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RE: Proposed Plasrefine Plastics Recycling Facility 74-76 Beaconsfield Rd Moss Vale NSW 2577 SSD Application No – 9409987

Dear Ms. Barnett,

I am writing to submit my opposition to the State Significant Development application by Plasrefine Recycling Pty Ltd. for the proposed plastics recycling facility.

Plasrefine Recycling Pty Ltd. (proponent) has put forth a State Significant Development application to the NSW Department of Planning and Environment (DPIE). Their request pertains to the construction and operation of a plastics recycling facility designed to handle and process up to 120,000 tonnes of plastic waste annually. Additionally, this facility would be engaged in the production of plastic fibers and resins.

My objections highlight important considerations that should be thoroughly addressed and evaluated during the project's planning and approval process to ensure the well-being of the community and the environment.

Transparency: The need for more specific detail and clarity in the project's documentation and communication particularly relating to the relocation of the level crossing, noise, and air quality.

Land Use Conflict: The discrepancy between the proposed use of Braddon Road and its original approval for residential access, which raises concerns about land use conflict.

Community Engagement: The absence of meaningful community engagement regarding the new proposed access and the relocation of a level crossing, which is essential for addressing community concerns.

Safety Concerns: The need for thorough safety assessments evidenced by the lack of fire safety designs and the absence of detailed design and information regarding access, particularly multiple level crossings, which will impact safety.

Wingecarribee Shire Council Concurrence: The necessity of obtaining approval and concurrence from the local council regarding access and the relocation of the level crossing, given the impact on local businesses and council assets.

Riparian Zone: Concerns related to the proposed access road impact on the riparian zone, a critical second-order watercourse in the area.

Bulk and Scale: Issues with the architectural plans and the need for more comprehensive details in this regard.

Health and Well Being: The health impacts of plastic exposure are a topic of ongoing research, and it can be considered an area of emerging science and the precautionary principle.

Inconsistent with the WLEP 2010: Inconsistency raises concerns about the project's alignment with local zoning and land use regulations and it underscores the need for a thorough evaluation to ensure that the development complies with the established planning and environmental guidelines within the region.

Transparency

As expressed in my previous submission, there remains a conspicuous absence of detailed information in the application, and on some occasions, the provided documents appear to be in conflict with one another. This failure to supply the necessary detailed information, rather than fostering transparency, seems to reflect a lack of consideration for the community affected by this proposal.

The lack of substantial, detailed information poses a significant obstacle to creating an informed submission for this proposal. This deficiency extends to critical aspects, including air quality, noise impacts, effluent management, power, water requirements, and waste disposal and management. At this stage, all these factors remain speculative assumptions, pending the submission of a more comprehensive and detailed design post approval. This level of uncertainty is inadequate and raises concerns about the project's readiness for approval. More robust, detailed information is required for a thorough evaluation of its actual impacts.

Land Use Conflict

A notable omission in the documentation is the absence of a credible reference to the council-approved formation of Braddon Road (DA22/0811). It's crucial to highlight that this approval was granted for residential access, not as implied for industrial use. The situation raises a clear concern regarding land use conflict, as accommodating residential access and industrial operations involving more than 100 heavy vehicles demonstrates a substantial lack of consideration by both the proponent Plasrefine Recycling Pty Ltd and the contracted engineer GHD. This oversight warrants closer scrutiny to ensure that the development aligns with the intended land use and minimises potential conflicts and disruptions to the community as per the WLEP 2010.

Community Engagement

I acknowledge the proposed alteration in access and haulage route, and I would like to emphasise that, in light of this further modification to the proposal, the proponent and their contracted engineers should have been obliged to re-engage with the community. The DPIE has a responsibility to ensure that the community affected by this proposal is kept fully informed about the implications of yet another change in the project parameters. This oversight constitutes a failure on behalf of the proponent to maintain open communication with the concerned community, which is essential to have a comprehensive understanding of the evolving situation.

Safety Concerns

In regard to this considerable change in access and haulage route, I would like to highlight the original documentation of GHD regarding the North South access.

GHD Plasrefine Recycling Pty Ltd - Technical Report 6 Traffic and Transport, 27 January 2022, Page 32, Section 4.1.3 Option 3: North-South Connection with Douglas -

During discussions with the Council, it became evident that this option was the least favoured. The primary concern revolves around the necessity for heavy vehicles to execute a hook turn across a level rail crossing associated with the Berrima Branch Line. This concern aligns with the broader issue of level crossing safety as outlined in the guidelines of Transport for NSW and the National Railway Level Crossing Safety Strategy 2010-2020, which highlight the significant road safety risk associated with train-vehicle collisions at level crossings.

