

PLEASE NOTE: I have no objection to the publication of my name but do not consent to the publication of my address.

The following submission contains my firm **objection**, to the **SSD – 9409987 Moss Vale Plastics Recycling Facility**

This is to certify that I **have not** made any reportable political donations within the last two years

Kennedy Bird

[REDACTED]

Moss Vale

NSW. 2577

Ms Emma Barnett

Infrastructure and Industry Assessments

NSW Department of Planning and Environment

GPO Box 39 SYDNEY NSW 2001

RE: SSD - 9409987 Moss Vale Plastics Recycling Facility

21st March, 2022.

Dear Ms Barnett,

I would like to register my vehement opposition and concerns regarding the plastic waste facility, Plasrefine, proposed for the township of Moss Vale, for the following reasons:

SITE, SIZE and SCALE:

The community of Moss Vale in particular and the Southern Highlands region in general, is to be severely impacted by the proposal to build a massive, over scaled and oversized plastic waste recycling and processing facility. It is to be constructed on a 19-hectare site within a mere 150 - 200 metres of residential homes, described in the Environmental Impact Statement, as 'sensitive receivers' and less than 1 km from an Early Childhood Centre. Worse still, boundary to boundary, it is only 30 metres distant from the Australian Bio Resources facility – the Garvan Institute, a world recognised medical research facility, reliant on quietness, clean air and minimal noise disruptions, to conduct their research. The location is only 2.17kms from the old GPO in Argyle Street to the top end of Beaconsfield Road, 'as the crow flies.' Any emissions released from the facility would obviously affect the township, given that short distance, dependent on prevailing winds. Any possible emissions would most certainly impact those 'sensitive receivers' located less 200 metres distance, and the Garvan Institute, in particular. Either scenario is completely unacceptable.

The very size of the facility is sufficient to cause alarm, due to its massive scale and bulk. Initial estimations in the Scoping Report, provided 8 - 10 metres in height. However, this has increased alarmingly to an 18 metre (5 storey) facility, which will be highly visible to all in the surrounding areas for some considerable distance, most especially immediate residents, who will suffer considerable loss of amenity. Due to the 24/7 hours of operation for 44 weeks per year, it will become even more apparent at night, when the lighting system (as yet undefined by GHD) will significantly impact the surrounding area and residents, providing a substantial, unmistakable and highly visible glare in the night sky. Assurances from GHD that this lighting system will be located at the halfway mark on the buildings and not 18 metres high at the top, means that lights will still be located approximately 9 metres high on the external perimeter. The projection angle and glare cannot be effectively camouflaged or minimised for safety reasons, to allow for the employees to work effectively.

The following statement by GHD contained on the front page of the Technical Report 6 – Traffic and Transport, is also cause for alarm....["Site conditions \(including the presence of hazardous substances and/or site contamination\) may change after the date of this Report. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this report if the site conditions change."](#) So as residents, we are expected to accept this disclaimer from GHD for unknown consequences that could result from site construction issues. Does that mean therefore that Plasrefine will accept responsibility for such an occurrence? Highly questionable.

The site contains two conflicting zones – C4 Conservation and IN1 – General Industrial. The diagram provided by GHD in the EIS (Fig. 1.2 Technical Report 2 – Noise and Vibration) could at best, be described as a generalised concept outline. It has no details of building scale nor any of the specifics required in the SEARS document and is little more than a mud map, providing very few details. The proponent has completely omitted the last page of the SEARS document requiring very specific particulars. There are no architectural drawings, no scaled building measurements, importantly, no contours and no specifics of the internal design of the factory complex itself and yet the EIS has been released for public scrutiny. It beggars belief that a State Significant Development of this magnitude, could be submitted and an EIS released for public exhibition and comment, when multiple detailed requirements from the SEARS have been completely ignored and conveniently omitted.

WATER:

The 2008 rezoning of the land in question, to industrial, has been heavily relied upon by the proponent and appears to be the sole reason and justification for the construction of a facility on such a massive scale, which results in a considerable adverse impact on the landscape amenity. The land designated for the facility is located within a Category 2 Riparian Zone and within the Sydney Water Catchment area. Plasrefine claims to be able to mitigate any overflows by redirecting the water course, which is highly questionable. During the recent flooding event, this watercourse was above capacity and flowed at a considerable rate across the paddocks. There is no satisfactory method for mitigating such an event and given the rapidity with which climate change appears to be altering our weather events, this type of occurrence could easily become common place. GHD claims that the site is “relatively elevated from regional waterways and as such, not in a floodplain location. However, due to its proximity to local drainage, there is potential for short duration overland flow inundation”.

