

Application Number: SDD-9409987
Location: 74-76 Beaconsfield Road, Moss Vale
Applicant: Plasrefine Recycling Pty Ltd
Council Area: Wingecarribee Shire
Consent Authority: Minister for Planning or Independent Planning Commission

Submission author: Joanna Frankland

Position on the proposal: **OPPOSE**

I strongly oppose the Plasrefine Pty Ptd proposal. I am a resident of the Southern Highlands who is raising my young family and also running a business in the district. This is not the right site for what the proponent is planning. The EIS document provided by GHD does not provide critical detail as to the enormous social impact that this facility would have on the Southern Highlands. There is a glaring lack of detail with regards to the structure and associated visual impact. The EIS fails to adequately specify the hugely concerning and untested processes that will be undertaken to process the plastic waste materials or the chemicals (that will inevitably leach into our water, air and soil) to be used. Further, the vagueness on road access and the path of frequent and heavy truck movements along and around residential streets, near schools and daycares and on unsuitable (or currently non-existent) roads is extremely concerning.

Residents have consistently raised these same concerns in the limited and unsatisfactory engagement opportunities facilitated by GHD. To see that these issues have still not been addressed in the EIS is both disappointing and worrying. It also follows a general theme of insufficient and unclear information being provided to the community by GHD on behalf of the proponent. At best this has felt like a general disregard for residents, at worst it has felt strategic. As if by ignoring inconvenient questions or rewording pertinent specific questions into vague, generalised and 'answerable' FAQ questions on the Plasrefine 'engagement' webpage the proponent does not need to provide the clarifications requested.

It should be noted that there are still local members of the nearby and impacted community finding out about this project daily. The required community notification undertaken by GHD was patchy and insufficient. The majority of local residents have been informed by concerned community members who have spread the word once realising the scale and impact of the proposal; and, the sheer number of people living in proximity to the site that had not been provided with any detail of the proposal.

The engagement opportunities provided by GHD have included limited 'in-person' engagement sessions; despite strong interest and requests for information from the community. Early engagement sessions were 'closed' to invited residents only. The first community engagement with an open invite attracted some 200 locals. It was a frustrating and micro-managed event. A lengthy presentation based around difficult to see slides followed by a Q&A session where GHD paraphrased handwritten questions (they had participants put on post-it notes) that they themselves selected whether or not to address. This led to an overwhelming sense that our communities questions and grievances were not being listened to or understood. The meeting also raised multiple inconsistencies in what GHD had previously communicated and a complete lack of the basic details that residents were desperate for. Instead, it read (to our community at large) as simply fulfilling a project requirement. More than anything it was taken up as an opportunity to 'sell' a vague recycling process (with a green logo) without any response to concerns about what the actual impact would be on locals, what the site would look like or what the processes would specifically involve chemically or technology-wise. The end result was a community that felt unheard, disheartened and gaslit. It should also be noted that there was NO representative from Plasrefine in attendance at this key meeting.

The next community engagement sessions were hosted during the major flooding event in the Southern Highlands (and NSW at large) in March 2022. Local schools were closed during the week these meetings were hosted, local properties were without power, key roads were considered dangerous, inaccessible and to be avoided; and, to exacerbate this situation, GHD

chose to host these sessions in Exeter village. A difficult to access venue, particularly odd when there were far more suitable locations in Moss Vale. Despite multiple requests from members of the community to provide a more accessible and considerate opportunity, GHD remained unmoved. I attended the online session in lieu of being able to attend in person (which I would have much preferred, like many others). During this session and in emails (attached below) GHD assured us that a 'bookmarked recording' of the session would be provided for those that could not make the engagement session and for community reference. Despite multiple email requests for the link to this recording none was provided. In fact, GHD stopped answering requests for the link and would not confirm that they were reneging on their commitment. The general tone of GHD in engaging with polite but understandably worried members of the community has been so disappointing. It has made what is already a difficult proposal for impacted residents even more so. Members of the GHD 'engagement team' have been dismissive, abrupt and non-responsive. I do not believe that any of the engagement opportunities provided by GHD were genuine. I left both 'engagement opportunities' feeling that I had helped the proponent fulfil their engagement requirements but that the community's deep concerns were ignored, reframed and minimised. I would not even describe GHD as providing 'lip service' on behalf of the proponent, as the words 'beyond the scope' seemed to be used over and over again to cover the enormous deficit of basic detail. It is my assertion that GHD did not fulfil the community engagement required of them for this proposal in good faith. As such I believe that **an independent (i.e. not conducted by GHD) Social Impact Assessment is absolutely critical.**

Further to concerns about the way in which GHD (representing the proponent) conducted community engagement, my key concerns are as follows.

