

Plasrefine Plastic Waste Recycling Facility.

Basic Breakdown / Submission inspiration

<https://www.planningportal.nsw.gov.au/sites/default/files/documents/2022/How%20to%20Make%20a%20Submission.pdf> The information you will need once you register : Moss Vale Plastics Recycling Facility , Project ID SSD-9409987

Access and Site

- Beaconsfield Rd not suitable for heavy vehicles
- The factory is proposed to be located within 150m - 200m from homes, off Beaconsfield Road
- Site has 2 incompatible zones, Conservation (C4) and 7.7ha of General Industrial (IN1)
- This is not 3kms North of Moss Vale, as stated by Plasrefine, but within the town boundary - MISLEADING! From the old GPO in Argyle St to the end of Beaconsfield Rd is 2.17kms as the crow flies, for emissions
- Lack of infrastructure

Unsuitability of Site

- The proposal is to be located in an unsuitable location having regard to:
- Uncertain and unsuitable access arrangements for the anticipated vehicle movements;
- The unacceptable noise impacts it poses for nearby sensitive residential receivers;
- 38,638 square metres of buildings, a 6ha complex over 5 storeys (18 m) in height
- No detailed plans, architectural drawings and diagrams of the factory complexes, only basic concept plans
- No reference of scale on any concept plan
- The proposal constitutes an overdevelopment of the site, particularly taking into account its excessive site coverage
- The design of the proposal fails to alleviate the visual intrusion of building bulk on neighbouring properties and the overall scenic quality and amenity of the rural landscape having regard to its excessive height and bulk
- The industrial zoning of the land appears to be relied on as the sole reason/ justification for maintaining building envelopes of uncharacteristic bulk and scale despite the numerous adverse impacts this design then has on the environment, neighbouring properties and the amenity of the landscape.
- The proposal fails to provide a suitable balance between landscaped areas and built form and therefore fails to minimise the impact of the bulk and scale of the buildings.
- survey plan / No contour plan / No cut and fill plans.

Unacceptable bulk and scale

- The design of the proposal fails to alleviate the visual intrusion of building bulk on neighbouring properties and the overall scenic quality and amenity of the rural landscape having regard to its excessive height and bulk
- The proposal constitutes an overdevelopment of the site, particularly taking into account its excessive site coverage
- The proposal fails to minimise the visual impacts from adjoining and nearby residential properties
- The industrial zoning of the land appears to be relied on as the sole reason/ justification for maintaining building envelopes of uncharacteristic bulk and scale despite the numerous adverse impacts this design then has on the environment, neighbouring properties and the amenity of the landscape.
- The proposal fails to provide a suitable balance between landscaped areas and built form and therefore fails to minimise the impact of the bulk and scale of the buildings.

Safety / Construction use of Local roads

- Narrow access along Beaconsfield Rd with no Pedestrian access
- Residents need to walk on the road – no footpaths (Beaconsfield and Lytton rds)
- Childcare Centre on Beaconsfield Rd and within vicinity of 2 schools
- Deterioration of local roads due to increased use and offset developer contributions therefore council / ratepayers become responsible for upgrade and ongoing costs.

Noise and Vibrations

- 24hr operation, 7 days per week for 44 weeks per year and 8 weeks for maintenance
- Only metres from Australian Bio Resources (the Garvan Institute)
- 150 metres from closest resident

Roads and Traffic

- There is no detail of the required construction for the proposed access road from Lackey Road - how can this have been costed
- The lack of detail would suggest that any negotiations with Garvan for purchase of the required land would, of necessity, be very high level.
- Traffic Impact Assessment undertaken Dec 2020, during covid and pre covid migration / increased Sydney migration.
- No adequate assessment of Lackey road.