The recent flooding event was anything but insignificant and although not positioned on a floodplain, it is in fact, located in a flood zone area. Given the unpredictability of this type of event, it could present the very real possibility of a contaminated Sydney water supply, since Wingecarribee supplies 20% of Sydney’s drinking water. The amount of cut and fill required to level the site, such that the facility could be constructed, would reduce this claimed elevation, especially when considering that there is a 4-metre drop in elevation, between Factory 1 and Factory 2. This issue has not been addressed in the report, nor has the associated issue of landslip which is highly probable, given the soil type and the considerable decreased elevation towards Lackey Road.

Therefore, attempting to divert the watercourse from its natural path would provide a temporary measure at best and at worst, could prove catastrophic. A direct quote from a Council DA refusal for the same site in 2019, states: “Refusal was based on the absence of a connection to the sewer and stormwater systems. The council noted the site is flood prone, traversed by watercourses and downgraded.” The DA also contemplated the use of Braddon Road as the point of vehicular access and was “...refused on the grounds that it would generate, by reason of future vehicle movements, a significant adverse impact on the residential amenity and safety of Moss Vale residents of the site.” How then, considering all those constraints mentioned by Council for refusal, does the site suddenly become a viable option?

Plasrefine is proposing to make use of the local water supply in addition to what is harvested via their roof space, although calculations of this so called 80% harvested water, into the tanks provided, only amounts to a 3-day supply. As previously stated, our climate is increasingly unpredictable and harvested roof water, only occurs with sufficient rainfall. Therefore, if our region experiences a severe drought, as occurred in 2019, the 46,300 litres required per day for Plasrefine’s operation, will of necessity, come from our town’s potable water, which is unthinkable. It is highly doubtful that a facility of this size and scale of operations, would close during times of drought and lack of sufficient water for processing. Residents will be operating as previously happened, on tightly monitored water restrictions, whilst because of the industrial classification, Plasrefine will be exempt. This is also unthinkable and completely unacceptable. Some 10,000 litres of supposedly treated sludge will empty into our already at capacity sewer system, which GHD have equated to the same usage as that of 20 homes. The sewer upgrade is not expected until 2027 and with the current Council under administration, the accuracy of this timeframe is highly questionable.

TRAFFIC and ROADS:

Following community outrage, GHD reduced the size of the heavy vehicles specified in their initial Scoping Report, in an attempt to make it more palatable to residents. However, those heavy vehicles will now carry more weight. In preference to 200 truck movements daily with a 10-tonne capacity, Moss Vale will now ONLY have to contend with 100 heavy vehicle movements per day, but with a 20-tonne capacity. Our existing local roads are already in an appalling state and have been the subject of an avalanche of complaints to Council. Plasrefine is proposing to import up to 120,000 tonnes of plastic waste annually, from waste transfer centres in major cities and at last report, additionally from regional centres. The newly proposed plastic waste facility destined for Parkes, is also a State Significant Development of far greater capital expenditure (\$260m) than that of Plasrefine. As it is projected to process some 200,000 tonnes of material during its initial start-up phase, one would have to question the issue of feedstock available for Plasrefine to achieve their anticipated volume of 120,000 tonnes.

As for developer contributions, mitigating ratepayers’ expenses, it appears that Plasrefine has proposed “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 project. A Voluntary Planning Agreement would be put in place between all parties, to transfer the constructed road to Council, for future use as a public road”.

Once the developer contributions have been exhausted, which are specific to the construction of East Braddon Road and land purchase, the burden will become a ratepayer issue for the ongoing maintenance and repair of surrounding arterial roads. This is an untenable situation, given the size, weight and frequency of use by these heavy vehicles, not to mention the additional traffic volumes due to the 240 light vehicles anticipated to be travelling to and from the site.

