



JOHN DESMOND

OBJECT

Submission ID: 216668

Organisation: N/A	Key issues: <i>Social impacts, 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 12:52:46 PM

I object to this proposal on the basis that it will impose very significant costs on the local community as well as endangering the wider environment, and the benefits if any appear to be significantly outweighed by the costs.

My detailed objections are attached.

SUBMISSION TO IPC RE PLASREFINE

I object to this proposal on the basis that it will impose very significant costs on the local community as well endangering the wider environment, and the benefits if any appear to be significantly outweighed by the costs.

If the Department wish to promote a plastics recycling policy the correct approach would be to examine the overall demand and the technology available. Some optimum level of recycling could then be assumed and the appropriate general locations and scope of development could be defined. It is unlikely that this process would produce a single plant with the capacity of the one proposed for Moss Vale but more likely to require a number of plants spread around the state. The next step would be to define the type of site, considering road or rail access, proximity to residential or environmentally sensitive areas, water usage and waste water disposal requirements and fire and pollution risks. Once these requirements are defined and general locations identified proposals could then be examined in more detail.

By way of contrast the current proposal appears to have been developed to maximise corporate profits and then the applicant, the consultants and the Department have looked for a way to tick the boxes and greenwash the proposal.

There are a number of specific issues which the IPC must consider in any evaluation:

Zoning

The development may comply with the wording of the original zoning which was determined many years ago with no thought as to the possibility of a development of this type. It is incompatible with the vision for the Southern Highlands Innovation Park and we have already seen some reluctance by potential occupants under this vision because of the looming threat of Plasrefine and the expected environmental damage which it will cause.

Water

The proposed site is very close to the Wingecarribee river and it is estimated that the plant will use 46,300 litres of water a day, which may impact the supply in periods of drought. In addition it will produce 16,300 litres of waste water run off daily. This will definitely pose a significant pollution threat to the water supply of the Southern Highlands and ultimately to Sydney's drinking water.

Microplastics

The science regarding the prevalence and impact of microplastics is not totally settled but the information we do have is very alarming and it seems likely that it will eventually come to rival asbestos and silicosis as a long term health risk. The proper application of the precautionary principle would require at the very least further analysis of the filtration and disposal systems. The applicant does acknowledge that there will be some release of microplastics from the site and one section of the analysis states that the worst impacts of this could be alleviated by residents staying indoors. This is totally unacceptable. The consultants have stated that there would be negative air pressure ventilators set up alongside roof ventilators, which would ensure that when the trucks enter and leave the building any microplastics would be drawn inside. However without fail safe filtration systems they would then be released through the roof ventilators.

Fire Hazards

The applicant has claimed that the development is not in a bush fire zone, which is contrary to the advice the community has received. The facility would contain a substantial quantity of highly flammable material and any fire would be well beyond the capacity of local fire services to control. Back up services from Campbelltown or Wollongong would be at least 45 minutes away and even if they could be relied on it is likely that there would be substantial damage to not only the subject property but the wider community. This is not an exaggerated risk as there have been over 19 fires associated with plastic facilities in Australia in the last 5 years.

Traffic

The site would generate at least 100 truck movements a day in and out and the original plans allowed for this to be through the town centre. I understand that the amended plans require trucks to use the Hume Highway and Taylors Road. This will presumably make it impossible for the facility to accept input from Wollongong coming up the Illawarra Highway. There is no detail on how this would be enforced and without heavy enforcement trucks are likely to utilise the most convenient route.

Local Amenity

Despite the assurances from the proponent I believe that the local amenity will be severely compromised through heavy vehicle movements, air and water pollution, noise and light pollution. At one point in the analysis it was stated that Moss Vale has an ageing and stagnant population. I do not believe that this is true at present but it would be if the proposal goes ahead. In our area many families with young children have expressed an intention to leave if this goes ahead as it would pose unacceptable risks to their children's long term health. A proposal under serious consideration at present is for local people to obtain blood tests to provide a baseline and provide the basis for legal action against both the operators and the NSW Government in the future if known pollution and health risks are ignored.

Conditions of Approval

If the proposal were to be approved it would be important to impose proper operating conditions with adequate enforcement mechanism and appropriate penalties. It would be important that breach of the conditions be treated legally as a strict liability offence with substantial financial penalties and more egregious breaches raising the possibility of custodial sentences.

Solution

The only sensible way of handling these issues is for the proposal to be rejected and for the Department to lay down proper scientifically based site characteristics against which any proposals can be evaluated.