NOTE:

GHD have freely admitted that they have reached no agreement with council as to the required corridor for this road - despite the DPIE having issued their requirements in October 2020. That is 16 months and council have confirmed that very little contact has been made by GHD. The alignment of a 20m wide corridor to connect to the paper Braddon Road has not been assessed by GHD (and therefore Garvan cannot be in a position to contemplate the potential impacts on their sensitive operations). Our traffic engineer has confirmed that there would be major cuts and retaining structures needed for the road construction - the proponent has indicated 1-2 months to construct the road and this is a massive underestimate.

Traffic Impacts

- **Increased traffic on local roads** – poses safety related risks for existing residents/local road users and businesses. This significant increase in traffic will be directly generated by the proposal.
- **Increased traffic-related noise** - Even if the proposal complies with relevant traffic-related noise requirements, residents will still experience adverse noise impacts having regard to the current rural ambience and quiet that form the soundscape of the area. The highly concentrated traffic flows will adversely impact on this quiet soundscape, particularly for residents along the proposed construction and operational routes. The increase in traffic related noise will compound the increase in noise from the facility's 24/7 hour operations.
- **Inadequate existing road infrastructure** – Multiple roads will need to be upgraded to sustain the increased traffic that will be generated by the proposal. Whilst the proponent appears to promote any such road works as upgrades for the community's benefit, these upgrades are necessitated purely for the private purpose of the proposal. Such works are simply a facilitator of the traffic-related noise and safety impacts that will eventuate if the proposal is approved.
- **Land-use conflicts** - approval of the proposal will intensify existing land-use conflicts in the area. The EIS has failed to address existing land-uses and how the proposed traffic management plan and construction and operation routes will impact these.

Water and Air Quality

- Odour from plastic waste bales, storage, processing, wastewater facility
- Toxic residues, toxins in plastic dust, emissions on prevailing westerlies
- Emissions are currently modelled as no machinery has been specified
- Category 2 riparian waterway that flows directly into the Wingecarribee River,
- Located in the SYDNEY Drinking Water Catchment!
- Proposing to use 46,300L of water every day to wash plastic waste sourced from a combination of rainwater harvesting and potable town water.
- Only 150,000L of water in storage = 3 days supply
- Proposing to pump 16,300L of contaminated water a day into our already overloaded sewage system. - waste water?

Social/Economic Impacts

- Inconsistent references to employment numbers. Unclear as to extent of localised employment.
- Known impacts of micro plastics on general health including the release of emissions into the surrounding atmosphere, carried to other Highlands towns and villages on prevailing westerlies.
- **Adverse social impacts have not been genuinely or adequately addressed in the EIS** – it follows that these cannot be known for these to then be properly assessed and (if and where possible) mitigated, noting that no Social Impact Assessment has been provided. It follows that there has been no consideration given to the following impacts likely to be associated with the proposal:
 - **Changes to sense of community** – refers to the adverse changes in the composition, cohesion, character and function of community and people's sense of place in Moss Vale and the Southern Highlands more broadly.
 - **Changes to "way of life"** – highly questionable whether the positive social benefits of local employment referenced in the EIS will be realised, having regard to increased automation and digitalisation of the waste recycling industry that has labour displacing effects.
 - **Impacts on tourism** - associated with adverse impact on natural environment. The proposal poses serious negative impacts to local economy due to its potential to impede growth and development of industries and businesses that depend on a clean and green environment (such as tourism and agri-tourism) and population growth from people attracted by the clean and green environment and quiet rural character moving to Moss Vale to live, work and play. The physical impacts of the proposal on scenery and amenity, the particulate, traffic, noise and light pollution from the proposal, the increased traffic along roads associated with the facility, result in the loss association and perception of Moss Vale as being a scenic and lovely place to live. These fears about the future for residents, their community and their surroundings have caused and will continue to cause social impacts
 - **Changed access to and use of local infrastructure, services and facilities** - impact on social infrastructure capacity, including childcare, healthcare, community services and facilities, employment and housing, impact on local infrastructure including roads in particular
 - **Impact on people's culture** – including shared beliefs, customs, values and stories, as well as connections to land, places and buildings (including both Aboriginal and European culture and heritage.) The proposal will impact negatively on the value of Moss Vale and the Southern Highlands generally as a heritage-scenic place. Many of the people of Moss Vale who are opposed to the proposal have a strong conception of Moss Vale/Southern Highlands as a place of high scenic value which contributes to people's sense of place.
 - **Impact on people's health and wellbeing** – this relates to health and wellbeing and incorporates both physical and mental health. The proposal will cause dust and particulate emissions, noise emissions (from the vehicles accessing the site daily and also the facility's 24/7 operates and also night lighting impacts (the extent of which has not been assessed in the EIS and which therefore remains unknown). These impacts will affect people's health and wellbeing, both directly and indirectly. Air, noise and light pollution has been found to directly affect people's health and wellbeing, if the pollution is sufficient, but it can also affect people's perception of their health and wellbeing, such as by increasing stress and anxiety, which can affect their mental health. This indirect effect on people's mental health is likely to be especially significant. Regardless of whether the proposal complies with the applicable criteria for air quality and noise, people perceive that the proposal will have a negative impact on their health and wellbeing and this can have knock on actual impacts on physical and mental health.
 - **Impact on people's surroundings** – The proposal will severely impact on the surroundings, including the natural environment and its associated aesthetic value and amenity. The proposal will also adversely impact on the amenity of Moss Vale due to the associated traffic, noise, nuisance and appearance of the proposal and the effect this has on people's way of life, particularly for those residents located in the closest proximity to the facility.
 - **Impact on people's personal and property rights** - stress and anxiety has resulted from the proposal associated with being faced with the possibility of living with a large waste facility next door and being unable to sell their property, concerns which manifest themselves in other types of social impacts, such as on people's way of life, community, culture, health and wellbeing and surroundings