This is not the right site. It is on fragile and ecologically critical riparian land. It is far too close to residents, schools, a daycare. There is no convenient or obvious road access. Even if road access was established, the truck movements are unreasonably frequent and unsafe for our community. The streets required by the proponent are for kids on bikes, families walking the dog, school buses and residents accessing their homes. Not heavy vehicles filled with waste materials.

It will forever change the character of the entirety of Moss Vale and beyond. The traffic issues of Moss Vale are in the process of being addressed. A long identified issue that will take years to rectify at the current level. The district cannot accommodate what is proposed. Moss Vale is evolving into a wonderfully liveable and more affordable option for families in the district. This development threatens this evolution and opportunity for generations to come.

The technology proposed is not detailed, it is untested in Australia and the lack of information provided on all aspects of what Plasrefine intends to do (i.e. the chemicals to be used, true pollution likelihood) is hugely concerning. The information that has been provided is not sufficient to allay concerns. In fact some of the information provided seems intentionally vague to allow for an every changing process. The use of a roller door to protect the air quality and noise impact does not seem either adequate or acceptable.

I know there needs to be a solution to our plastic consumption. This is not it. We need transparent, truly innovative and clean solutions. This proposal is asking the community to welcome a polluter to our local area, to sacrifice what makes the Southern Highlands unique for the financial gain of a business. This is not about a green recycling project. It is about offering up our land and resources for irreparable damage under the guise of a recycling solution. This is a business opportunity for the proponent. A business opportunity that will inevitably devalue and change the amenity and character of the whole town and take away the business opportunities for so many others. It will take away the current quality of life and safety and opportunities of hundreds of families. For one business. A business with no real investment, allegiance or ties to this community it seeks to profit from.

This is not the right site for what has been proposed. It threatens so much of what makes the Southern Highlands what it is. A place where clean water, clean air, green space, safe streets and the quiet draws both residents and tourists. To wedge in Plasrefine so close to the homes and businesses and schools and daycares of Moss Vale is unacceptable. The process undertaken by GHD to present this to the community has only highlighted the sheer number of unknowns and

the lack of transparency as to what the impact of this plastics business would be. The damage of allowing Plasrefine on the proposed site would be devastatingly irreversible for generations to come. It's not the right site.

Email exchange between myself and the GHD Project Team - Community and Stakeholder Engagement

- My emails: blue
- GHD's emails: black

** The most recent email is below, please start at the end of the exchange and scroll up to read in sequence.

*** The section of GHD's email highlighted in red is a formatting edit [only] to draw your attention to what was committed to both verbally and in writing by GHD but not honoured.

Subject: TIME CRITICAL - Engagement recording link

J Frankland
Mon 21/03/2022 15:51

Please respond to the below. This is a time critical request for basic information. A response I require in writing. Other community members are awaiting GHD's response on this.

It is extremely poor form to receive no reply (not even confirmation of receipt) to multiple emails on this subject in the lead up to the most critical date for our community's response to this proposal.

On 21 Mar 2022, at 9:33 am, Jo Frankland <jo.frankland@outlook.com> wrote:

Submissions are due tomorrow. Can you please provide the link as a priority OR confirm that GHD is NOT honouring it's commitment to providing the recording of the online engagement session to the community?

Thank you.

On 18 Mar 2022, at 4.28 pm, J Frankland wrote:

To: Community Input

I have been informed that the size of the file shouldn't be an issue for providing the link. Both Microsoft and Zoom platforms support meetings of this length being shared. It is not an IT feasibility issue. We look forward to the link being provided as promised and with expedience.

On 18 Mar 2022, at 2:33 pm, J Frankland wrote:

I appreciate it's a large file but it was promised by GHD. I'm sure GHD has the requisite internal IT capabilities to facilitate this. In fact a bookmarked version was promised to the community. I have an email to that effect and members of the community that were unable to attend the engagement sessions are expecting the recording to be available to inform their submissions.

Please let me know as soon as it is uploaded.

I need to notify a number of people. As you are aware this is time critical given the submission due date is next Tuesday. It has now been a considerable amount of time since the meeting, particularly given the EIS timeline.

On 18 Mar 2022, at 2:17 pm, Community Input <cominput@ghd.com> wrote:

Hi Joanna

Thank you for your email.

We are currently looking into the feasibility of uploading the file as it is extremely large (over 3 hours of recording).