Relocation of the current level crossing to the west might enhance access for contractor drivers to the proposed factory, it introduces potential risks and considerable impacts for other road users. In particular, this raises concerns for the owners and businesses situated on Douglas Road, including those already operating and possessing approvals in the business park located on Redfield Road regarding safe access to travel east, without having to perform a hook turn across the level crossing. The absence of comprehensive consideration for the welfare of other road users beyond their own interests is evident. Once again, the proponents approach appears to disregard the broader community and its well-being.

The absence of any detailed information or design regarding the proposed level crossing relocation raises concerns about the thoroughness of the study. It suggests that the assessment might have been primarily desktop-based, lacking an on-site survey or physical inspection. If a physical survey had been conducted, it should have identified the need to alter the levels of Douglas Road to ensure that trucks can access the crossing.

The matter of level crossing safety remains unresolved, with three crossings that drivers must navigate before reaching the proposed North/South access road. Furthermore, as previously mentioned there are still no engineering specifications or detailed drawings available for the new crossing design or the proposed access road. The absence of a survey in the provided documentation is also noteworthy, given this is SP2 Rail Infrastructure regardless of the Boral Cement landowners consent - concurrence from TFNSW should be mandatory.

As evidenced in the National Railway Level Crossing Safety Strategy 2010-2020, there are approximately 100 incidents at Australian railway level crossings every year, these incidents result in the death of 37 people annually.

After investigating 87 fatal Australian level crossing incidents, the Australian Transport Safety Bureau (ATSB) identified the following key characteristics that require consideration:

- In 66% of fatal level crossing incidents, the point of impact was the front of the train.
- Over 80% of fatal incidents occurred in daylight during fine weather, on a straight, dry road.
- More than 50% of fatal incidents occurred at crossings with active controls in place.
- Unintended road user error accounted for 46% of fatal level crossing incidents.

More recently the ATSB investigated 12 road vehicle and train level crossing incidents between 2006 and 2007 of these nine involved heavy vehicles. In total, 19 lives were lost, and 60 injuries caused.

Any suggestion that this route, involving three level crossings to access a single landlocked site, is the safest option is a matter that requires close scrutiny. It is indeed essential to evaluate the impact on safety and ensure that the proposed design of the level crossings prioritises the well-being of the community and road users. Delaying the Australian Level Crossing Assessment Model (ALCAM) assessment until after project approval is not adequately address these concerns, and it is crucial to ensure that safety assessments are conducted in a timely and thorough manner as part of the project's application.

Wingecarribee Shire Council Concurrence

It is crucial to determine whether the proponent has obtained the necessary concurrence and or endorsements from the Wingecarribee Shire Council to alter Douglas Road. Given that this road is relied upon by numerous businesses, any alterations to it would have significant implications for local access and operations. The lack of clarity on this matter underscores the importance of engaging with the local council and stakeholders to address such concerns and ensure a well-informed and considerate development process.

Riparian Zone Impact

The proposed placement of the North/South road within the riparian zone at (the intersection of Braddon Road) raises significant concerns regarding biodiversity and environmental impacts, there is a lack of outlined plans for how this placement will be managed. Of particular importance is the role of the mapped riparian watercourse in the Sydney Drinking Water Catchment. Given its vital significance, it is imperative to address these concerns and ensure that the potential impact on this crucial resource is thoroughly considered and managed appropriately. Preserving the integrity and health of the riparian zone is essential for the sustainability of the surrounding environment and water resources.

The continuing failure to adequately address flooding and biodiversity implications in the proposal is of significant concern, especially if it remains non-compliant with biodiversity requirements. The assertion in the application document, dated 27/01/2022, that there are no threatened species or endangered ecological communities, while contrary to the actual situation, is troubling. Moreover, the lack of detailed information regarding the potential impacts to the neighbouring dam, including the proposed dewatering, further raises questions about the project's environmental impact and sustainability.

A comprehensive and environmentally responsible approach is needed to address this issue. These concerns highlight the need for a more thorough and accurate assessment of environmental impacts, as well as compliance with biodiversity regulations, to ensure that the proposed development does not harm local ecosystems, threatened species, or water resources with particular focus on microplastics and the Sydney Drinking Water Catchment.

Bulk and Scale

The amended report highlights a slight reduction in the height of the buildings; however, the overall bulk and scale of the development appears to remain unchanged. Notably, there is a lack of landscaping on the industrial land itself, with all landscape screening features placed on the neighbouring land and on the southern side of Braddon Road. This arrangement results in the built environment being entirely unshielded from the view along Braddon Road, Douglas Road, and Collins Road. Inclusion of photo montages from the northern viewing corridors would provide a more complete understanding of how the proposed development will interact with the existing landscape and surroundings and the compliance with the WLEP 2010.

The architectural drawings in the provided documentation appear to lack the necessary level of detail (22m stacks mentioned in the emissions and noise assessment report are not located in drawings). Furthermore, fast-acting roller doors suggested for emission and air quality control, now seem irrelevant when considering the presence of windows labelled in the architectural drawings as providing light and ventilation.

