrates a lack of respect or understanding of the concerns of sensitive receivers and others living close to or adjacent to the site
    - Many sensitive receivers—including landowners adjacent to the site—have never been approached or spoken to by GHD/proponent and therefore have been unable to provide input to social, amenity or economic impacts of the proposal for the purposes of this EIS.
    - It makes sweeping generalisations about community perceptions with no attempt to explore or address them in any meaningful way.
    - Disregards the content or intent of feedback provided during the EIS-preparation phase.
    - Is disingenuous in its assertion that consultation indicates 'most people support local plastics recycling' but are uncertain about the benefits and impacts of this proposal.
- Many people do support recycling in principle, but not on the proposed site. And the community has demonstrated time and again that it is very aware of the impacts of this proposal on that site, despite this EIS' reluctance to interrogate these impacts with the community and stakeholders in any meaningful way.
- Does not demonstrate that community or stakeholder concerns have been adequately sought, canvassed, understood or addressed.



- The NSW Government's Social Impact Assessment Guidelines clearly set out how social impacts should be identified, evaluated, responded to and, if appropriate, monitored and managed. It also notes that a SIA is not a 'one-size-fits-all' approach. Noting that it is compulsory for all SSD applications to now be accompanied by a Social Impact Assessment (as of October 2021) due to the Department's recognition that this is critical to identifying, predicting and evaluating the likely social impacts of a proposal, *it is unacceptable that no such assessment has been carried out having regard to the significant scale and nature of the proposal.*
- With some small exceptions, Section 18.2 could have been taken from any report about any regional community. It is generic and contains no real analysis or understanding of the specific nature, context or impact of this proposal on this community, or their specific concerns and repeated requests for meaningful information and detail about the proposal.
- The EIS' lack of detail and rigour reflects poorly on the proponent's genuine willingness to understand, consider and address the community's concerns and demonstrates little respect for the community, surrounding landowners, nearby residents and businesses, the local school and childcare centre, or the very real safety issues associated with construction and operation of a proposal of this scale and impact.
- *This provides the community with no confidence that our concerns or perspectives have been listened to or considered. This is evidenced by the nature of the proposal and its numerous unacceptable impacts.*

- Without an adequate, respectful and meaningful engagement or Social Impact Assessment process, the proponent cannot enjoy the trust of the community. Without trust, the proponent can have no social license to operate within the community and there is no acceptance of the project by most community and stakeholders.
- It is submitted, and noting that there is an absence of any evidence from the proponent demonstrating anything to the contrary and based on our own independent social engagement activities, *that the proposal will have a variety of negative social impacts that have a high-extreme risk rating that cannot be mitigated or managed.*
- The lack of quality of the EIS demonstrates that the proponent/GHD have no interest in understanding the full extent of these impacts and have instead simply focused on promoting purported and unsubstantiated 'benefits', meaning that there has been no efforts made to address in a tangible way the serious concerns of the community (e.g. in relation to the traffic, visual, noise, odour, air quality and other environmental and amenity related impacts).
- Where the very purpose of a Social Impact Assessment is to identify, evaluate and weigh both the positive social impacts as well as the negative social impacts, and no such assessment has been undertaken, this suggests that it is likely the proponent is aware that any positive benefits of the proposal are far outweighed by the significant negative impacts that will be caused which should, we submit, be sufficient justification for the refusal of the proposal.
- In respect of the EIS's claim that the proposal will generate local employment opportunities, this is highly questionable and there is insufficient information available to support the accuracy of this statement. For example, we note taking into account the increased automation and digitisation of the waste industry this may in fact have labour displacing effects.

Furthermore, the proponent has made public statements indicating that specialised staff from overseas would be employed to operate the facility. Regardless of any moderate positive social impact that the proposal may (but will likely not) have on the local economy, it remains the case that the significance of any such impacts would be countered by the negative social impacts.

- For example, there are serious concerns held for the tourism industry in the Southern Highlands because of the proposal in circumstances where the scenic nature of Moss Vale and surrounding townships and villages is at the heart of

many businesses and why peoplechoose to live in these areas.

It follows that any such activity that tarnishes the scenic nature of the area poses a threat to the livelihoods of residents and businesses alike.

- The significant safety issues (both vehicular and health) posed by increased truck and traffic movements in and around the site are of sincere and significant concern to the community—particularly as the EIS and consultation process has been muddled and contradictory on the question of traffic and road access.
- That these have not been considered in any serious or sensible way by the EIS and consultation process again reflects poorly on the intent and judgement of both the proponent and the consultants engaged to prepare the EIS.

### Construction

EIS provides no real detail about construction (and therefore impacts) and how the building will/can house equipment of a scale and complexity necessary to deliver such an ambitious project

- The lack of detail provided does not allow an assessment of the environmental impacts of the entire construction required to establish a facility at this site.
- GHD have repeatedly stated that the detail would be provided after a consent was granted. They are missing the point about the requirement to assess all the works BEFORE any consent could be granted.

### Operational concerns

Waste arriving, product leaving and waste leaving

- The EIS claims that the number of vehicle movements have been reduced from the initial proposal, as a result of community input.
- The main change has been to move to 20 tonne trucks - they have also shown a semi-trailer as the largest vehicle to access the site and the two facility buildings. This does not tally with a 20-tonne load of plastic waste.
- The figures also do not include for product leaving the site - whether it is flakes or pellets, or finished product.
- There will be items that cannot be recycled, together with captured waste from the washing process. This needs to be clearly quantified and details of the destination identified and to include vehicle routes/truck sizes etc.

Vehicles accessing the buildings

- Fast action roller doors are identified in the submission (we note that for accuracy, these should be referred to as fast action panel doors) and vehicles are to enter the building and the doors immediately close behind them to prevent loose plastics escaping. The doors are identified as also helping to prevent noise escaping from the building.
- Details for the acoustic panel lifts doors are not provided. A more developed design would use an appropriate trap arrangement where the product is delivered into a holding area with doors. The connecting doors to the processing area could then be opened at an appropriate time to ensure the noise from operations is not encountered each time a truck enters or leaves the premises.
- We have been advised by GHD that the noise level inside the operations area is predicted to be 85dBa. There is no control over the timing of deliveries over the proposed 11-hour period for trucks entering and leaving the site, and assurances are not sufficient to accept that these will be staggered. The applicant has requested 24-hour operations for this site - how can noise spill events be detected, quickly addressed and mitigated?
- The two buildings are shown at RL 672 and RL 676 - with swept paths showing access for the semi-trailer to both. From simple analysis it is difficult to accept that this can be made workable - vertical curves and clearances would need to be checked. Again, no real details for this have been provided.



### Greenhouse gas assessment

The EIS states that a key objective of the proposal is to align with NSW Government policy around waste and recycling

- The NSW Government's Climate Change Policy Framework sets clear objectives to halve greenhouse gas emissions by 2030 and achieve net zero emissions by 2050.
- The *EIS Technical Report 9: Greenhouse Gas Assessment* fails to acknowledge the NSW Government's policy context on climate change and therefore fails to assess the project's alignment with government targets and objectives for greenhouse gas emissions.
- It is not appropriate for the greenhouse gas assessment to exclude scope 3 emissions, particularly from the following emissions-intensive sources:
  - the embodied energy of construction materials, particularly concrete, steel and asphalt/bitumen, which are high in embodied carbon
  - the transport of construction materials and waste to and from site, which is likely to be significant.
- While it is acknowledged that specifics are difficult to obtain during a project's planning process, there are various methods available to estimate such quantities and calculate the associated emissions (for example, the publicly available resource used by NSW Roads and Maritime Services: Greenhouse Gas Workbook for Road Projects (Transport Authorities Greenhouse Group, 2013) Greenhouse Gas Assessment Workbook for Road Projects ).
- The exclusion of such sources of emissions is likely to grossly underestimate the emissions attributable to the project's construction and it is therefore not appropriate for GHD to state that construction emissions would be negligible on this basis.
- Exclusion of these sources from the assessment also means GHD fails to identify specific and targeted mitigation measures to reduce GHG emissions during the project's construction. There is no commitment in the EIS to the ongoing monitoring and management of GHG emissions during construction.

### Community and stakeholder engagement

The EIS claims that the approach taken to engagement was based on the proponent and GHD proposing 'a clear and comprehensive approach to engaging with the community and stakeholders' based around the principles of 'regular, two-way communication and active listening'. GHD claims to have worked within the following engagement objectives (p.6-1):

1. build and maintain relationships with the community and stakeholders
2. ensure that a broad range of local community and stakeholders are informed about the proposal and given the opportunity to provide feedback
3. provide the community and

- The *Undertaking Engagement Guide: Guidance for State Significant Projects*, published by (then) Department of Planning, Industry and Environment (Department) in December 2020 clearly sets out the expectations of the Department for early and effective engagement on state significant projects, including SSDs.

- It advocates for 'early and effective' engagement and notes its importance in underpinning a fair and transparent environmental assessment process *where careful consideration of diverse viewpoints* [our emphasis] can help achieve good planning outcomes and avoid negative impacts to communities.
- It notes that best practice engagement can only be achieved if the engagement strategy is underpinned by principles which reflect best practice, i.e. open and inclusive, easy to access, relevant, timely and meaningful.
- We submit that the community engagement process conducted by

the proponent and GHD to support both the pre-EIS exhibition phase and the EIS public exhibition phase has been woefully and demonstrably inadequate.

- To demonstrate, our response refers to GHD's failure to address its own engagement objectives:

### **Build and maintain relationships with the community and stakeholders:**

- GHD has made no genuine or authentic attempt to engage with the community or stakeholders to consider diverse viewpoints or facilitate good planning outcomes for this proposal.
- This is evidenced by the number of emailed/telephone complaints and objections that have been made to GHD/Plasrefine, the Department, Wingecarribee Shire Council (WSC), Wendy Tuckerman MP, and Anthony Roberts MP to name but a few. There would be little need for people to resort to such lengths if there was any kind of relationship between GHD and the community.

stakeholders with an opportunity to ask questions and identify areas of concerns re proposal

4. provide direct feedback to the project team during all stages of the proposal and develop solutions to address community expectations, where possible

5. identify and manage issues, effectively and proactively

6. manage stakeholder feedback and complaints in a timely, respectful way

7. satisfy engagement requirements of SEARs

8. monitor and evaluate stakeholder feedback to measure success

build community and stakeholder confidence in Plasrefine Recycling and the decisions it makes through transparency and ongoing commitment to working in partnership with the community.

- A petition on the Change.Org website has just under 5,000 signatures (4,850 as at 21 March 2022) and the community has clearly articulated its dissatisfaction with both the proposal and the EIS process through this outlet.
- GHD advised that 27 people in total attended the 6 sessions held in Exeter on 9 and 10 March.
- The capacity for each session was capped at 25 people (no real explanation was provided as to this limit and the venue being 12km distance from Moss Vale).
- It is clear that the community has realised that the sessions were a simple tick box for GHD and that answers provided to questions raised were often in contradiction of the EIS with many apparently invented on the spot.

### **Ensure that a broad range of local community and stakeholders are informed about the proposal and given the opportunity to provide feedback:**

- It is difficult to provide feedback on a State Significant Development with such little detail or substance.
- The lack of community knowledge of, or information about, the proposal led to the establishment of the Moss Vale Matters Facebook page by community members as a means of providing information to the community about the proposal.
- In many cases this was the first time people had heard of the proposal, including some sensitive receivers who until then (and as recently as January/February 2022) had no knowledge of what was proposed on land adjacent to their own properties (e.g. [REDACTED] of Elwood Park Beef Cattle Enterprises, who neighbour the proposed site and who are providing their own objection submission).
- Wingecarribee Shire Council (WSC) recently advised the community (via a community session held on 17 March) that they have asked for an extension of time to provide a response to the EIS, noting that they have been unable to assess all documents within the exhibition period timeframe.
- GHD has repeatedly claimed to have been in regular contact with WSC during the pre-EIS and EIS exhibition phases of the SSD process, which was countered during a community information session with Council (who noted they had met with GHD three times from pre-EIS to EIS exhibition) and evidenced by Council's request for an extension of time to consider and provide a response to the EIS.

Had Council been regularly 'informed about the proposal' and given the 'opportunity to provide feedback' there would have been 'no surprises' in the EIS documentation and they would feel informed enough to prepare a response within the exhibition period.

- Similarly, had the community been adequately informed about the proposal, and given meaningful opportunity to provide feedback and ask questions during the EIS preparation, there would have been no need for information about the proposal to have been provided to the community by the community (via Moss Vale Matters Facebook page, local media, social media), there would have been no need for the community to organise its own letterbox drop of 10,000+ flyers (conducted 10-15 March) to advise the community about the proposal and how to make a submission, and there would have been no need for us to organise our own community information session (held on 16 March at Moss Vale Services Club and attended by just over 100 community members) in order to provide information and answer questions (as best we could).

### **Provide the community and stakeholders with an opportunity to ask questions and identify areas of concerns re proposal:**

- It should be noted that many community members asked for an extension of the

mandated 28-day  
exhibition period  
(23 February to 22  
March 2022) to  
review the EIS  
documentation  
lodged by GHD,  
noting that this was  
the first time we  
had seen any  
meaningful detail of  
the proposal.

- This was also  
requested as the  
exhibition period  
was punctuated  
by some of the  
worst floods on  
record for NSW,  
with many areas  
of Wingecarribee  
inaccessible and  
deluged by  
floodwater in  
February.

- Despite these difficulties, our request for an extension (made to the Department and also to Wendy Tuckerman MP and Anthony Roberts MP) were not accommodated and we have been compelled to review the EIS documentation, and assess and lodge our objection/submission under extremely difficult circumstances.
- Similarly, requests to GHD to postpone their scheduled EIS Exhibition in-person events (held w/c 7 March) to later in the exhibition period when community members could be better prepared and recovered from flood events, went unheeded. Hard copies of the EIS documentation did not appear in the local library until early March.
- GHD's in-person sessions were held in Exeter, 12kms from Moss Vale. Requests for sessions to be held in Moss Vale (a) at a later date once impacts of floods had reduced, (b) within a reasonable area/radius of the proposed site, and (c) once people had had enough time to read through and digest the many hundreds of pages of the EIS, were refused by GHD.
- When asked why the sessions were being in Exeter, as opposed to Moss Vale, responses ranged over time from there being no suitable venues available in Moss Vale (demonstrably incorrect) to fears people may become intoxicated if the sessions were held in the Moss Vale Services Club (despite multiple pre-EIS sessions being held there without incident).
- Ultimately, we organised our own community information session on 16 March at Moss Vale Services Club, which was attended by over 100 people. Many people had only heard about the proposal due to community-led efforts, including Moss Vale Matters Facebook page, letter-box drop flyers, local media advertising, and word-of-mouth.
- Clearly, if GHD had 'built and maintained relationships with the community', or given us a chance to 'ask questions and identify areas of concern' in a genuine and authentic way throughout the pre-EIS and EIS Exhibition process, we would not have had a situation where so many members of the community were so distressed at such a late stage in the process about a proposal they had heretofore heard nothing about.

Neither would we have had to ask for an extension of time to be able to review the detail of the proposal—mostly for the first time—in the EIS documents and during the exhibition period. We should already have been aware of the key tenets of the proposal.

**'Provide direct feedback to the project team during all stages of the proposal', 'develop solutions to address community expectations, where possible, and identify and manage issues, effectively and proactively' and 'manage stakeholder feedback':**

- This objective has most clearly not been met. The opportunity to work with GHD or the proponent to co-develop solutions and/or manage issues effectively has not been evidenced at all throughout the entire pre-EIS and EIS exhibition process.
- On the few occasions when GHD has met directly with the community, the format has been about providing very high-level information and expecting the community to either provide on-the-spot feedback or via a community hotline or email, neither of which provides an opportunity for informed discussion or co-developing solutions and better community outcomes over time.
- This does not meet GHD's own objectives and it does not satisfy the Department's criteria for effective and genuine engagement either.
- GHD's approach to engagement has been muddled and lacking in transparency.

During conversations with the community, it was never made clear what could or could not be influenced as part of the engagement process. Rather, some feedback would appear



to be actioned (e.g. changing number of truck movements) but no substance provided as to what that might actually look like (e.g. routes, size, capacity, operation). By the next interaction, it would be changed again to something different. Again, with no apparent logic or substance.

- Details of which route would be used to gain access to and from the proposed site were confused at best and obfuscatory at worst.

- Wingecarribee Shire Council has clearly stated that they will not allow Beaconsfield Road to be used to access the site either during construction or operation, yet the EIS states that :

*During preparation of the EIS and in consultation with Council, it has been identified that if construction of the new access road is delayed due to land acquisition issues, the proponent would need to use Beaconsfield Road for construction access until the new road is available. During this period, limitations on the number of heavy vehicle movements allowable on Beaconsfield Road would be implemented to ensure compliance with the noise criteria stipulated in the Construction Noise and Vibration Guideline (Transport for NSW 2016).*

- The continued lack of clarity and contradictory statements about issues as fundamental as access to and from the site is indicative of the muddled and rushed nature of the EIS process and documents submitted.

## Satisfy engagement requirements of the SEARs

- While in principle most people support initiatives that help reduce emissions, increase recycling and help achieve net zero aims, this proposal does not have community support or buy-in because it is, quite simply, not justified or in the public interest given its size and scale, position and noise, transport and access issues, and complete lack of adequate assessment of environmental impacts.
- We have repeatedly asked GHD/proponent to conduct a social impact assessment in order to fully explore impacts to amenity, social connections, safety and other issues with the community in a meaningful way.
- Council too has asked for a social impact assessment, as has, we believe, Wendy Tuckerman MP. GHD has consistently declined to conduct this, stating that it is not a requirement of the SEARs.
- In the absence of a social impact assessment, a meaningful, genuine and authentic engagement process with community and stakeholders becomes doubly justified and important in order to adequately canvas, address and respond to concerns and questions. It is also important for the proponent to understand any limitations of the proposed site and surroundings, and to ensure design and operation considerations are reflected in the EIS.
- Engagement with GHD has consistently been on their own terms, not that of the community. While GHD may cite the volume of interactions with the community as evidence of a functioning engagement process, we would counter that it instead indicates confusion and a desperate need for adequate and meaningful information about the proposal—which we have never received and which is clearly still absent from the EIS documentation submitted.
- As far as managing stakeholder engagement to a standard expected of an EIS process is concerned, separate submissions from relevant and primary stakeholders (e.g. WinZero, Wendy Tuckerman MP, WSC) will also, we are confident, demonstrate that this process was sub-par and not in line with community expectations.
- We recognise that community engagement around SSD proposals cannot always yield all the outcomes a community desires. Nonetheless, transparent and authentic engagement means the community can have confidence in the process, if not the outcome.
- In this case, the community has no such confidence, noting the due diligence lacking in both the engagement process and the resulting EIS documents.

### Not in the Public Interest

- The negative impacts of the proposal, including not least the traffic, visual, noise, odour, air quality, water and associated social impacts outweigh any economic and other public benefits that the proposal may offer and which may be secured elsewhere on a more suitable site. The responses from the community are entirely reasonable and despite the deficiencies in the proponent's application, it is still clear that an adverse effect on the amenity of the local area will result from this proposal. The proposal therefore must be

refused.