The entire Wingecarribee community, therefore, will be responsible for the ongoing maintenance, damage and use of what is essentially an industrial road, for an indefinite period, well into the future. This massive daily increase in traffic on our already clogged local roads, cannot be deemed acceptable. Congestion, noise, pollution, vibration and community safety are paramount amongst my concerns, regarding traffic. One proposed route to the site mentions the use of Berrima Road, Lytton Road and Beaconsfield Road, none of which are suited to heavy vehicle volumes. All three roads are Council owned residential streets totally unsuited to daily use by large numbers of heavy vehicles and should under no circumstances, be considered as an alternate route to the industrial site. It is also concerning that once these vehicles are in operation, there will be no enforceable means of ensuring that those vehicles abide by the predetermined routes. As with any long haulage enterprise, truck drivers almost always opt for the shortest possible route which will translate to the use of local roads and subsequent further degradation.

Interestingly enough, GHD made use of those specific roads when conducting their traffic analysis studies on 5th, 6th and 7th December, 2020 at a time when Covid restrictions were in place. Most people were working from home, schools were not operating at full capacity and the roads were practically empty, particularly on December 6th which was a Sunday. Therefore, these figures cannot represent an accurate assessment of traffic numbers. The study was conducted at the intersection of Berrima, Gibbons and Lytton Roads, which would call into question assurances from GHD that heavy vehicle movements would be restricted to Taylor Avenue, thence onto Berrima Road and exiting onto Douglas, Collins and Lackey Roads. Perhaps a more updated traffic study at the intersection of Berrima and Douglas Roads, constantly referred to as the preferred designated route, would provide a more accurate assessment.

GHD has assured residents that there will be no queueing on local roads, therefore eliminating associated pollution and noise issues and that all heavy vehicles will be fully contained onsite and within the factory complex. However, there are no allowances for this occurrence on their diagram outline. There is one truck parking spot, excluding the fire truck allowance and 74 car spots. GHD has attempted to persuade the community that not only the trucks, their noise, pollution and vibrations but also any production emissions, will be sealed off due to the 'fast acting roller doors' designed for this specific purpose. This would prove to be an interesting exercise, given the slow speed of entry, necessary for entering and exiting to ensure adherence to OH&S regulations for employees working within their close vicinity, in addition to consideration of the length of each vehicle. There would, by necessity, be several factors of influence, due to these vehicles emanating from different centres of origin, at different times and on different routes. Since the deliveries are intended to occur between 7am and 6pm, this exercise would need to be expertly organised, monitored and fully controlled as there is no room for error. Community members have also expressed concerns and doubts as to the validity of this exercise, particularly since the 19 metre long, 20 tonne heavy vehicle to which GHD refers, does not actually exist. On questioning recently, at a community engagement session, neither Nanxi Zheng, the Director of Plasrefine nor GHD, could supply any details of the trucking companies to be used, nor their respective safety records, which was rather surprising since the proposal has reached the stage of their EIS having been released for public comment. Far too many questions, anomalies, conflicting statements and not enough specific information.

Fire Hazard and Emissions:

There are a multitude of examples both within Australia and overseas, where plastic recycling facilities have caught fire and burnt for days and weeks, emitting highly toxic carcinogens over surrounding areas. Moss Vale experiences predominantly prevailing westerlies, particularly during winter. As recently as winter 2021, we had several days where the township experienced winds in excess of 65kms per hour. Emissions and toxins from a factory fire the size of what is being proposed, would reach as far as outlying Sydney suburbs, if propelled by winds of this nature. GHD have made assurances that Plasrefine will install four carbon filters within the facility and that, in their own words, "there will be no emissions" Much of the new technology purported for use by the facility, has never been trialled in Australia and with a facility as large as the Plasrefine proposal, within such close proximity to homes and more especially to the Garvan Institute, this is extremely concerning, particularly in the event of a fire.

In July, 2021 a fire destroyed several shops in the township of Bowral. It took 30 firefighters over 4 hours to completely extinguish the blaze. Brigades had to be called in from as far away as Campbelltown to assist, as the resources at Moss Vale were not sufficient to cope, with a fire of that magnitude. Imagine by comparison, a Plasrefine factory fire in the 9 ½ acre complex. Highly flammable and toxic material would create billowing carcinogenic fumes and smoke to travel kilometres over surrounding towns, villages and Sydney suburbs, for the length of time required to extinguish such a blaze. In the GHD Technical Report 5 – Fire and Incident Management Review it clearly states that:

“The sprinkler system would be designed for High hazard classification.

