



BEV HORDERN

OBJECT

Submission ID: 216560

Organisation: N/A	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues</i>
Location: <i>New South Wales 2577</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/21/2024 9:45:56 AM

Please see attached

INTRODUCTION

I strongly **OBJECT** to the Plasrefine Plastic Recycling Facility (the Facility), on numerous grounds. I understand the IPC's request that information in this submission be novel and I take note of that, however I may refer to subjects covered in my two previous submissions as it seems The Department of Planning, Housing and Industry (DPHI) have ignored them. I will focus on areas which the proponent can't just **mitigate or manage away** and attempt to categorise my concerns under the headings provided by the IPC on Page 3 of the Public Submission Guidelines ***"Matters the IPC must take into account where relevant"***.

"Provisions of rules and regulations that apply to the land to which the proposed development relates":

LAND USE CONFLICT and UNSUITABLE SITE SELECTION

This poorly chosen site is adjacent to land zoned Conservation 4 which is described by NSW Department of Planning thus: ***"Conservation clearly signals that this zone is about conserving the environmental values and natural qualities in areas where it applies."*** There is **NO BUFFER** between this land and the development, which, because of its operational demands, cannot be designed to create an adequate buffer. The development covers over 77% of the site's area and proposes offsite landscaping to mitigate its visual impacts because it's too small to accommodate sufficient measures onsite. This offsite parcel of land, while owned by the proponent, cannot be considered for use in order to create a so-called visual buffer. We have been directed by the IPC to not refer to the proponent in our submissions as the proponent could change, yet the proponent plans to use his C4 land as part of the proposal. This is surely a contradiction and is untenable?

We have been told by GHD, that Plasrefine has a right to occupy General Industrial land because it is a permissible use. I strongly contend that, based on the scale, nature and intensity of the proposed development's operations it is properly characterised as a **potentially hazardous heavy industry** that should be situated in a Heavy Industrial Zone or at a minimum, a site which can offer the requisite level of separation from sensitive receivers, provide sufficient area onsite to incorporate appropriate setbacks and effective mitigation measures and does not necessitate a highly compromised design due to the site's significant constraints and proximity to residential land and surrounding lighter industrial and commercial land uses such as Garvan next door. Based on its current zoning it is totally inconsistent with two critical Objectives for E4 land as stated in WELP. ***"To minimise any adverse effect of industry on other land users."*** and ***"To ensure that new development and land uses incorporate measures that take account of their spatial context and mitigate any potential impacts on neighbourhood amenity and character, or the efficient operation of the local or regional road system."***

The "mere permissibility" of a resource recovery facility in the zone does not imply that it is to be expected that the specific form of facility contemplated by this DA is consistent with the objectives of the zone. I strongly urge the IPC to place weight on those zone objectives

that this development does not and simply cannot meet, due to the unique nature and extent of the operations involved and proposed and the site's constraints, and not approve the DA on this basis.

The reality is that if this massive factory is built on the current site, the community's vision for the development of the Southern Highlands Innovation Precinct (SHIP), which has been publicly exhibited, will be sunk (along with Garvan), it will dominate the landscape for kilometres with emissions, noise, vibrations, light spill and traffic in its 24/7 operation and ratepayers will forever be covering the cost of damage to local roads with the operations proposed to generate 100 heavy vehicle movements and 280 light vehicle movements per day. The riparian zones will be impaired and water quality of the Sydney Water Catchment is at great risk. An inspection of the topography illustrates this.

I support plastic recycling and whilst acknowledging the pressing need world-wide to find a solution – this is NOT THE RIGHT SITE. The Applicant refused an offer from Mrs Wendy Tuckerman MP to find a more suitable site comparable to that in Parkes NSW by Brightmark who will be developing a plastics waste facility within the Parkes Special Activation Precinct which is ideally located at the junction of Australia's two rail spines and which the NSW Government hopes will become an inland port, transferring export ready goods to domestic and international markets, and creating new industries including energy and resource recovery. Brightmark, a company with proven experience in plastics recycling, has found a suitable site. **Plasrefine has not**, yet.

“The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality”

The greatest concern and anxiety has been caused by the inherent **environmental impacts** and risks this proposal holds. The Commission will be well aware of the current academic papers written about the acknowledged risks the leakage of **forever chemicals, microplastics and Chemicals of Concern** pose. There are countless peer reviewed documents indicating the impossibility of preventing any leakage of these into the air, land and waterways from such facilities. Let alone in the case of leakage due to human error and accidents. The prevailing westerly winds will carry these toxins overland across the Highlands impacting on human health, agriculture, viticulture and tourism. The proximity to the riparian zones leading to Sydney Water Catchment is a risk too great to accept on any level. Being able to filter out 'most' of these chemicals is just not good enough when this inappropriate site is considered. This may be more acceptable if the facility was located away from residential areas, sensitive waterways, fragile environments and agricultural land.

