



Attn: Emma Barnet  
Industry Assessments  
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PARRAMATTA NSW 2124

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

I am making a submission in opposition to the above-mentioned State Significant Development by Plasrefine Recycling Pty Ltd.

Whilst in principle and practice, I support the recycling of plastics and the need for responsible management of Australian plastic waste, I believe however, the impacts and constraints associated with this site and the proposal itself are incompatible.

**My reasons for my opposition to this proposal are as follows but are not limited to:**

**Suitability of site – unsuitable location:**

Had the required due diligence had been undertaken early in the scoping process, it would have been evident that this site was unsuitable for a proposal / concept of this size and scale. Given significant environmental, access, infrastructure and location constraints, it appears this site was purchased without the proper consideration and feasibility required for a proposal of this size, was this irresponsibility on behalf of Plasrefine or simply an indication of inexperience?

- This site, with the above noted constraints is literally undevelopable with out impacts to the waterways.
- The proposal site is located within the Sydney Drinking water Catchment. This Catchment covers 16,000 square Kilometres and services more than *four million people* in Sydney, Wollongong, Goulburn, Lithgow, the Blue Mountains, Bowral and Nowra.
- Much of the Shire falls within the Sydney Drinking Water Catchment area, and the integrity of this catchment is critically important to the residents and economy of greater Sydney and NSW.
- Significant waterbodies located within proposed site - re-alignment of the natural flow could have deleterious effects further downstream.
- Land-use conflict, the EIS fails to appropriately address the surrounding land use and mentions only the industrial surrounding land.
- Failing to adequately consider impacts to the Conservation Zoning (C4) and the Rural Zoning (RU2) of the immediate neighbours and in fact has the wrong zones in the mapping in the EIS, showing a reliance on outdated mapping.

- The EIS has failed to address existing and future land uses and how the proposed traffic management plan for both construction and operation routes will impact these.
- The proposed site is within Moss Vale, and within 1.5kms of a rapidly growing residential area with hundreds of residents, school and a childcare centre.
- It is within 3 km of St Paul’s Catholic Parish Primary School and a bus route that services local schools and shopping centres.
- If approved, and at full capacity 120,000 tonnes per year, this proposal would be one of *the largest facilities of its kind in Australia*.
- To place a facility of this size and scale within Moss Vale (not 3kms to the north of Moss Vale as per the scope)—and within a rapidly-growing residential area with families, schools and childcare centres is simply unacceptable.
- There has been no clear, logical or convincing explanation for why this site in Moss Vale was selected, over and above other potential sites in NSW.
- There is no evidence of a facility or proposal at a similar scale and capacity that is or would be located within a similar zoning/adjacent to a residential area as the Plasrefine proposal.
- The scale of this enterprise is enormous and is entirely inappropriate for a small area like Moss Vale.
- Topography of the land, as noted in the EIS and by their own admission state “The topography is undulating”
- Lack of infrastructure: the SEARS clearly states:  
*‘details of road upgrades, infrastructure works, or new roads or access points required for the development.’*
- These details are lacking, in some cases missing all together.

### **Traffic and Road Impact**

During the period of EIS preparation, the traffic and the proposed haulage routes changed multiple times, from scope to engagement, sometimes changing within a week causing unnecessary duress and anxiety within the community.

- For Beaconsfield Rd to have originally been proposed in the scoping report as the *daily access route* for heavy vehicles to and from the site (45 semi-trailers bringing mixed plastics to the proposed site, 15 semi-trailers exporting plastic products from the site, and 35 personal vehicles) clearly demonstrates the proponent and GHD’s lack of familiarity with the site and location. This does not inspire confidence in due diligence or obligations to properly assess sites before preparing formal planning documents.
- Continued suggestion that Beaconsfield Road (along with Lytton Road) is suitable to use for construction is ridiculous, safety aspects alone should be enough to have had any reasonable traffic assessment finding need of an alternative. Yet GHD continue to state to the community, use of their “Lawful Access”
- Wingecarribee Shire Council has stated they do not support the use of Beaconsfield (and for surrounding local road network) for either construction or operations of the facility 17/03/22.

Further concerns as follows:

- Uncertain and unsuitable access arrangements for the anticipated vehicle movements — no agreement with The Garvan Foundation or the owners of 77 Beaconsfield Road, has to date been reached.
- Vehicle numbers are inconsistent and truck numbers are under quoted and in one instance is incorrectly calculated (100 truck movements divided by 11hr period = 9.9 not the stated 6 movements per hour)
- Assumptions regarding the actual vehicles proposed to be used and load size of the heavy vehicles accessing the facility Plasrefine would have little to no control over what size vehicle a contractor company may be driving
- Delivery routes are at best assumed, the EIS contains a traffic assessment and haulage routes, however given private contract drivers will be operating the heavy vehicles it is not practicable to assume they will abide by the nominated haulage route, and not impact on Moss Vale township or surrounding local streets.
- Failure to provide any logistical management, which would have been expected in an Operational Management Plan (not included in the EIS), particularly in regard to vehicle access flow, to ensure that there are not significant vehicle queues at the choke points on local roads and on the facility access roads and as clearly stated in the SEARS is the requirement :