**Submission to the Department of Planning & Environment re the proposed  
Plasrefine Plastics Recycling Facility at Moss Vale NSW  
SSD Application No - 9409987**

We are making this submission on behalf of **Wingecarribee Net Zero Emissions Inc (WinZero Inc)**, which is a coalition of 12 environmentally-engaged community groups in the Southern Highlands of NSW. We were formed following the Declaration of a Climate Emergency by the Wingecarribee Shire Council in February 2020 with the aim of working with both the Wingecarribee Shire Council and the local community to achieve Net Zero Carbon Emissions by 2050 at the latest, as well as to use our best endeavours to preserve the irreplaceable environmental attributes of our Shire.

**We oppose this Application** because, while we support in principle the need for Australia to recycle a large proportion of the plastic waste produced in this country, we are strongly of the view that the particular proposed location in the industrial estate at Moss Vale is entirely inappropriate for such a project.

There are a number of reasons why we oppose this development at this particular location:

- **Plant Design** – The design details included in the Plasrefine EIS regarding proposed plant and equipment and processing flow sheets are entirely inadequate and therefore insufficient to allow an informed submission on most aspects of the project.

Design details are critical as they affect so many parts of the proposal assessment including (but not necessarily limited to) air quality issues, noise impacts, effluent management, power requirements, water requirements, Sydney water catchment issues, financial viability and waste disposal/management.

- **Feed Sources & Quality** – This aspect of the project proposal impacts on a variety of key elements of the project. These include:
  - Transport routes to the plant and volumes for each route
  - The types of plastic material that would be processed
  - The density of the feed material, which would dictate the size of the trucks required to meet the design processing volumes
  - The likely deleterious emissions from the process which would be dependent on feed analyses
  - The availability of suitable feed material for the plant when competing with alternative processing facilities (such as the mooted Parkes NSW 200,000tpa plant due for start-up in 2023).
- **Transport Route Design & Management** – the EIS makes a number of assumptions about the likely delivery routes and the sort of vehicles that would be involved. However, the feed materials would be processed off-site by third parties and they would be using transport providers independent of the Proponent. This raises a number of questions about these assumptions:
  - How would the Proponent ensure that the assumed truck sizes are adhered to?
  - How would the Proponent ensure that the delivery vehicles would adhere to the assumed routes as this would have a significant effect on traffic impacts for the Southern Highlands residents?
  - How would the Proponent manage the flow of delivery vehicles to ensure that there are not significant vehicle queues at the various choke points and on the plant access roads?
  - Where are the detailed road designs that would allow for sufficient turning circles for large trucks and for necessary slip lanes at turnouts from main roadways to avoid significant local traffic interference?
- **Air Quality** – it is difficult to make a realistic assessment of this aspect of the proposal without answers to the aforementioned questions on plant design and feed specification. However, it is noted that the Proponent proposes to manage this issue by installing “fast opening and closing” roller doors on the plant to minimise the escape of any deleterious substances. Again, this raises a number of questions:
  - How realistic is it to assume that truck movement management would be so good that the roller doors would only be open for a couple of minutes at a time (even if that is acceptable in principle which is doubtful)?
  - How wide-spread and comprehensive are the air quality sampling points around the plant?
  - What sort of deleterious elements would be sampled at these points?
  - Where is the comprehensive wind rose analysis that would be needed to highlight those areas most at risk from fugitive emission escapes?

- **Plant Access** – there have been various and often conflicting statements from the Proponent about what roads would be used for access for both the construction period and the ongoing production phase. There are number of potential “show stoppers” in this key question:
  - Beaconsfield Road cannot be considered a realistic option for either the construction phase or the operational phase for a variety of reasons:
    - The road is generally too narrow for heavy vehicle traffic
    - There are childcare centres in the area
    - There is a lot of bicycle and pedestrian traffic along this road
    - The local residents have no desire for a procession of heavy vehicles to enter their domain
  - The proposed route would seem to require private land acquisition on a number of adjacent properties. While this may ultimately prove to be legally possible, it would be highly disruptive to the neighbours involved and may well incur considerable extra costs for the Wingecarribee ratepayers.
- **Community Engagement** – it is apparent that community engagement in the whole EIS process has been sporadic and generally inadequate. The project is crying out for a Social Impact Study to be done given the plant’s proximity to residential housing, schools and low-impact light industrial activities (such as the Garvan Institute facility).

While it is conceded that a Social Impact Study was not a legal requirement at the time of the application, a legitimately caring Proponent should welcome the opportunity to gauge the social license it has for the project. Too many SSD development proposals fail to take into account this key component of the assessment process or pay lip service to it.

- **Infrastructure** – the proposed plant site is remote from existing infrastructure for the supply of power, water and sewerage, and the existing infrastructure is of itself inherently inadequate for the site’s needs. This would require considerable Council outlays at the Wingecarribee ratepayers’ expense with doubtful offsetting benefits. Again this issue should have been highlighted by more comprehensive engagement with the Wingecarribee Shire Council and the provision of a Social Impact Study at the outset.
- **Mixed Residential and Industrial zoning** – the lot purchased by the developer is an unusual lot in so far as it consists of 2 parts, one being zoned IN2 Light Industrial, and the other part zoned C4 Environment Living, meaning that there are several residences in proximity. “Light Industrial” would not normally include a petrochemical processing plant.



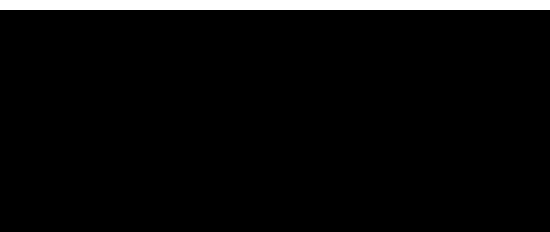
- **Visual Impacts** - the conceptual design indicates that the profile view of the main building is approximately 17 metres high and 120 metres long (more than big enough to house a 747 Jumbo Jet), and the whole plant covers 38,000 square metres of total floor space (the size of around 6 average soccer fields). The impact of this large edifice is further exacerbated by the significant slope of the land to the northeast. This obviously presents views of abnormal bulk and scale to the nearby sensitive receptors who would be painfully aware of it at all times.

There would also have to be considerable external lighting at the site for security and safety reasons. This would be highly visible at all nighttime hours to the same sensitive receptors.

- **Noise Impacts** - while again being very difficult to assess without a plant or process design, it is hard to imagine how there would not be a significant noise output from plant and equipment operation. This would be exacerbated by the movement of materials around the plant at all hours of the day and night, as well as many and large truck movements during daylight hours. This continuous noise on a 24/7 basis would be completely unacceptable to the sensitive receptors.
- **Overall Financial Viability** – given the recent announcement of a major NSW State Government supported plastics recycling facility at Parkes, there must be serious doubts as to whether this proposal would be financially viable. If it is not, it would be a major net drain on State and local finances.

The scope and significance of the multitudinous potentially negative community impacts outlined above, when coupled with the fact that these issues are generally inadequately addressed in the EIS, drive us to the conclusion that it is the right idea in the wrong place.

WinZero therefore urges the Department to **refuse this Application at the selected location.**



On behalf of the WinZero Team  
Email –

**From:** "  
**Sent:** Mon, 21 Mar 2022 18:45:52 +1100  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>  
**Subject:** Objection to Plasrefine Facility Moss Vale

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

As a resident rate payer I object to the Plasrefine Facility as it is wrong on many levels:

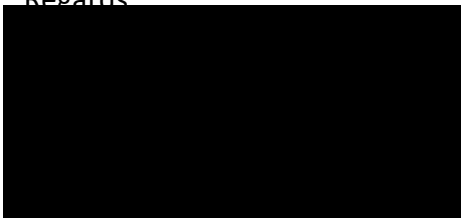
Height/bulk being excessive site coverage, lack of road infrastructure from the highway to copewith at least 40x19m/20 tonne trucks per day to receive waste, which does not include the number required to remove sludge to Lucas Heights and to transport manufactured furniture from the recycled waste. There is currently no access onto the site other than through neighbouring long established residential areas and no consent given by the three neighbouring properties to run a further extension of 900m length to Braddon Road.

The project will require high water use and their proposed roof rainwater harvesting cannot be guaranteed to provide required water. There are also potential water catchment pollution issues including straining the local sewage system. I also do not believe they have provided acceptable storm water provisions in their submission.

Foul odours are likely to be blown by the prevailing westerlies into the town and its neighbouring tourist destinations which comprise a major industry of the area. Further, the plastic industry has a worldwide history of catastrophic fires and there are insufficient resources to combat such a fire if highly flammable plastic should ignite.

Finally, the town has not as yet developed its Master Plan for the Southern Highlands Innovation Park where the site lies so it should be impossible to approve the proponent's application at this time.

Regards



**From:**  
**Sent:** Fri, 18 Mar 2022 14:53:07 +1100  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>  
**Subject:** Plasrefine objection

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Attention S  
My submission as sent to Department of Planning

Sent from my iPad Director – Industry Assessments,

Planning Group,  
Department of Planning and Environment.  
Locked Bag 5022  
Parramatta  
NSW 2124.  
13 March 2022

**PROJECT ID SSD-9409987**

Moss Vale.  
NSW 2577.

Dear Sir/Madam,

Please accept my submission regarding the Plasrefine proposal to build a plastic recycling center at the end of Beaconsfield Road in Moss Vale 2577 NSW.

The following reflect my objections to this location.

## **The site:**

The Proposed Plant is to be built on an area of 7.7 hectares, in the middle of two residential areas.

I have no objection to the facility, **BUT “IT IS THE WRONG SITE”**

Being built so close to residential areas and School and also to be built on Sydney Water Catchment Land.

The proposed buildings consist of two separate structures with heights of 5 stories, making them the tallest building in the vicinity.

### **MANAGEMENT**

It has been determined that the directors and management of the company have NO EXPERIENCE in plastic recycling, but only in waste water management



## The Access

There is presently no access to the land other than Beaconsfield Road. This road is not suitable for any traffic other than light vehicles and Plasrefine have been told by Wingecarribee Shire Council they will not support any use of heavy construction traffic on this road. A proposed access road is yet to be built through private land.

The owners NOT yet having been approached.

Traffic/volume of vehicles and trucks. Movement of 100,000-120,000 tons of waste from Sydney, Wollongong and Canberra on roads not suitable for heavy vehicles 19 m long.

Producing 80 to 100 movements a day from 7AM to 6PM.

This not including the extra 280 movements of light vehicles on local roads.

Plasrefine have stated they intend to use the existing roads (despite WSC saying no) for access during construction of the main access road in the initial stages, roads with no verges and in all cases, very narrow and often congested will be used, presenting danger for our parents pushing prams to the childcare centres or students walking on the road to catch their school busses on Lackey Road.

Traffic noise: disturbance to residents due to 24 hour 7 days a week operation. Vibrations of trucks on roads.

The conclusion to this is very simply, **IT IS THE WRONG SITE!!**

## **Environmental impact:**

Less than 3 kilometers from Moss Vale town Centre, residential homes, schools and early childhood centres we are concerned regarding the vile odours being emitted from the plastic containers that would have originally contained waste milk, cream and all animal products having been stored for days in all conditions, although we are assured by Plasrefine "WE HAVE FAST ROLLER DOORS TO PREVENT THE ODOUR ESCAPING"

## **Safety:**

Will be a major concern for our residents with schools, pre- school to high school and including university students, plus older folk going for their daily health walks. The proposed route of Beaconsfield Road and Lyton Road have no footpaths

## **Omissions:**

Despite Plasrefine claims of no odours because of the "fast roller doors" the lingering odours of the various uses of this containers having been stored in the various weather conditions will escape and pollute the air in whichever way the wind is blowing, thus impacting on residential land.

## **Water:**

The 16,000litres of water, the plants washing facilities are expected to discharge in the sewerage each day could well be contaminated with microplastics and phthalates, chemicals used to make plastics more durable.

There is conflicting claims of how much water will be available from their claimed "roof catchment" and how much will be drained from the local town system which is now struggling to keep up the fast growing residential demand.

## **Disposal of waste refined products.**

The final by products "**Sludge/Pellets**" that cannot be released into the sewage, has to be transported to **Lucas Heights** as it is classified as **Hazardous Waste**

## **Future expansion:**

Claims of another factory to make by products such as plastic chairs and tables and other plastic products.

## Ownership:

As the company was only recently been registered in Australia on 1st. July 2021 and a 2020 scoping report submitted by GHD Group, an international engineering consultancy hired by Plasrefine, referred to Mr Lyu Yalin as the “principal technical director” who would “provide the technology and experience necessary to successfully operate the plant”

Companies owned by Mr Lyu Yalin have been censured by Beijing’s Environmental and Ecological Bureau. Public notices on the bureau’s website show four regulatory infractions from 2011 including air pollution, with Kelilier, a company owned and operated by Mr. Lyu, being fined \$6600 in March last year for monitoring failures.

Plasrefine director Nanxi Zheng, is Mr. Lyu’s niece and states that she is now the EPA licensee.

This in itself poses the question of what percentage of the profit will remain in Australia.

## **Staff employment:**

Being owned by Chinese investment with management being a niece of the “owner” it poses the question of how much local employment will be offered

## **Local waste plastics:**

As I understand it, our Southern Highland recycling will be sent to Sydney to be sorted and then brought back.

The \$70 million plant will process over 120,000 tonnes of mixed plastics from Sydney, Canberra and Melbourne each year.

Operation hours will be 24 hours a day, seven days a week.

## **Valuation of our properties**

I am greatly concerned if this project goes ahead not only will it impact greatly on our residential roads, therefore putting more stress on our local council to maintain the existing streets which are currently in poor condition.

This in turn will have a negative effect on property values in proximity to Beaconsfield Road and the streets feeding it

## **Local Council Communications:**

No information has been supplied by our local Wingecarribee Council and at a meeting called by them they assured those in attendance they will in no way support the use of construction vehicles using Beaconsfield Road or it’s feeder roads for the construction of access to the site. Our local representative MP Wendy Tuckerman, Minister for Local Government. NSW has submitted our rejection to the project stating “It is simply not a suitable site and the community and I don’t support it in the location proposed” she told the NSW Parliament recently.

State Government is desperate for facilities like the proposed Plasrefine development, but this is simply **THE WRONG SITE**

## **Meetings:**

I have attended several meetings hosted by Plasrefine and been told to write any questions on a sticky note and they were then hung on a board for them to pick their answers. Just not good enough.



I am not anti the Plasrefine project but it is simply THE WRONG SITE



Please Note,

I do not wish my private details to be published. The following submission contains my objections with accompanying reasons to the



[REDACTED]

I am saying No to Planteford, Beaconsfield  
the  
no through street, it cannot carry heavy  
vehicles consistently, it is also dangerous  
with streets like mine will be coming onto  
Beaconsfield Street on a main thoroughfare.

Could you consider another area say  
Marellum, Wingello, Caringaligh.

I think it is a good idea recycling Planteford  
here but not as close to homes, schools, town-  
ship etc.

Yours sincerely  
[REDACTED]



Director – Industry Assessments,

Planning Group.

Department of Planning and Environment.

**PROJECT ID SSD-9409987.**

13<sup>th</sup> March 2022

Moss Vale.

NSW 2577.

Dear Sir/Madam,

Please accept my submission regarding the Plasrefine proposal to build a plastic recycling center at the end of Beaconsfield Road in Moss Vale 2577 NSW.

## **Some of my objections are:**

### **The site:**

Proposed Plant being built in the middle of two residential areas. I have no objections to the facility, **BUT NOT SO CLOSE TO RESIDENTIAL AREAS, SCHOOLS, Aged Care facilities, and being BUILT ON THE SYDNEY WATER CATCHMENT LAND.**

The factory is proposed to be located within 150M-200M from homes off Beaconsfield Road.

Council 17-3-22 stated that the site is known as The Southern Highlands Innovation Park INI, General Industrial Site.

I understand that the GHD group haven't completed their submission for the EIS along with their Social Impact Assessment, flooding being an issue. Water/stormwater should be respected and adhered to. Flood limitations to the west and west/east of the site may impact on Storm water Management.

**(NOT THE RIGHT SITE).**

### **The size:**

7.7 hectares in size and the proposed two buildings of over five storeys (18m) in height, excessive site coverage.

No detailed plans or scale regarding architectural drawings of the factory itself provided. I worry that the scale of the development is way too big for the site.

### **The access roads:**

Traffic/volume of vehicles and trucks. Movement of 100,000-120,000 tons of waste from around the nation. Heavy vehicles 19 m long with 80 to 100 movements a day not including the extra 280 movements of light vehicles on local roads.

The hill is all shale no plans for surveys done, neither contour or cut and fill plans. There is a 4m level difference, a lot of moving of soil etc.

The Lackey Road entrance is already a very dangerous entry now used by The Garvin Institute due to the clear vision impacts due to the blind hill with a steep incline, putting huge trucks there will be an



accident waiting to happen. Beaconsfield Road certainly not suitable for heavy vehicles along with the other roads proposed to be used, I feel major road works would have to take place before these roads could stand the heavy vehicles proposed to use them. The impact of those living in the areas of concern is causing a lot of distress.

An access road to accommodate the hundreds of truck movements is yet to be built and no consultation with the Garvin Institute or neighboring property owners also, the non- existing road (Braddon Road)? is yet to be built of which is now private land.

GHD have admitted that they there isn't any agreement with Council as to the required corridor for the road- despite the DPIE having issued their requirements in October 2020. In 16months council confirmed that there was minimal contact made by GHD.

The 20m wide corridor to connect to the paper Braddon Road hasn't been assessed by GHD (and therefore the Garvan Institute can't make informed decisions on the potential impacts on the sensitive operations carried out there.

A massive underestimate of time (1-2 months) in construction of the road due to the major cuts and retaining structures required, as stated by a traffic engineer.

No assessments done on Traffic impact on Beaconsfield, Lynton and Lackey Roads.

Looking to the future - what happens as other industries establish there and the volume of traffic increases?

Roads with no verges and in cases very narrow and often congested, a danger for our parents pushing prams to the childcare centres or students walking on the road to catch their school busses on Lackey Road.

GHD stated that if the roads don't ahead as they have planned, they will use Beaconsfield Road anyway. This presents huge concerns for us the residents.

GHD as part of their plan is to have Council forcibly resume the land required for the roads to service their site. Feel they have ignored the proper process for the IES and I question as to why this has been allowed to process without land holders consultation.

Traffic noise: disturbance to residents due to 24 hour 7 days a week operation will adversely impact on the quiet soundscape of the area.

Impact on The Garvin Institute re noise, vibrations and toxic omissions contaminated water drainage.

## **Environmental impact:**

Less than 3 kilometers from Moss Town Centre, residential homes, aged care facilities, schools and early childhood centres.

The land is zoned I understand as both Environmental 7.7ha General Industrial (INI), and Conservation C4, the two zones aren't compatible.

In 2019 a lot of land there was an application to divide the land into two lots but was unable to due to no sewage or storm water connection and the two streams forming of the Sydney Water Catchment area.

The visual impact: landscaping, build heights and size, lighting day and night, odours from the storage of plastics which have sat out in the sun containing milk and animal by products, and lastly the noise.

Although Plasrefine stated “We have fast roller doors to prevent odours escaping”?????

The proposal doesn't include a balance of landscaped areas and the buildings causing minimal effects of impact of the size and scale of the huge buildings.

## **Safety:**

Our residents, schools, pre- school to high school includes university students, plus older folk going for their daily health walks. Roads with no verges and there will be additional large truck and vehicle movements on these narrow roads.

