

Inadequate information provided and Unacceptable, Unreasonable Adverse Impacts

Traffic and safety impacts

Firstly, I wish to express my sincere concerns about the lack of detail provided in the EIS documentation to enable the consent authority to undertake an adequate assessment of the proposal. This is particularly the case in respect of the proposed traffic impacts and access arrangement, the enforceability of the traffic routes and the impact of the proposed construction and operational routes on existing traffic conditions in the surrounding streets and townships. The 'assumptions and limitations' referenced in Part 1.6 of Technical Report 6 (Traffic and Transport) should be carefully scrutinised by the consent authority. For example, it is noted that an incredibly small sample of traffic surveys were undertaken during a time when COVID-19 restrictions were in place and one of which occurred on a Sunday. The foundation of the traffic analysis is therefore not even close to being an accurate reflection of the current traffic conditions and therefore the true impact of the proposed additional 40-50 additional heavy vehicles on the road network on a daily basis is not reflected in the EIS documentation. It is also unclear whether the 40-50 heavy vehicles will only be entering and exiting the site between the nominated "waste acceptance" hours of 7:00am and 6:00pm. It may very well be the case that the proposal will involve such vehicles travelling to and from the subject site outside these hours for other purposes unrelated to "waste acceptance". For example, the EIS indicates that the proposed facility will include manufacturing activities whereby plastic products will be produced. I have not seen any indication in the EIS documentation as to when these products will be leaving the facility and in what manner. Given that the facility is proposed to operate 24/7 there is every possibility that heavy vehicles will be entering and leaving the subject site for a range of purposes during any given hour. Regardless of whether there is a traffic management plan in place that seeks to control the movement of the facility's trucks, in reality there is insufficient monitoring and enforcement measures in place to effectively ensure the facility's operator and various trucking contractors are complying with this. In the interim, the residential community surrounding the facility will suffer daily for it in terms of the constant threat of a traffic incident occurring when they travel in their cars or go for a walk along the side of the residential streets (most if not all of which do not have a pedestrian footpath). The noise and odour associated with such vehicles can also not be overlooked which will contribute to the overall extreme degradation of the basic amenity that residents should be entitled to enjoy.

Visual Impacts – Lighting impacts not assessed in EIS

The EIS does not include any assessment of the lighting impacts that will be associated with the proposal despite this being an express requirement of the SEARs. In fact, Technical Report 7 (Landscape and Visual) expressly excludes this in its (limited) assessment of the visual impacts. It is anticipated that a facility of the nature, bulk and scale proposed will feature significant external lighting for a range of reasons (security, safety for access and otherwise). The use of multiple heavy vehicles in connection with the facility's 24/7 early morning and late afternoon operations will also generate significant lighting emissions and light spill. Such light will contribute to the adverse and irreversible visual impacts that the proposed facility will have on the amenity of the area. These impacts are not reasonable and cannot be effectively and reliably mitigated by the vegetative screening proposed. It should be queried why the EIS lacks any genuine assessment of the actual visual impacts that will be experienced from those residents closest to the facility. For example, there is not commentary or photomontage material included in Technical Report 7 which details what rooms in each of the relevant residential properties will experience the most impact. Will the visual impacts be experienced from the most frequently used rooms of people's homes, their living rooms and kitchens? Given the excessive bulk and scale of the proposed facility, it is clear no

genuine steps or measures have been taken when designing the facility to consider the impacts this will have on the nearby residents and visitors to the area.

Intensity of proposed use conflicts with surrounding residential land use

Inadequate assessment has been undertaken in relation to the land use conflicts that the proposal generates by virtue of its nature, high intensity and proximity to surrounding sensitive residential land uses. I don't think there is one person who, if they lived in proximity to the proposal, could genuinely say that they will be able to remain happy living there and will not experience its adverse impacts should the proposal be approved. I personally live a number of streets away from the proposal in Moss Vale (along Parkes Road) but I emphasise fully with the terribly stressful and confronting situation in which those residents closest to the facility find themselves. The impacts that will result from the proposal are not reasonable or acceptable and the proponent's reliance on the permissibility of the proposal does not overcome these or render them so. In my view it is largely the intensity of the particular industrial use and its servicing requirements that render this proposal unsuitable in this particular location. How can multiple persons including young families who live along Beaconsfield Road, Lytton Road, Bulwer Road, Roche Close, Stables Place, Garret Street, Parkes Road, Trotters Lane, Innes Road and who regularly go for walks and bike rides along these streets (again, most of which do not include footpaths) safely and comfortably continue to do so? The very first time I travelled to the subject site to better ascertain the location and nature of the subject site in person, I drove past 3 young children who I think would have been at or around the age of 10 years old cycling happily along the side of Beaconsfield Road. I also observed two young families walking their dog along Lytton Road and an elderly couple carrying out gardening in their front yard. These lovely leisurely activities carried out by local residents on a daily basis simply could not continue if the proposal was approved and if they did would be either rendered completely unsafe or unenjoyable (or both). The character of the area and the reason why people choose to live in Moss Vale will be irreparably damaged by approval of the proposal.

The subject site is not suitable for an industrial development of this intensity, particularly due to its proximity to sensitive residential receivers and the low density residential nature of these surrounding residential land uses. These impacts cannot and have not been ameliorated through effective design and operational solutions and I suspect that this is a product of the particular requirements of a facility of the nature and scale contemplated.

The subject site would be better suited to a lighter industrial use that is smaller in scale and intensity, that does not generate multiple heavy vehicle truck movements to and from the site on an hourly basis every day, that does not emit offensive odours due to the burning/processing of plastics and that overall does not carry with it the multiple adverse and unreasonable impacts associated with a facility of the magnitude proposed. There are countless sites available that are better removed from residential areas and which therefore would not be characterised by the multiple adverse impacts that define this proposal. It must be recognised that the subject site is obviously not the only site available across NSW on which a facility of the nature proposed would be permissible.

No Social Impact Assessment

It is disheartening that the proponent has been able to get away with not carrying out a proper Social Impact Assessment for this proposal that complies with the Department's guidelines. The social impacts associated with this proposal will be considerable and I do not understand why the SEARs did not require such an assessment to be carried out. This is an additional major gap in the EIS

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and in my view its absence means that the consent authority must not determine to approve the application by way of approval because it simply does not have sufficient information before it to know and understand the full extent of its impacts, which of course includes its social impacts. I believe that these social impacts will extend beyond those residents in Moss Vale most immediately impacted by the proposal and that they will also be felt by the broader Southern Highlands community. I also have grave concerns that given the tokenistic efforts that were undertaken by the proponent in respect of the so called 'community consultation' (which in my view was ran as nothing more than a 'tick-the-box' exercise) that there are multiple people in the Southern Highlands community that simply have no idea that this proposal is on foot and have therefore been denied an opportunity to make comment or a submission. By way of example, I understand that the use of Bowral Tip is incorporated into the proposal and that this Rubbish Tip simply cannot take additional waste of the scale that is proposed and is already failing to comply with its EPL conditions. Nearby residents living nearby are already suffering from the Bowral Tip's poorly run operations and would no doubt be keen to know more about the proposal in Moss Vale and make a submission due to the impacts it will likely have on them (i.e. increased odour and traffic alike), yet many of them simply have not been notified or engaged in any social impact assessment.

Overall I submit that the proposal is not in the public interest for the aforementioned reasons and must be refused.

Sincerely,

A very concerned resident of Moss Vale