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SUBMISSION, MOSS VALE PLASTICS RECYCLING FACILTY
APPLICATION NO SSD-9409987
74-76 BEACONSFIELD ROAD MOSS VALE

Dear Sir or Madam

I wish to lodge my objection to the application for the proposed Moss Vale Plastics Recycling Facility, Application No SSD-9409987.

While I respect the importance of recycling, my objection to the Application is based upon the following:

Lack of Appropriate Community Consultation

The agent for the proponent GHD has done everything in its power to avoid meeting with the community to discuss the proposed facility. Initially it aimed to consult on a limited basis online. Face to face meetings with the community have only occurred after the intervention of the local member of Parliament.

At its community consultation in December 2021 at the Moss Vale Services Club (which I attend), GHD structured the 'community engagement' session in such a way that residents could not speak and address questions to GHD personnel. The fact that GHD employed security staff who stood over those residents who attempted to ask questions to GHD staff demonstrated GHD's (and by association, the proponent) contempt for the community.

The recent 'community engagement' sessions held in the week beginning Monday 7 March 2022 were held when the Highlands was flood and storm affected, with damage to homes and local roads. This meant that many residents were unable to travel to the village of Exeter (some distance from Moss Vale) where the meetings were held. This again demonstrated GHD's disingenuous behaviour and lack of real intent to meet with and engage the community.

Inappropriate Location

The proposed plastics recycling facility is in the wrong location.

- It is too close to (ie within the boundary of) the township of Moss Vale
- It is too close to 2 schools (Moss Vale Public School and St Paul's International College)
- It is too close to an early childhood centre (Southern Highlands Early Childhood Learning Centre)
- it is too close to the Garvan Institute for Medical Research
- It is too close (ie adjacent) to residential properties.
- It is too big in scale and scope for the proposed location (especially given that the facility will not only recycle but manufacture, which would include stockpiling)

- The large scale and scope of the proposed facility would negatively impact upon Moss Vale township property prices, given its proposed location within the town boundaries
- The proposed facility would present a negative visual impact, in spite of any planned landscaping to 'screen' the facility
- There is **no** existing infrastructure on the proposed site and no servicing capacity (eg water)
- The facility intends to operate 24 hours a day, 7 days a week. This is inappropriate given the proposed facility would be situated within the boundaries of the Moss vale township.

Access

There is currently **no** road access to the proposed site of this facility either from Beaconsfield Road or Lackey Road Moss Vale.

Roads

Beaconsfield Road Moss Vale, and its feeder roads are local, residential roads.

These local, residential roads are not suitable for heavy vehicles, either during the construction phase or during the 24 hour a day, seven days a week facility operation.

The typography of the land is also detrimental to the construction of another road to access the site, especially near the Garvan Institute (ie the proposed Braddon Road).

I understand that the proposed facility would require the acquisition of privately owned land in order to access the site. To my knowledge, neither the proponent or GHD, its agent, has approached the owner of the adjacent residential property to discuss the proposal. The proponent does not have the authority to forcibly acquire the land. The proponent requires the land owners' consent which it does not have.

Traffic Concerns

The proponent has not given any plan for noise and emission mitigation (toxic fumes) from heavy vehicles travelling to and from the proposed site either during the construction phase or during facility operations. There are estimations, during facility operations, of up to 200 heavy vehicles plus an equivalent number of light vehicles accessing the site per day.

There is no indication that a traffic study of this local, residential area has been undertaken. It would highlight the obvious negative impact that a constant stream of heavy vehicles would have upon local roads, local residents and the Moss Vale township. The large number of truck movements will only serve to cause more gridlock in town and damage to local road. Huge numbers of heavy vehicle movements would possibly impact upon pedestrian safety.

Health Issues

Research is available that demonstrates that populations living in close proximity to such recycling facilities suffer from serious health conditions including respiratory diseases and skin and eye disorders caused by plastic resin compounds released into the environment

(despite the Environmental Impact Statement indicating that this would not occur at this facility).

The prevailing gusty westerly winds that occur in the Highlands could blow emissions, odour and dust over the Moss Vale township as well as other towns and villages including Berrima, New Berrima, Burradoo and Bowral, thereby impacting upon air quality.

There is also the possibility of contaminated waste running into local waterways.

There is no doubt that this type of waste industry is highly toxic to a population living in its surrounding area as well as to the surrounding natural environment.

There would be risks to the health of the Moss Vale and wider Southern Highlands community should this proposed facility in the proposed location be approved.

Water

The proposed facility would have high water usage. This would impact upon water services especially to already approved local development.

The proposed facility intends to use 46,300 litres of water per day to wash plastic waste using a combination of rainwater harvesting and potable town water.

It proposes to pump 16,3000 lites of contaminated water per day into the already at capacity Moss Vale sewerage system.

