

JD Constructions Australia Pty Ltd.  
PO Box 2364  
BOWRAL NSW 2576

20 March 2022

**RE: Application by Plasrefine Recycling Pty Ltd**  
**Moss Vale Plastics Recycling and Reprocessing Facility SSD-9409987**  
**74-76 Beaconsfield Road Moss Vale NSW 2577**

To whom it may concern,

I am writing to object to this proposal and request it be recommended for refusal due to the many significant impacts this project would have on the regional community of Moss Vale, along with the lack of tangible proof as to the benefit to the local community.

I object to excessive use of potable water, excessive wastewater output, noise, air quality, amenity, impacts to the local economy, and the health and wellbeing of the local community.

The EIS shows a lack of consideration to physical constraints such as access, flood prone land, topography, proximity to local residential and agricultural land. In addition, a lack of infrastructure such as water, stormwater and sewer.

These constraints should have raised some questions as to the viability of the site and would have if appropriate due diligence and feasibility were undertaken. It needs to be asked, is this due to an absence of corporate experience or simply lack of commitment by the Director of Plasrefine Recycling to the community?

The proposed use of the local road network for construction is fanciful, particularly the use of Beaconsfield and Lytton roads for construction, had the proponent any genuine concern for the community, for which they desire to be part of, promising to “*BE A GOOD NEIGHBOUR*”, then they would impose their will on the community because they purchased an inaccessible block of land.

Whilst GHD claim many benefits to the local economy from construction and operational phases of this proposal, there has yet to be any clarification as to the actual employment numbers available for the local community, not just the “*waste industry sector*” as mentioned in the EIS.

The total absence of technical and machinery data by GHD and/or the proponent Plasrefine Recycling Pty Ltd, ensures the emissions cannot be adequately assessed in any certain detail, it therefore remains to be proven there will be minimal impacts to resident health and environment as claimed.

There has been a tangible lack of engagement with the community, most learning of this proposal by word of mouth and from impacted residents. Consideration of the social and economic impacts in the EIS have been minimised and, in some places, not considered at all.

Construction of this facility will undoubtedly go to a large commercial contractor based outside of the Southern Highlands. A large proportion of products required for such a large construction project will be required to be outsourced from Sydney or Canberra, being a small regional area, we lack the necessary industry required to supply this type of construction, both in product and labour. Had more than a superficial and dismissive social and economic investigation been undertaken by GHD, this would have been evident.

The “detailed” plans, which should be called basic at best, appear to be a series of work experience level computer generated boxes, located in perfectly flat pad, the occasional RL and basic survey points noted, therefore the ability to assess the facility design is severely impeded by substandard design plans, shown by the absence of a detailed site survey, relevant levels and contours, and cut and fill documentation.

There are no documents showing the modelled structures on the site taking into consideration the topographical limitations, and no indication as to the impact the topography will have on visual impacts given the undulating nature of the land, particularly from the view-field from the North.

A brief look at a contour map of the area shows the significant undulation of the site. The omission of a detailed site survey, showing levels that indicate earth works that would be required to construct this facility on a flat pad, and height out of the ground the structures will be in the northern end of the site, including levels showing how access will be facilitated on both Braddon Road and the proposed extension road to the east. These omissions do not allow for an informed assessment of the development impact.

The EIS provides a disturbing lack of detail in construction management of the site, particularly relating to the management of storm water whilst the site is undergoing considerable earth works, stockpiling of soils and materials on site, and as such, impacts cannot be assessed or managed.

A construction management plan can not be adequately undertaken without the factual knowledge of the levels, constraints, hydrology, wind and weather impacts, water management considerations, cut and fill, engineering, and lastly permissible access. This is not something that can be done via a desk top study.

The proximity of the Wingecarribee River system: this is concerning to say the least, impacts of silt and runoff from a completely denuded site will be considerable given the topography and hydrology of the site, and in consideration of recent weather events how significant water runoff would be managed considering the scale of the site and volumes of water being generated.

Wind analysis is crucial for construction and operational management of this site, as residents understand and appreciate, the nature of highspeed persistent westerly winds that impact this site, both winter and summer. Given the location of the proposed site and its exposed nature, size and scale of the proposal, dust and soil management will be almost impossible, and will impact significantly close neighbours.

The only way this project can be adequately assessed is site inspection, the desktop study and pictorial representation of a perfectly flat area accessed by a perfectly straight and flat extension road access (which has a 24m contour fall), is a complete misrepresentation and must be considered negligent at best.

In conclusion, this site is unsuitable for development, and that is any kind of development, with the identified environmental constraints and lack of access. The question must be asked, why would any credibly experienced company wanting to build and operate an \$88 million dollar waste facility choose a site such as they have? Surely due diligence would have indicated the site as being unsuitable for a commercial waste facility.

This lack of due diligence and feasibility undertaken by Plasrefine Recycling Pty Ltd should not become the burden of the community, the impacts for the local community thus far outweigh any promised benefit by Plasrefine Recycling.

I respectfully ask that all these things be considered when assessing the proposal by Plasrefine Recycling Pty Ltd and the “concept” that GHD are proposing.

Sincerely

John Dick

Director