

Director – Industry Assessments,

Planning Group.

Department of Planning and Environment.

**PROJECT ID SSD-9409987.**

13<sup>th</sup> March 2022

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Dear Sir/Madam,

Please accept my submission regarding the Plasrefine proposal to build a plastic recycling center at the end of Beaconsfield Road in Moss Vale 2577 NSW.

### **Some of my objections are:**

#### **The site:**

Proposed Plant being built in the middle of two residential areas. I have no objections to the facility, **BUT NOT SO CLOSE TO RESIDENTIAL AREAS, SCHOOLS, Aged Care facilities, and being BUILT ON THE SYDNEY WATER CATCHMENT LAND.**

The factory is proposed to be located within 150M-200M from homes off Beaconsfield Road.

Council 17-3-22 stated that the site is known as The Southern Highlands Innovation Park INI, General Industrial Site.

I understand that the GHD group haven't completed their submission for the EIS along with their Social Impact Assessment, flooding being as issue. Water/stormwater should be respected and adhered to. Flood limitations to the west and west/east of the site may impact on Storm water Management.

**(NOT THE RIGHT SITE).**

#### **The size:**

7.7 hectares in size and the proposed two buildings of over five storeys (18m) in height, excessive site coverage.

No detailed plans or scale regarding architectural drawings of the factory itself provided. I worry that the scale of the development is way too big for the site.

#### **The access roads:**

Traffic/volume of vehicles and trucks. Movement of 100,000-120,000 tons of waste from around the nation. Heavy vehicles 19 m long with 80 to 100 movements a day not including the extra 280 movements of light vehicles on local roads.

The hill is all shale no plans for surveys done, neither contour or cut and fill plans. There is a 4m level difference, a lot of moving of soil etc.

The Lackey Road entrance is already a very dangerous entry now used by The Garvin Institute due to the clear vision impacts due to the blind hill with a steep incline, putting huge trucks there will be an

accident waiting to happen. Beaconsfield Road certainly not suitable for heavy vehicles along with the other roads proposed to be used, I feel major road works would have to take place before these roads could stand the heavy vehicles proposed to use them. The impact of those living in the areas of concern is causing a lot of distress.

An access road to accommodate the hundreds of truck movements is yet to be built and no consultation with the Garvin Institute or neighboring property owners also, the non- existing road (Braddon Road)? is yet to be built of which is now private land.

GHD have admitted that they there isn't any agreement with Council as to the required corridor for the road- despite the DPIE having issued their requirements in October 2020. In 16months council confirmed that there was minimal contact made by GHD.

The 20m wide corridor to connect to the paper Braddon Road hasn't been assessed by GHD (and therefore the Garvan Institute can't make informed decisions on the potential impacts on the sensitive operations carried out there.

A massive underestimate of time (1-2 months) in construction of the road due to the major cuts and retaining structures required, as stated by a traffic engineer.

No assessments done on Traffic impact on Beaconsfield, Lynton and Lackey Roads.

Looking to the future - what happens as other industries establish there and the volume of traffic increases?

Roads with no verges and in cases very narrow and often congested, a danger for our parents pushing prams to the childcare centres or students walking on the road to catch their school busses on Lackey Road.

GHD stated that if the roads don't ahead as they have planned, they will use Beaconsfield Road anyway. This presents huge concerns for us the residents.

GHD as part of their plan is to have Council forcibly resume the land required for the roads to service their site. Feel they have ignored the proper process for the IES and I question as to why this has been allowed to process without land holders consultation.

Traffic noise: disturbance to residents due to 24 hour 7 days a week operation will adversely impact on the quiet soundscape of the area.

Impact on The Garvin Institute re noise, vibrations and toxic omissions contaminated water drainage.

### **Environmental impact:**

Less than 3 kilometers from Moss Town Centre, residential homes, aged care facilities, schools and early childhood centres.

The land is zoned I understand as both Environmental 7.7ha General Industrial (INI), and Conservation C4, the two zones aren't compatible.

In 2019 a lot of land there was an application to divide the land into two lots but was unable to due to no sewage or storm water connection and the two streams forming of the Sydney Water Catchment area.

The visual impact: landscaping, build heights and size, lighting day and night, odours from the storage of plastics which have sat out in the sun containing milk and animal by products, and lastly the noise.

Although Plasrefine stated “We have fast roller doors to prevent odours escaping”??????

The proposal doesn't include a balance of landscaped areas and the buildings causing minimal effects of impact of the size and scale of the huge buildings.

## **Safety:**

Our residents, schools, pre- school to high school includes university students, plus older folk going for their daily health walks. Roads with no verges and there will be additional large truck and vehicle movements on these narrow roads.

Local roads deteriorating due to increased volumes of use /ongoing cost in maintenance council and then US the RATE PAYER, this is not acceptable.

Our Emergency Services, are they able to cope with an event in such a large area?

The towns are growing at such a rate, do we have the infrastructure and facilities to cope in a major event such as a fire or explosion. History of catastrophic fires in Australia and overseas our nearest service had to come from Cambelltown to the most recent fire at the old brick factory in Bowral, that is an hour away, whilst it burns, the pollutants are in the air, not good enough!

## **Omissions:**

There is potential for environmental devastation that this factory poses to our air and water quality. Noise and vibrations will also impact on surrounding residential homes and will threaten the riparian zone that exists on this site.

Odours and fine plastic particles polluting the air.

Sports people playing on our fields, schools and residents inhaling the fine particles/dust of plastic residue.