How can this be approved when in Appendix 2 of the Department's Assessment Report there are 27 ***“revised environmental mitigation measures to be incorporated into management plans where relevant”***. Who decides the relevance? 27 promises which, and I quote *“will be developed prior to commencement of construction ...during the detailed design phase... plan developed after construction contractor is engaged.”* These are all **after the fact** and rely solely on compliance of the proponent. Once again I will refer to the proponent only in terms of the compliance issues and conditions of consent – it is clear that

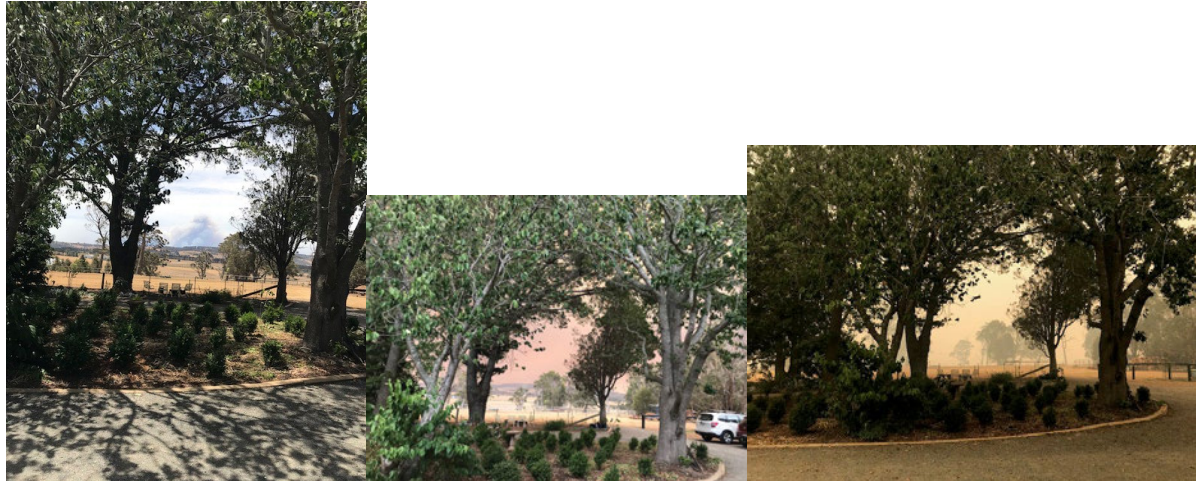
ANY proponent is capable of non-compliance and to leave the reporting and policing of this to the community is beyond ridiculous. SIMP and CCC are just pie in the sky concepts regarding this dangerous facility. The fact that it is assumed that a Council representative will have to be on committees places an unreasonable burden of their limited resources which the ratepayers will have to fund. The Department has recommended a range of *'stringent conditions'* which include undertaking a series of *'air quality validation events'* after commencement of operations – at six months, two years and at full operation and that contingency measures would be implemented in a *'timely manner'*. Six months, two years and at full operation, whenever that is, is hardly timely or stringent.

Most concerning of all in these revised ***"environmental mitigation measures"*** is ***"Fire risks : plans to be developed prior to commencement of operations"*** Fire is a real and present danger based on recorded events in such factories worldwide. The risk of fire and the inability of our local services to manage such a catastrophic event at a site located so close to residential homes and Garvan ABR should be enough to shut this project down now! To say the smoke will rise vertically is just an insult to anyone's intelligence! Lack of adequate local resources and no provision of an Asset Protection Zone around the property with road access on only two sides, means a fire will take hold quickly and threaten lives, property and the health of the community via toxic smoke inhalation.

We have just been informed that any water used to fight a fire would be retained in the building in underground tanks. In Section 2.7 under Fire Management, it states : *"Building 1, which would contain combustible waste material, would include an automatic fire sprinkler system, fire detection and alarm system, automatic smoke exhaust system and a building occupant warning system."* No mention of underfloor tanks here - yet another last minute addition by GHD. What about the water sprayed on the buildings from outside by large appliances? Nothing will control the spread of contaminated water in a fire like the one shown below in a facility of a similar size to Plasrefine with the closest NSWRFs station unmanned and unequipped for such an event – see below.



The risk of fire brings a visceral fear to those, like me, living just 250m from the site. When the many documented fires in these facilities are considered (many were referenced both verbally and visually by speakers during the three days of meetings) we know it's not if, but when this happens. The catastrophic impact of a bushfire igniting Plasrefine is a nightmare scenario you would not wish to imagine. The site is in a Bush Fire zone. A search of the RFS Fire Prone Land check for 74-76 Beaconsfield Road states that ***"The parcel of land you have selected is within a designated bush fire prone area."*** We know from experience, the risk of bushfires in our area having lived through the 2019/2020 drought and bushfire which came towards the highlands from several directions. The photos below are taken from our home towards the site. The grass was tinder dry and we had an evacuation plan in place.



