

**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

I **have not** made any reportable political donations within the last two years

**Kay Jones**

**[REDACTED]**

**Moss Vale**

**NSW. 2577**

Ms Emma Barnet.

Industry and Infrastructure Assessments.

NSW Department of Planning and Environment

GPO Box 39

Sydney NSW 2001

Re: SSD - 9409987 Moss Vale Plastics Recycling Facility

The following submission contains my firm objection, with accompanying reasons, concerns and associated photographs regarding the Moss Vale Plasrefine facility (SSD - 9409987) I declare that I have not made any reportable political donations within the last two years.

Dear Ms Barnet,

**Site:**

I have lived in Moss Vale for many years and wish to register my profound opposition to the Plasrefine proposal. If approved, this development would be an enormous, intrusive blight on what is essentially a rural landscape. Although zoned industrial, the site is totally inappropriate for a facility of the size and scale of what is being proposed and has no infrastructure in place. The proposal fails to minimise the visual impacts from adjoining and nearby residential properties. The proponent has submitted their intention to construct a massive complex that will be five storeys in height (18 metres), with two huge factories of 7.7 hectares, having a roof space of approximately nine and a half acres. This constitutes excessive site coverage. In contravention to the SEARS requirements, no detailed architectural plans, or drawings and diagrams have been provided.

The site is located on a category two riparian zone, which is situated within the Sydney drinking water catchment and is prone to flooding. During the unprecedented weather conditions recently experienced, the rate of flow of this water course across the open paddocks, increased and widened from its natural boundary and was extremely fast flowing. This is the same water course that GHD have proposed to divert, which would prove extremely impractical. The climate of the Highlands, as with other localities, has become increasingly unpredictable. As such, the proposed diversion therefore, cannot be guaranteed to be a permanent solution, as it would revert to its original course during flood times and flow into the Wingecarribee River and Sydney's water catchment.

**Location and Impact:**

GHD have indulged in several misleading statements in the EIS. The intended complex is indeed located within the town boundary, contrary to information presented by GHD and as emissions travel by air and not road, to the top end of Beaconsfield Road, is a distance of 2.17kms. The site is also some 150 - 200 metres from the nearest residential homes. The facility has no access and is reliant on acquiring land from the Garvan Institute, (a world recognised research facility), to construct an access road. The figures and measurements quoted to Garvan, are, in my belief, totally inaccurate. The access on East Braddon Road from Lackey Road for construction, would require far more than the 13-metre width stated and no allowance or specifications of a turning entry and exit, have been included. Given that Plasrefine is proposing to use 20 tonne heavy vehicles, I would have assumed that this information was not only essential, but critically important for assessment purposes. It would need to be provided to the Garvan Institute in order for them to make an accurate evaluation when considering the extent to which their land is required for road construction and its inherent value, should a sale be considered.

GHD have consistently referred to Beaconsfield Road as their 'legal access' to the Plasrefine facility. At the most recent community engagement sessions and additionally at previous sessions, mention was made of the intention to use Beaconsfield Road for construction of the East Braddon and Braddon Road access. However, once constructed, in an estimated one - two months (not feasible given the gradient, additional reinforcement embankments and landscaping required), GHD have assured the community that Beaconsfield Road will no longer be used. It is my assertion that Beaconsfield Road should not be used for either construction nor permanent access. It is a narrow residential road not at all suited, to multiple heavy vehicles using it five days per week for the stated 44 weeks per year of operation. The verges are currently in a seriously deteriorated state, made worse by the recent flooding, as evidenced by the enclosed photographs. There are no footpaths for pedestrian access. A pre-school centre is located midway with minimal parking

available and the road itself is frequently used by a wide variety of community members - school children, horse riders and pedestrians. Therefore, it is not only extremely unsuitable, but also dangerous, to consider the access of Beaconsfield Road for any purpose other than its current use by local residents.