The project webpage and EIS contains all relevant information related to the proposal which can be found at the below links:

Plasrefine Recycling webpage: <http://plasrefine.com/news/>

EIS: <https://www.planningportal.nsw.gov.au/major-projects/projects/moss-vale-plastics-recycling-facility>

Kind regards

GHD Project Team

Community and Stakeholder Engagement

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Level 15, 133 Castlereagh Street Sydney NSW 2000 Australia

T 1800 810 680 E community.input@ghd.com

-----Original Message-----

From: J Frankland

Sent: Thursday, 17 March 2022 10:47 PM
To: Community Input <community.input@ghd.com>

Good evening,

At the online engagement session held on the 8th of March 2022 (and in subsequent correspondence) it was stated that a time stamped recording would be made available to the community and that questions asked in the 'discussion' feature would also be addressed. Could you please direct me where I can find this?

As you would appreciate it is important to be able to access this prior to the EIS response submission due date on Tuesday (22nd of March 2022).

I am aware others (who had difficulty accessing the Exeter venue, who were contending with the unprecedented flooding event and due to the timing of the sessions) are also keen to view the recording, we look forward to the link to the material being provided to us with expedience. Thank you.

Regards,
Joanna

Subject: Update - Moss Vale Plastics Recycling and Reprocessing Facility - Engagement sessions

Community Input <cominput@ghd.com>

Thu 10/03/2022 11:49

To: You

Cc: Community Input

Good morning Jo,

Thank you for reaching out to the project team for Moss Vale Plastics Recycling and Reprocessing Facility. We have over the past couple of weeks monitored the advice for travel within the local area. We made the difficult decision last week to postpone the community information session due to the weather conditions. Knowing that these sessions are very important to the community and faced with a similar decision this week regarding the weather, we continued as planned. We acknowledge that school closures yesterday locally made it difficult for some, we are pleased that schools are open again today and many have managed to book back in.

Yesterdays sessions were very productive for the community and close residents that attended, at times getting one on one decisions with the specialists and owners representative. As outlined below, we will leave the booking system open until 1 hour before the sessions start, if you have time we strongly encourage you to attend if you have unanswered questions.

If you were unable to attend the online session in the evening earlier this week, we will be putting a recording of the session up online. However with it being 3 hours will try to add bookmarks to specific topics discussed by the specialists and questions asked by the audience. I note your email from yesterday didn't have any questions about the proposal and I am more than happy to answer your questions via email if you would prefer.

If you are still unhappy with this response, please send an email to haveyoursay@ghd.com who are cc'd into this email.

Kind regards

GHD Project Team
Community and Stakeholder Engagement

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J Frankland

Wed 09/03/2022 18:10

To: Community Input

A predictably tone deaf response to genuine community concerns for safety. Concerns that are informed by our local authorities and the state government. The irony of hosting community engagement events (at Exeter no less?) with zero sensitivity to how the recent week of flooding has impacted this community is noted. I will include it in my submission. At best it speaks volumes as to GHD's general lack of concern for local residents, at worst it shows a total disregard for us. Could you please provide me with an email contact at GHD so that I can submit a formal complaint about how the engagement for this project has been handled? Thank you.

On 9 Mar 2022, at 4:36 pm, Community Input <cominput@ghd.com> wrote:

Good afternoon,

Thank you for providing the project team with an update on your availability for the upcoming in-person engagement sessions, we have removed your ticket and opened the ticket up for other members of the community to attend your session.

The project team continues to monitor the weather forecast provided by the [Bureau of Meteorology](#) and [Live Traffic NSW](#) to confirm any road closures. We acknowledge that some residents have been impacted by school closures and they are hopeful that schools will be open tomorrow to enable them to attend. Based on the current available information we are proceeding with the scheduled in-person sessions at Exeter Village Hall later today and tomorrow. We will leave the booking systems open until 1 hour prior to the start of the sessions, please feel free to make a booking using the following links.

The options are:

- Session 3: 5:30 pm to 7:30 pm, Wednesday 9 March 2022 (in-person) - [Moss Vale Plastics Recycling and Reprocessing Facility | TryBooking Australia](#)
- Session 4: 9:00 am to 11:00 am, Thursday 10 March 2022 (in-person) - [Moss Vale Plastics Recycling and Reprocessing Facility | TryBooking Australia](#)
- Session 5: 1:00 pm to 3:00 pm, Thursday 10 March 2022 (in-person) - [Moss Vale Plastics Recycling and Reprocessing Facility | TryBooking Australia](#)
- Session 6: 4:00 pm to 6:00 pm Thursday 10 March 2022 (in-person) - [Moss Vale Plastics Recycling and Reprocessing Facility | TryBooking Australia](#)

We hope to see you at one of the in-person sessions over the next two days.

Regards,

GHD Project Team
Community and Stakeholder Engagement

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T 1800 810 680 E community.input@ghd.com

END OF EMAIL EXCHANGE