Mention of drought brings me to the issue of **water**. When we have the inevitable drought and accompanying water restrictions, will this facility continue to use our potable water? Will our trees die while they make products which are one use away from landfill anyway? Where is the justice in that?

The **riparian land** is a valuable environmental asset in need of protection. Below is a picture of the flood study from GHD's own documents. The accompanying video was taken by myself in March 2022 after heavy rain. It is taken at the south eastern corner of the site and the power of the flow is seen clearly – this water will wash unwanted chemicals into the Wingecarribee River and possibly flood the outdoor retention basins. (double click on video)



The **Social Impact** on the community has been demonstrably illustrated by the numbers who have attended meetings, met with media, written submissions previously and now currently in response to IPC involvement. The stress on members of the community and the level of emotion evident at the three days of meetings is indicative of the negative impact this facility's approval has had on their wellbeing. The main focus of concern is for the protection of the **HEALTH, SAFETY AND THE ENVIRONMENT** of current and future generations and ensuring the adverse impact of this development on existing residential development, businesses and the future development of the SHIP is avoided. It is incomprehensible that there was **NO HEALTH STUDY** as part of the SIA and that the Health Department did not provide an Agency response. Who are the people **accountable** for these decisions? The large number of submissions lodged no matter how brief, is indicative of the huge Social Impact on our Community. No Social Impact Assessment has been done on the economic losses which will result from the destruction of the SHIP masterplan - the impact of which will be multi-generational.

The SIA is not commensurate with the scale and siting of this development and relied on reviews of reviews with no further engagement with members of the community – only a meeting with council... *“specific and targeted community SIA engagement.”* (Page 41 Assessment Report Final SIA 119). You simply **cannot mitigate and manage social impacts.** (124 same page) in a *“performance-based document”* or by means of a Community Consultative Committee (CCC) as recommended by Professor Ryan (130) using information provided to her by the already inadequate SIAs done in house by GHD and reviewed by Ethos Urban using the same information. It is doubtful that community members who have been so bruised mentally by this development will want anything to do with monitoring compliance. Once built the worst fears will have been realised – it will be too late. The fact that *“the Department notes that in the period 2022-2024, the SIA documents were **revised multiple times** to ensure the final version was as robust and comprehensive as possible...”* (Department's Consideration 133) means nothing. To **revise multiple times** and create a **final version** without undertaking further face to face engagement with the community and with no Health Impact Assessment just indicates that this was just a tick the box exercise.

The Social Impact has been exacerbated by the **PROCESS** which began for us on Christmas Eve 2020 with a letter *“to the resident”* informing us of what was going to happen and requesting we allow noise and vibration equipment be placed on our land – just before everything closed down for Christmas and New Year! A ‘good neighbour’ would never do that! It has dominated our lives ever since and had a negative impact on our health.

When responding to two EIS's we were given a non negotiable period of just four weeks to digest and respond to literally thousands of pages of technical information. Requests for an extension of time from the community fell on deaf ears. Yet, when the proponent failed to meet a stated response date we were told by planning that this date was not a *“statutory deadline as such.”* Community engagement has been contrived and controlled by GHD. Meetings were limited in numbers, questions limited to one, attendees limited to one per household, no follow up question if an answer was unsatisfactory or unclear, total disdain for the community alienated by this process. Below there is a section of a graphic

prepared by GHD on their community engagement and I would request that the commission obtain a copy of the letter box drop document and the contract for delivery. It is beyond belief that 4,600 community members were informed of the existence of the Plasrefine proposal, so many have not known about it or can recall any letter box dropped information.



There will be a negative **economic** cost benefit of this facility. The SHIP has already lost two investors, people are hesitant about buying homes and land in Moss Vale and those with homes stand to lose the ability to sell them when they have to move out due to the risks of living near this facility. The intergenerational impact of the loss of the huge potential the SHIP represents for our young people to obtain excellent jobs in technology and other advanced industries is immeasurable. It's incomprehensible that Plasrefine may attract Government Grants after approval. This would mean that our (taxpayers') money would go towards the very destruction of our own community.

The suitability of the site for the development.