### **Traffic Impacts:**

I find it extremely concerning that the Plasrefine proposal plans to import up to 120,000 tonnes of plastic waste from major cities throughout the country, using our small country township as a virtual 'dumping ground' but with no inclusion of any waste material from, nor any direct benefit to, Wingecarribee Shire. Due to the highly publicised use of robotics and modern technology proposed, there would seem to be very minimal employment opportunities for locals in this facility. However, major use of our already congested local roads which are in an appalling state, has been proposed. These roads are not designed to take the volume or capacity of heavy vehicles being suggested, on a daily basis and well into the future. They are in urgent need of upgrading and repair which is unlikely to occur in the near future and once the developer contributions have been exhausted, it will be up to ratepayers to fund any repairs or upgrades required, for little or no local benefit. This situation is untenable and cannot be allowed to occur. There are serious concerns for the welfare and safety of local residents with the proposed increase in traffic, not just from the heavy vehicles, but also from the anticipated 240 additional light vehicles accessing the facility, on a shift work basis.

There is no guarantee that the truck drivers employed by other firms, will operate within the parameters set by GHD in regard to the designated routes. Given that many of these will involve long haulage, it is far more feasible that drivers will take the shortest, most direct and time saving route to the facility which in turn, means a severe impact on local residential streets and the associated dangers. There are no means of effectively controlling or preventing this from occurring, once the facility is fully operational. By necessity, these heavy vehicles will be diesel combustible engines, not electric and the subsequent noise emanating from them, significant. Engines will be left idling whilst in a holding pattern for entry to, and exit from, the facility. If the East Braddon Road access becomes viable, it entails a steep incline, which will also mean changing gears several times, both entering and exiting with associated noise and vibrations. None of this would be acceptable to local residents, with those residing closest to the facility being the most impacted, in addition to the deleterious effects on the Garvan Institute.

### **Water Issues:**

GHD have made several concerning alterations to their statements regarding water usage and their plans to mitigate the overuse of our town water supply. I believe this to be purely a public relations exercise to appease residents and make the proposal more palatable. From stating initially, that they would require 40,000 litres daily of potable water including roof water harvesting to wash and process the plastic, it then changed to 46.3GL This is in actual fact, 46,300 litres per day, which is a significant increase. They have claimed that their nine and a half acres of roof space will harvest 80% of requirements. However, provision has only been made for 150,000L of water storage amounting to a three day supply. I would question the validity of their calculations. Additionally, if the Highlands experiences long periods of drought as in the past, there will be little to no water available and I can only assume that in preference to closing the facility, it will revert to relying on the town water supply. Residents would no doubt be placed on water restrictions during that period, which unfortunately will not apply equally to the facility. My other major concern is that during a bushfire, also experienced in this area as recently as 2019, every drop of available water is needed. There is no allowance for excessive usage for other purposes, most specifically for a facility that relies so heavily on such huge quantities of water usage to conduct its operations.

### **Fire and Emissions:**

On multiple occasions both within Australia and overseas particularly, plastic recycling facilities such as what is being proposed, have experienced quite significant fires with resultant highly toxic fumes emanating over large tracts of land for hours and in some instances, for days. Wingecarribee Shire does not have the facilities to combat an industrial fire within a factory complex of such a massive scale. It was only in recent months that we experienced this specific event, when three retail premises caught fire, in Bowral. Additional assistance had to be provided from brigades located as far away as Campbelltown, which took a significant amount of time. Our community simply does not have the resources to combat such a catastrophic event, should one occur. The toxic plastic carcinogenic emissions would be enormous and as our township is infamous for prevailing westerlies, these dangerous emissions would travel huge distances, perhaps even as far as the outlying suburbs of Sydney. There are a multitude of reasons why the site proposed for the construction of the Plasrefine facility is simply not suitable and the proposal needs to be rejected. It is not the right site.

The proponent should withdraw their application and relocate to an area that meets the specific site suitability demands and ensure that they properly address ALL requirements of the SEARS prior to submitting any further applications.

Kind regards,

Kay Jones.

Photo 1. The proposed site on what is ostensibly rural land, despite the zoning



Photo 2. Depicts the top end of Beaconsfield Road looking south





Photo 3. Depicts the topmost part of what will form the East Braddon Road access which will cross Beaconsfield Road and join the Braddon Road access west, to the Plasrefine site.

