



22nd March 2022

Major Projects
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

ATTENTION: Emma Barnet - Planner

**OBJECTION AND ADDITIONAL INFORMATION REQUESTS
MOSS VALE PLASTIC RECYCLING FACILITY
STATE SIGNIFICANT DEVELOPMENT
SSD-9409987**

On behalf of the landowners of 48-50 Bulwer Road Moss Vale, Resolve Urban Planning hereby both objects, and seeks additional information, regarding the State Significant Development application for the Moss Vale Plastic Recycling Facility proposed at 74-76 Beaconsfield Road Moss Vale.

Objection to the proposal is made on the basis of insufficient information in respect of proposed construction of the road required for access to the proposal.

Additional information is requested in respect of

- Visual impact information, including consideration of lighting
- Landscape provisions and mechanisms for maintaining landscape
- Acoustic assessment
- Detail within the plans of the proposal

Road Access

Objection

The proposed development describes how access to the proposed facility will be undertaken via an extension of Braddon Road, the unformed road to the south of the site, to Lackey Road.

This extension is required to occur via private property being through 9-11 Lackey Road (Australian Bioresources site) and possibly 77 Beaconsfield Road.

All supporting documentation clearly indicates that the project will rely on this new road connection to allow for the construction and operation of the facility.

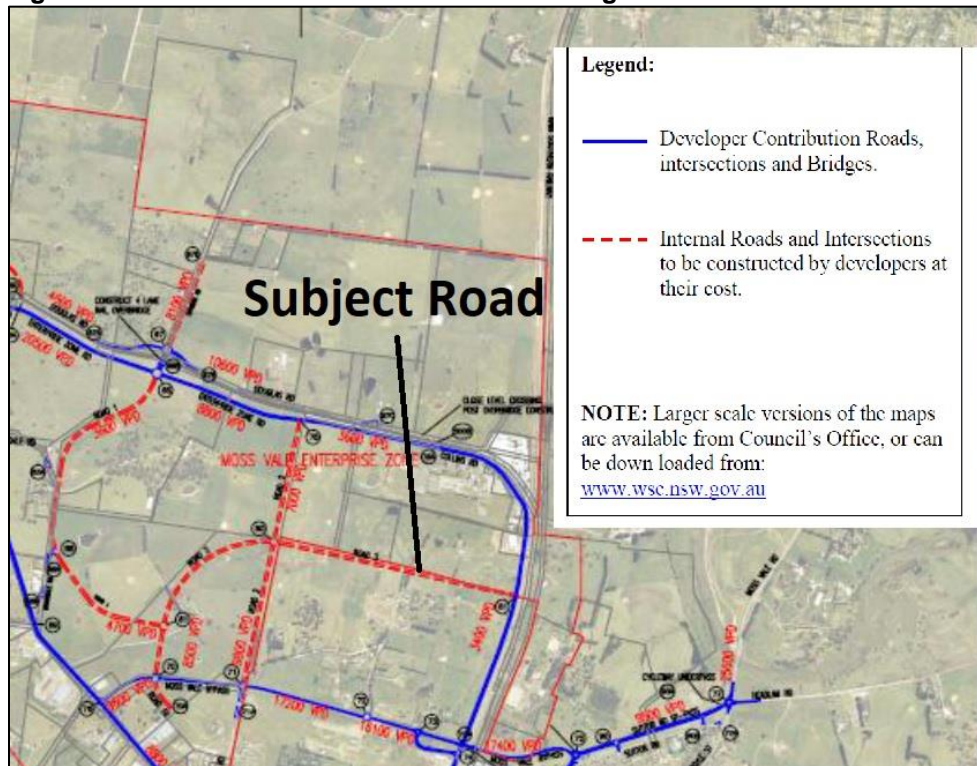
The applicant, within the traffic assessment, indicates that this road will be acquired/constructed as follows:

Since the east-west road (Option 2) is shown in the current Section 94 plan for the Moss Vale Enterprise Corridor (MVEC), Plasrefine Recycling proposes that the costs associated with purchasing land and

building the road be considered as works in kind and offset against potential Section 94 contributions associated with the project. A Voluntary Planning Agreement would be put in place between all parties to transfer the constructed road to Council for future use as a public road (Technical Report 6, Page 33)

The statement of the road being shown in the Section 94 (now known as a 7.11) plan for the Moss Vale Enterprise Corridor is incorrect. The road is not identified within the contribution plan for construction from funds received from contributions, but is in fact identified as a road that is to be fully funded by the developer, see Figure 1:

Figure 1 Extract from WSC Section 7.11 Plan Figure 3



Accordingly there is no mechanism available for the road to be acquired (by Council) and built in a works in kind agreement under the Section 7.11 Plan.