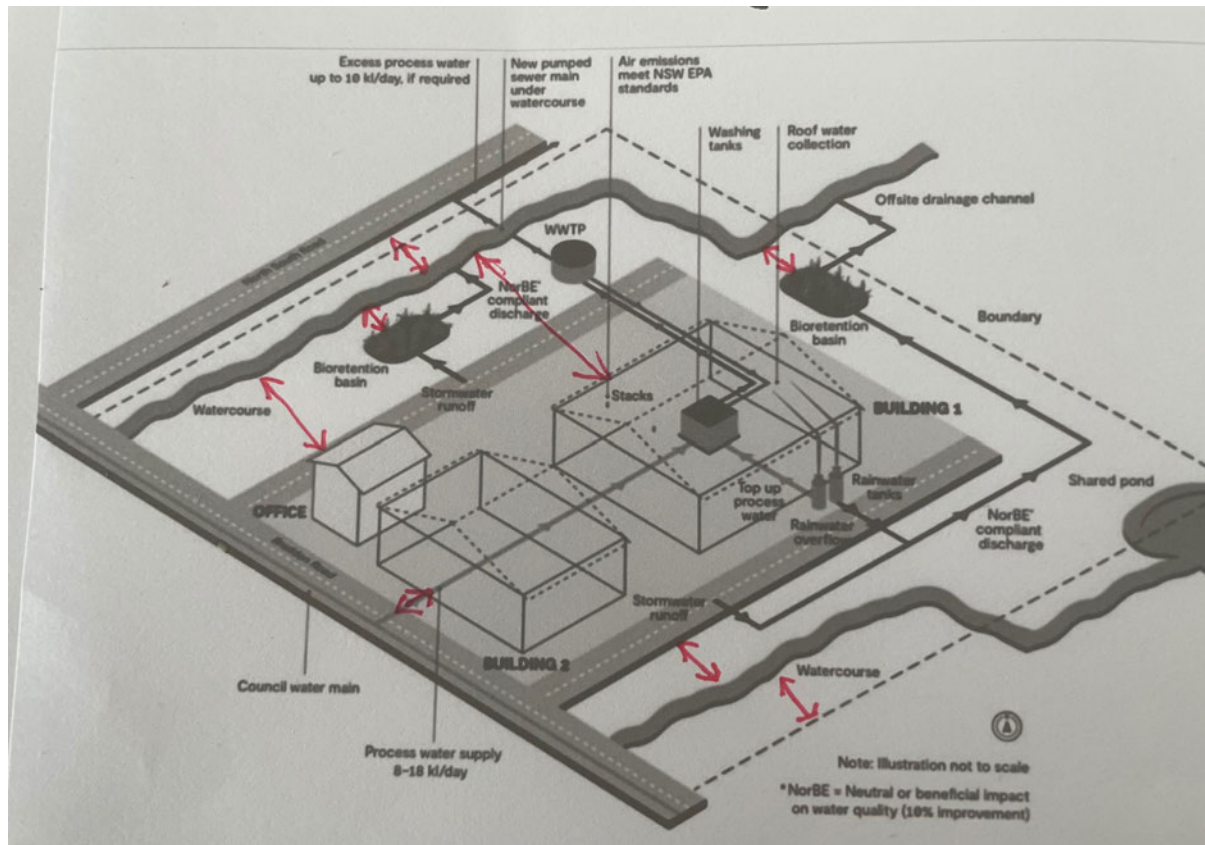
This site is an undersized industrial legacy block which is not big enough for the facility proposed, further compromised by undulating land, spring and rain fed riparian zones on two boundaries, no road or rail access, no room for adequate buffering between it and adjoining C4 land and totally incompatible with the Wingecarribee Shire Council's Southern Highlands Innovation Park Draft Plan which is almost approved and has been funded by the NSW State Government in recognition of the employment and development of smart businesses which will be zoned into hubs of similar enterprises. Architectus, the firm who have developed the SHIP plan state *"There is support for industrial uses such as waste recycling, but these uses need to be located in the appropriately zoned land. Plasrefine as an example, is a plastics recycling facility proposed to be located on an E4 General Industrial zoned lot when this use is more aligned to E5 Heavy Industrial and should be located accordingly."*

It is impossible to determine from information in the Assessment Report, or anywhere else in fact, exactly where the buildings sit on the site. Images and montages fail to show stacks, underground tanks, distances from boundaries, even the parking for 8 trucks seems undersized (why the need to have 8 truck parks when we are told there will be no queueing?) There were several drawings presented in the last minutes of the last day of the IPC meetings. Can GHD just keep adding, modifying their plans ad infinitum as they have done for the last four years in order to massage this project through to an approval by DPHI? On page 14 of the April 30, 2024 Response to DPHI RFI ... *"The proponent should update the project to ensure consistent designs are shown."* The response was : *"noted"*. Noted, but nothing changed.

A week after the last online IPC Meetings, GHD produced yet another document regarding the fast-acting roller doors. How can a project get to this stage without GHD actually identifying their suppliers and knowing how long these doors take to open and close? Yet another item left for 'final detailed design' no doubt. It seems so unfair to the community, many of whom have already lodged their submissions and all of whom have addressed the IPC, that GHD can continue to add documentation with alternate facts. DPIE even added a condition at that late stage "...our conditioning will be saying that only while these doors are closed, can the site be operating." (Mr Chris Ritchie taken from transcript)

One day the doors will be open for five hours in total according to Mr Gamble, a week later it's magically reduced to 42 minutes – how unprofessional and unacceptable is this? The drawings presented at this last session were an insult in their naivety as have others been in the documentation with no scale, and few actual measurements, to enable us to see exactly where the buildings sit on the site. This has been indicative of the process from the very beginning. Deadlines for the community while DPHI allowed GHD to constantly update, add, alter to a level acceptable for DPHI to approve – with many conditions. The multiple revisions of the SIA is but one example.

