

I Danuta Hulajko, Manager DH Natural Medicine Clinic at Moss Vale object to SSD-9409987, Pasrefine Recycling Pty Ltd development

### **Section 7.5.1 of the EIS**

This section lists 6 types of plastics and polymers which will be crushed (powder will be in there), melted at a high temperature and molded into new plastic products. I cannot find anywhere in the EIS how the proponent is going to address this. The Material Safety Data Sheet (MSD) for each of those plastic is discussed in great details in my submission as the resident of Moss Vale. Two of plastic proposed for recycling (PP and ABS) are potentially explosive in the powder form. Other byproducts like plastic sludge is deadly to the environment (water, wildlife, humans, soil) and cannot be disposed just anywhere like in Bowral waste facility as GHD report suggests.

The proposed development is not a General Industrial but Heavy Industrial (toxic and hazardous). Therefore the proposed Development is therefore not permissible use within the IN1 General Industrial Zone of the Wingecarribbe Local Environmental Plan 2010.

### **The State Environmental Planning Policy 2011 No 511:**

The proposed Development is therefore not suitable use under the State Environmental Planning Policy 2011 No 511 and includes the Chapter 6B of the *Occupational Health and Safety Regulation 2001* for the following reasons:

The proposed development is located:

- Less than 2 km from the Town Centre of Moss Vale.
- Less than 1 km from residential suburbs of Moss Vale.
- Less than 200 m to the first residences.
- Directly adjoining Primary Production Small Lots area.
- Less than 1 km from Early Childhood Learning Centre.
- There are a number of archaeological sites including Aboriginal Sites of heritage values.
- There are only local roads and no any major thoroughfare easy accessible.

The Environmental Impact Statement (EIS) does not address adequately any possible hazard:

- No buffer zone for air quality and odour.
- No buffer zone for noise and vibration.
- No buffer zone for fire hazard
- No plan for evacuation in case of any accident including surrounding residences as well as future employees.

Figure 12.4 and 12.5 Noise Contour is modelled on the way to avoid residential suburbs. There is no natural barrier or any other barrier, so obviously that contour on both maps intentionally modified.

Instead of identified hazard zones, the LES stated as the potential cumulative hazard (page 284):

- Noise and vibration - **1.6 km radius** surrounding the proposed plastic and reprocessing facility site,
- Air Quality and odour – **1.2 radius** surrounding the proposed plastic and reprocessing facility site,

- Landscape and visual – **2 km radius** surrounding the proposed plastic and reprocessing facility site,
- Aboriginal and cultural heritage – **10 km radius** surrounding the proposed plastic and reprocessing facility site,
- Biodiversity – **10 km radius** surrounding the proposed plastic and reprocessing facility site.

Please note that the significant residential areas within the Moss Vale and the surrounding rural residences as well as Early Childhood Learning Centre and other facilities will be significantly compromised if the proposed plant will be approved.

In addition, the local road network in the vicinity of the proposed site including Berrima Road, Douglas and Collins Roads, Lackey Road, Bulwer Road, Lytton Road, Beaconsfield Road, possible other local roads and adjoining residences will be significantly affected by heavy vehicles traffic.

The plastic recycling and reprocessing site is therefore completely unsuitable for the proposal for the following reasons:

- The proposed use is inconsistent with the objectives for the IN1 General Industrial zone of the Wingecarribbe Shire LEP.
- The use is not permissible within the IN1 General Industrial zone under the provisions of the provisions of the Wingecarribbe Shire LEP.
- The proposed use is inconsistent with the State Environmental Planning Policy 2011 No 511 which includes the Chapter 6B of the *Occupational Health and Safety Regulation 2001*.
- The proposed use would create significant affectation on local traffic and surrounded residences by heavy vehicles traffic.

### **Guidelines for Riparian Corridors on Waterfront Land**

It is proposed to realign thee eastern watercourse, however the flood modelling is not based on the current trend of heavy rains since February 2022.

### **Consultation Process with the GHD**

The public consultation process with the GHD was totally inaccurate and few meetings at the Community Hall at Exeter were restricted to only 25 people. The local community was discouraged to comment or ask questions.

### **Conclusion**

The proposed development is unable to operate without significant hazardous impacts on the surrounding residential and Environmental Living (E4) suburbs, the Southern Highlands region, roads and the environment. The EIS is concentrating only on a number of superficial mitigation and management methods rather than admitting that the site is completely unsuitable in this particular location. In addition social and environmental costs significantly outweigh any benefit, and as such it is not in the public interest. The whole EIS is full of errors, mistakes, inconsistencies, and

technical inaccuracies and therefore the proposal cannot be taken seriously the proponent should withdraw the application.