I understand the proposed facility would have the capacity to store only 3 days of harvested rain water; then would depend entirely upon potable town water.

I understand that the owner of this proposed facility is China-based. He may not appreciate the fact that the Southern Highlands and most of NSW can experience drought and most recently was in a severe drought from 2016-2020.

We are likely to face more droughts and more severe droughts in the future due to climate change. In 2019, water restrictions were in place as there was limited water and no rain. The Southern Highlands community faced water restrictions in 2019 in order to satisfy Sydney's need for water as our rivers feed into the Sydney Water Catchment Area.

There are existing demands upon our water supply. This will increase into the future with new residential developments in Moss Vale. There is no 'excess water' and I am concerned about the large amount of water required on a daily basis to supply the proposed Moss Vale Plastic Recycling Facility.

The fact that this proposed facility would pump a huge amount of contaminated water into our local sewerage system defies belief. Wingecarribee Shire Council is the local water authority and the Moss vale sewerage works has already reached capacity. There are plans to increase the capacity of the Moss Vale sewerage system; this is however primarily to enable the building of new residential developments in the township, in particular the new development Ashbourne, formerly known as Cumungie-Chelsea

Gardens which will see 1380-1500 new homes. **This development was approved by the NSW State Government (ie Secretary of Planning) despite the fact that no supporting infrastructure exists.**

The amount of water the proposed facility requires and the amount of waste it would pump into the local sewerage system is of particular concern and could negatively impact upon the local water servicing capacity of the town and its current and future residents.

Fire Risks

Fire near and within this proposed facility would present a huge risk to the Moss Vale and wider community as well as to the natural environment.

The Southern Highlands is extremely sensitive to fire and fire risk. In the 2019-2020 bushfire season, the Highlands was subject to extensive bushfire: lives were lost, property destroyed, wildlife and habitant lost. Page viii of the Environmental Impact Statement states:
the plastics recycling and reprocessing facility site is not located on bush fire prone land and therefore the risks associated with bushfire are considered to be low.

My home in Moss Vale is not situated on bush fire prone land but homes like mine on the northern side of Moss Vale were subject to ember attack during the 2019-2020 bushfires. The Moss Vale Services Club, at the southern end of the town, served as an evacuation centre during this time. It was subject to ember attack and experienced high levels of smoke from the fires and had to be evacuated.

In addition to the possibility of bushfires, there is also the risk of fire occurring within the facility itself. Recent fires in recycling facilities have shown to have caused a large detrimental impact upon the local community, the local environment and local firefighting intervention.

Our own local emergency services may not have the resources to deal with a fire at the proposed recycling facility.

In addition to noxious fumes and waste, a fire within the facility would result in a large and disastrous impact to, with consequences felt across, the entire Southern Highlands. A fire within the facility would pose high risk not only to the surrounding residential households, schools and the Garvan Institute but also to the wider community due to the existing high winds we experience in the Highlands.

Natural Environment

The Southern Highlands community values its natural environment and local native flora and fauna. The proposed facility would be located in a sensitive environmental area. A koala sanctuary is located at the southern end of the Highlands. Two vulnerable species of bats have been recorded on the site of the proposed facility and have foraging habitat there. A mob of kangaroos also moves across the site. The site is also habitat to birdlife and other smaller animals.

The Highlands is home to farms and other types of agricultural businesses (eg major

wineries). Tourism and agri-tourism are important to the Highlands and depend upon a 'clean and green' environment.

The scale and scope of the proposed facility, its 24 hour a day, seven days a week operation, its noise and any release of toxic micro plastics as well as noxious odours and contaminated water would have repercussions for immediate and wider environment. It would prove detrimental to native wildlife, residents, small business, farms and agricultural activity in the area.

According to the Environmental Impact Statement, the proponent also intends to realign an existing watercourse and 'manage' associated vegetation. This watercourse and surrounding area is habitat. A 'realignment' would naturally impact upon the native flora and fauna that exists here. This proposal is inappropriate in this conservation area.

Aboriginal Cultural Heritage

The Environmental Impact Statement indicates that the proposal would result in 'harm' to 3 isolated finds which have been assessed as possessing 'high cultural values but low scientific values'. GDH has demonstrated its apparent unwillingness to properly engage with the community on behalf of the proponent, as evidenced by its previous 'community engagement sessions'. The EIS does not provide details of liaison with local Aboriginal stakeholder groups regarding the proposal and the findings of high cultural value.

Social Impact Statement

It is noted that the proponent has not provided a Social Impact Statement. The proposed facility would clearly have a negative impact upon public amenity not only for the Moss Vale community but for the wider Southern Highlands community.

The proposed Moss Vale Plastics Recycling Facility is in the wrong location. It should not be approved.

Yours sincerely

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18 March 2022