Local roads deteriorating due to increased volumes of use /ongoing cost in maintenance council and then US the RATE PAYER, this is not acceptable.

Our Emergency Services, are they able to cope with an event in such a large area?

The towns are growing at such a rate, do we have the infrastructure and facilities to cope in a major event such as a fire or explosion. History of catastrophic fires in Australia and overseas our nearest service had to come from Cambelltown to the most recent fire at the old brick factory in Bowral, that is an hour away, whilst it burns, the pollutants are in the air, not good enough!

## **Omissions:**

There is potential for environmental devastation that this factory poses to our air and water quality. Noise and vibrations will also impact on surrounding residential homes and will threaten the riparian zone that exists on this site.

Odours and fine plastic particles polluting the air.

Sports people playing on our fields, schools and residents inhaling the fine particles/dust of plastic residue.

## **Water:**

The proposal of using 46,300 L of water, in the plants washing facilities are expected to discharge in the sewerage each day could well be contaminated with microplastics and phthalates, chemicals used to make plastics more durable.

The water is harvested from the roof but, in times of no rain the facility would then tap into the town water system thus draining our water supply.

The availability of water, with proposal of pumping 16,300L contaminated drainage into the already overloaded sewage system or being allowed to enter in the Wingecarribee River located in the Sydney Water Catchment area (not acceptable). Ground water contamination is a concern.

## Disposal of waste refined products:

I understand that at the end of the process that 9000 tonnes of plastic powder and this by product called sludge/pellets is not able to be recycled. This is deemed to be Hazardous Waste and will need to be transported to Lucas Heights for storage. More movements of trucks.

Bowral's waste and Andersons from Moss Vale currently goes to waste stations in West Sydney. Will Plasrefine join in with more truck movement removing the toxic waste to Lucas Heights.

## Future expansion:

Claims of another factory to be built to make by products such as furniture and other plastic products or the end processed product being taken to another facility to manufacture. More trucks, omissions etc.

As other industries want to set up in the area, I have concerns with the ever-increasing traffic volume and noise etc. Is there no other entry that could be established to avoid residential areas?

## Ownership:

Ownership of the facility-Australian/overseas and money? staying in Australia.

Foreign owner Mr. Lyu as the proposed operator, technical director was unable to be contacted.

Companies owned by Mr. Lyu Yalin have been censured by Beijing's Environmental and Ecological Bureau.

Public notifications on the Bureau's site reveal 4 regulative violations from 2011 consisting of air contamination, with Kelilier, a business owned and run by Mr. Lyu, being fined \$6600 in March 2015 for monitoring failures.

Mr. Lyu's function in Plasrefine has recently been minimized but, in August Mr. Lyu was still being described as the "proposed operator" who owns and is responsible for Plasrefine Recycling.

In the most recent community engagement report Mr. Lyu is described as "an early investor", who has no experience in plastic recycling but has experience in wastewater management? (OUR WATER CATCHMENT AREA?) compromised.

Ms. Zheng states that she is now the EPA licensee, she is Mr. Lyu's niece.

## Staff employment:

Local/Foreign - submissions have inconsistent reference to employment numbers.

GHD have expressed that the laborers could be local people and the experienced staff would be brought in from overseas.

Local staff would do tasks of tech assistants, forklift drivers and cleaning.

Technical positions will be filled with numerous drawn from over-seas-based expertise.



## Local waste plastics:

Will our local waste plastic be accepted at the facility? No! we are told by GHD.

The \$70 million plant will process over 120,000 tonnes of mixed plastics from Sydney, Wollongong, Canberra and Melbourne each year.

Operation hours will be 24 hours a day, seven days a week.

The final by products sludge/pellets having to be trucked elsewhere to Lucas Heights, as it is classified as Hazardous Waste.

## Valuation of our properties:

The volume of traffic increased, deteriorating roads, noise being generated, and odours omitted along with 24-7 lighting from the facility.

The 24hour operation, 7 days a week for 44 weeks per year and the 8-week period for maintenance.

Some residents are only 150M from the proposed sight plus the Australian Bio Resources (The Garvin Institute) will be a few meters from the site. Quiet residential areas turned into dangerous noisy roads with excessive vehicle movement, not acceptable.

## Local Council Communications:

No information was supplied by our local council the Wingecarribee Shire. Poor planning by Council.

A crucial access road appears on a map. Without any easement marked. The land was zoned for environmental living sits side-by-side with industrial land on a single lot. In 2019 an application to subdivide one of the adjacent blocks of the land into two separate lots reflecting the different zonings was refused for several reasons one reason being that it isn't connected to the local sewer, stormwater and two streams forming part of the Sydney Water Catchment crossed it thus conflicting with the state water protections.

We are told that the front of the block a smaller area is set aside to build a family home on. How can that be processed when it is zoned industrial?

Council found that construction of the access road would generate a "significant adverse impact on the residential areas and safety of Moss Vale residents living south of the site".

Also, it was stated that Beaconsfield Road shouldn't be used for the construction of major industrial structures.

MP Wendy Tuckerman Minister for Local Government NSW said "It is simply not a suitable site and the community, and I don't support it in the location proposed" she told the NSW Parliament recently.

State Government is desperate for facilities like the proposed Plasrefine development.

Tony Khoury the head of NSW Waste Contractors and Recyclers Association hasn't heard any industry talking about the project and said, "astonishing for such a large venture".

## Meetings:

Meetings have been held of which I have attended. No questions to be asked all to be written down on post notelets to be answered later- still waiting for reply.

During the meeting question asked were overridden by GHD staff speaking quickly and loudly over the microphone.

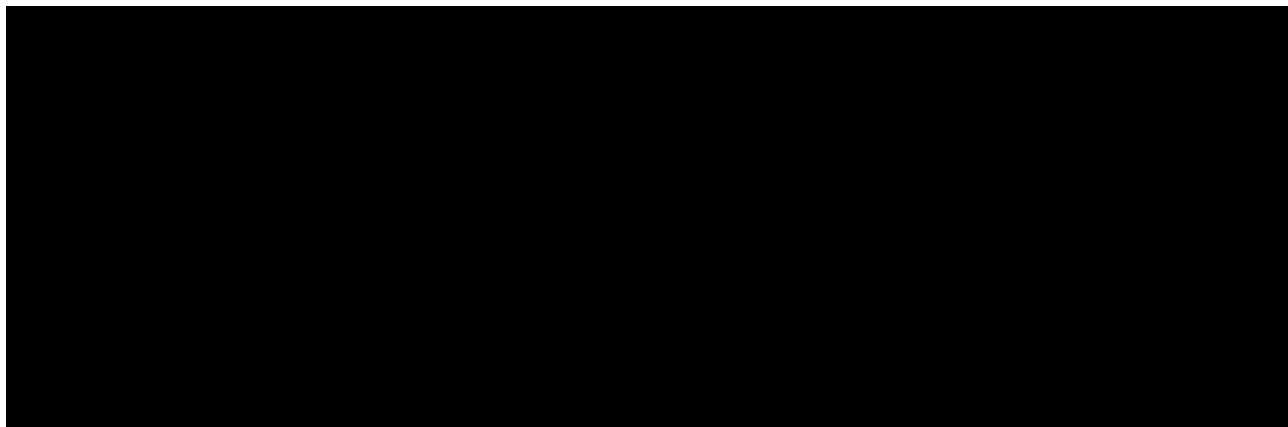
Another meeting held at an out- of town venue, making it difficult for some folk to attend.

They had a security guard there who we were told it was requested by the Council, very intimidating- as was the young bar attendant who was at a meeting in the Moss Vale RSL at an earlier meeting acting as a security guard.

Unsatisfactory way to converse with an enquiring community as to what was Plasrefine is all about.

### **NOT THE RIGHT SITE AND A LOT OF WORK TO BE DONE BY PLASREFINE.**

**I have no objections to the concept of the Plasrefine factory, and I believe we must look to the future but NOT ON THIS SITE.**



SUBMISSION FOR PROJECT ID: SSD-9409987

18 March 2022

Re: Moss Vale Plastics Recycling Facility (Plasrefine)

Project ID: SSD-9409987

Attention: Emma Barnet

Cc: Wendy Tuckerman MP: [ElectorateOffice.Goulburn@parliament.nsw.gov.au](mailto:ElectorateOffice.Goulburn@parliament.nsw.gov.au)

Anthony Roberts, Minister for Planning: [lanecove@parliament.nsw.gov.au](mailto:lanecove@parliament.nsw.gov.au)

Wingecarribee Shire Council: [mail@wsc.nsw.gov.au](mailto:mail@wsc.nsw.gov.au)

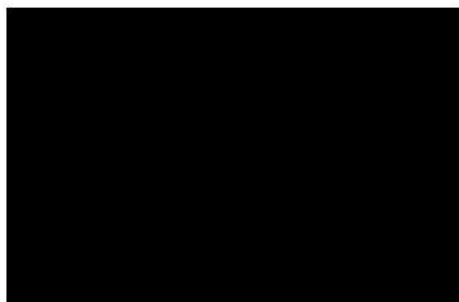
I am strongly opposed to the development by Plasrefine at the proposed site.

Some obvious reasons for the site's unsuitability include:

- Access arrangements and anticipated vehicle movements.
- The proposed facility size and footprint constitutes overdevelopment.
- Visual and health impacts.
- Safety issues for pedestrians that include local residents and school children.
- Close vicinity to childcare centre and two schools.
- Volume of large transports using local roads.
- 24-hour operation just meters from Australian Bio Resources and 150 meters from closest resident.
- Traffic impacts to road infrastructure and related noise.
- Water and air quality degradation factors that include massive water usage and toxic emissions in the Sydney drinking water catchment, plastic dust toxins and odours.

The impact to the rural community, visually, culturally, health and our overall wellbeing would be devastating and irreversible.

Yours truly,



**From:**  
**Sent:** Wed, 9 Mar 2022 16:32:31 +1100  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>; "interim admin" <interim.admin@wsc.nsw.gov.au>  
**Cc:**  
**Subject:** Submission re Plasrefine EIS

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

## **Plasrefine EIS**

-  
I believe that Council, in its submission to the Department of Planning should insist that, if approval is granted, one of the conditions of approval should be that;

The **construction of the new Braddon Road should be completed prior to any production on the site,**  
**and,**  
**WSC should impose a weight limit of 10T on Beaconsfield Road one the new road is completed.**

The residents of Beaconsfield Road and adjacent streets should not be subject to heavy traffic for at least 15 months prior to the opening of Braddon Road.

Building the road will require Plasrefine to come to an agreement with the owners of Lots, L1 DP26490, and Lot 10 DP 1084421. If Plasrefine cannot come to an agreement with the owners of Lots, L1 DP26490, and Lot 10 DP 1084421, they will apply for access via Beaconsfield Road.

Access to Beaconsfield Road would, most likely, involve access from Lackey Road through Lytton Road, and the extension of Beaconsfield Road. These are residential streets, involving far more than 30 houses rather than the 5 nominated in the EIS. Neither Lytton Road, nor Beaconsfield Road, are constructed to regularly carry heavy loads, or the articulated and B Double vehicles which will be involved. There are two right angle bends in Lytton Road, a right turn into Beaconsfield Road. This is untenable in what is basically a residential area.

An alternative route could involve the use of Berrima Road to Lytton Road, which involves an acute left turn followed by a kilometre of residential street to Beaconsfield Road, or a left turn into Bulwer Road, through a residential area, to Beaconsfield.

Access to an industrial area should not be through long established residential streets on roads which were constructed for light traffic only.

In its presentation as part of Community Consultation, GDH tabled a slide which indicated the new road would be constructed prior to construction on site. The construction schedule incorporated in the EIS indicates the road would not be constructed until the plant was ready for production. This is disingenuous to say the least, and indicates that the applicant is not



acting in good faith. As the total investment value is in the region of \$70-\$80 million, the construction of the road at the commencement of the project should be financially feasible.

The Technical Report 6 - Traffic and Transport, appended to the EIS is predominantly, a justification by the proponent to use their Option 1. It is based almost completely on the physical attributes of the surrounding streets, and ignores the disruption to the lives of the residents which would be affected, including those of Garfield Road, the location of a Catholic school.

If the land acquisition issues are not resolved prior to construction, there is no incentive for the proponent to pursue the matter, and there is a high chance it will never proceed.

Section 6.3 of the EIS deals with amendments made as a result of consultation. The last paragraph, "Amendments which were unable to be implemented," the final paragraph reads; "During preparation of the EIS and in consultation with Council, it has been identified that if the construction of the new access road is delayed due to land acquisition issues, the proponent would need to use Beaconsfield Road for construction access until the new road is available....."

Under 4.3.5 Access option conclusion and next steps, the last paragraph reads; "Since the east-west road option (Option 2) is shown in the current Section 94 plan for the Moss Vale Enterprise Corridor (MVEC), Plasrefine Recycling proposes that the costs associated with purchasing land and building the road be considered as works in kind and offset against potential Section 94 contributions associated with the proposal. A VPA would be put in place between all parties to transfer the constructed road to Council for future use as a public road." This seems a reasonable suggestion and should be accepted by Council. The MVE should have been developed with clear delineation of access to all potential development sites.

Respectfully,

0 08 23 21

**From:** [REDACTED]  
**Sent:** Sat, 3 Mar 2022 10:51:15 +1100  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>  
**Subject:** protest letter re Plasrefine proposal  
**Attachments:** Protest letter to council.docx

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Attention [REDACTED]

,

Attached please find my letter of protest re Plasrefine proposal. It details my concerns, most of which are on record already. I look forward to hearing that Council has also submitted a submission in protest!!!!

Please will you help ensure the residents of the Southern Highlands receive the courtesy of a mandated SIA by DPIE and an extension to the exhibition period due to Covid, weather and delayed Plasrefine/GHD community consultation.

[REDACTED]



Wingecarribee Shire Council  
Moss Vale, NSW, 2577

MOSS VALE PLASTICS RECYCLING FACILITY SSD-9409987

## **I OBJECT TO THE PROPOSAL.**

Obviously Waste management facilities are to be applauded but the chosen Moss Vale site is utterly illogical on the following grounds.

**Alarminglly, GHD, in the EIS, states clearly that they have identified areas of concern and that these would not be addressed until after DPIE gives its approval. Unless rules for approval have changed in recent times this is not acceptable procedure in any manner or form.**

**The Paper Road (Braddon) is not in the Industrial zone.** It is part of DP 1084421 which has recently been considered for rezoning into 5-acre residential lots by Wingecarribee Shire Council. The Braddon Road East (not gazetted) would pass through and run adjacent to land belonging to the highly hygienic Garvan Institute which breeds mice for valuable research. Mice, as you may not be aware, are very sensitive to vibration and pollution. It would also slice off a part of DP26490 which is non industrial and privately owned. The Garvan and owner of DP26490 have not yet been approached by Plasrefine or GHD to my knowledge.

**The proposal to use Lytton and Beaconsfield Road for operation** has been refused by Wingecarribee Council. It is likely that, should those roads be used for construction of the facility, there would be an expectation by Plasrefine to use them operationally until the Braddon Road East is constructed. **Council refused Garvan permission to use Beaconsfield as access for construction and operation when the institute was built about 12 years ago.** It is not

acceptable that DPIE can overturn that decision to accommodate the Plasrefine heavy industrial operation, especially when at full strength. The



diagrams included with the EIS show the proposed "option one" road running right up to the carport of No.72 Beaconsfield Rd, effectively taking out a 27-year-old Oak Tree and two well established flowering cherry trees as well as bringing the associated traffic, noise, pollution practically into my bedroom. Add to that the distinct possibility of trucks lining up in Beaconsfield awaiting their turn, motors idling, outside the homes of my neighbours and myself.

**It is ludicrous for GHD to state that [REDACTED] would not be affected by Noise, Light and Vibration. [REDACTED]**

[REDACTED] Whereby an inconsiderate neighbour does reverse out of his drive at 4am beeping all the way, it is a matter of minutes. A far cry from what we can expect from Plasrefine's vehicle movements. As for vibration, the Blue Circle trains and those on the main line cause vibration [REDACTED] when they pass, once again just minutes. Imagine an operation which runs 24/7, trucks during the day and processing during the night. **With a 24/7 operation comes artificial light which invades [REDACTED] and the stars go out.**

Beaconsfield and adjoining roads all run through a residential area comprising many young families, a kindergarten and a catholic primary school. At the top of the hill where I live there are eight out of nine homes which have young people living or visiting regularly. There are several residents who have health issues [REDACTED]



*blue arrow shows site*

[REDACTED] is a rural sanctuary with cattle, sheep and horse grazing on what Council promised would be a buffer zone between the SHIP and Moss Vale. That we even have to consider a proposal such as the Plasrefine EIS is an anathema. That the land has not been used since 1933 is a blatant mistruth. It was once a strawberry market garden and in recent times has never been short of cattle.

Regarding DP 1084421 itself, when Micksham submitted a DA in 2019 it was knocked back by Council on grounds of **WATER** management and **ACCESS**. Previous Waterboard letters have drawn attention of Council to the unsuitability of the site for industrial use and further subdivision. When you look at the plans for the development you will see how much development Plasrefine has to cram onto a block of 7.7 hectares (not even the mandatory 10 Hectares) which, as far as I am aware has not yet been subdivided from DP 1084421 C4 zone.

**The suitability** of the site itself leaves much to be desired. It is fraught with springs. As well, at least a third of the 7.7 hectares is prone to run off from property to the south. I do not think Plasrefine have even bothered to check out the site in this latest run of wet weather or they would have taken down the **SAY NO to PLASREFINE NOT THE RIGHT SITE** sign on their gate!!!!



*PART OF THE 7.7 HECTARES IN THE WET*

**In a dry time**, the dams have all run dry and the soil coverage is tinder dry. When there is a strong hot wind from the west the power lines have triggered fires in my time living here. In the last bush fires the Council rubbish depot caught fire. Had not the fire brigade been quick off the mark many businesses in the SHIP (Southern Highlands Innovation Park) and even [REDACTED] would have been in the firing line. Plasrefine would be reliant on Town water. Wind and weather come from all points of the compass in the Highlands.

**Plasrefine says the doors to the facility** would be facing west to help noise mitigation. It refrains from saying that our regular howling winds would wreak havoc inside the plant scattering plastic like confetti. The doors have to open and shut regularly during operation time 24/7!!! Burradoo and Berrima as well as [REDACTED] would really love to be on the receiving end, not to mention the plastic festooning the fences and creating an eyesore.

**GHD keeps pointing us in the direction of a similar facility in Victoria.** Why is it then that when I googled the operation it was accompanied by a very unfavourable report citing the floor was covered by water, rubbish, dead animals and glass? The Victorian facility was, however, situated on a major road at Somerton and had easy access. Not so the proposal for Moss Vale which is situated in the heart of the Southern Highlands, its vehicles criss-crossing the area on a network of ill maintained, non-load bearing roads.

**How can GHD say that their articulated truck and light vehicles movements will not add to the congestion in the Highlands?** Moss Vale's Argyle Street comes to a virtual standstill with residents traveling to and from employment in the city, towns and villages, and students travelling to the many Public and Private Schools which make the Highlands a great residential destination for young families. Will Plasrefine instruct its drivers to only use the roads at the quieter times. Will Plasrefine, in fact, have any control over the route the vehicles will take from their pick-up points. GHD have told us that monitoring and control will be the task of Council and residents and that it will not be a Plasrefine responsibility. **That is arrogant and unacceptable.**

**Douglas/Lackey Roads, Plasrefine major access route, were closed to traffic during the wet weather recently. This is not an uncommon occurrence.**

**THE SOUTHERN HIGHLANDS IS A TOURIST DESTINATION.** Are visitors then to compete with Plasrefine truck and vehicle movements **DAILY** from all points of the compass????