Reference is made (Appendix A Stormwater) of a 5m setback from the riparian waterway with an offset for 5-10m – I understand there should be a 20m zone of protection around riparian land. We are provided with diagrams with no scale or measurements. The measurements I would like to see are those shown in red on the image below.



I have a real concern for the riparian land during construction. Will it be fenced? We are told that the site will need a cut and fill to make it level and above the flood zone. Yet another example of the poorly chosen site on such undulating land. The massive machinery which will be required to undertake such work will be a real danger to this fragile environment. We are all too aware of sites being totally razed pre-construction by unauthorised or accidental use of graders, trucks and other large machinery. It will be too late once the damage is done – the facility would proceed regardless and unsanctioned no doubt. Too great a risk.

From the outset, this poorly chosen site has had no access. We are now on access route number 4! It has been evident that GHD's modelling was carried out with the minimum of professional expertise – using desktop studies to determine alternate routes once it became obvious that their first choice of Beaconsfield Road was totally unsuitable due to the quality of the road and the fact that it would mean that all traffic would come through the main street of Moss Vale, already at capacity. One route even had the trucks travelling along a very narrow road in Berrima with a load limit on it. You would only need to drive down this road to see that it was untenable. More sloppy and inadequate work by GHD. No one believes that trucks will not use their satnavs and follow the fastest route to the site via Argyle Street from both directions and then up Lackey and Beaconsfield Roads. The expectation that this can be managed by the community is outrageous.

The construction timetable (2.3) is unrealistic. You could hardly build a domestic residence in this timeline of 15 months which allows for just two months to re-site a level crossing, extend Collins Road, build north south access road and upgrade Braddon Road. One month to do groundwork, excavation and slab pouring. The upgrade and indeed use of Braddon Road is highly contentious as it is a rural residential road and does not form part of the access to the SHIP.

The public interest, which include the benefits of the proposed development and consideration of intergenerational equity and the principles of Ecologically Sustainable Development

The Assessment Report (p55) makes the following conclusions to which I will add a comment.

“Overall, the Department's assessment has concluded the development would:

- *be consistent with the strategic planning directions of both State and local government*
- *contribute to achieving the State's targets of recovering an average of 80% of all waste streams and tripling plastic recycling by 2030*

Comment :

This facility is not circular. It is greenwashed **down** cycling and the products it makes will end up in landfill eventually. Why should the Southern Highlands which is 1% of the state's population accept such a huge proportion of the State's plastic waste into an area of such high environmental, agricultural, tourism and advanced industry potential? A more appropriate must be found by the proponent.

- *aid NSW's transition to a circular economy by diverting waste from landfill and transforming it into a useable product*

Comment:

It will end up in landfill eventually, meanwhile spewing out microplastics in pellets, flakes and powders as they are transported here and overseas.

- *generate social and economic benefits through the provision of 140 operational jobs and a capital investment of over \$88 million*

Comment :

This is a false claim. There will be no economic benefits, only costs, to the community. The \$88 million will NOT come into the community. Governments will be keen to give grants to this proponent once approved (with conditions) in order to say they are doing something to support the acknowledged huge problem of plastic waste. Profits made will go off-shore and the community will be funding the cost to repair local roads damaged by trucks. The 140 jobs offered by Plasrefine do not compare to the good, clean jobs promised by the strategically designed SHIP. There will be a net loss of both jobs and money.

The Department considers that these benefits can be realised without significant amenity or environmental impacts and therefore, considers the development is in the public interest and could be approved, subject to conditions."

Comment :

"the proposal will also be fully enclosed thereby minimising amenity impacts on nearby current and future businesses. This ensures the development will provide a satisfactory transition between the residential area and broader SHIP land." (P33 AR 140) How can the DPHI accept this? The trucks are not fully enclosed, the lights are not fully enclosed, the doors will be open for long periods each day, the forklifts and machinery will run 24/7, the staff will come and go at 11:00pm, the building itself is enormous and the planned 'landscaping' is probably not going to survive the winds, rabbits, lack of water for long enough to hide even one floor of the buildings. The department requested 'revised photomontages' (6.2.2 151) they may be revised but they are still deceptive.