Sprinkler water supply time would be at least 2 hours.” One could ask therefore, if the facility is not classified as hazardous, why has the sprinkler system been designed to combat highly hazardous material?

As evidenced in the aforementioned quote, the size and volume of a full-scale factory fire in the Plasrefine facility has only allowed for 2 hours of sprinkler water supply time. In view of the evidence from the Bowral retail fire, even taking into account the contribution of the Moss Vale brigade, the onsite allocation of water is clearly insufficient.

The local community was assured in the initial engagement sessions, that no hazardous chemicals would be stored onsite, that there would be no heating of the plastic and that emissions could be safely eliminated with advanced technology carbon filters. We have since learned that chemicals such as turpentine and eucalyptus (highly flammable), amongst others, will in fact be used during the washing process, to eliminate odours. Despite assurances that these chemicals will be diluted, that process will not take place until after delivery so those highly flammable materials will be delivered in their concentrated form and since it would be virtually impossible to ensure dilution immediately upon arrival, storage would be necessary. That, therefore, should be classified as hazardous material and appropriate restrictions and safeguards installed, including regular inspections by the regulatory authority as a minimum requirement. No such inspections appear anywhere in the documentation with the exception of “an annual audit” to assess air quality. For material with the propensity for such volatility, this is an extremely unsatisfactory and concerning arrangement. Residents have also been informed that Plasrefine will in fact, be melting the plastic waste to a temperature of 280 degrees, which would necessitate the installation of a furnace, with associated issues for OH&S. Again, no such regulatory measures are mentioned in the EIS

Social Impacts and Community Consultation:

Wingecarribee Shire has not been included in any of the plans by GHD, for accepting plastic waste for recycling. However, the Plasrefine facility has stated their intention to transfer sludge waste material from the factory to the Bowral Waste Centre, in clear contravention of EPA guidelines for the removal of such hazardous material. Our Southern Highlands community is simply expected to become the dumping ground, for a massive plastic waste recycling facility, offering minimal local employment and with no real benefit to the township of Moss Vale and a multitude of extremely serious ongoing repercussions and problematic issues. Although not officially required, a Social Impact study is most definitely needed, given the enormity of community concerns and the poorly presented documentation contained within GHD’s Environmental Impact Statement. The EIS is littered with vague terminology and assurances, using wording such as...”anticipated, likely, expected” This has done nothing to allay fears from residents that the impacts of the Plasrefine SSD, will not be properly realised until it is fully operational, by which time, it will be too late to combat.

Throughout the various EIS reports, many of which contain conflicting information and inaccurate calculations, the community is expected to rely on assurances from a company which has done nothing to date to foster cooperation, empathy, nor understanding amongst residents. On the contrary, residents have become increasingly alarmed and suspicious resulting from the constantly evolving assurances and changing information provided by the proponent. Community engagement sessions have been carefully engineered to eliminate opposition as much as possible. Although GHD has given the ‘appearance’ of accommodating community concerns and answering questions, carefully micromanaged events have been the order of the day. Following recent community pressure, and after almost 2 years of interactions between GHD and various members of the community, it was not until the most recent community engagement sessions, at the beginning of March, that residents were afforded the opportunity to directly engage with the Director of Plasrefine, Ms Nanxi Zheng. These sessions were conducted at a venue outside of the Moss Vale town limits and of the 6 sessions available, only 1 was arranged after hours, to accommodate working members of the community, despite requests on 3 prior occasions, for a local venue. There was also an online session, which was attended by those who were able to access Internet services unaffected by the severe weather event at the time. Due to the location and nature of the venue, for the in-person sessions, organised when most residents were still preoccupied with unprecedented flooding issues, attendances were quite small. By comparison, however, at our own community session held in the Moss Vales RSL Club on Wednesday, 16th March, we achieved an attendance in excess of 100 members.

It is obvious that Australia is in urgent need of solutions to the increasing problem of plastic waste. However, the location for such an enterprise as the Plasrefine proposal, is simply not the right site and the application needs to be withdrawn.