**GHD tells the community that the Proposal will be good for jobs.** In the next breath they say it will be computerized. Who is to say that the proposed number of personnel employed will even live in the Highlands when their waste pick-up points are so far afield? (When I rang a waste recycling facility at Minto, I was told that no one spoke English well enough to talk to me!!!! It was a Chinese owned and run facility as is Plasrefine). Surely the continued promotion of the Southern Highlands as a tourist destination will do more to provide jobs than will the Plasrefine proposal which will only bring road chaos, noise, transmissions of toxic emissions **and visual pollution** to name a few.

Needless to say, the **VISUAL POLLUTION** for [REDACTED] will be horrendous should the proposal go ahead. We are told that parts of the building will be 18metres high which even the most advanced of trees will not camouflage, ever!! The distance from [REDACTED] to the Braddon Road is an [REDACTED] The thought of the buildings, trucks, vehicles, noise, light 24/7, vibration and transmissions is making for many a sleepless night.

**GHD has stated that only 20% of contaminated water will enter the Sydney Water Catchment. 80% will be recycled.** [REDACTED] have mandatory septic tanks and the Council regulations are very strict regarding leakage!!

Surely 20% of the huge amount of stored and mains water needed to clean the



plastic is 20% too much. Sufficient water storage is only possible if it rains. In a dry time, Moss Vale water storage is barely adequate. Huge residential development has occurred in the last few years and the Wingecarribee Council is struggling to furnish water, sewerage and power as it is.

To date, Plasrefine has not felt it necessary to attend any of the community meetings. We have found GHD to be very un-professional in its dealings and their EIS to be full of holes and grammatical errors. A SIA, which would highlight all the Southern Highlands' concerns, has not been submitted by GHD. **It would be much appreciated by all if DPIE were to ask for one in retrospect.** Can Council assist?

**With COVID, school holidays and now the delays in community consultation due to the weather, there is clearly need for an extension to allow more time in which to peruse the EIS in detail and make submissions. I ask that an extension be granted.** Can Council assist?

Yours sincerely

**From:** [REDACTED]  
**Sent:** Sat, 5 Mar 2022 09:49:28 +1100  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>  
**Subject:** Attention : [REDACTED]

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

**RE : EXECUTIVE LISTENING TOUR.**

Dear [REDACTED]

We are writing to request that Council consider holding the Moss Vale session much earlier in the planned Listening Tour. Moss Vale is facing very significant issues right now, one of which, the Plasrefine Proposal, cannot wait until May for Council to hear ratepayers' concerns due to the pressing date for EIS Submissions.

Without Councillors available to us at the present time, we are feeling somewhat unrepresented. Please consider our request for the opportunity to have the Executive listen to us before submissions close.

Thank you for your attention to this

[REDACTED]

**From:**  
**Sent:** Mon, 28 Feb 2022 13:18:16 +1100  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>  
**Subject:** URGENT - Community Concerns regarding Plasrefine Plastics plant access and traffic routes

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Hi

I was hoping to take just a moment of your time as I have some very serious concerns regarding the proposed plastics plant - Plasrefine to the Moss Vale area.

We have seen from the latest main EIS from GHD for Plasrefine, that they plan on using Innes Road, Moss Vale as secondary access route for trucks. My huge concern with this is that Innes Road is used by St Pauls Primary school as pick up for students each day. It is full of parents, cars and also children from 2:30pm until about 3:15pm. That in itself is a huge safety concern when they have predicted 10 truck movements an hour.

They will no doubt also use Garrett Street which is the front of the school as their access towards Beaconsfield road where the proposed site will be.

Garrett street is always busy in the mornings with families dropping kids to school, as well as buses, and then again in the afternoon for pick up, as all buses use Garret Street whilst children are being picked up by parents in adjoining Innes Road - the school has arranged this with WSC as a safety measure.

Also, not forgetting to mention all the children that walk these key streets home before and after school.

I have been in touch with the school and they are aware and also very concerned with this. I have asked them to email their concerns to you and also to Wendy Tuckerman our Goulburn seat for Parliament.

Lisa, I cannot tell you how fearful I am for the safety of children and locals, when our local roads will be so heavily impacted by trucks. We are trying to alleviate the congestion of cars and trucks from suburban roads across the Southern Highlands, but with an extra 10 truck movements an hour, 7 days a week, past schools and also daycare centres it's just a recipe for disaster.

Who will have to lose their lives for this to be stopped.

There are so many concerns with the proposal and EIS from GHD on behalf of Plasrefine, but I felt this concern really needed to be noted.

Their studies for the main EIS was done in December 2020, at a time of lockdowns and when schools weren't running at proper capacity. It does not show a true indication of what our roads are like today with all the new influx of people and business to the area.

I will be continuing to protest the proposal of this site, as I really do not feel its in the right place, and there are so many concerns regarding health, traffic, local safety, riparian water, the land, the list just goes on and on. I have previously emailed you regarding this. But in order to



keep this email relatively short and to one point, I will email you separately again for the other concerns relating to the most recent EIS.

Please help us.

Kind regards,

Civic Centre, 68 Elizabeth St. Moss Vale, NSW 2577 | PO Box 141 Moss Vale NSW 2577

[www.wsc.nsw.gov.au](http://www.wsc.nsw.gov.au)

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**From:** [REDACTED]  
**Sent:** Wednesday, 8 December 2021 10:05 AM  
**To:** [REDACTED]  
**Subject:** Plasrefine Plastic Recycling Facility

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Hello,

I'm writing to voice my disapproval of to lack of inaction that council has displayed in regard to this proposed development.

I'm of the opinion the Council has been verballed by GHD not to make public the council's view on this development.

Council has been deafening by its silence.

I understand that it is a State-Specific Development that has lodged with the NSW Department NSW Dept of Planning, Industry, and Environment (DPIE) and also is in line with the character of the Enterprise Corridor. But that doesn't mean the development will measure up environmentally. It will destroy the quality of life in the Highlands.

You would and if not you should be aware of the Highlands Community is very much against this development. We're not going into all of the salient points that have been raised as to why this development should not go ahead.

When I first heard of the plastic recycling facility over 4 months ago I was extremely concerned. I was involved in the first round of community consultations via Microsoft Teams (if you can call a few dozen people community consultations). From those sessions, I was concerned over the covert manner in which GHD conducted the consultations under the guise of Covid and we can't travel blah, blah, blah, and that GHD was obviously counting on apathy of the community to say well that box is ticked off.

The one big issue for us is that we live in Beaconsfield Road which as GHD has so eloquently put it's the lawful access road to the site. We moved to the Southern Highlands for its rural environment. This proposed development will destroy this. I'm pretty sure that if lived in Beaconsfield Road you wouldn't be happy with this thing being built in your backyard.

But the one thing that really sticks in our craw is the arrogance and dismissive nature of GHD. This is the statement that made us really angry was from Sofie Mason-Jones Manager Environmental Assessment and Planning, GHD "Yes, there green rolling hills, there are cows in paddocks, I get that, but this is going to change... it will not be rural land anymore but it will be employment generating land".

HOW DARE SHE MAKE SUCH A DISMISSIVE COMMENT AND TREAT THE COMMUNITY WITH SUCH CONTEMPT. THIS SPEAKS VOLUMES OF THE OWNERS ATTITUDE TOWARDS OUR COMMUNITY AND DOESN'T GIVE A BUGGER!!!

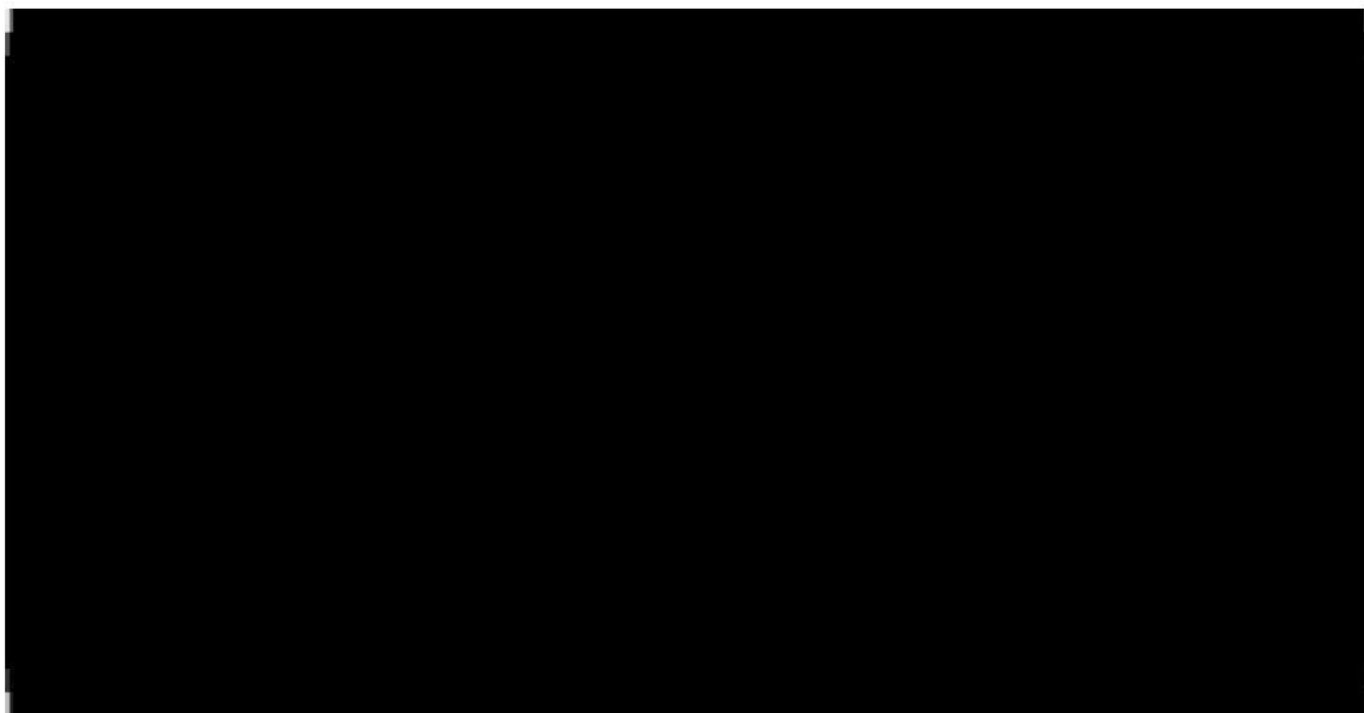
The land was cheap, so it was bought on the pretense of building a state-of-the-art recycling facility.

Now Wendy Tuckerman has stuck her neck out raising her concerns in parliament this week. But nothing from the council in speaking up on the development.

WE WILL FIGHT TIRELESSLY TO STOP THIS DEVELOPMENT.

**Regards**

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**From:** [REDACTED]  
**Sent:** Wednesday, 1 December 2021 5:31 PM  
**To:** [REDACTED]  
**Subject:**

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble

As an extremely concerned resident of the Southern Highlands I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly changes their information and, as a result, my concerns are as follows:

**ROAD ACCESS** - At the GHD community engagement meetings, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed East Braddon Road which would run from Lackey Road up right next to Garvan's Bio Medical Research Institute. This road is completely unsuitable for heavy traffic, it is an uncurbed road where locals walk and school children are dropped off and picked up by the local buses.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

**TRUCK MOVEMENTS** - 200 per day, one every 3 mins on our local roads regardless of route. Roads that will deteriorate under this heavy traffic volume and presumably be repaired constantly at cost to rate payers. This also leads to the issue of safety as far as other road users, pedestrians, and diesel emissions are concerned.

**THE SITE ITSELF AND THE ZONING** – The WLEP (Wingecaribee Local Environment Plan) for this zoning



(IN1) has among its objectives: 'to minimise any adverse effect of industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.'

This facility should be in a Heavy Industrial Zone (IN3) which has these objectives 'To provide suitable areas for those industries that need to be separated from other land uses.' And 'To minimise any adverse effect of heavy industry on other land users'. Permitted with consent in IN3 are 'Hazardous storage establishments; Heavy Industries; Offensive storage establishments'.

This facility is in the wrong place!

HEALTH AND SAFETY CONCERNS – We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and when windblown, will affect agriculture, waterways, grazing animals and the food they produce, and human bodies.

DAMAGE TO THE ENVIRONMENT – in addition to the above mentioned issues, this is riparian land with spring fed dams and all waterways flow into the Wingecarribee River which is the water catchment for Sydney.

EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, and the 7th largest facility of its kind in the world, alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development; however I would like the WSC to consider the wishes of the community when considering the support of the project.

Regards,

A solid black rectangular box used to redact the signature of the sender.

**From:** [REDACTED]  
**Sent:**  
**To:** "Wingecarribee Shire Council" <mail@wsc.nsw.gov.au>  
**Subject:** Ref. Proposed Plasrefine Recycling Factory Moss Vale

External Email: This email was sent from outside the organisation, please be cautious with links and attachments in the email.

This is not acceptable and must not be approved. It is disgrace how the developers have behaved in not being open and transparent. This cannot be allowed [REDACTED]

Sent from my iPhone

Civic Centre, 68 Elizabeth St. Moss Vale, NSW 2577 | PO Box 141 Moss Vale NSW 2577

[www.wsc.nsw.gov.au](http://www.wsc.nsw.gov.au)

From: [REDACTED]

Sent: Tuesday, 30 November 2021 12:12 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Plasrefine - Moss Vale (IDENTIFIER - SSD-9409987: Moss Vale Plastic Recycling Facility).

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

*Good morning,*

*My name is [REDACTED] and am extremely concerned about the proposed Plastic Waste facility at 74-76 Beaconsfield Rd Moss Vale. To have a facility of this nature so close to residents on Beaconsfield hill and along Bulwer Rd. is of particular alarm and to say I'm surprised it is permissible, moral, ethical or even legal?!*

*The proposed facility site is on the south side of Douglas Rd. which I can not believe industry of this nature is permissible literally next to long term residents! This facility will decimate the lives of hundreds of people directly and thousands in the broader community beyond that! I moved to the area to raise my young family and envisioned living on Beaconsfield Rd. indefinitely.*

***Beaconsfield Rd. and Beaconsfield hill is an extremely quiet, safe and friendly rural community. If this proposed facility went ahead it will destroy what many of us residents have loved about our home for a long time.***

***If approved, this development will cripple the rural lifestyle of hundreds of residents, destroy property values and our livelihoods, create dust and pollution, Light pollution, produce constant industry noise and vibration from HUNDREDS of heavy vehicle movements every day, as detailed in GHD's EIS scoping report.***

***The site lies in a riparian basin which flows directly into the Wingecarribee River to the East. It is unbelievable that the land could potentially be used for heavy industry such as this and I believe that it is our local and state governments responsibility to protect us as residents from such developments in this area!***

***IF the facility were approved (again the fact that it is even proposed that it can be built in such a pristine area, immediately next to residents is bewildering, and something has to stop this) and IF the potential use of Beaconsfield Rd. as an access for hundreds of semi trailer movements every day, even for the construction phase, it would be extremely hazardous and dangerous for***

***If the factory is approved the use of Beaconsfield road should not be permitted under any circumstance due to the nature of the road and topography there!***

***ride their bikes and play games along this quiet, residential road every other day, this would all end if you turn our street into a thoroughfare for heavy industry traffic and again it would absolutely destroy our way of life and cripple our lifestyle and the whole reason we moved to this beautiful part of Moss Vale. This absolutely must be managed properly and stopped by responsible people in power to protect the residents of our community!***

***The physical nature of Beaconsfield road is not to grade to be able to handle such traffic, there is barely enough room for passenger vehicles to pass on the hillside let alone prime movers going both ways IF Beaconsfield Rd. were approved as an access route!***

***I ask that sensibility, responsibility and duty of care from our government prevail here and the proposed factory is seen to be absolutely unsuitable for this site and would be more suitable in a heavy industry area with the nature of the facility and socioecological nature of the land.***

***Regards.***



**From:** [REDACTED]  
**Sent:** Mon, 29 Nov 2021 16:24:44 +1100  
**To:** "info@wsc.nsw.gov.au" <info@wsc.nsw.gov.au>  
**Subject:** Plasrefine factory, North West Moss Vale

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

The General Manager,  
Ms Miscamble,

Like many others living in the north western part of Moss Vale, I am alarmed at the plan to build this large factory so close to residential areas, not only of Moss Vale but also Burradoo (downwind when the prevailing westerly winds blow)

I am sure that you are now more conversant with the long list of objections to the business and its location.

I live in Anembo Street, Moss Vale, so I don't expect more than minor inconvenience to me, and I rent my home, so property values do not concern me.

However, I believe the traffic problems alone at this site will mean a great deal of inconvenience for people using Berrima Road, Lytton Road, Beaconsfield Road, Lackey Road etc. It seems unlikely that some traffic problems will spill into surrounding roads and even Argyle Street.

It seems particularly unwise to allow any development of the Plasrefine factory before the completion of the Moss Vale by-pass, or the construction of the side road past the Garvan Institute from Lackey Road. This factory cannot be permitted to be built until adequate roads are in place. Alternatively, perhaps Plasrefine could be encouraged to sell their current unsuitable site and find a better site that is already well served by adequate infrastructure.

Yours faithfully,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Mon, 22 Nov 2021 00:29:38 +1100  
**To:** interim admin  
**Subject:** We do NOT want PLASREFINE in our shire!!

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Mr May,

As an extremely concerned resident of the Southern Highlands I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly changes their information and, as a result, my concerns are as follows:

**ROAD ACCESS** - At the GHD community engagement meetings, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed East Braddon Road which would run from Lackey Road up right next to Garvan's Bio Medical Research Institute. This road is completely unsuitable for heavy traffic, it is an uncurbed road where locals walk and school children are dropped off and picked up by the local buses.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

**TRUCK MOVEMENTS** - 200 per day, one every 3 mins on our local roads regardless of route. Roads that will deteriorate under this heavy traffic volume and presumably be repaired constantly at cost to rate payers. This also leads to the issue of safety as far as other road users, pedestrians, and diesel emissions are concerned.

**THE SITE ITSELF AND THE ZONING** – The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has among its objectives: 'to minimise any adverse effect of industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.'

This facility should be in a Heavy Industrial Zone (IN3) which has these objectives 'To provide suitable areas for those industries that need to be separated from other land uses.' And 'To minimise any adverse effect of heavy industry on other land users'. Permitted with consent in IN3 are 'Hazardous storage establishments; Heavy Industries; Offensive storage establishments'.

This facility is in the wrong place!

**HEALTH AND SAFETY CONCERNS** – We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and when windblown, will affect agriculture, waterways, grazing animals and the food they produce, and human bodies.