Health and Well Being

The application of the precautionary principle, specifically the "Avoidance of Irreversible Harm," to the issue of plastics and plastics recycling calls for a careful and cautious approach by decision-makers and regulators when dealing with plastics, particularly when assessing this proposal.

This approach is particularly important when there is a potential for causing lasting or irreversible damage to the environment and public health, particularly in cases where a comprehensive understanding of the risks linked to plastic and plastics recycling is lacking.

The health impacts of plastic exposure are a topic of ongoing research, and it can be considered an area of emerging science. While the environmental and ecological consequences of plastic pollution have been more extensively studied and documented, the health effects on humans are a relatively newer area of focus.

Plastics are ubiquitous in modern life, and there is increasing concern about the potential health risks associated with exposure to various plastic components and additives, some of the key areas of research and concern related to plastic health impacts include:

Chemical Leaching: Plastics can leach chemicals, such as phthalates, bisphenol A (BPA), and other additives, into food, beverages, and the environment. These chemicals have been linked to various health issues, including endocrine disruption, developmental problems, and potential carcinogenic effects.

Microplastics: Microplastics are tiny plastic particles or fibers that have been found in the air we breathe, the water we drink, and the food we eat. Research is ongoing to understand the potential health risks associated with the ingestion or inhalation of microplastics - exacerbated by the intentional production of microplastics for recycling.

Bioaccumulation: Plastics can accumulate in the food chain, and there are concerns about the potential for plastic particles and associated chemicals to accumulate in the tissues of animals, which may then be consumed by humans. This could have indirect health implications, particularly given the rural food producing location of the Southern Highlands and the potential irreversible impact to the Sydney drinking water catchment.

Research in these areas is ongoing, and while there is growing evidence of potential health risks associated with plastic exposure, further investigation is needed to better understand the extent of these risks and the mechanisms by which they occur. Consequently, it is accurate to describe the study of the health impacts of plastic exposure as an emerging science.

The potential for a plastic recycling facility to release microplastic pollution and possible filtration remediation effectiveness. <https://www.sciencedirect.com/science/article/pii/S2772416623000803>

Chemicals of Concern in Plastics

<https://www.dcceew.gov.au/environment/protection/chemicals-management/chemicals-of-concern-plastics>

Greenpeace - Forever Toxic – The science on health threats from Plastic Recycling 2023

https://www.greenpeace.org/usa/wp-content/uploads/2023/05/GreenpeaceUSA_ForeverToxic_ENG.pdf

Inconsistent with the WLEP 2010

Adherence to the Wingecarribee Local Environmental Plan 2010 (LEP) is crucial for maintaining the integrity and well-being of our community and the environment.

Consistency with the LEP ensures that development and land use practices are in harmony with local goals and priorities, promoting responsible growth, preserving natural resources, and safeguarding the unique character of our region for current and future generations.

The proposal is currently inconsistent with the Wingecarribee Local Environment Plan (WLEP 2010), with particular note -

- (a) to conserve and enhance, for current and future generations, the ecological integrity, environmental heritage, and environmental significance of Wingecarribee,
- (d) to provide opportunities for development and land use activities that—
 - (ii) do not adversely impact on natural systems and processes and the overall quality of Wingecarribee's natural environment, and
 - (iii) retain the critical natural, rural, and built environmental landscape elements that make up the scenic and cultural heritage value of Wingecarribee

(l) to develop an ecologically sustainable future for Wingecarribee through the conservation, rehabilitation, and regeneration of native vegetation (particularly threatened species populations and ecological communities), soil, waterways, riparian land, and water quality (surface and groundwater)

(p) to protect and enhance waterways, riparian land, and water quality in the drinking water catchments of Wingecarribee.

Inconsistent with the WLEP 2010

Zone E4 General Industrial

With Specific note to the General Industrial Zone with in the WLEP, and objectives of that zone, the process and the hazardous materials involved - the proposal should be limited to heavy industrial area with significant buffers between industry and residential areas.

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

In conclusion, the numerous concerns and objections raised regarding the proposed development are well-founded and require serious consideration. From non-compliance with the intended objectives of the WLEP 2010 and Zone E4 General Industrial to the lack of transparency and clarity throughout the project documentation, each issue highlights the need for a more responsible and comprehensive evaluation of the proposal.

Moreover, the lack of comprehensive data, limited to mere assumptions that cannot be entirely anticipated or measured, regarding vital elements such as air quality, noise effects, effluent handling, water needs, and waste disposal, creates a notable level of unpredictability. The potential influence of this project on the identity of Moss Vale, as well as its consequences for local quality of life, extends to the broader community, the environment, and regional resources, all of which justify rejecting this proposal.

Sincerely