

19 March 2022

Director—Industry Assessments, Planning Group  
NSW Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

**RE: SDD-9409987 Moss Vale Plastics Recycling Facility—EIS Submission**

Dear Sir/Madam,

I am making this submission to express my concerns about the Moss Vale Plastics Recycling Facility project, in relation to a range of potential adverse environmental and social impacts associated with the proposed development.


I would not be directly affected by the proposed development and I have no financial or other direct interest in any of the properties in the vicinity of the proposed development site, nor have I made any political donations. As a resident of the Southern Highlands, with a young family, I am concerned about the potential impacts that may result from the construction and operation of the proposed development, and want to ensure that the consent authorities scrutinise all details of the application, to avoid the approval of an inappropriate development that would have long-term impacts on adjoining properties and the wider community.

I support the development of a plastics recycling facility in the region, in principle, and believe that it is critical that we effectively manage the growing problem and impact of plastic waste. However, it is equally critical that in addressing one problem, we don't create others. After reviewing the Environmental Impact Statement (EIS) prepared for the project, including the Technical Reports, I feel that the proposed development, in its current form and in the proposed location, would result in too many potential adverse impacts to the local community and the environment and do not believe that the location or scale of the proposed development is appropriate. On that basis, I do not support the current proposal.

The EIS concludes that 'the proposal has the potential to result in minor increases in traffic, noise, air quality and amenity impacts'. I disagree that these potential impacts could be considered 'minor' and request that further information about the nature and extent of the full range of impacts that would likely result from the project be considered by the consent authorities before any approval is considered.

**Location**

The proposal site is located within the boundary of the Southern Highlands Innovation Park, a precinct that has been earmarked for industrial and 'employment generating' development to promote economic



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growth in the region. The proposed development it is located right on the edge of the precinct that is closest to the Moss Vale township, and relatively close to residential areas. The proponents note that this site was chosen because it was available for purchase at the time. If the development was to be located within SHIP, it would be much better suited further to the west, away from existing residential areas, and in a larger site that allowed for increased separation from neighbouring properties, not just the site that happened to be available at the time.

### **Bulk and scale**

The proposal appears to be a major overdevelopment of the site. The concept plan presented in the EIS indicates the massive bulk and scale of the proposed facility, covering the majority of the site. No design detail has been provided or suitable mitigation measures to minimise the visual impacts from the excessive height and bulk of the facility. The EIS Landscape and Visual report acknowledges some of the visual impacts that would be created by the enormous facility but notes that these impacts would likely be diluted over time as adjacent sites also become developed for industrial purposes. This feels like an irresponsible and defeatist approach to development planning!

### **Emissions**

The EIS states that the reasons why the proposed facility is so large is to fully contain the operations that have potential to emit hazardous chemicals. I am very concerned about the potential for contamination from the proposed operation of the facility on the local environment, including impacts on air and water quality.

The EIS acknowledges that the operation of the plant would result in a range of toxic emissions that would have some impact on nearby properties, including VOCs and particulate matter, but concludes that these impacts would be within acceptable limits. Given the toxic nature of the material that would be processed at the site, the theoretical modelling that has been used without detailed specifications of proposed machinery, and the potentially serious impacts to the local community and environment if this modelling is wrong, I implore the consent authorities to scrutinise the proposal to ensure that sufficient technical detail is provided to ensure that all assumptions are correct, that any potential impacts would be minimised, and that every effort is made to ensure that any potential impacts would be suitably mitigated if this development were to proceed.

### **Water**

The water modelling presented in the EIS indicates that the local water supply network and wastewater treatment plant are already overloaded or reaching capacity and that several major water projects are required to address existing and projected needs of the community. The introduction of such a water-hungry facility into a network that is already under pressure at this time would be premature and irresponsible. Greater consideration should be given to water recycling options for the facility to reduce pressure on the broader water supply and wastewater system, wherever the development is to be located.

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### **Traffic**

The proposed development would have significant impacts on local traffic volume, with associated noise impacts and safety impacts and increased pollution. The modelling shows that the number of trucks that would travel to and from the site daily is staggering, and solutions for managing this increased traffic are not well resolved in the EIS. A facility of this nature and scale would be much better suited to a location that is connected to a freight rail line, to minimise any increases in traffic movements on local roads.

### **Conclusion**

On this basis, I believe that the proposed Moss Vale Plastics Recycling Facility project has potential to have greater adverse environmental and social impacts than those identified in the EIS. I do not support the current proposal, and request that the consent authority seek further information about the nature and extent of the full range of impacts that would likely result from the project before any approval is considered.

Yours sincerely,

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[REDACTED]