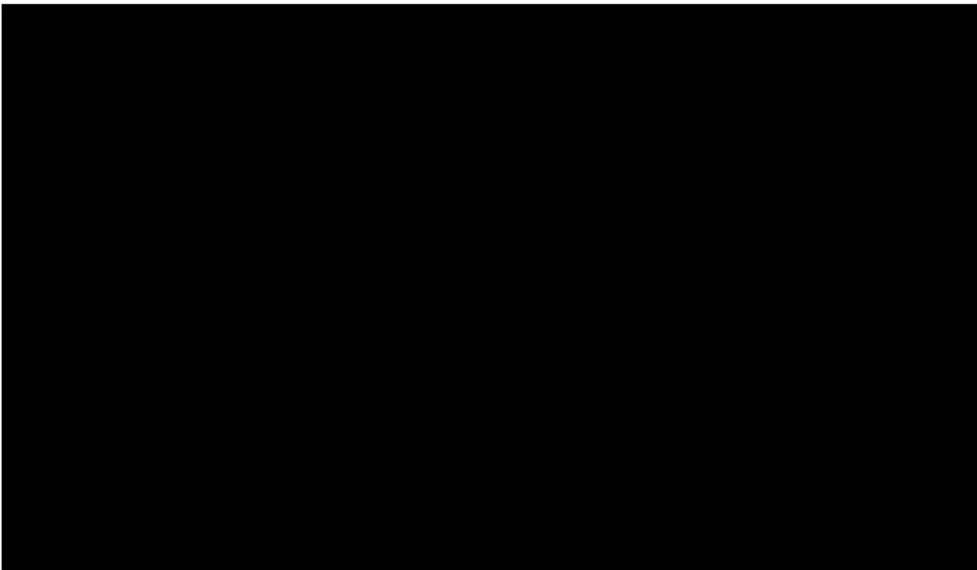
DAMAGE TO THE ENVIRONMENT – in addition to the above mentioned issues, this is riparian land with spring fed dams and all waterways flow into the Wingecarribee River which is the water catchment for Sydney.

EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, and the 7th largest facility of its kind in the world, alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development; however I would like the WSC to consider the wishes of the community when considering the support of the project.

Kind Regards,





Civic Centre, 68 Elizabeth St. Moss Vale, NSW 2577 | PO Box 141 Moss Vale NSW 2577

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**From:** [REDACTED]  
**Sent:** Thursday, 25 November 2021 5:25 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Plasrefine Plastics factory proposal

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble,

We are concerned residents of the Beaconsfield Road area of Moss Vale writing to express our concern regarding the Plasrefine Plastics processing plant proposal located 1km north of our home.

GHD, the Consultants representing the Proponents, who are developing this project are constantly changing the information to the community and amending the details in the scope of the project and as a result our concerns are as follows:

**ROAD ACCESS** - At the GHD community engagement meeting, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed Braddon Road Access to the development, running from Lackey Road west through Garvan's Bio Medical Research Institute (ABR) property. Beaconsfield Road is completely unsuitable for heavy vehicle traffic. It is without Kerb and



Guttering over much of its length with variable widths ranging from 4.5m at the northern end to just over 10 metres width near Stables Place the constantly varying width and damaged unsealed shoulders and no footpaths where locals walk regularly on the road and school children are dropped off and picked up by the local buses occurs between Parkes Road Intersection and the Pre School just north of Stables Place. Beaconsfield Road has a lack of sealed pavement width, less than 6m wide for much of its length, and no line marking to delineate travel paths at present. Trucks will not be able to negotiate travelling past each other in opposite directions safely without going off the sealed pavement. The road from 100m north of Trotter's Lane has less than 5.5 metres sealed width for the northern 785m of the road. The minimum pavement width for Heavy Vehicle access roads should be 7.0 metres in width or 3.5m lanes each way as trucks are generally 2.4m to 2.6m in width dimension, Seven Metres is required to ensure safe movement of heavy vehicles past each other. There shall be no turn around provision at the northern end of Beaconsfield Road if Braddon Road is constructed to the Concept Design drawings provided by GHD as the detail incorporated a cutting and 3.0 metre high retaining wall in the proximity of the turnaround point that is there now.

The Beaconsfield Road area is a growing part of Moss Vale with new houses under construction, urban infill, subdivision and land development. The farms located on the southern end of the road are zoned for subdivision which will no doubt happen, given the current housing environment, in the near future. At the moment there are 14 houses that access the narrower pavement section of Beaconsfield Road north of Trotter's Lane plus the majority of Bulwer Road residents use Beaconsfield Road as their access. By early 2022 there will be over 162 properties that will utilise Lytton and Beaconsfield Roads combined. This development will add extra pressure to Beaconsfield Road and the surrounding road network including Lytton Road west of Beaconsfield Road Intersection

We are concerned about the safety of the infants and young children who attend the Daycare Centre, Southern Highlands Early Childhood Centre (SHECC), located on Beaconsfield Road whose staff, and sometimes parents, park on Beaconsfield Road North and South of the Daycare Centre. Just to the north of the centre is a steep hill with a grade of over 5% just below Bulwer Road Intersection which some cars already speed down. Trucks travelling down this hill will struggle to not exceed the 50km/hr speed limit and we believe there is an increased risk of accidents occurring. [REDACTED] and often have difficulty with sight distance when turning right into Beaconsfield Road due to the sight lines and vehicles parked on the street.

Another issue is the fact that Berrima Buslines aren't able to travel up Beaconsfield Road beyond the Lytton Road intersection due to the nature of the road geometry. The bus stops for the area are on Lytton Road near the intersection with Beaconsfield Road for the Primary Schools or on Garrett Street for high schoolers. Children are often seen running along Beaconsfield Road from the bus stop to their homes. Parents living further along the road

generally drive down to the bus stop to meet their children as it is too dangerous for children to walk up the steep hill north of Trotter's Lane.

The proposed route for Stage 1 of the Moss Vale Bypass cuts through this area and will add another potential traffic conflict during and after construction.

The traffic from this part of Moss Vale funnels onto Lackey Road then onto Argyle Street (Illawarra Highway) in the centre of town. When you add the traffic from St Paul's Catholic Primary School on Garrett Street, the Basketball Stadium at Lackey Park plus the traffic from the industrial businesses along Lackey Road/Collins Road creates a traffic log-jam at the Lackey Road intersection which is often queued past Garrett Street. Turning right onto Argyle Street from Lackey Road is near impossible for much of the day.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

Will Council be responsible for widening, sealing, kerbing Beaconsfield Road and installing footpaths between Parkes Road and the Southern Highlands Early Childhood Centre on Beaconsfield Road? Will WSC provide at least centreline delineation, preferably full line marking, from Parkes Road to Bulwer Road along Beaconsfield Road?

We believe Council needs to address the safety issues in the area before there is a fatality or serious incident involving pedestrians and vehicles using the road.

**TRUCK MOVEMENTS** – According to the GHD EIS Scoping Report, 120 articulated truck movements per day (7am to 6pm) will result in approx. 1 haulage truck every 5 to 6 minutes on our local roads regardless of route. These roads will deteriorate more rapidly under this heavy vehicle traffic volume and presumably will have to be repaired constantly at extra cost to ratepayers. This also leads to the issue of safety as far as other road users, pedestrians and cyclists are concerned, not to mention additional Diesel emissions from the increased truck traffic.

**THE SITE ITSELF AND THE ZONING** – The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has among its objectives: 'to minimise any adverse effect of industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.' This facility should be in a Heavy Industrial Zone (IN3) which has these objectives 'To provide suitable areas for those industries that need to be separated from other land uses.' And to minimise any adverse effect of heavy industry on other land users'. Permitted with consent in IN3 are 'Hazardous storage establishments; Heavy Industries; Offensive storage establishments'. This facility we believe is in the wrong zoning as it is not categorised as General or Light Industry by definition.

At the community consultation meeting at the Moss Vale Services Club on Thursday, 18 November 2021, the GHD representatives stated that the Plasrefine site is zoned as heavy industrial. The colour coding looked like light purple not dark purple which is defined as Heavy Industry Zoning. According to the map in their LEPP the site looks to be zoned as IN1 General Industrial, can you please clarify? We are concerned regarding the zoning of the site and believe there should be a buffer zone between the heavy industrial area of the SHIP and the edge of residential Moss Vale in the Beaconsfield Road area that would extend the E4 buffer zone further west and north to properly separate Rural residential areas from the Industrial Zone along Douglas and Collins Roads. During the purchase of our home in 2007 our solicitor and the real estate agents made enquiries on our behalf regarding future development in the area and informed us of the proposed Moss Vale Bypass route and the impending Garvan Institute facility construction. When the Council rezoned the area to our north we were not informed of the proposal nor was there any community consultation notifications sent to our address or others in our part of town.

**HEALTH AND SAFETY CONCERNS** – We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and when windblown, will affect agriculture, waterways, grazing animals and the food they produce, and in turn affect human bodies as well.

**DAMAGE TO THE ENVIRONMENT** – In addition to the above mentioned issues, this is riparian land with spring fed dams and all waterways (creeks and streams) flow into the Wingecaribee River which is the water catchment for Sydney.

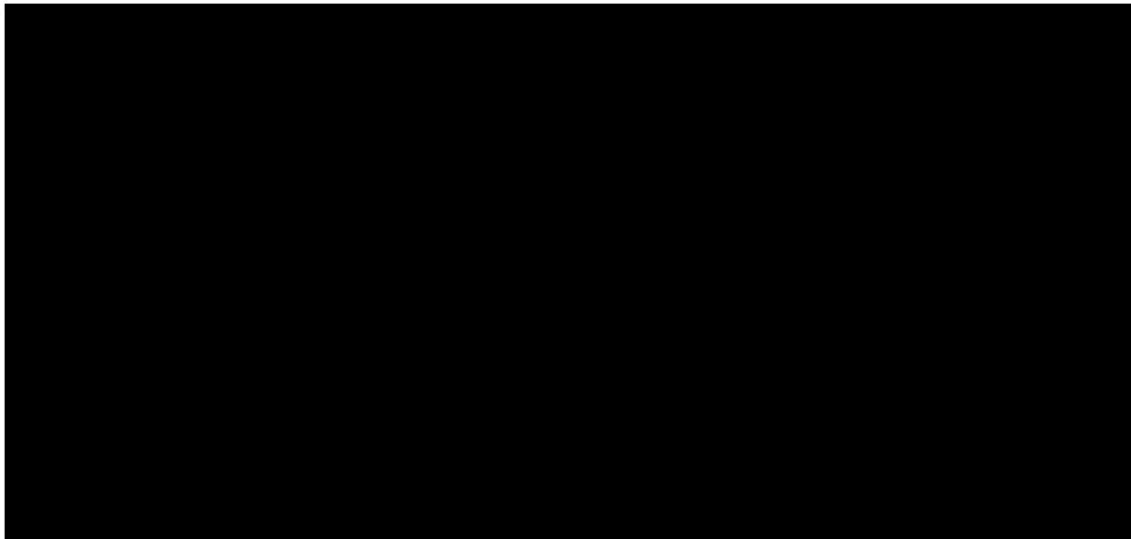
**EXISTING DEVELOPMENTS** – It would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, and the 7th largest facility of its kind in the world, alongside this Plasrefine plant and access road construction and ongoing operations. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

Therefore, although Wingecaribee Shire Council is not the consent authority responsible for the proposal, as it is a State Significant Development, we implore the Council to consider the wishes of the community and it's duty of care to residents, when considering its support of the project.

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.





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**From:** [REDACTED]

**Sent:** Thursday, 25 November 2021 5:39 PM

**To:** [REDACTED]

**Subject:** Concerns relating to Plasrefine Plastics factory proposal

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble

As an extremely concerned resident of the Southern Highlands, I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly changes their information and, as a result, my concerns are as follows:

1. ROAD ACCESS -

At the GHD community engagement meetings, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed East Braddon Road which would run from Lackey Road up right next to Garvan's Bio Medical Research Institute. This road is completely unsuitable for heavy traffic, it is an uncurbed road where locals walk and school children are dropped off and picked up by the local buses.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

2. TRUCK MOVEMENTS -



200 per day, one every 3 mins on our local roads regardless of route. Roads that will deteriorate under this heavy traffic volume and presumably be repaired constantly at cost to rate payers. This also leads to the issue of safety as far as other road users, pedestrians, and diesel emissions are concerned.

### 3. THE SITE ITSELF AND THE ZONING –

The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has among its objectives: 'to minimise any adverse effect of industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.'

This facility should be in a Heavy Industrial Zone (IN3) which has these objectives 'To provide suitable areas for those industries that need to be separated from other land uses.' And 'To minimise any adverse effect of heavy industry on other land users'. Permitted with consent in IN3 are 'Hazardous storage establishments; Heavy Industries; Offensive storage establishments'.

This facility is in the wrong place!

### 4. HEALTH AND SAFETY CONCERNS –

We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and when windblown, will affect agriculture, waterways, grazing animals and the food they produce, and human bodies.

### 5. DAMAGE TO THE ENVIRONMENT –

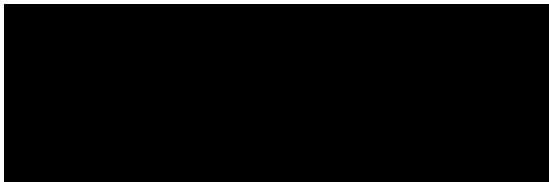
In addition to the above mentioned issues, this is riparian land with spring fed dams and all waterways flow into the Wingecarribee River which is the water catchment for Sydney.

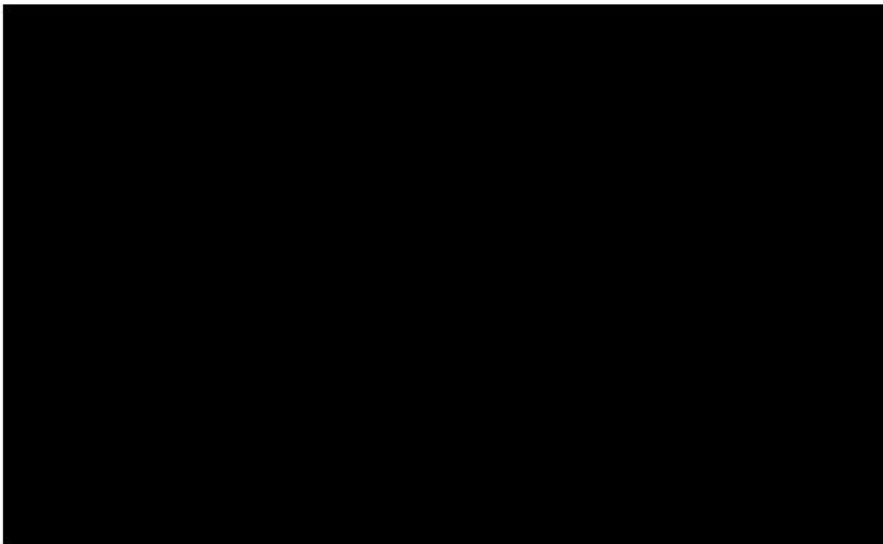
### 6. EXISTING DEVELOPMENTS –

It would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, and the 7th largest facility of its kind in the world, alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development; however I would like the WSC to consider the wishes of the community when considering the support of the project.

Kind regards,





Civic Centre, 68 Elizabeth St. Moss Vale, NSW 2577 | PO Box 141 Moss Vale NSW 2577

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**From:** [REDACTED]  
**Sent:** Tuesday, 23 November 2021 11:22 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Plasrefine Plastics Factory Proposal

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble

As an extremely concerned resident of the Central West and regular visitor to the Southern Highlands I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly change their information and, as a result, my concerns are as follows:

**ROAD ACCESS** - At the GHD community engagement meetings, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed East Braddon Road which would run from Lackey Road up right next to Garvan's Bio Medical Research Institute. This road is completely unsuitable for heavy traffic, it is an uncurbed road where locals walk and school children are dropped off and picked up by the local buses.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

TRUCK MOVEMENTS - 200 per day, one every 3 mins on our local roads regardless of route. Roads that will deteriorate under this heavy traffic volume and presumably be repaired constantly at cost to rate payers. This also leads to the issue of safety as far as other road users, pedestrians, and diesel emissions are concerned.

THE SITE ITSELF AND THE ZONING – The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has among its objectives : ‘to minimise any adverse effect of industry on other land users.’ And ‘to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.’

This facility should be in a Heavy Industrial Zone (IN3) which has these objectives ‘To provide suitable areas for those industries that need to be separated from other land uses.’ And ‘To minimise any adverse effect of heavy industry on other land users’. Permitted with consent in IN3 are ‘Hazardous storage establishments; Heavy Industries; Offensive storage establishments’.

This facility is in the wrong place!

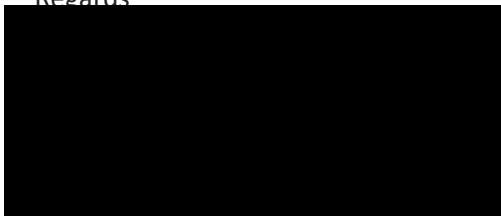
HEALTH AND SAFETY CONCERNS – We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and, when windblown, will affect agriculture, waterways, grazing animals (and the food they produce), and human bodies. This has the potential to negatively affect farmland and waterways well beyond your shire and should be a concern to all Australians.

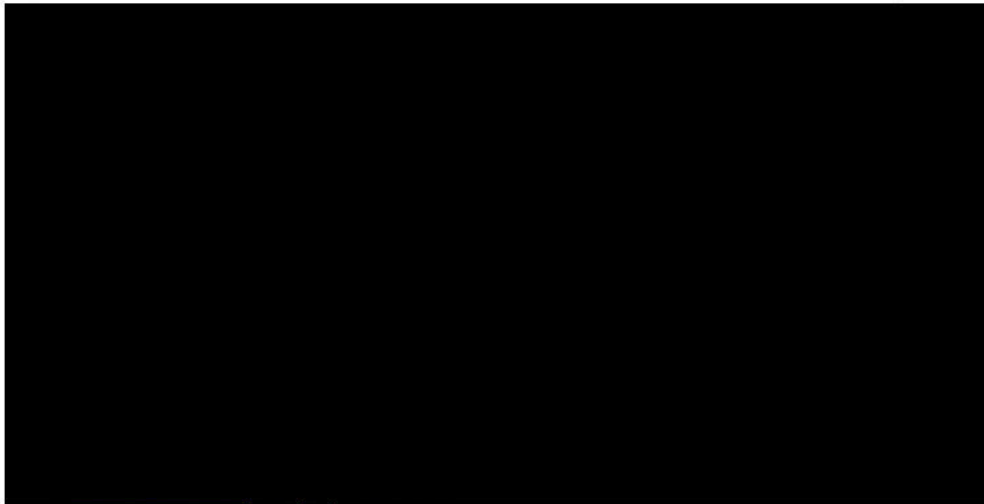
DAMAGE TO THE ENVIRONMENT – in addition to the above-mentioned issues, this is riparian land with spring fed dams and all waterways flow into the Wingecarribee River which is the water catchment for Sydney.

EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, (and the 7th largest facility of its kind in the world,) alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development, however I would like the WSC to consider the wishes of the community when considering the support of the project.

Regards





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**From:** [REDACTED]  
**Sent:** Tuesday, 23 November 2021 9:20 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Where does Council's Stand on Plasrefine?

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

RE Plasrefine Plastic Waste Processing Factory

Dear Ms. Miscamble,

[REDACTED] Beaconsfield Road Moss Vale in the near future, and so I would like to know where council stands on the proposed plastic waste processing factory planned by Plasrefine.

Will council be for or against the development?