The under-realisation of the SHIP will lead to intergenerational **inequity**. The business case for this project has not been presented but there are facilities like this which have ceased to operate or gone into receivership due to a lack of markets for their products. If this were the case with Plasrefine, the community would be left dealing with the consequences. There will be many more desirable jobs lost in the SHIP due to this project than the 140 stated positions at Plasrefine, working in a less than ideal environment.

I urge the IPC to give proper consideration to the impacts of this development and interrogate whether the Department's assessment report adequately and accurately presents the impacts. I believe it does not. It makes countless

sweeping and unsubstantiated statements and as an example, when considering the suitability of the site simply says:

*“Although the SHIP Masterplan is not in effect, the Department is satisfied the proposed development will provide a satisfactory transition between the residential area and broader MVEC/ SHIP land through **enclosing the building’s operations**, providing suitable visual mitigation in the form of façade treatment and landscaping and managing air quality, traffic and noise amenity impacts.”*

Respectfully, this statement does not provide reasons that go to the suitability of the site. How can a development of this scale, nature and intensity be said to provide a "**satisfactory transition** between the residential area and broader MVEC/ SHIP land" Where is the transition???

CONCLUSION :

The Commissioners have witnessed the level of Community rejection of this proposal and their horror that the DPHI has seen fit to approve it. In the almost four years since this process began there have been precious few voices in favour of something which will destroy so much and only benefit the proponent whose profits (if any) will go off-shore. Three levels of Government have voiced their opposition Hon Stephen Jones Fed MP, Hon Wendy Tuckerman MP , Hon Judy Hannan MP, WSC technical staff and Councillors are unilaterally in opposition. Where is the duty of care? Where is the Precautionary Principle?

The standard of the DPHI’s Assessment and GHD’s documentation is questionable and not commensurate with the importance of a project determined to be a State Significant Development. So much detail lacking, too much left for after approval, far too many conditions to be ‘complied’ with and way too much risk to Health, Safety and the Environment.

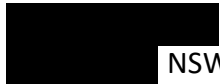
The Government and its Planning Department does not have to say NO to Plasrefine’s plans for a Plastic Recycling Facility (with all its flaws and dubious long term business case) just NO to this site. The sheer number of conditions applied to this project should have indicated a big red flag to those "**accountable persons**" who have chosen to approve this development.

There is a solution : **FIND THE RIGHT SITE for a development of this scale and intensity.**

There is nothing intrinsic about the site which says “place a plastic factory here, it’s appropriate and can accommodate it without unacceptable environmental impacts” with so many identified problems, not the least of which is access. The proponent does not have to be denied permission to recycle plastic in Australia – just not on this site. He has no **social licence to do so and approval of the DA would be contrary to the public interest**



Bev Hordern



NSW 2577

28 December, 2024.

Ref : SSD 9409987 Plasrefine Recycling Facility Moss Vale

Attn: Mr Kendall Clydesdale Independent Planning Commission submissions@ipcn.nsw.gov.au

Dear Mr Clydesdale,

I am writing to the Commission to request that my comments herewith be noted as they are in response to information provided by DPHI and GHD recently. I request it be considered along with other information to be considered up until the January 6 and 13 period.

The first document I will refer to is the letter addressed to Mr Stephen Barry, Planning Director NSW IPC from DPHI's Mr Chris Ritchie dated December 6, 2024.

This letter serves to only reinforce the fact the DPHI has continued to give GHD repeated opportunities to massage this proposal through to approval via constant revisions and changes to their inadequate EIS. Some of these are highlighted below :

Door Opening times (p1) : Mr Ritchie states : *"It should be noted that this five hour time frame does not align with the Department's understanding"*

Comment : The Department sought further clarification from GHD which indicated that under a *"worse case scenario of 50 trucks per day when the site is operating at full capacity"* the doors will now only be open for 42mins per day – not 5 hours. We are therefore asked to accept that the problem is solved. How can Mr Chris Ritchie describe full operational conditions as a *"worse case scenario"*? I will indicate later in this letter why I think 42 minutes is not possible and request here that the IPC demand modelling to prove otherwise.

Operational Noise (p2) : *"Following review of the EIS, the Department requested the Applicant provide additional information to clarify certain noise model inputs. However, the Applicant's response did not adequately address the queries raised. As a result the Department issued further requests ..."*

Comment : Two more chances to modify an inadequate EIS so that ***"the development can still comply..."*** Then there are the following conditions B57(b) and B57(c) regarding keeping doors shut when not in use and restricting heavy vehicles egressing to two per 15 minute periods. Who will police this? The proponent cannot currently ensure the safety of its neighbours from bush fire risk due to their noncompliance to requests from Council to reduce the fire load on their land. Compliance to conditions is hardly likely.

Air Quality (page 4) Mr Ritchie states : *"in relation to the online public meeting.....I made reference to recommended conditions that require the facility to stop operating while roller doors are open. I wish to clarify that the conditions...actually make reference to the doors*

needing to be shut while they are not in use, rather than the Applicant only being able to operate if the doors are shut.”

