

WinZero Inc
P.O. Box 1193
Bowral NSW 2576



info@winzero.com.au
www.winzero.com.au

**Submission to the Department of Planning & Environment re the proposed
Plasrefine Plastics Recycling Facility at Moss Vale NSW
SSD Application No - 9409987**

We are making this submission on behalf of **Wingecarribee Net Zero Emissions Inc (WinZero Inc)**, which is a coalition of 12 environmentally-engaged community groups in the Southern Highlands of NSW. We were formed following the Declaration of a Climate Emergency by the Wingecarribee Shire Council in February 2020 with the aim of working with both the Wingecarribee Shire Council and the local community to achieve Net Zero Carbon Emissions by 2050 at the latest, as well as to use our best endeavours to preserve the irreplaceable environmental attributes of our Shire.

We oppose this Application because, while we support in principle the need for Australia to recycle a large proportion of the plastic waste produced in this country, we are strongly of the view that the particular proposed location in the industrial estate at Moss Vale is entirely inappropriate for such a project.

There are a number of reasons why we oppose this development at this particular location:

- **Plant Design** – The design details included in the Plasrefine EIS regarding proposed plant and equipment and processing flow sheets are entirely inadequate and therefore insufficient to allow an informed submission on most aspects of the project.

Design details are critical as they affect so many parts of the proposal assessment including (but not necessarily limited to) air quality issues, noise impacts, effluent management, power requirements, water requirements, Sydney water catchment issues, financial viability and waste disposal/management.

- **Feed Sources & Quality** – This aspect of the project proposal impacts on a variety of key elements of the project. These include:
 - Transport routes to the plant and volumes for each route
 - The types of plastic material that would be processed
 - The density of the feed material, which would dictate the size of the trucks required to meet the design processing volumes
 - The likely deleterious emissions from the process which would be dependent on feed analyses
 - The availability of suitable feed material for the plant when competing with alternative processing facilities (such as the mooted Parkes NSW 200,000tpa plant due for start-up in 2023).

- **Transport Route Design & Management** – the EIS makes a number of assumptions about the likely delivery routes and the sort of vehicles that would be involved. However, the feed materials would be processed off-site by third parties and they would be using transport providers independent of the Proponent. This raises a number of questions about these assumptions:
 - How would the Proponent ensure that the assumed truck sizes are adhered to?
 - How would the Proponent ensure that the delivery vehicles would adhere to the assumed routes as this would have a significant effect on traffic impacts for the Southern Highlands residents?
 - How would the Proponent manage the flow of delivery vehicles to ensure that there are not significant vehicle queues at the various choke points and on the plant access roads?
 - Where are the detailed road designs that would allow for sufficient turning circles for large trucks and for necessary slip lanes at turnouts from main roadways to avoid significant local traffic interference?

- **Air Quality** – it is difficult to make a realistic assessment of this aspect of the proposal without answers to the aforementioned questions on plant design and feed specification. However, it is noted that the Proponent proposes to manage this issue by installing “fast opening and closing” roller doors on the plant to minimise the escape of any deleterious substances. Again, this raises a number of questions:
 - How realistic is it to assume that truck movement management would be so good that the roller doors would only be open for a couple of minutes at a time (even if that is acceptable in principle which is doubtful)?
 - How wide-spread and comprehensive are the air quality sampling points around the plant?
 - What sort of deleterious elements would be sampled at these points?
 - Where is the comprehensive wind rose analysis that would be needed to highlight those areas most at risk from fugitive emission escapes?

- **Plant Access** – there have been various and often conflicting statements from the Proponent about what roads would be used for access for both the construction period and the ongoing production phase. There are number of potential “show stoppers” in this key question:
 - Beaconsfield Road cannot be considered a realistic option for either the construction phase or the operational phase for a variety of reasons:
 - The road is generally too narrow for heavy vehicle traffic
 - There are childcare centres in the area
 - There is a lot of bicycle and pedestrian traffic along this road
 - The local residents have no desire for a procession of heavy vehicles to enter their domain
 - The proposed route would seem to require private land acquisition on a number of adjacent properties. While this may ultimately prove to be legally possible, it would be highly disruptive to the neighbours involved and may well incur considerable extra costs for the Wingecaribee ratepayers.
- **Community Engagement** – it is apparent that community engagement in the whole EIS process has been sporadic and generally inadequate. The project is crying out for a Social Impact Study to be done given the plant's proximity to residential housing, schools and low-impact light industrial activities (such as the Garvan Institute facility).

While it is conceded that a Social Impact Study was not a legal requirement at the time of the application, a legitimately caring Proponent should welcome the opportunity to gauge the social license it has for the project. Too many SSD development proposals fail to take into account this key component of the assessment process or pay lip service to it.

- **Infrastructure** – the proposed plant site is remote from existing infrastructure for the supply of power, water and sewerage, and the existing infrastructure is of itself inherently inadequate for the site's needs. This would require considerable Council outlays at the Wingecaribee ratepayers' expense with doubtful offsetting benefits. Again this issue should have been highlighted by more comprehensive engagement with the Wingecaribee Shire Council and the provision of a Social Impact Study at the outset.
- **Mixed Residential and Industrial zoning** – the lot purchased by the developer is an unusual lot in so far as it consists of 2 parts, one being zoned IN2 Light Industrial, and the other part zoned C4 Environment Living, meaning that there are several residences in proximity. “Light Industrial” would not normally include a petrochemical processing plant.

- **Visual Impacts** – the conceptual design indicates that the profile view of the main building is approximately 17 metres high and 120 metres long (more than big enough to house a 747 Jumbo Jet), and the whole plant covers 38,000 square metres of total floor space (the size of around 6 average soccer fields). The impact of this large edifice is further exacerbated by the significant slope of the land to the northeast. This obviously presents views of abnormal bulk and scale to the nearby sensitive receptors who would be painfully aware of it at all times.

There would also have to be considerable external lighting at the site for security and safety reasons. This would be highly visible at all nighttime hours to the same sensitive receptors.

- **Noise Impacts** – while again being very difficult to assess without a plant or process design, it is hard to imagine how there would not be a significant noise output from plant and equipment operation. This would be exacerbated by the movement of materials around the plant at all hours of the day and night, as well as many and large truck movements during daylight hours. This continuous noise on a 24/7 basis would be completely unacceptable to the sensitive receptors.
- **Overall Financial Viability** – given the recent announcement of a major NSW State Government supported plastics recycling facility at Parkes, there must be serious doubts as to whether this proposal would be financially viable. If it is not, it would be a major net drain on State and local finances.

The scope and significance of the multitudinous potentially negative community impacts outlined above, when coupled with the fact that these issues are generally inadequately addressed in the EIS, drive us to the conclusion that it is the right idea in the wrong place.

WinZero therefore urges the Department to **refuse this Application at the selected location.**



Derek White
Secretary – WinZero Inc

On behalf of the WinZero Team

Email – secretary@winzero.com.au