

There are such a significant number of problems and issues with this proposal that it appears impossible to approve it going ahead in anything like its current form.

Road Traffic

The survey purportedly carried out by GHD was based on 2020 during significantly reduced traffic flows due to the COVID pandemic. At a bare minimum it would need to be repeated after all traffic flows have returned to normal. The route from Wollongong and Port Kembla does not appear to have any alternatives at present than clogging up the main streets of Moss Vale.

There are also very significant gaps in the analysis where traffic from Sydney or Melbourne is assumed to sidestep the short cuts and use the designated routes, but no detail as to any enforcement mechanisms. Experience suggests that truck movements will follow the most straightforward GPS route unless strong regulatory enforcement is in place. A possible suggestion here is for a standard fine of say \$1,000 be levied on each truck movement outside the designated route. This mechanism could be administered by Council with the proceeds of the fine shared between Council and any citizens who provide evidence. This would empower the citizens of Moss Vale to protect their environment.

Noise Pollution

Apart from the extra traffic noise from truck movements there will be significant overflow noise and light pollution from the proposed 24 hour operation of the facility.

Air and Water Pollution

Details of the machinery to be used have not been provided and any modelling of air pollution must therefore be suspect. Proposal to use 46,300 L of water a day and to pump 16,300 L of waste into the sewerage system. Again the only sensible way for a consent authority to approach this would be either refusal or specification of maximum discharge limits for both air and water pollution. Any breach of limits to be treated as a strict liability offence with mandatory custodial sentences.

Visual and Lifestyle Impacts

A proposal of this magnitude, which could be the largest in Australia, would have irreversible impacts on the views, lifestyle and amenity of the entire Southern Highlands. This will in turn have deleterious flow on effects to the local tourism and agricultural economy.

Assessment

A cursory examination of the recycling industry leads to the view that the proposal is likely to be far bigger than actual activity levels and has been crafted to qualify as State Significant because the Council would be unlikely to approve it. I can accept that plastic recycling may be an important objective of State policy but consider that a better solution would be four separate facilities in separate locations with lower impacts and significant savings in transport costs.

In summary the proposal is far too big, clearly located on the wrong site, inadequately assessed, and offers little in the way of local benefits while imposing significant social and economic cost on the region. State policy should not be driven by developer profit opportunities.