Comment : How can the community be assured of the competency of the DPHI’s Assessment Report when such a basic error is made by the Executive Director? This Approval has been given without proper interrogation by the Department considering the enormous consequences of final approval.

The final condition mentioned in the document refers to the verification of air emissions on three occasions following commencement of operations (B47) – three assessments over two years is most inadequate.

My next comments relate to the letter dated 19 December, 2024 from GHD’s David Gamble to the IPC, addressed to Mr Kendall Clydesdale, in response to matters raised in correspondence from the IPC.

Item 1 Zero Discharge (page 1): GHD states *“The main reason for discharging water would be to prevent salts from building up in the process water, which would depend upon whether the containers that are provided from the material recovery facilities are fully washed.”*

Comment : Nowhere has the Proponent identified the source or quality of its feedstock and it is highly unlikely that it will come sorted and washed.

Item 2 Traffic and Access (page 2): a) GHD states that for groundworks and excavation, *“the North South Road would initially be constructed as a temporary access road and Route 3C used. This is the nominated route for both heavy and light vehicles.”*

Comment: The newly described Route 3C will entail many heavy vehicles negotiating an extremely dangerous **hook turn** on Collins Road to both enter and leave the property. This presents an unacceptable risk to other road users and train drivers. Routes 3C and 3B will cause destruction of the Riparian land to the east of the site. It will be impossible to protect it from the number of heavy and construction vehicles being used to complete groundworks and construct the 3B route. Will the 20m protection zone be fenced off?

c) (page3) : **Light spill from trucks** : GHD states *“maximum time period for trucks using headlights on the North South Road is during the one hour at sunset on the shortest days of the year.....in addition....during fog conditions in daylight hours.” “ In addition, the proponent has proposed mature vegetation planting along the southern boundary of Braddon Road which would provide a further barrier to minimise any light spill.”*

Comment : Trucks will use headlights during dark winter days well before 5pm as anyone driving would witness many cars and trucks with lights on all day. The light spill will impact residential properties elevated from the site. Vehicles will be entering and exiting the site at shift changeover from 10:30 to 11:30 pm on seven nights per week. The cited ‘mature vegetation planting’ **cannot be considered at all as part of this proposal**. The land on which it will supposedly be planted is NOT on the site and although owned by the current

proponent we have been directed to not consider this proponent as this could change – thus negating consideration of the plantings as a barrier to sight, noise and light pollution.

Item 3 – Biosecurity Measures (page 4): GHD states *“The proposed facility will not receive food waste.....material received will already have been processed at a material recovery facility...Material received would be sprayed with disinfectant whilst waiting (sic) processing.”*

Comment : As stated earlier, the Proponent cannot guarantee the quality of the feedstock and anecdotal evidence indicates that in fact, food waste does arrive at such facilities attached to and inside recycled materials, no evidence of pre-processing or which material recovery facilities will be used has been provided by the proponent.

Item 4 : **Enclosure of the process** (page 4) : GHD states : *“A diagram.....has been adjusted to show photos of the various items of processing equipment and their degree of enclosure. **Specific processing equipment is still to be selected** with the final equipment selection to take place during the detailed design process, which typically follows the planning approval stage.”*

Comment : This adjusted diagram, (Figure 3 Level of enclosure of equipment), is naïve at best (a six year old could do better), its photos and incredibly basic infographics provide scant detail on which to judge the efficacy of such critical equipment, and do not instil confidence in the proponent’s ability or indeed willingness to source state of the art equipment once the proposal is approved. There will be no authorised body to certify this equipment post approval and cost will no doubt be a determining factor. Why, after four years does the proponent still not know where this integral equipment will come from? How can the IPC judge it satisfactorily in the interest of community health and safety?

My last comments relate to a letter sent to Mr Chris Ritchie DPHI from GHD re Roller Door Opening Times, Dated November 15. Please see overpage for additional information and related diagrams.

Throughout this whole (four year) process, every time information is received from GHD, there are omissions, unexplained changes, inadequate diagrams and conflicting information. Here I wish to draw the IPC’s attention to the **discrepancies** in the positioning of the three roller doors, critical to the claim that the Waste Water Treatment Plant (WWTP) will provide protection from the westerly winds shown in one diagram in a document dated Nov 15, 2024 but then the doors have been moved in a document provided ten days later. I also question the claim that a truck will reverse into the facility in ten seconds when there is just not room to do that in one movement. I have done my best to explain this visually on the following page.

Thank you for considering the matters raised herewith.

Yours sincerely,
Mrs Bev Hordern
52 Bulwer Road, Moss Vale. NSW 2577

2. Potential for microplastics emissions during roller door open times

of public submissions stated the possibility of strong westerly winds occurring whilst the roller door open, resulting in microplastics escaping into the environment.