*“plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network.”*

- Photos used in the traffic assessment, are in some cases not even the correct location.
- Questionable traffic study: - conducting a survey during covid restrictions, work at home orders, home schooling in Dec 2020, and pre covid migration, is not reflective of actual traffic movements in the area in 2022.
- Failed to undertake a full assessment of Lackey Road, swept path and required upgrades to road infrastructure to accommodate the heavy vehicles turning in to and out of the new access road.
- Failed to provide any actual design of the proposed access extension, to allow proper assessment of the road and operation, safety and impact to The Garvan Foundation Facility of Australia Bio Resources
- Including proof of consent from affected owners.
- Failure to address inadequate existing road infrastructure or lack thereof, many roads will need to be upgraded to sustain the increased traffic that will be generated by this proposal.
- Lack of infrastructure: the SEARS clearly states:  
*‘details of road upgrades, infrastructure works, or new roads or access points required for the development.’*

## **Design and Visual**

- Lack of appropriately detailed drawings and survey plans do not allow for proper assessment of the proposal, and thus extend to informed assessment of water and soil / air quality / noise and vibration / waste and stormwater management given the impact that poor design would have on the outcomes.
- Lack of technical details of engineering / cut and fill and topography make it almost impossible to understand the impact the buildings will have on the residents, surrounding land users and overall development of the site.
- GHD appear to Dismiss the MVEC / SHIP Development control plan, as not required in the SSD process, but are happy to site and use when it benefits.
- The MVEC DCP clearly states the location of the site falling into the Enterprise Precinct noting:  
*“The Enterprise Precinct includes land at and near the interface with the Moss Vale township and existing light industrial development. This precinct will facilitate a transition between residential uses and heavier industrial uses across the northern parts of the Enterprise Corridor. This precinct will accommodate a mix of light industrial and commercial office uses.”*
- The site also identified as being a Potential Constraint Area (being a natural watercourse and riparian zone)

## **Further concerns:**

- Detail included in the Plasrefine EIS regarding the proposed facility design is demonstrably absent.
- Survey provided is perfunctory at best.
- The minimal design details of the proposal appear to fail and does not alleviate any visual building bulk on neighbouring properties
- The overall scenic quality and amenity of the rural landscape particularly having regard to its excessive height and bulk.
- The proposal is a complete overdevelopment of the site, in particular the excessive site coverage (6ha of a 7.7ha site)
- In respect to building 1, noted to be 12.4m high and at an RL of 672, the contour of the land shows a drop to 665 in the adjoining land, indicating the siting of the building could give the visual impact of being 19.4m high.
- Complete failure to provide detailed documentation of the siting of the facility in relation to engineering and cut and fill required to locate the buildings and access to the buildings given the considerable undulation of the land in question.
- The Stormwater and Hydrology fail to consider the overland water flow and the undulation of the adjoining C4 land minimising the known flood impacts, whilst it doesn't sit in a flood plain, the land is considerably affected by water inundation and is prone to flooding.
- Consideration must be given to mitigation failure in relation to water, failure of detention basins in extreme weather events would likely to impact the Wingecarribee River system.

## **Community and Stakeholder Engagement**

The community engagement process conducted by the proponent and GHD to support this proposal has been to date demonstrably inadequate.

- GHD has made no real genuine or authentic attempt to engage with the community or stakeholders.
- This is evidenced by the number of emailed/telephone complaints and objections that have been made to GHD/Plasrefine, the DPIE, Wingecarribee Shire Council (WSC), Wendy Tuckerman MP.
- There would be little need for people to resort to such lengths if there was any kind of relationship between GHD and the community.
- There was no engagement by the actual proponent until recently, and that interaction hardly instilled confidence in the company who would essentially be running the largest waste processing facility in Australia, so close to homes.
- GHD's most recent in-person sessions were held in Exeter, 12kms from Moss Vale, in a venue with a capacity to hold over 100 people, however sessions were limited to 25 pax and one person per household, how is this effective and meaningful engagement with a community?
- GHD ignored requests for sessions to be held in Moss Vale later once impacts of floods had reduced, and within a reasonable area/radius of the proposed site, that also had access to public transport, but was refused, citing issues with booked venues and the need to limit alcohol.

## **Social Impact**

- Due to the absence of a meaningful undertaking of social and economic impact, it is difficult to see what community benefits this proposal brings to the community of Moss Vale.
- The purported jobs are questionable and given the automated nature of the plant the numbers are essentially an assumption.
- The proponent has stated numerous times in meetings and the media (including the scope) that suitably qualified staff would be sought from overseas and the need for actual labour would be minimal.
- Impacts v benefit:- clearly show the impacts outweigh any benefit the proposal may provide.

For the reasons outlined above, this proposal is clearly incompatible with the site and provides no real benefit to the community and as such the proposal should be refused.

Sincerely



References:

**Richards. D : A big blue in a small Southern Highlands town over a giant plastics plant. The Sydney Morning Herald 2022 Jan 13, Environment Sustainability.**

- <https://www.smh.com.au/environment/sustainability/a-big-blue-in-a-small-southern-highlands-town-over-a-giant-plastics-plant-20220111->

***Liu B, Achenza M, King C. : Plastic Factory Unwrapped. The Southern Highlands Express 2021 May 1, issue 50, Pg 8-9.***

<https://online.fliphtml5.com/kbufk/otyg/>

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