Adverse and irreversible visual Impacts

- **Inadequate Visual Impact Assessment** – The visual impact assessment that has been provided in support of the proposal is completely inadequate in identifying the impact on existing views from surrounding and nearby development.
 - The EIS fails to adequately assess the acceptability of the impact of a proposal on the views enjoyed from all impacted private properties in the vicinity of the facility. The acceptability of the impacts of the views considered in the EIS has not been addressed.
 - Similarly, the visual impact assessment fails to satisfactorily address the acceptability of the impact of the private development on views from the public domain in the vicinity of the development
 - Within the EIS – specifically Technical Report 7 (Landscape and Visual Impact), it is concluded on page 57 that:

"The visual impact of the proposal would be high for the surrounding sensitive receivers, and it is anticipated that the ongoing changes through the re-development of rural land would result in long-term and adverse impacts to the landscape character of LCZ1 and the surrounding sensitive receivers, with significant and irreversible, changes to the attributes, elements and value of the rural landscape character"

- **No assessment of lighting impacts** - Despite this being a requirement of the SEARs, no information has been provided to enable the consent authority to be satisfied that there will be no adverse impact on the amenity of residences in the vicinity of the site due to illumination of the development and the trucks of a morning/afternoon etc. /light spill.
- Technical Report 7 (Landscape and Visual Impact) specifically states on page 2:

"This assessment does not include landscape and visual impacts from lighting and any possible visual impacts from lighting or light spill are excluded from this assessment, and with the exception of suggested mitigation measures outlined in section 8, external lighting has not been assessed."

- Inadequate and unreliable mitigation measures proposed – The EIS proposes screening planting to reduce the significant and irreversible visual impacts associated with the proposal. This is despite Technical Report 7 acknowledging that the mitigation measures are unlikely to reduce the impacts of the change. It is inappropriate to allocate any definitive weight to the mitigating effect that any proposed screening trees and vegetation may provide because such trees are a natural element, subject to the frailty of weather, disease and bushfire risk. It follows that, where the screening is critical to a conclusion of compatibility and acceptability of the proposal, they simply cannot be relied upon as they do not provide any degree of certainty in relation to their ability to mitigate the visual impacts effectively on an ongoing basis.