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Re: Application by Plasrefine Recycling Pty Ltd
Moss Vale Plastics Recycling and Reprocessing Facility SSD-9409987
74-76 Beaconsfield Road Moss Vale NSW 2577

I am writing to formally object to the proposed development by Plasrefine Recycling Pty Ltd and respectfully request that it be recommended for refusal. This objection is based on the significant and far-reaching impacts that this project would have on the Moss Vale community, as well as the lack of clear evidence regarding its benefits to the local area.

My objections are as follows:

Wastewater / Sewer Output: The proposal falls short in addressing the critical issue of excessive wastewater output. The proposed suggestion to truck wastewater to Berrima WWTP is not only impractical but also raises concerns about its environmental and logistical implications. This approach places undue strain on local infrastructure and fails to provide a sustainable solution for managing wastewater in a responsible manner.

Noise Impact: The project's documentation lacks the necessary level of detail concerning the management and mitigation of noise impacts. This deficiency is evident in the project's non-compliance with night-time noise requirements. The absence of a clear strategy for addressing noise concerns raises doubts about the project's commitment to preserving the local community's amenity and well-being.

Air Quality: The proposal has not sufficiently addressed air quality concerns, particularly in proximity to the Australian Bio Resources facility and its staff. The dismissal of potential impacts as insignificant, with the expectation that staff can remain indoors, reflects a narrow-minded and careless approach. This approach does not adequately consider the potential health and well-being of the affected individuals and raises questions about the project's commitment to ensuring a healthy living environment.

Amenity Impact: The potential impact of the project on local amenity has not undergone a comprehensive evaluation. This lack of assessment leaves residents in uncertainty about the quality of life they can expect in the affected area. It's essential for a project of this scale to thoroughly consider and address its potential consequences on the community's amenity and living conditions.

Health and Well-being: While the Social Impact Assessment (SIA) has outlined potential health and well-being impacts, the mitigation strategies remain unclear and seem to place significant reliance on the proponent. It's important to note that the proponent lacks relevant experience, corporate history, and has not established a social licence within the community. This raises serious concerns about their ability to effectively address and mitigate these impacts on local residents.

Physical Constraints: The RTS and amended report do not appear to adequately consider the physical constraints related to access. These constraints include the proximity of the new road to the Riparian corridor and the fact that portions of the new North-South road and Collins Road are located on flood-prone land. The absence of comprehensive consideration of these physical limitations raises concerns about the project's overall feasibility and potential environmental impacts.

Lack of Infrastructure: The proposal has not adequately addressed the absence of essential infrastructure, including water, stormwater, and sewer systems. This oversight raises concerns about the project's feasibility and its potential to strain existing infrastructure, impacting the surrounding community and the environment. It is crucial for any development to ensure that the necessary infrastructure is in place to support its operations and minimize negative impacts.

Viability and Corporate Experience: There are valid questions regarding the viability of the chosen site and whether proper due diligence and feasibility studies were conducted. These uncertainties raise concerns about the experience and commitment of Plasrefine Recycling Pty Ltd. Any significant project of this nature should undergo rigorous assessments and demonstrate a clear understanding of the associated challenges, which currently appear to be lacking.

Unsuitable Road Network: The proposed road network, which involves three level crossings for both construction and operation, is viewed as impractical and inconsiderate to the local community. This road network raises concerns about safety, efficiency, and the potential disruptions it may cause to the community, especially in an area with multiple level crossings. The feasibility of this road network requires further scrutiny and revision to align with community interests and safety standards.

Unclear Employment Impact: The proposal lacks clarity regarding the employment opportunities it will provide for the local community. There are doubts about the availability of genuine local job opportunities, given the ambiguous information presented in the project documentation. It is essential for the project to provide transparent and accurate details about the employment it will generate, especially for the benefit of the local workforce.

Lack of Technical Data: The absence of specific technical information and machinery data raises significant concerns about potential emissions and their impact on health and the environment. Without comprehensive and transparent technical data, it is challenging to assess the project's potential environmental and health consequences accurately. This lack of information raises questions about the project's commitment to safeguarding the well-being of the local community and the surrounding environment.

Substandard Design Plans: The design plans provided in the proposal are substandard and do not align with the topographical characteristics of the site. This inadequacy hampers a proper assessment of the project's impact and feasibility. To ensure a comprehensive and informed evaluation, it is crucial for the design plans to accurately reflect the site's topography and conditions.

Lack of Site Survey: The absence of a detailed site survey, which should include information about earthwork requirements and their impact on access, severely limits the ability to conduct an informed assessment of the project. A comprehensive site survey is essential to understand the site's specific conditions and their implications for the project's design and viability.

Riparian Zone and Flood Implications: The proposal's proximity to the riparian zone and its potential implications for flood-prone areas, particularly in the proposed road section, require further clarification. Understanding the environmental and safety considerations related to the riparian zone and flood risks is critical to ensuring the responsible development of the project. Further details and assessment of these aspects are necessary for a thorough evaluation.

Level Crossing Relocation: The proposal's reports, particularly the Road Traffic Study (RTS), lack sufficient detail regarding the relocation of the level crossing. This includes a notable absence of supporting documentation from Transport for New South Wales (TfNSW). It is essential to have comprehensive and transparent information about the level crossing's relocation to assess the safety and logistical aspects adequately. Further details and documentation are necessary to ensure that this aspect of the project is thoroughly examined.

Updated QS Report: It is imperative that an updated Quantity Surveyor (QS) report for construction costs is conducted, taking into account the changes in the building industry. Given the dynamic nature of the construction sector, an up-to-date cost analysis is essential to ensure accurate financial projections and to prevent of a non-viable enterprise. An updated QS report will provide a more realistic assessment of the project's financial implications and feasibility - this needs to include costs of the relocation of the level crossing, upgrades to Douglas and Collins roads and construction of the access roads of North South access and Braddon Road.

In conclusion, it is evident that the chosen site is unsuitable for any form of development, especially for a waste facility, due to the identified environmental constraints, inadequate access, and its incompatibility with the sensitive Sydney Drinking Water Catchment area. The proposed project's impact on the environment, community, and infrastructure outweighs any potential benefits, making it a poor choice for this location. It is recommended that this project be reconsidered and refused.

Plasrefine Recycling Pty Ltd have shown a lack of due diligence and feasibility and this should not become a burden for the local community.

The impacts of this proposal outweigh any promised benefits. I respectfully request that the proposal by Plasrefine Recycling Pty Ltd and the concept proposed by GHD be refused.