GHD, the engineering firm employed to undertake the SEARS, have continued to change information about the scope and size of the factory over the past year since we have known about it, so as a result I have many concerns:

1. ROAD ACCESS - GHD have stated that WSC actively supports this proposal and is furthermore supporting the use of Beaconsfield Road for construction, can you please advise if this is true?

If they are permitted to use Beaconsfield Road for the construction phase, then one would assume they will continue to use it for operations.

Will council widen Beaconsfield Road to allow for truck movements?

2. TRUCK MOVEMENTS - The scope proposes 200 truck movements per day - one every 3 minutes on local roads regardless of route. Roads will deteriorate under heavy traffic, the cost to repair will be born by rate payers.

There are issues of safety for local road users and pedestrians, diesel emissions, noise and vibration throughout the local neighbourhood and the wider community.



3. SITE AND ZONING - this is the wrong place for such a facility.

Among the objectives for the IN1 zoning, according to The Wingecarribee Local Environment Plan, is 'To minimise any adverse effect of the industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential impact on neighbourhood amenity and character, or the efficient operation or regional road system.' This factory should be in Heavy Industrial Zone, IN3, which has these objectives, 'To provide suitable areas for those industries that need to be separated from other land uses.' And 'to minimise any adverse effect of heavy industry on other land users.' Permitted with consent in IN3 are 'Hazardous Storage Establishments; Heavy Industries; Offensive Storage Establishments.'

4. HEALTH AND SAFETY - Next door to environmental zones and close to residences.

In addition to road safety and traffic upheaval, information is that this facility will produce volatile organic compounds. The health implications of these dangerous gases are of concern.

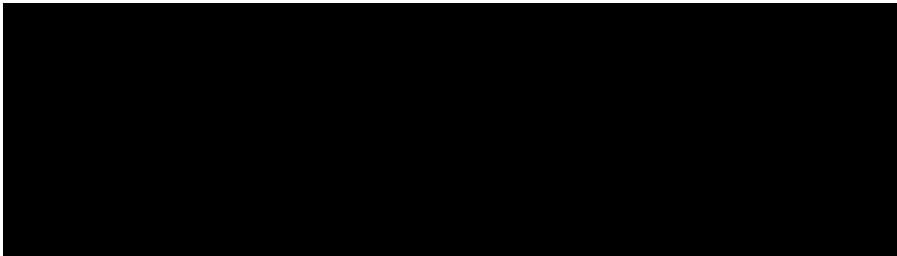
Additionally, micro plastics which will be created during the process are proving to be of grave concern to waterways, agriculture, animals, the food chain, and ultimately to humans!

5. ENVIRONMENTAL DAMAGE - the site is on Sydney Water Catchment. It contains riparian lands on which spring fed dams and all waterways flow into the Wingecarribee River and on from there to drinking water.

6. EXISTING DEVELOPMENTS - Will council forcibly resume land for the paper road beside Garvan to allow Plasrefine entry via Lackey Road? Will Moss Vale lose the Garvan Institute as a result, the only facility of its kind remaining in the country, and a good, quiet, clean neighbour? As a world renowned BioMedical Research Institute, shouldn't it be considered?

I understand as a State Significant Development that the proposal is out of the council's hands. But I ask that you would please consider my deep concerns as a rate payer and future resident, as well as the wishes of the community when deciding whether to support to this proposal.

Thank you.



23<sup>rd</sup> November 2021

Dear Ms Miscamble

As an extremely concerned resident of the Southern Highlands I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly changes their information and, as a result, my concerns are as follows:

ROAD ACCESS - At the GHD community engagement meetings, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed East Braddon Road, which would run from Lackey Road up right next to Garvan's Bio Medical Research Institute. This road is completely unsuitable for heavy traffic, it is an uncurbed road where locals walk and school children are dropped off and picked up by the local buses.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

TRUCK MOVEMENTS – Proposed 200 trucks per day one every 3 mins on our local roads regardless of route. Residential roads are TOTALLY unsatisfactory for the trucks. Roads that will deteriorate under this heavy traffic volume and presumably be repaired constantly at cost to rate - payers. This also leads to the issue of safety as far as other road users, pedestrians, and diesel emissions are concerned.

THE SITE ITSELF AND THE ZONING – The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has among its objectives: 'to minimise any adverse effect of industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential impact on neighbourhood amenity and character, or the efficient operation of the local or regional road system.'

This facility should be in a Heavy Industrial Zone (IN3) which has these objectives 'To provide suitable areas for those industries that need to be separated from other land uses.' And 'To minimise any adverse effect of heavy industry on other land users'. Permitted with consent in IN3 are 'Hazardous storage establishments; Heavy Industries; Offensive storage establishments'.

**This facility is in the wrong place!**

HEALTH AND SAFETY CONCERNS – We have been informed that this facility will produce Volatile Organic Compounds. The health

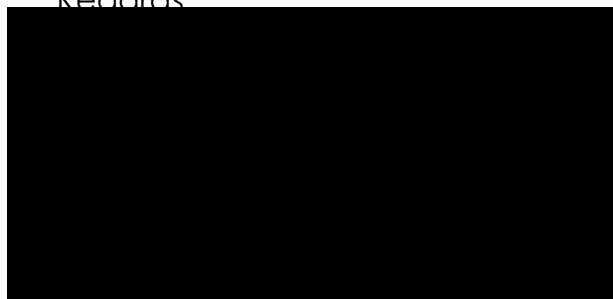
implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and when windblown, will affect agriculture, waterways, grazing animals and the food they produce, and human bodies.

DAMAGE TO THE ENVIRONMENT – in addition to the above, mentioned issues, this is riparian land with spring fed dams and all waterways flow into the Wingecarribee River, which is the water catchment for Sydney.

EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, and the 7th largest facility of its kind in the world, alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development; however I would like the WSC to consider the wishes of the community when considering the support of the project.

Regards





From: [REDACTED]

Sent: Saturday, 20 November 2021 9:46 PM

To: [REDACTED]

Cc: [REDACTED]

Subject:

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble

As a concerned friend of the Southern Highlands I would like to enquire as to where the council stands with regards to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly change the information available to us and, as a result, our concerns are as follows:

**ROAD ACCESS** - At the GHD community engagement meetings, attendees were told that Beaconsfield Road will be the 'legal access' road and that it would be used while construction was carried out on the proposed East Braddon Road which would run from Lackey Road up to and right next to Garvan's Bio Medical Research Institute.

This road is completely unsuitable for heavy traffic, it is an uncurbed road where locals walk daily and school children are dropped off and picked up by the local buses. Even if curb and guttering were to be laid, a constant stream of heavy vehicles would pose a serious danger to the local population.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

TRUCK MOVEMENTS - 200 per day, one every 3 mins on our local roads regardless of route. Our roads will deteriorate under this heavy traffic volume and presumably will be repaired constantly at cost to rate payers. This also leads to the issue of safety as far as other road users, pedestrians, and diesel emissions are concerned. The health of the community is at risk.

THE SITE AND ITS ZONING – The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has among its objectives : ‘to minimise any adverse effect of industry on other land users.’ And ‘to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.’

This facility should be in a Heavy Industrial Zone (IN3) which has these objectives ‘To provide suitable areas for those industries that need to be separated from other land uses.’ And ‘To minimise any adverse effect of heavy industry on other land users’. Permitted with consent in IN3 are ‘Hazardous storage establishments; Heavy Industries; Offensive storage establishments’.

This proposed facility is definitely in the wrong zone.

HEALTH AND SAFETY CONCERNS – We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and, when windblown, will affect agriculture, waterways, grazing animals (and the food they produce), and humans. Long term side effects could be catastrophic.

DAMAGE TO THE ENVIRONMENT – in addition to the above-mentioned issues, the proposal is to build on what is riparian land with spring fed dams and all waterways flowing into the Wingecarribee River - the water catchment for Greater Sydney. The last thing we need is pollutants getting into our water system and jeopardising the health of millions. How many legal cases could come out of that?!

EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, (and the 7th largest facility of its kind in the world,) alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development, however I would like the WSC to consider the wishes of the community when considering the support of the project.

Yours in good faith



nds



**From:**

**Sent:** Saturday, 20 November 2021 9:34 PM

**To:**

**Cc:**

**Subject:** Plasrefine Plastics Factory proposal.

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble

As an extremely concerned resident of the Southern Highlands I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly change their information and, as a result, my concerns are as follows:

**ROAD ACCESS** - At the GHD community engagement meetings, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed East Braddon Road which would run from Lackey Road up right next to Garvan's Bio Medical Research Institute. This road is completely unsuitable for heavy traffic, it is an uncurbed road where locals walk and school children are dropped off and picked up by the local buses.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

TRUCK MOVEMENTS - 200 per day, one every 3 mins on our local roads regardless of route. Roads that will deteriorate under this heavy traffic volume and presumably be repaired constantly at cost to rate payers. This also leads to the issue of safety as faras other road users, pedestrians, and diesel emissions are concerned.

THE SITE ITSELF AND THE ZONING – The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has amongits objectives : ‘to minimise any adverse effect of industry on other land users.’ And ‘to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.’

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establishments’.This facility is in the wrong place!

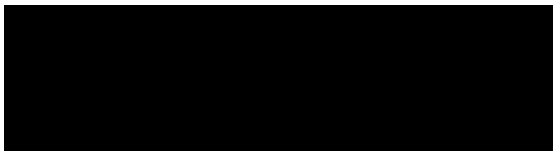
HEALTH AND SAFETY CONCERNS – We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and, when windblown, will affect agriculture, waterways, grazing animals (and the food they produce), and human bodies.

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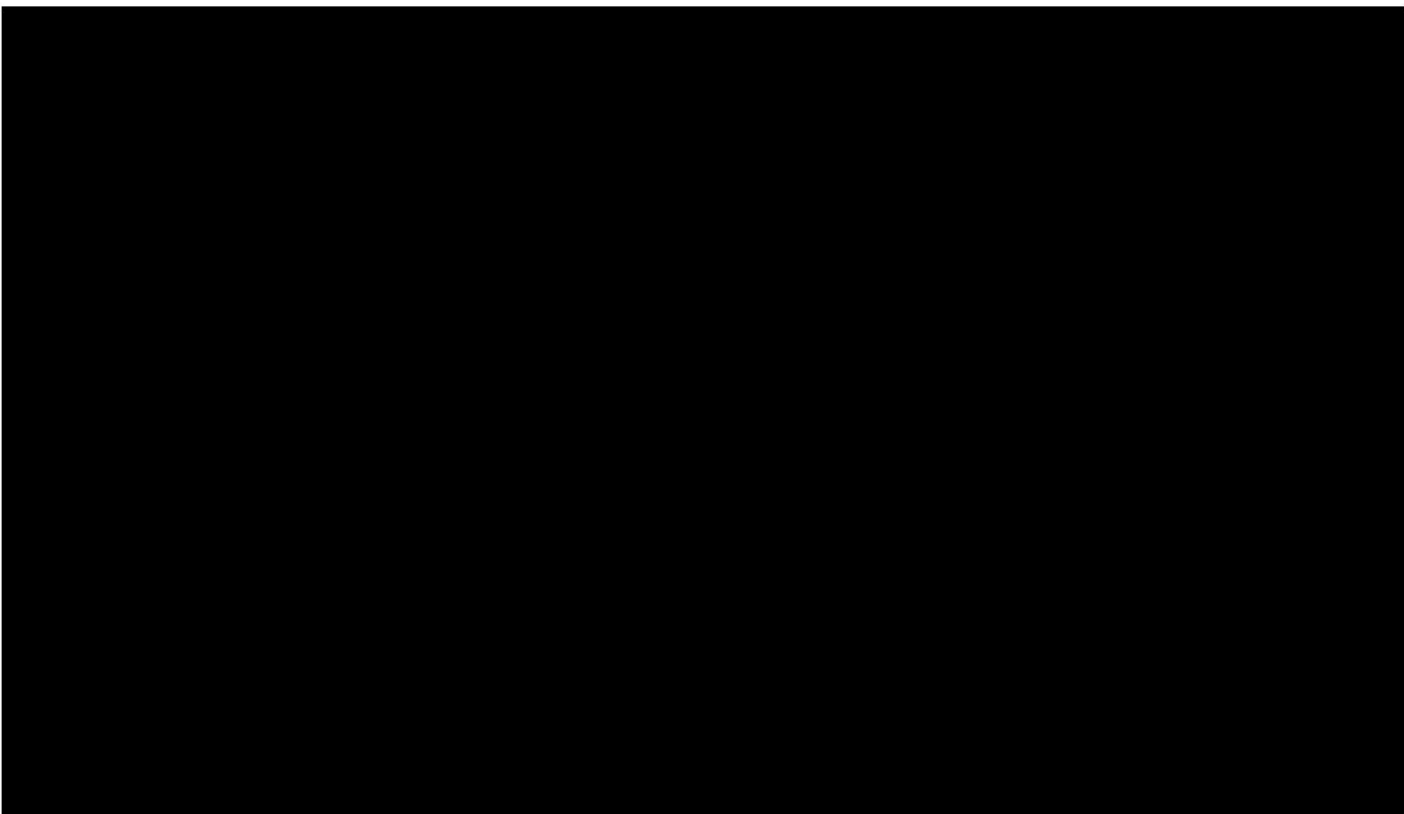
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In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development, however Iwould like the WSC to consider the wishes of the community when considering the support of the project.

Regards,







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**From:** [REDACTED]  
**Sent:** Saturday, 20 November 2021 9:20 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Plasrefine Plastics factory proposal.

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble

As an extremely concerned resident of Moss Vale in our Southern Highlands, I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly change their information and, as a result, my concerns are as follows:

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This facility is in the wrong place!

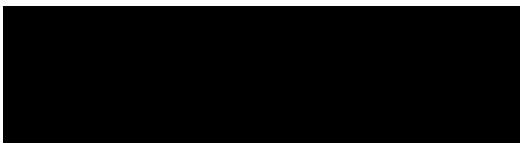
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EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, (and the 7th largest facility of its kind in the world,) alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development, however I would like the WSC to consider the wishes of the community when considering the support of the project.

Regards,



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 22 November 2021 12:27 AM  
**To:** [REDACTED]  
**Subject:** We do NOT want PLASREFINE in our shire!

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble,

As an extremely concerned resident of the Southern Highlands I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

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This facility is in the wrong place!

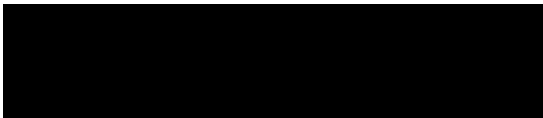
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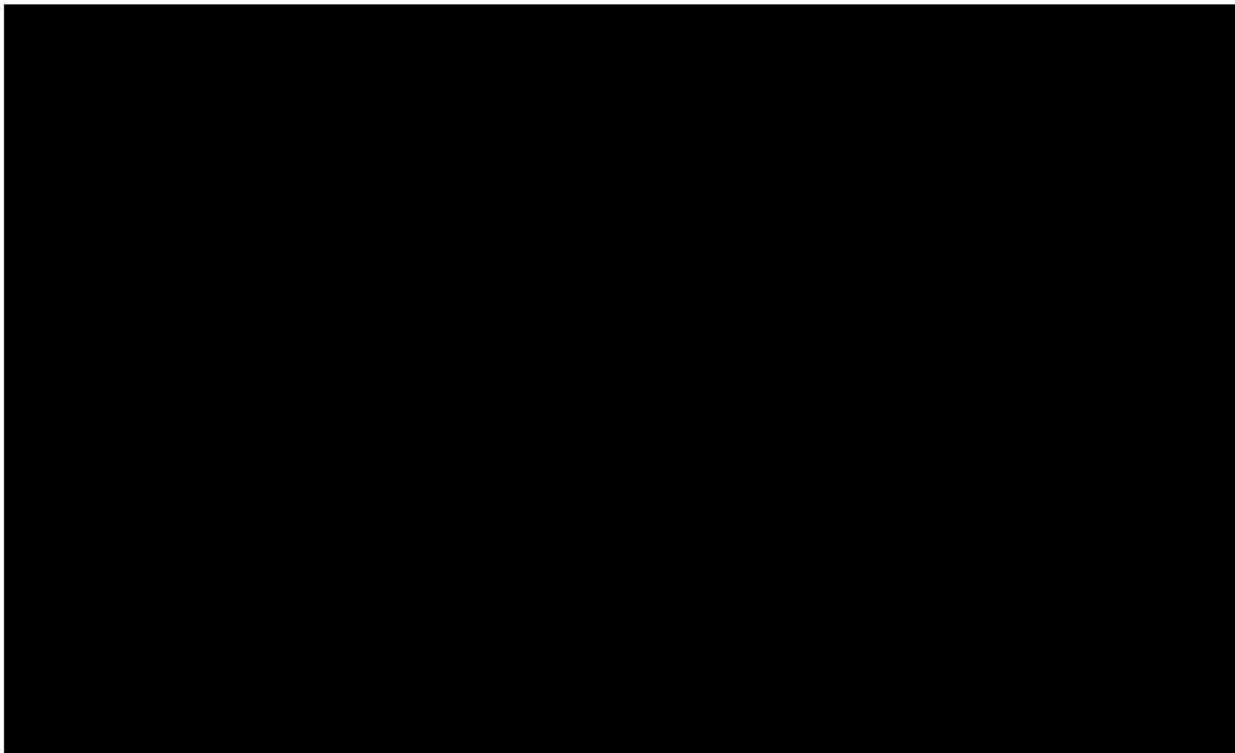
EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, and the 7th largest facility of its kind in the world, alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development; however I would like the WSC to consider the wishes of the community when considering the support of the project.

Kind Regards,







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**From:** [REDACTED]  
**Sent:** Sunday, 21 November 2021 10:37 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Plasrefine Plastics factory proposal

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble,

As an extremely concerned resident of the Southern Highlands I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly changes their information and, as a result, my concerns are as follows:

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This facility is in the wrong place!

