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OBJECT

Submission ID: 209683

Organisation: N/A	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues</i>
Location: 2575 New South Wales	
Attachment: N/A	

Submission date: 10/28/2024 8:15:51 AM

*We object to the October 2024 NSW Department of Planning, Housing and Infrastructure’s assessment of the proposed Moss Vale Plastics Recycling Facility. The Proponent (Plasrefine Recycling Pty Ltd) has not yet chosen the operational plant and machinery to be used in the proposed facility (p. 59/84). So, the Department’s evaluation and recommendation are based on assumptions provided by the Proponent which have no basis in reality. The Department’s report also relies on assessments made by other Government agencies which have relied on the Proponent’s claims which have no basis in reality for the same reason.*

*The Proponent is not reliable*

*██████████ was the original director of the Proponent. “Companies owned by ██████████ have been censured by \*██████████ Environmental and Ecological Bureau. Public notices on the bureau’s website show four regulatory infractions from 2011 including air pollution, with Kelilier, a company owned and operated by ██████████, being fined \$6600 in March last year for monitoring failures.” The director of the Proponent is now ██████████ (SMH, 13 January 2022, Recycling: Moss Vale plastics plant leads to protest in the Southern Highlands).*

*The Proponent’s assurances that it will address the concerns of Government and the community cannot be relied upon. The Proponent has disclosed no experience in owning or running a facility of this nature. The Proponent has provided no explanation of the financing or economics of the project or of its technology. All the Proponent has is a block of land and a proprietary disinfectant, with no disclosed independent assessment of its efficacy. The Proponent’s big plans have caused the local community and Government to chase an illusion. The proponent has no substance.*

*Our concerns*

*We share the local community’s legitimate concerns that the proposed facility will be noisy, pollute our air, take a disproportionate amount of our precious drinking water, discharge foul material into our waters, and create an enormous amount of waste.*

*The Department relies on the Proponent’s amended description of its development proposal to find the facility’s waste outputs from its daily operations will be (p. 9):*

*“€ 10,000 tons per annum of residual waste such as stones, wood blocks (sent to landfill)*

*“€ 9,000 tons per annum of dewatered sludge and filter cake residue*

*“€ 1,800 tons per annum of filter residue and waste filters*

*“€ 2,000 tons per annum of metals*

*The Department’s evaluation makes no reference to how this waste is to be disposed of, let alone whether this can be done economically or effectively.*

*Facility is on a flood plain*

*The Department dismisses any concern about the impact of a “Probable Maximum Flood event’. We are not told the size of this event. The local community knows that there can be substantial flooding on occasion in our*



*region which can cause considerable damage to buildings, roads and the environment. The site is not suitable for this facility because of the flood risk.*

#### *Impact of heavy vehicles*

*The proposal that the heavy vehicle traffic be re-routed along Douglas/Collins and Berrima Roads creates a new set of concerns which the Department's evaluation has not considered. The heavy traffic would have to go through three uncontrolled railway level crossings along minor country roads which were not constructed to bear use by the expected number of heavy vehicles. The Department's assumption of a small number of heavy vehicle movements during the morning and afternoon peak hours is not based on reality. The likelihood is that heavy truck movements would be bunched around times which balance the interests of truck drivers and the facility. There is no reason to assume trucks movements will be more or less uniform across the day (p. 178, 184). This bunching of heavy vehicle movements is likely to cause substantial delays, particularly around the three uncontrolled level crossings and at the entrance/exit to the site.*

#### *Conclusion*

*We are opposed to the Plasrefine proposal. The proposal for the facility itself has no substance. The proposal does not reveal which plant and machinery are to be used. So, there is no basis for the estimated cost of the proposal. No detail of the financing or the economics of the facility have been disclosed. The Proponent has a shadowy background that we cannot rely upon. We are left to chase shadows so the Proponent can secure an approval, presumably to seek government funding to support a development with no financing, no economic assessment and no community support.*

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