Fig 2 shows that the northern roller doors would largely be shielded from westerly winds by the wastewater treatment plant (WWTP) building. The WWTP is 5 m in height. The southernmost roller door would be protected from north west winds. There is potential for westerly winds to blow into the doors, when open, noting that the time for which the door is open is at the most, 30 seconds when a semi-trailer is reversing, and 20 seconds when a semi-trailer is leaving.

Roller doors would only be open when in use. Therefore, at all times when the door is open, there would be resistance to wind blowing through the opening. This would create resistance to wind in addition to the static pressure. A westerly wind direction (blowing towards the building), would not cause material to be blown through the door opening in the opposite direction.

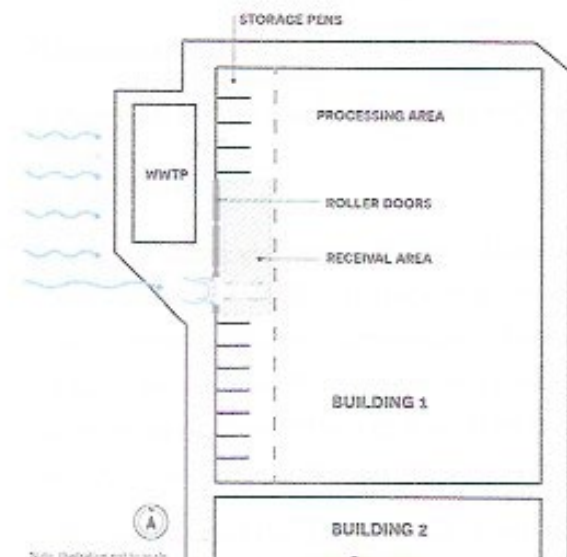


Fig 2 page 3 Ref 2.
Potential impacts of roller door being open for short periods of time

INCONSISTENT DIAGRAMS PROVIDED BY GHD TO IPC.

GHD is claiming that the WWTP will protect door openings from westerly winds. HOWEVER the most recent diagram shows that the doors have moved.



Figure 5.2 Fire safety compliant storage page 11 Ref 1:
Response to IPC from GHD - November 25, 2024

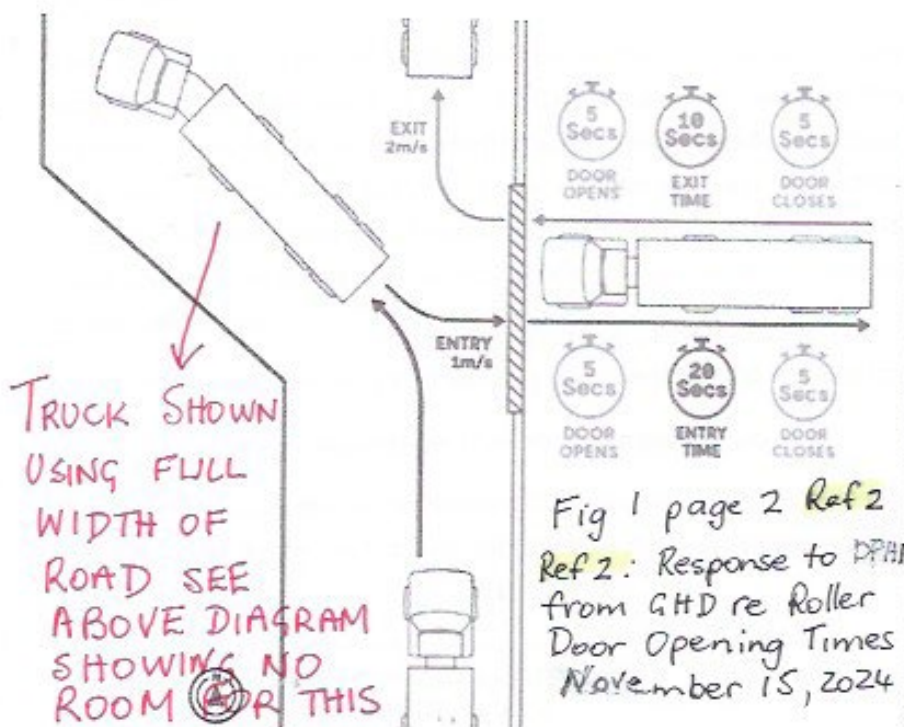


Fig 1 page 2 Ref 2
Ref 2: Response to DPPII from GHD re Roller Door Opening Times November 15, 2024

FIGURE ON LEFT INDICATING ROOM NEEDED FOR TRUCKS TO REVERSE INTO BUILDING IN 20 SECONDS.

THE ABOVE DIAGRAM SHOWS THAT WITHOUT THIS ADDITIONAL WIDTH OF 'ROAD' TRUCKS WILL TAKE MUCH LONGER TO REVERSE.