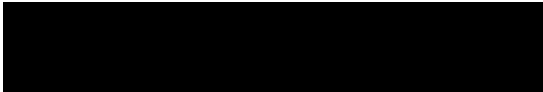
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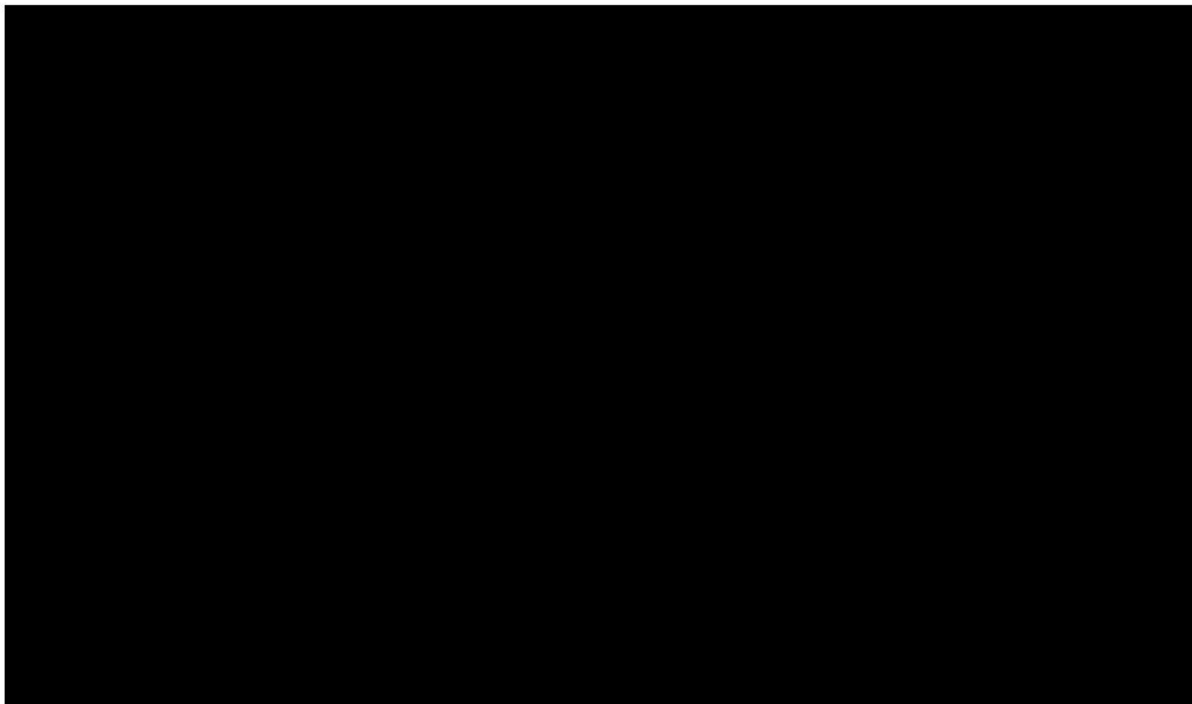
DAMAGE TO THE ENVIRONMENT – in addition to the above mentioned issues, this is riparian land with spring fed dams and all waterways flow into the Wingecarribee River which is the water catchment for Sydney.

EXISTING DEVELOPMENTS – it would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, and the 7th largest facility of its kind in the world, alongside this Plasrefine construction. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development; however I would like the WSC to consider the wishes of the community when considering the support of the project.

Regards,





Civic Centre, 68 Elizabeth St. Moss Vale, NSW 2577 | PO Box 141 Moss Vale NSW 2577

[www.wsc.nsw.gov.au](http://www.wsc.nsw.gov.au)

From:

Sent: Monday, 22 November 2021 9:52 AM

To:

Cc:

Subject: Council's Stance on Plasrefine's proposed development

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

RE Plasrefine Plastic Waste Processing FactoryDear

Ms. Miscamble,

My husband and I hope to move to Moss Vale in the near future, and so in light of the proposed plastic waste processing factory planned by Plasrefine, I would like to know where council stands on the matter, please.

GHD, the engineering firm employed to undertake the required EIS, have continued to change information about the scope and size of the factory over the past year since we have known about it, so as a result I have many concerns:

1. ROAD ACCESS AND TRUCK MOVEMENTS - GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction, can you please advise if this is true?

My firm belief is that if they are permitted to use Beaconsfield Road for the construction phase, then they will continue to use it for operations.

The scope proposes 200 truck movements per day - one every 3 minutes on local roads regardless of route. Intolerable! Roads will deteriorate under heavy traffic, the cost to repair will be borne by rate payers. There are issues of safety for local road users and pedestrians, diesel emissions, noise and vibrations throughout the local neighbourhood and the wider community.

2. SITE AND ZONING - this is the wrong place for such a facility.

Among the objectives for the IN1 zoning, according to The Wingecarribee Local Environment Plan, is 'to minimise any adverse effect of the industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential impact on neighbourhood amenity and character, or the efficient operation or regional road system.'

This factory should be in Heavy Industrial Zone, IN3, which has these objectives, 'To provide suitable areas for those industries that need to be separated from other land uses.' And 'to minimise any adverse effect of heavy industry on other land users.' Permitted with consent in IN3 are 'Hazardous Storage Establishments; Heavy Industries; Offensive Storage Establishments.'

3. HEALTH AND SAFETY - Next door to environmental zones and too close to residences.

In addition to road safety, information is that this facility will produce volatile organic compounds. The health implications of these dangerous gases are concerning. Additionally, micro plastics which will be created during the process are proving to be of grave concern to waterways, agriculture, animals, the food chain, and ultimately to humans!

4. ENVIRONMENTAL DAMAGE - the site is on Sydney Water Catchment. It contains riparian lands on which spring fed dams and all waterways flow into the Wingecarribee River and on from there to drinking water.

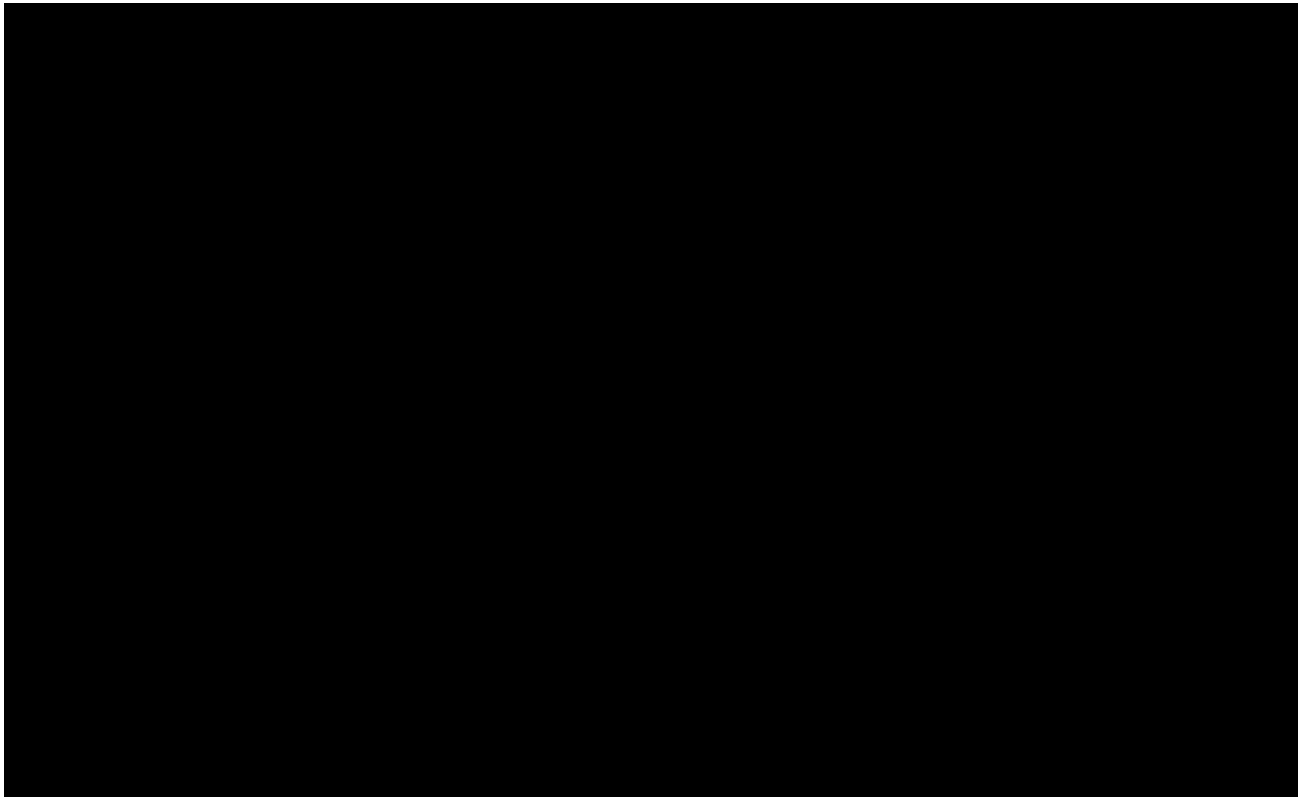
5. EXISTING DEVELOPMENTS - Will Moss Vale lose the Garvan Institute, the only facility of its kind remaining in the country, and a good, quiet, clean neighbour? As a world renowned Bio Medical Research Institute, shouldn't it be considered?

I understand as a State Significant Development that the proposal is out of the council's hands. But if you would please give consideration to my deep concerns and the wishes of the community when deciding whether to lend your support to this proposal, I would be very grateful.



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Kind regards,



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**From:** [REDACTED]  
**Sent:** Sunday, 21 November 2021 9:20 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Proposal of Plasrefine Plastics Factory in Moss Vale

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble,

I write to you to express my extreme concerns regarding the proposal of a Plasrefine Plastics plant/factory in Moss Vale in the Southern Highlands. Over the past few months, I have spent a lot of time looking at the Proposals from Plasrefine and also GHD (The company marketing the project on behalf of Plasrefine) trying to understand all aspects of this project and I have some strong concerns in regards to this.

Can you advise me as to where the local council stand with regard to this proposal??

GHD have repeatedly changed their information which concerns me.

I would greatly appreciate your response regarding my below concerns:

**ROAD ACCESS** - At the GHD community engagement meetings, attendees were told that Beaconsfield Road is their 'legal access' and that it would be used while construction was carried out on the proposed East Braddon Road which would run from Lackey Road up right next to Garvan's Bio Medical Research Institute. This road is completely unsuitable for heavy traffic, it is an uncurbed road where MANY locals regularly walk, including school children as well as being dropped off/ picked up by buses. There is also a Childcare Center on Beaconsfield Road, in which one of my young children attend.

GHD have stated that WSC is actively supporting the use of Beaconsfield Road for construction. Can you please offer some clarity around this statement?

**TRUCK MOVEMENTS** - 200 per day, one every 3 mins on our local roads regardless of route. Roads that will deteriorate under this heavy traffic volume and presumably be repaired constantly at cost to rate payers, which is already an extremely frustrating issue with constant pot holes, including the ones currently on Beaconsfield Road. This also leads to the issue of safety as far as other road users, pedestrians, and diesel emissions are concerned. More congestion is NOT something we need in the Southern Highlands, especially Moss Vale.

**THE SITE ITSELF AND THE ZONING** – The WLEP (Wingecarribee Local Environment Plan) for this zoning (IN1) has among its objectives : 'to minimise any adverse effect of industry on other land users.' And 'to ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential on neighbourhood amenity and character, or the efficient operation of the local or regional road system.'

This facility should be in a Heavy Industrial Zone (IN3) which has these objectives 'To provide suitable areas for those industries that need to be separated from other land uses.' And 'To minimise any adverse effect of heavy industry on other land users'. Permitted with consent in IN3 are 'Hazardous storage establishments; Heavy Industries; Offensive storage establishments'.

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**HEALTH AND SAFETY CONCERNS** – We have been informed that this facility will produce Volatile Organic Compounds. The health implications of these dangerous gases within the community are too numerous to mention. In addition to this, there will be micro plastics created which are microscopic and, when windblown, will affect agriculture, waterways, grazing animals (and the food they produce), and human bodies. IT IS A HUGE CONCERN.

**DAMAGE TO THE ENVIRONMENT** – In addition to the above-mentioned issues, this is Riparian land with spring fed dams and all waterways flow into the Wingecarribee River which is the water catchment for Sydney. Need I say more?!

**EXISTING DEVELOPMENTS** – It would seem unlikely that the Garvan Institute can continue to function as the ONLY facility of its kind remaining in Australia, (and the 7th largest facility of its kind in the world,)

alongside this Plasrefine construction. Vibrations over a certain decibel can significantly impact the mice and studies they perform at the institute. As a Bio Medical Research Institute serving an essential purpose nationwide, should this not be taken into consideration?

In conclusion, I am aware that WSC is not the consent authority as the proposal is a State significant development, however I would like the WSC to consider the wishes of the community when considering the support of the project.

The Southern Highlands is already struggling with infrastructure, and this will only cause many more issues for the area.

Hundreds of locals are against this proposal and the number is growing continuously.

I look forward to hearing from you soon,

Kind regards,



Moss Vale Resident.



From: [REDACTED]  
To: [REDACTED]  
Subject: Plasrefine Plastic Factory  
Date: Sunday, 21 November 2021 8:17:47 PM

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External Email: This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Ms Miscamble

As an extremely concerned resident of the Southern Highlands since my birth , 3 children & 8 grandchildren I would like to enquire as to where the council stand with regard to the Plasrefine Plastics factory proposal.

The company who are charged with 'marketing' this project, GHD, constantly changes their information and, as a result, my concerns are as follows:

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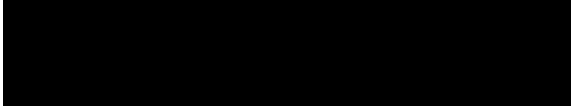
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Regards



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From: [REDACTED]  
Sent: Monday 5 July 2021 1:39 PM  
To: [REDACTED]  
Sub

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Good Morning [REDACTED]

We preface this correspondence with acknowledgement of the pressure all levels of Government are under in finding a solution to the problem of the country's plastic waste. We understand the expediency of finding this solution.

We are very concerned with the site of the proposed facility at the very edge of residential Moss Vale and The Southern Highlands more generally. Surely it is possible for the proponents to be required to find land for this development which will not have the enormous social, economic and environmental (pollution - air, water, noise, light) impacts on so many. The scale is enormous, the 24/7 hours of operation and the traffic flow alone will destroy the amenity and health of many residents. Not to mention leakage of toxic chemicals into the atmosphere and water.

It is simply in the wrong place. We have attached the definitions of relevant zonings taken from the Wingecaribbee Shire Council's LEP and are seeking the justification as to how this proposal fits the General Industrial Zoning rather than Heavy Industrial and how it is at all compatible with the E4 zoned land to which it is adjacent.

We understand the need for such a facility but it should be away from residential homes, roads and fragile environmental areas such as the Southern Highlands Shale Woodland.

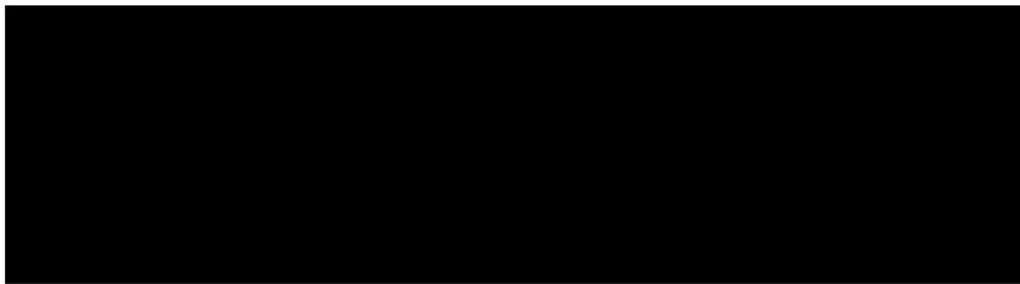
We request that you listen to residents as well as the developers and try to understand the enormity of the issue from the perspective of ratepayers and taxpayers.

We will be writing a much more detailed response to the EIS when it lands but respectfully request that you consider the possibility of directing the proponent to find a more suitable site on a larger lot and away from people's homes. Also closer to the highway so it does not use village roads for the 100s of heavy vehicles travelling to and from the site.

Thank you for your attention to this matter and look forward to your response in explaining how this proposal is not suited for Heavy Industrial Zones away from E4 and residential homes and roads.

[REDACTED]





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**From:** [Redacted]  
**Sent:** Thursday, 19 August 2021 11:14 AM  
**To:** Wingecarribee Shire Council <mail@wsc.nsw.gov.au>  
**Subject:** ATTN : Mr Viv May : Administrator

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

ATTN : Mr Viv May : Administrator

**Communication with WSC regarding Plasrefine Proposal**

Good Morning Mr May,

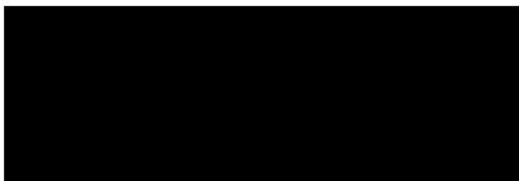
We are writing to express our disappointment with Council's lack of response to communications from concerned residents and ratepayers.

The most recent example is a letter written by us to Ms Lisa Miscamble on July 20 which remains unanswered. A copy of this letter is attached for your information as it details our efforts to engage council on an issue which is of critical concern to us and the wider Southern Highlands Community.

We feel disenfranchised, unheard and unrepresented by our own council and as long term residents and ratepayers we do feel we should expect at least acknowledgment of our efforts to communicate. We know GHD is liaising with Council while we are excluded.

We hope there will be an opportunity for meaningful communication with Council once Covid allows.

Regards,





Ms Lisa Miscamble GM WSC  
[mail@wsc.nsw.gov.au](mailto:mail@wsc.nsw.gov.au)

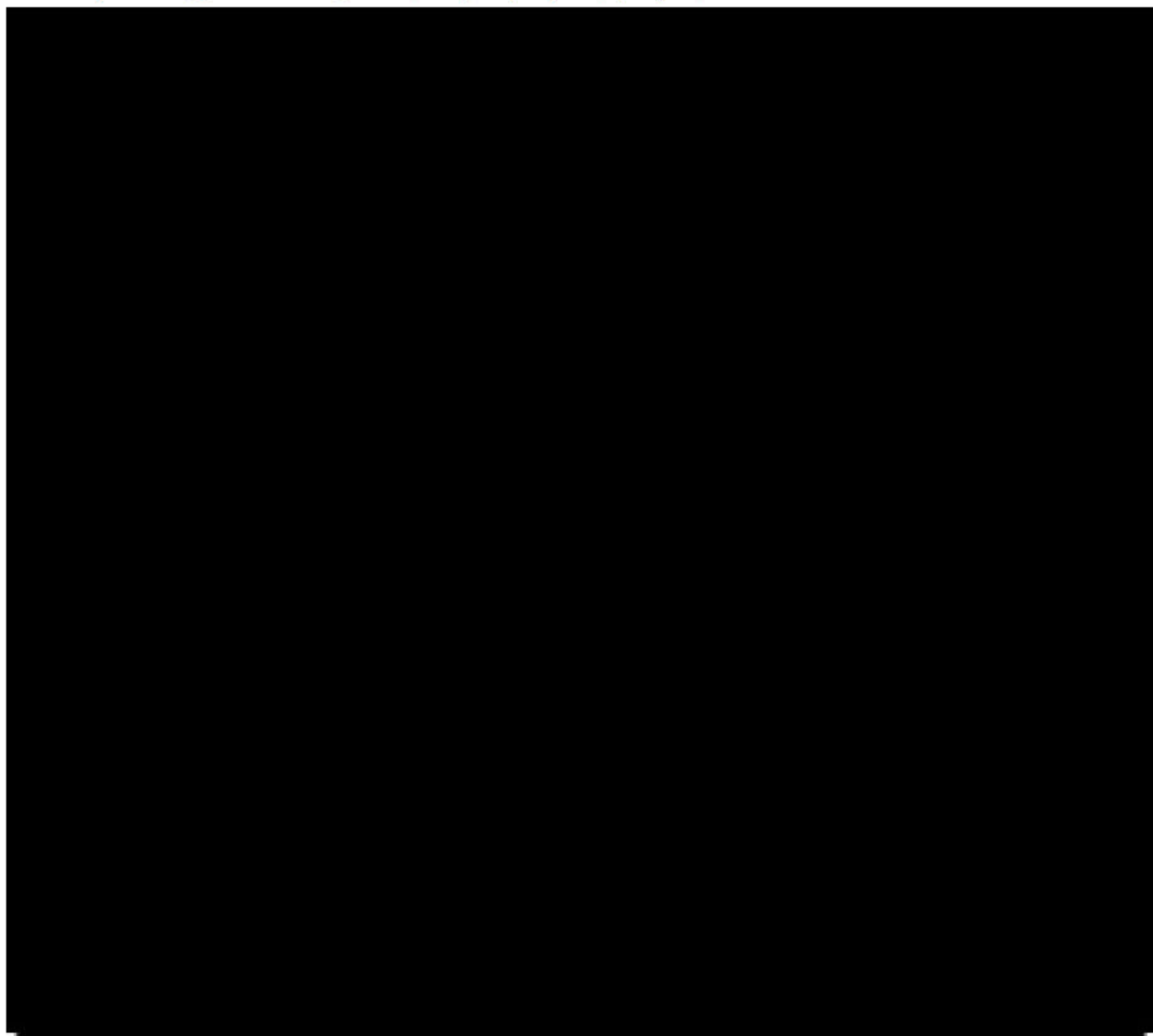
July 20, 2021

Dear Ms Miscamble,

We are writing to you in respect of the Plasrefine Development proposed for Moss Vale. We are residents who would be severely impacted by this ill-placed development but are equally concerned about the damage caused to air and water quality, health, roads, tourism and jobs in Moss Vale and Southern Highlands should it proceed.