## **Water:**

The proposal of using 46,300 L of water, in the plants washing facilities are expected to discharge in the sewerage each day could well be contaminated with microplastics and phthalates, chemicals used to make plastics more durable.

The water is harvested from the roof but, in times of no rain the facility would then tap into the town water system thus draining our water supply.

The availability of water, with proposal of pumping 16,300L contaminated drainage into the already overloaded sewage system or being allowed to enter in the Wingecarribee River located in the Sydney Water Catchment area (not acceptable). Ground water contamination is a concern.

## **Disposal of waste refined products:**

I understand that at the end of the process that 9000 tonnes of plastic powder and this by product called sludge/pellets is not able to be recycled. This is deemed to be Hazardous Waste and will need to be transported to Lucas Heights for storage. More movements of trucks.

Bowral's waste and Andersons from Moss Vale currently goes to waste stations in West Sydney. Will Plasrefine join in with more truck movement removing the toxic waste to Lucas Heights.

## **Future expansion:**

Claims of another factory to be built to make by products such as furniture and other plastic products or the end processed product being taken to another facility to manufacture. More trucks, omissions etc.

As other industries want to set up in the area, I have concerns with the ever-increasing traffic volume and noise etc. Is there no other entry that could be established to avoid residential areas?

## **Ownership:**

Ownership of the facility-Australian/overseas and money? staying in Australia.

Foreign owner Mr. Lyu as the proposed operator, technical director was unable to be contacted.

Companies owned by Mr. Lyu Yalin have been censured by Beijing's Environmental and Ecological Bureau.

Public notifications on the Bureau's site reveal 4 regulative violations from 2011 consisting of air contamination, with Kelilier, a business owned and run by Mr. Lyu, being fined \$6600 in March 2015 for monitoring failures.

Mr. Lyu's function in Plasrefine has recently been minimized but, in August Mr. Lyu was still being described as the "proposed operator" who owns and is responsible for Plasrefine Recycling.

In the most recent community engagement report Mr. Lyu is described as "an early investor", who has no experience in plastic recycling but has experience in wastewater management? (OUR WATER CATCHMENT AREA?) compromised.

Ms. Zheng states that she is now the EPA licensee, she is Mr. Lyu's niece.

## **Staff employment:**

Local/Foreign - submissions have inconsistent reference to employment numbers.

GHD have expressed that the laborers could be local people and the experienced staff would be brought in from overseas.

Local staff would do tasks of tech assistants, forklift drivers and cleaning.

Technical positions will be filled with numerous drawn from over-seas-based expertise.

## **Local waste plastics:**

Will our local waste plastic be accepted at the facility? No! we are told by GHD.

The \$70 million plant will process over 120,000 tonnes of mixed plastics from Sydney, Wollongong, Canberra and Melbourne each year.

Operation hours will be 24 hours a day, seven days a week.

The final by products sludge/pellets having to be trucked elsewhere to Lucas Heights, as it is classified as Hazardous Waste.

## **Valuation of our properties:**

The volume of traffic increased, deteriorating roads, noise being generated, and odours omitted along with 24-7 lighting from the facility.

The 24hour operation, 7 days a week for 44 weeks per year and the 8-week period for maintenance.

Some residents are only 150M from the proposed sight plus the Australian Bio Resources (The Garvin Institute) will be a few meters from the site. Quiet residential areas turned into dangerous noisy roads with excessive vehicle movement, not acceptable.

## **Local Council Communications:**

No information was supplied by our local council the Wingecarribee Shire. Poor planning by Council.

A crucial access road appears on a map. Without any easement marked. The land was zoned for environmental living sits side-by-side with industrial land on a single lot. In 2019 an application to subdivide one of the adjacent blocks of the land into two separate lots reflecting the different zonings was refused for several reasons one reason being that it isn't connected to the local sewer, stormwater and two streams forming part of the Sydney Water Catchment crossed it thus conflicting with the state water protections.

We are told that the front of the block a smaller area is set aside to build a family home on. How can that be processed when it is zoned industrial?

Council found that construction of the access road would generate a "significant adverse impact on the residential areas and safety of Moss Vale residents living south of the site".

Also, it was stated that Beaconsfield Road shouldn't be used for the construction of major industrial structures.

MP Wendy Tuckerman Minister for Local Government NSW said "It is simply not a suitable site and the community, and I don't support it in the location proposed" she told the NSW Parliament recently.

State Government is desperate for facilities like the proposed Plasrefine development.

Tony Khoury the head of NSW Waste Contractors and Recyclers Association hasn't heard any industry talking about the project and said, "astonishing for such a large venture".

## **Meetings:**

Meetings have been held of which I have attended. No questions to be asked all to be written down on post notelets to be answered later- still waiting for reply.

During the meeting question asked were overridden by GHD staff speaking quickly and loudly over the microphone.

Another meeting held at an out- of town venue, making it difficult for some folk to attend.

They had a security guard there who we were told it was requested by the Council, very intimidating- as was the young bar attendant who was at a meeting in the Moss Vale RSL at an earlier meeting acting as a security guard.

Unsatisfactory way to converse with an enquiring community as to what was Plasrefine is all about.

**NOT THE RIGHT SITE AND A LOT OF WORK TO BE DONE BY PLASREFINE.**

**I have no objections to the concept of the Plasrefine factory, and I believe we must look to the future but NOT ON THIS SITE.**

[REDACTED]

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