

Attn; Ms Emma Barnet

Infrastructure and Industry Assessments DPIE

SSD 9409987 Moss Vale Plastics Recycling Facility

Consideration is sought of the following submission in opposing the proposed Plasrefine Pty Ltd development at 74 – 76 Beaconsfield Rd Moss Vale, NSW.

As an identified ‘sensitive receptor’ in the project EIS prepared by consultants GHD, the following items are raised relating to the proposed location, scale and impacts of the Plasrefine Pty Ltd development.

1: Visual Amenity- conflict with current LEP objectives.

There is clear recognition that the proposed development will have a significant detrimental impact on adjacent residents and community’s visual amenity and override the considered objectives for the site’s future development.

Quote from EIS (Summary page 8)

“The scale and nature of buildings would result in discernible change to the visual characteristics, features, and values of the proposal site and immediate area. Mitigation measures have been developed to reduce the impacts.”

Section 16 Urban Design and Visual

16.1.2 Method

- *“The study area for the landscape and visual impact assessment was two kilometres surrounding the proposed site. The study area was based on an analysis of the zone of theoretical visibility, a desk top study of aerial photographs and topographic mapstwo site inspections were undertaken to undertake site photography suitable for photomontage preparation”*

Noting:

- the adequacy of the referenced mitigation measures are untested in situ, are given as the output of desktop modelling, concepts, predictions for a range of critical environmental, health and safety issues.
- the photo montages ref VPO2 for Bulwer Road residents are not representative of the visual impacts of the proposal site to the elevated site of surrounding residences in Beaconsfield and Bulwer Roads.
- no attempt made by GHD to seek access from resident properties to capture direct line of sight impact of the proposed development site eg direct line of sight from this resident's living areas.
- no recognition given to innate site or community held values by proponent captured in a credible Social Impact Assessment.

Versus:

Ref. Wingecarribee Shire Council LEP objectives for zone IN1

Quote:

** "to minimise any adverse effect of industry on other land uses."*

** "to ensure that new development of land uses incorporate measures that take account of their spatial context and mitigate any potential impacts on neighbourhood amenity, character or their efficient operation of the local or regional road system."*

Noting:

- the sheer scale of the proposed development and its proximity to residents is inconsistent with acceptable town planning guidelines
- the proposed development site is immediately adjacent to the Garvan Institute's sensitive operational site of Australian BioResources Pty Ltd.
- adjacent to the "Elwood" beef cattle operation
- adjacent to C4 zone vacant and resident occupied land
- the site is landlocked and dependent on existing low density residential road network
- adjacent to an expanding residential demographic and related support services
- the proposed frequency of truck and vehicle movements on current surface deficient roads
- 24/7 operation and associated unspecified light impacts and night time vehicle/fork lift movements on surrounding residents amenity
- the acknowledged need to mitigate (not prevent) a range of environmentally damaging emissions, noise, light, fire and vibration issues that further underline the development as incompatible with existing LEP objectives and legacy land zoning deficiencies

- weather extremes associated with climate change are not incorporated into potential impacts on local / regional residents, on community and commercial assets; on the Sydney water catchment.
- the proposed site is adjacent to an identified Threatened Ecological Community (TEC) – Southern Highlands Shale Woodland – displayed on WSC maps and classified by the NSW Scientific Committee as subject to extinction. The referenced TEC is located on (our) private C4 zoned land.

2. Water quality management

The following issues are either not or adequately addressed in the EIS relating to the proposed Plasrefine operation and in consideration of its intended location in the Sydney Water catchment.

Ref. WaterNSW agency response:

“The EIS must specifically address each of these clauses, in particular a clear description as to how the development would achieve a neutral or beneficial effect on water quality”

Noting - there is no evidence of actual test results/sampling exercises undertaken to demonstrate compliance with the above requirement.

Questions for GHD

1. Do truck movements include those for wastewater sludge?
2. The EIS does not provide detail on the waste treatment plant and water balance to sewer eg treatment plant appears to be a filter only; no indication of a biological treatment to remove nutrients, organic compounds and bacteria/pathogens likely to generate odorous recycled water.
3. Is the recycled water from the plant fit for purpose/meet relevant guidelines, the potential for contaminating stormwater? Are conditions surrounding the water treatment plant and output written into Plasrefine’s operational licence?
4. Sludge : water residue and sludge is greater than 15% of inputs. Is there landfill capacity for this sludge and residue? What is the chemical composition of the sludge and dry solids content? Does this sludge

contain hazardous waste material and therefore not acceptable for standard land fill?