We acknowledge your recent appointment and its demands, but if you have not had the opportunity already, could we request that you familiarise yourself with this project as a matter of urgency? Here is the link :

[www.planningportal.nsw.gov.au/major-projects/project/40146](http://www.planningportal.nsw.gov.au/major-projects/project/40146)



email, likely provided by GHD, referring to community consultation process of which we are only too well aware. There was one sentence in a different font which was possibly personally written by Ms Sample.

What we, as residents, require from our Council is to be heard at least as much as Plasrefine has been at their meetings with Council. There is a whole other side to this proposal which they will not present to Council and which many of us have been reading and researching for the last six months. This factory is an abomination and Council needs to oppose its location, there is just too much at stake. We acknowledge that Governments at all levels are under pressure to solve the problem of the country's plastic waste and this pressure might expedite a very poor decision.

Council manages local roads and to have an additional 120 large truck movements daily, on local roads is just untenable, unsafe and will endanger lives. This plastic waste facility needs to be out of town, near the highway so these trucks do not travel from Wollongong via the Illawarra Highway and down the already congested main street of Moss Vale, or through new Berrima and Douglas Road, or worse case as outlined in the Scope, via Berrima, Lytton and Beaconsfield Roads!

We have sought the advice of the Environmental Defenders Office and are continuing strong advocacy in order to protect the health and safety of the Southern Highlands residents and their beautiful environment.

The current proposal does not comply with Council's own WLEP objectives for General Industrial Zoning :

*To minimise any adverse effect of industry on other land users.  
To ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential impacts on neighbourhood amenity and character, or the efficient operation of the local or regional road system.*

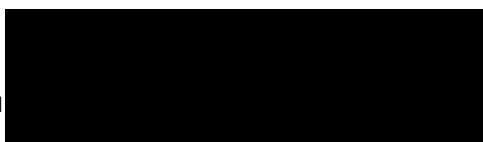
Noted that this and associated objectives were an accepted inclusion in the last rezoning of this land with resident input. It is also completely incompatible with the adjacent E4 zoned land.

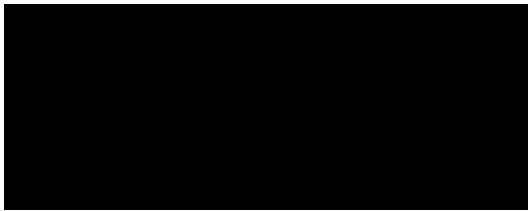
The right decision here will encourage more jobs if the MVEC is developed as a 'clean green' industrial area. We acknowledge that WSC is not the consent authority but are aware that council is meeting with GHD on behalf of the proponents and are seeking that as our community representatives, we ask that consideration is given to the community's concerns regarding this proposal.

We extend an invitation to you and any relevant WSC personnel, to view the site in question from our property and to meet with a small delegation of concerned residents. There are currently over 1400 signatures on a petition opposing this development and these people/us, need to have our voices heard and recognised. GHD's attempts at 'meaningful' community consultation are completely inadequate and heavily controlled.

Thank you for your attention to this

matter, Regards,





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From:

Date: Sat, 3 Jul 2021 at 10:55

Subject: Plasrefine Facility

To:

Hello

I understand that DA application for the Plasrefine Recycling Facility.

We live at [REDACTED] and we send you our strongest objection to this facility to be built in our neighbourhood.

We cannot understand why Moss Vale has to be treated with so much disrespect that a facility of this nature would ever be considered in the first place.

Guaranteed that if this facility was planned for Bowral or Mittagong it would not even get to first place because of objections.

So why is Moss Vale considered a dumping ground for these types of facilities.

Would you want a facility of this type in your backyard?? We would think not.

WE ARE TOTALLY DISGUSTED.

WE DO NOT WANT THIS FACILITY BUILT.

We would respectfully request a reply.

Many thanks.

[REDACTED]



From: [REDACTED]

Sent: Tuesday 13 July 2021 2:57 PM

To: [REDACTED]

Subject: Plasrefine - Moss Vale

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Hi [REDACTED]

Further to my previous email, please see below my email previously sent to Wendy Tuckerman:

Thank you.

*Dear Mrs Tuckerman,*

[REDACTED] and am extremely concerned about the proposed facility on Beaconsfield Rd Moss Vale. To have a facility of this nature so close to (immediately next to) residents on Beaconsfield hill and along Bulwer Rd is of particular alarm and to say I'm surprised it is permissible, moral, ethical or even legal would be an understatement?!

*The facility is on the south side of Douglas Rd which I can not believe industry of this nature is permissible literally next to long term residents! This facility will decimate the lives of hundreds of people! I moved to the area to raise my young family and envisioned living on Beaconsfield Rd indefinitely. Beaconsfield Rd, Beaconsfield hill and the broader neighbourhood is an extremely quiet, safe and friendly rural community. If this proposed facility went ahead it will destroy what many of us residents have loved about our home for a long time.*

*If approved, this development will cripple the rural lifestyle of hundreds of residents, destroy property values and our livelihoods, create dust and pollution, light pollution, produce constant industry noise and vibration from HUNDREDS of heavy vehicle movements every day, as detailed in GHD's EIS scoping report!!!*

[REDACTED]  
[REDACTED] IF the facility were approved (again the fact that it is even proposed that it can be built in such a pristine area, immediately next to residents is bewildering, and something has to stop this)! And IF the potential use of Beaconsfield Rd as an access for hundreds of semi trailer movements every day it would be extremely hazardous and dangerous for [REDACTED] it would LITERALLY PUT OUR LIVES AT RISK, EVERY SINGLE DAY!!!

***GHD who represent the Chinese foreign owner and profiteer of the proposed development, have proposed using Beaconsfield Rd to access the site which would be criminal! [REDACTED] [REDACTED] ride their bikes and play games along this quiet, residential cul-de-sac every other day. This would all end if you turn our street into a thoroughfare for heavy industry traffic and again it would absolutely destroy our way of life and cripple our lifestyle and the whole reason we moved to this beautiful RESIDENTIAL part of Moss Vale. This absolutely must be managed properly and stopped by responsible people in power to protect the residents and the interest and socioecological nature of this area in our community!***

***The physical nature of Beaconsfield road is not to grade to be able to handle such traffic, there is barely enough room for passenger vehicles to pass on the hillside let alone prime movers going both ways IF Beaconsfield Rd were approved as an access route!***

***The nature of the site itself is ecologically sensitive and is riparian land! The approval of such a facility could severely jeopardise water quality as it flows downstream to the Wingecarribee River! A sensitive ecological waterway with platypus resident in parts of the waterway with evidence of Platypi DNA present in the waters.***

***Plasrefine is 100% Chinese interest ownership with no evidence of operation and the toxic nature and measures available with any transparency within Australia. There has been minimal engagement with the community from GHD who represent Plasrefine. One letterbox drop and a door knock in the middle of a work day. My wife and I both work full time to support our young family so conveniently were not home for GHD consultation. GHD have also represented the Adani Carmichael coal mine which is of enormous concern!!!***

***I am a [REDACTED] and if this development is approved, in time it would move towards processing and melting plastics which would emit toxic fumes over Burradoo where I work when South West winds blow over the Highlands!***

***I trust you can gauge the degree of concern, and the anxiety this proposed waste facility has caused my family and my community. I hope you will fully support our resistance and represent our concerns accordingly to the Minister for Planning and Public Spaces. I would like some clarification as to how an industrial proposal of this scale and nature can possibly be a realistic consideration from the local and state governments for a site with all of the forwarded issues for me, and many, many more!!!***

***There has previously been a DA refused for this site due to such items identified here by current staffer Nicholas Wilton, obviously for valid reason. Surely the usage of the area to the south of Douglas Road should be reconsidered so such proposals are not ever a realistic threat to our community in the future!!!***

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From:

Date:

Subject: Plasrefine Facility

To:

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we send you our strongest objection to this facility to be built in our neighbourhood.

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WE ARE TOTALLY DISGUSTED.

WE DO NOT WANT THIS FACILITY BUILT.

[REDACTED]

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Sent: Monday 5 July 2021 1:39 PM

[REDACTED]

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Good Morning

We preface this correspondence with acknowledgement of the pressure all levels of Government are under in finding a solution to the problem of the country's plastic waste. We understand the expediency of finding this solution.

We are very concerned with the site of the proposed facility at the very edge of residential Moss Vale and The Southern Highlands more generally. Surely it is possible for the proponents to be required to find land for this development which will not have the enormous social, economic and environmental (pollution - air, water, noise, light) impacts on so many. The scale is enormous, the 24/7 hours of operation and the traffic flow alone will destroy the amenity and health of many residents. Not to mention leakage of toxic chemicals into the atmosphere and water.

It is simply in the wrong place. We have attached the definitions of relevant zonings taken from the Wingecarribee Shire Council's LEP and are seeking the justification as to how this proposal fits the General Industrial Zoning rather than Heavy Industrial and how it is at all compatible with the E4 zoned land to which it is adjacent.

We understand the need for such a facility but it should be away from residential homes, roads and fragile environmental areas such as the Southern Highlands Shale Woodland.


We request that you listen to residents as well as the developers and try to understand the enormity of the issue from the perspective of ratepayers and taxpayers.

We will be writing a much more detailed response to the EIS when it lands but respectfully request that you consider the possibility of directing the proponent to find a more suitable site on a larger lot and away from people's homes. Also closer to the highway so it does not use village roads for the 100s of heavy vehicles travelling to and from the site.

Thank you for your attention to this matter and look forward to your response in explaining how this proposal is not suited for Heavy Industrial Zones away from E4 and residential homes and roads.

[REDACTED]





**To:** Wingecarribee Shire Council <mail@wsc.nsw.gov.au>

**Subject:** Attention Mr Les McMahon - Objection to the Plasrefine Pty Ltd proposal for Moss Vale site

**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Dear Mr McMahon,

I have lived in the Southern Highlands my whole life and have worked in Moss Vale for the past 13 years. I'm very concerned about the proposed Plastic Waste Processing facility at 74-76 Beaconsfield Rd Moss Vale.

This proposed Plastic Recycling Plant is to be constructed directly next to Australian BioResources, a world class rodent breeding facility that supplies mice to many of our vital medical research facilities in Australia. These animals are extremely sensitive to noise, vibration and odours – all of which will become an issue as soon as construction starts, not only once the facility is up and running.

Australian BioResources employs many locals and provides a vital service to research institutes across Australia and around the world. Any adverse exposure to any of the factors on this facility could have long lasting impacts on the vital research these institutes are carrying out. The fact that Plasrefine and GHD have left out any mention of Australian BioResources from their propaganda material and “public” consultation alarms me greatly as I believe they already know the impact it will have.

I also have profoundly serious concerns for the safety of the road users around this proposed facility with the movement of the plastic waste by large trucks through a largely residential area.

This facility will negatively impact the water supply for the Southern Highlands. We are an area that is rapidly expanding with new housing developments and the use of this exorbitant amount of water will have detrimental effects not only to our lifestyle but also those in the Goulburn region as Wingecarribee is where their emergency water supply comes from. This land also forms part of the water catchment area that flows directly to the Wingecarribee river.

The Operation of this plant 24/7 is unsuitable and simply not acceptable this close to any residential area. The MVEC was never intended for Heavy Industry such as this. Local DCP doesn't allow for this type of Heavy Industry on that site.

Plasrefine Recycling Ltd was founded less than 12 months ago by Chinese owners ( along with 2 other shelf companies ) – none of which have any prior trading experience in the waste or recycling industries.

Could you please represent my concerns to theWingecarribee Shire Council as to why this proposal is absolutely unsuitable for the 74 – 76 Beaconsfield Rd , Moss Vale site.

I look forward to your response.



[Redacted]

[Redacted]

Wednesday, 12 May 2021 3:47 PM

[Redacted]

**Subject:** Plasrefine Plast Waste Recycling Plant, Moss Vdle

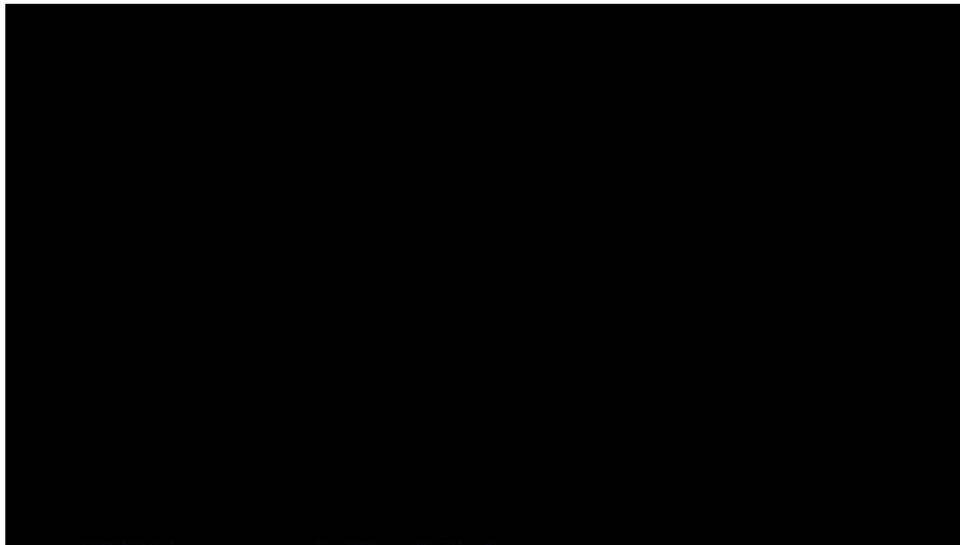
**External Email:** This email was sent from outside the organisation, please be cautious with links and attachments in the email.

Please refer to the attachment which records strong objections to the Plasrefine Plastic Waste Facility which is currently undergoing its EIS for construction on 74-76 Beaconsfield Road, Moss Vale.

Yours Sincerely

[Redacted]

This information is provided from Wingecarribee Shire Council

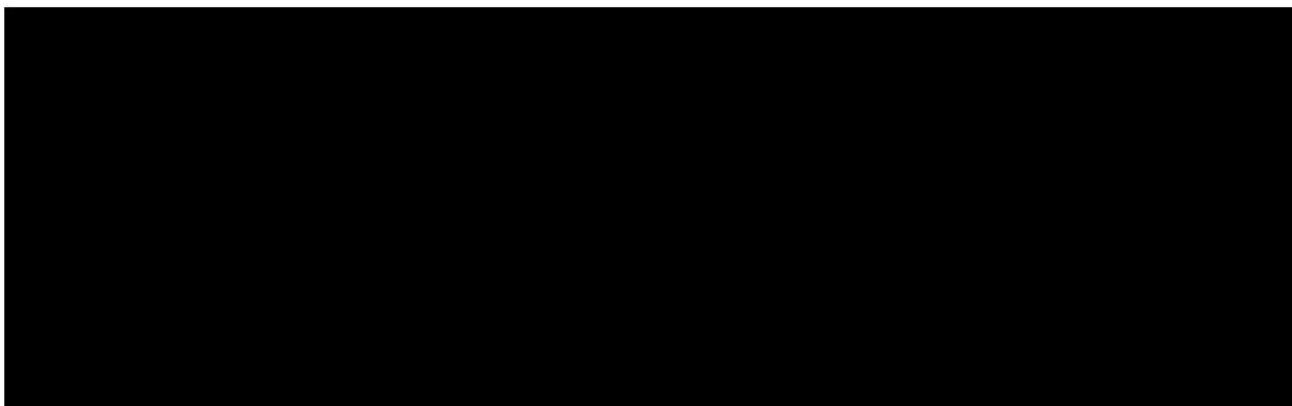


NSW Government Att Wendy Tuckerman

Wingecarribee Shire Council: Attention Department of Planning

**Re: Plasrefine Plastic Waste Recycling Plant Proposal for Moss Vale**

I am writing to place objections to the above proposal on behalf of:



road he uses regularly in his wheelchair.

I myself am a [redacted] Stress plays havoc with my sugars and mental well-being and the Plasrefine project is indeed causing a very stressful situation.

[redacted] having Council

Plans. In fact, the area bordered by Douglas and Lackey Roads was then zoned light industrial.

**Garvan.** When Garvan (Australian Bio Resources) sought to build over 10 years ago, we negotiated a community with Council to bar access to their project from the Beaconsfield Road. Garvan, keen to be a welcome neighbour, did not press their case and eventually accessed from Lackey Road. **WSC at the time assured residents that 74-76 Beaconsfield Road, would remain a buffer zone between the then Light Industrial corridor and Moss Vale.**



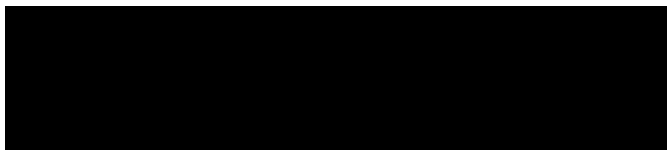
Since that time, WSC has, in its wisdom, permitted rezoning of 74-76 Beaconsfield Rd, and the portion adjacent to Garvan on its western side is now the site of the proposed Plasrefine Plastic Waste Recycling Plant which, in its EIS Scoping report, plans to access its property via.

**Whilst we all have concerns for the environment, an industry such as that proposed by Plasrefine is not in the interests of all local residents who would be impacted by the heavy daily transport, the 24/7 operation, noise, emissions, vibration and sight pollution. In fact, it is probably safe to say that had this project been in the hands of the WSC it would never have been allowed as Council has a duty of care to its residents throughout the Highlands.**

We are informed that this is a NSW Government Project. I respectfully ask that Plasrefine, the NSW Government, and associated departments seek to find a more suitable site for the plastic waste recycling facility and that they recognize the detrimental impact, not only to the residents of Moss Vale but to the Southern Highlands as a whole.

**The dollars that pour into this beautiful part of NSW as a tourist and residential destination must far outweigh that of a non-environmental development such as Plasrefine. Should the Plasrefine Project be allowed to go ahead in the Southern Highlands I am sure the backlash in the next State Election will be very considerable.**

Yours sincerely

A large black rectangular box redacting the signature of the person who wrote the letter.