It is therefore fundamental to the application that consent/agreement is made with the owner's of the adjoining allotments to build the road as proposed. Evidence of this agreement is deemed to be required to allow for assessment of the application to proceed.

Further, on the basis of the above, objection is raised to this statement within the EIS Main document:

It has been identified that if construction of the new access road is delayed due to land acquisition issues, the proponent would need to use Beaconsfield Road for construction access until the new road is available.

It is contended that the authority/agreement of the owners of the proposed road reserve must form part of the application in order to allow the assessment of this application to progress.

Visual Impact and Lighting

Additional information requested

Technical report 7 provides information in respect of possible visual impact and mitigation measures, along with a general comment in respect of lighting under Section 8.1.5.

The applicant is requested to provide a lighting plan, and analysis of possible light spill/visual impact on the site's context, given the 24 hour nature of the operation.

Section 8.1.5 spells out the requirements for the lighting design, however it is considered necessary to properly assess the application for a detailed lighting plan/visual analysis of lighting to be made available for review by the assessing officer and the community.

Landscaping

Additional information requested

It is noted that the proposed mitigation measures include the provision of a 14m wide landscaped screening area within the portion of the allotment to the south of the unformed road.

To ensure this landscaped area is planted and maintained in perpetuity, given it will be fundamental to ensuring the visual impact of the development is minimised, the Department is requested to condition any consent to place suitable covenants over this part of the allotment for the purpose of maintaining the landscaped area. This will ensure the area is maintained even if the allotment is subdivided from the portion of the allotment to the north.

Landscaping is also indicated as being tubestock only for the bushland screening area and include a number of slow growing gum species. In due consideration of the role landscaping will play in screening the proposal the following is requested:

- Additional plan details indicating the planting layout within the screening areas
- Plant selection to include a mix of large gums and faster growing species
- Larger pot sizes to be selected, with gum species to be 100L pots, or similar, to maximise the effectiveness of the plantings as soon as possible after establishment

Further, the landscaped area within this portion of the allotment is to be established prior to the commencement of any construction work, to maximise the opportunity for the area to be established as quickly as possible. This is required to be a condition of consent.

Acoustic Assessment

Additional information requested

The acoustic assessment is noted as including consideration of the truck deliveries within the site, including limiting the hours of deliveries to between 7am and 6pm.

However it is unclear from the assessment whether the acoustic assessment has included an allowance for reversing alarms being installed on all delivery trucks, as is likely to be the case (given the proponent has no real control over reversing alarms fitted to trucks not under the ownership of the proponent).

Reversing alarms, at the frequency of the deliveries (10 per hour) is considered to be a significant acoustic impact on the surrounding allotments.

The applicant is requested to provide additional information in respect of the extent of assessment completed for trucks fitted with reversing alarms.

Further, the applicant is requested to consider a reconfiguration of the proposal to remove the requirement to reverse onsite. This would eliminate any possible acoustic impact from the alarms and is recommended within the acoustic assessment (Section 6.3, Page 61):

Operations should be designed to minimise reversing movements onsite

Further, it is requested that, in the event of consent being issued, the Department applies the following condition in respect of acoustic mitigation:

The Applicant must:

(a) implement best practice noise management, including all reasonable and feasible noise mitigation measures to minimise the construction and operational noise generated by the development

(b) regularly assess the real-time noise monitoring and meteorological forecasting data and modify, and/or stop operations on site to ensure compliance with the relevant conditions of this consent

Such a condition will ensure that the operation will not impact on the acoustic amenity of the site's context over time.

Finally it is requested that a condition be placed on the proposal to establish signage on surrounding roads advising trucks to not use air brakes to avoid disturbance to residential properties.

Plans of Proposal

Additional information requested

The plans of the proposal, provided at Appendix I, are conceptual plans of the buildings only. To allow for a proper assessment of the application the following additional details are requested:

- Confirmation of extent of cut and fill required across the site
- All boundary setbacks to be dimensioned
- Confirm building heights relative to existing site levels, it is insufficient information to provide approximate heights
- Sections through all buildings
- Plans to clearly indicate proposed materials and colour selections

Conclusion

Assessment of the documentation has confirmed that the application is required to address a fundamental issue in respect of the proposed road required to construct and operate the facility. In addition, additional information is required to allow for a complete assessment of the proposal.

The applicant must address these concerns via amended and additional documentation that is to be made available for further review prior to the application being determined.

We hereby request that notification be provided to the undersigned of when the additional information is available for further review.

Should you have any enquiries in respect of this objection and request for additional information please do not hesitate to contact the writer via email paul@resolveurbanplanning.com.au or mobile 0401 348 204.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Paul McLean', written in a cursive style.

Paul McLean
Resolve Urban Planning
B. Nat Res (Hons.) & B. Urb & Reg Planning (UNE)