5. What category of trade waste guidelines is the proposed facility? Can Plasrefine provide chemical composition of water quality to be discharged to sewer?
6. What water quality monitoring regime will be imposed on the facility to monitor compliance with trade waste limits?
7. Can Plasrefine confirm that wastewater does not contain prohibited substances ie POPs (Persistent Organic Pollutants), PFAS etc
8. Can Plasrefine advise that given details and responses to the EIS will be written into the facility's Environment Operating Licence? Eg fast acting doors, monitoring and maintenance requirements of stormwater system gross pollution trap and bio retention basin filter; clear limits on noise, odour, air emissions; detail air emission licence limits?
9. The EIS has reliance on desktop analysis with very high assumptions versus the provision of actual data required prior to providing approvals eg no odour model, associated with the recycled water. Reference : Protection and Biodiversity Conservation Act 1999 : 4.3 5.11
10. Can GHD advise of any test work/trials to demonstrate wastewater quality eg given residential recycling bins can be contaminated with a range of wastes, pesticides prohibited under NSW trade waste guidelines. GHD's trade waste assessment does not address this aspect of trade waste and assumes that it will be standard waste versus a more likely high risk category (category C) requiring more attention. Noting acceptance of some industrial waste discharges may require modifications to sewage treatment works or transportation system and related ministerial approvals under Section 60 of the Local Government Act.
11. Independent Industry Assessment indicates a sewage treatment plant with capacity for 10,000 people will produce less than 1,000 tonnes of residue a year for transport to end use or disposal. On this basis the EIS indicates the Plasrefine operation would produce more waste/sludge

than the Moss Vale Sewage Treatment Plant. Reference Item 6 and 21 Water Meeting Minutes response to questions.

12. Water Balance : The EIS indicates that Plasrefine would require 46 kilolitres of water per day from an external water source while discharging less than 20 kilolitres per day. On these figures, there is a 20 kilolitres per day discrepancy suggesting a discharge of greater than 20 kilolitres per day requiring a Category C High Risk Trade Waste Discharge.

13. Water Source and Usage: Quote from GHD Minutes Item 21 under Water :

“About 46.3 kilolitres per day of water would be sourced from a combination of rainwater harvesting and potable water supply connection to the mains. Approximately 80% of the site water needs can be captured from rainwater captured on site.”

This does not account for the predicted increased frequency of drought associated with climate change and assumes dependency on the Moss Vale potable water supply. Note : there are three water storage tanks in the proposal with a total capacity of 150 kilolitres which is just over three days operational supply.

14. Trade Waste Guidelines: Can GHD provide details as to how they have determined that wastewater from the Plasrefine operation meets Trade Waste requirements for discharges to sewer for contaminants eg evidence of independent test work. Item 26.

15. Risk Assessment : Can GHD provide evidence of and the basis for how they scored risk? Can GHD verify that the Risk Assessment has been undertaken on by an independent entity and on a quantitative versus qualitative assessment/analysis?

3. Road & Transport Issues

Major concerns are raised in relation to the proposed road and transport issues:

- Potential use of existing residential streets during construction/operation

- Frequency of proposed truck movements and service vehicles
- Truck size, weights and road surface impacts and maintenance costs to ratepayers
- Resident traffic and pedestrian safety eg absence of pedestrian walkways/cycleways in targeted truck routes
- Design and development impacts of a proposed East /West Braddon Road on adjacent residents
- Compliance management of proposed truck routes
- Proximity of truck movements to local pre-school, schools
- Inconsistency of data provided by GHD relating to project transport arrangements to date
- On site truck noise and emissions impact on air quality and resident/community amenity

4. Fire & Rescue NSW Agency issues

FRNSW's agency response response acknowledges that :

- *"waste recycling facilities pose unique challenges to firefighters when responding to and managing an incident....."the development poses unique challenges to the response to and management of an incident"*
- *"we request that we be given the opportunity to review and provide comment once approvals have been granted and the project has progressed such that more relevant detailed information available."*
- *".....screening will be carried out under SEPP 33 to determine if the site is deemed potentially hazardous or offensive"*

As an identified 'sensitive receptor ' the deemed fire and related health, safety and environmental risks presents an unacceptable threat to us and fellow neighbouring residents exacerbated by the unspecified final access route to the development site in the EIS.

Comment:

The absence of an independent and coordinated certified risk management assessment of the Plasrefine development is noted as a significant omission in the EIS.

Reliance in a number of key risk areas on desk top modelling, concepts, and untested mitigation assertions are not commensurate with potential catastrophic short and long term incident impacts during construction and operation of the Plasrefine facility.

5. Compliance issues

The inability to provide sustainable and real time compliance with regard to:

- Truck delivery routes
- Delivery operational hours
- Odour, noise levels
- Trade waste and EPA licence requirements

provide an unfair burden on the community's living amenity, physical and mental health.
