



ALISON STEPHENS

OBJECT

Submission ID: 217844

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>	

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See submitted document in PDF and DOCX format.

PLASREFINE OBJECTION

I hereby register my strongest objection to the proposed Plasrefine Plastics Facility. I have reviewed many of the submitted documents, and object for the following reasons.

Response to the recommended conditions of consent.

I refer to the proposed conditions of consent and the shortfalls therein.

Item B1 Social Impact Management Plan.

What is the point of doing this plan after the project is approved? It will be too late to apply any mitigation features that have real impact, as they may clash with the conditions of consent or require a S4.55 amendment. There is allowance in this clause for target measures to not be met, as long as they are documented. This is a get out of jail card which means any social impacts will not need to be met or implemented if they are too hard and a report can be written as such.

Item B4 Community Consultation Plan

How disgusting to refer to the nearby residents as sensitive receivers. They are human beings whose lives will be irrevocably altered by this facility being built on their doorstep. They are now at risk should any adverse effects arise from this development. Any fire and resulting smoke will impact them. Any accidental discharge of waste water, airborne contaminants, noise or unexpected breakdowns of vital equipment will impact them first. These families will feel the impact of this development every day via the potential for real harm to themselves and their future. With the scale of this project, all of the residents of Moss Vale are neighbours, and will be impacted every day by the imposition of this facility on our town. We are humans with lungs and minds and biological systems that will be impacted by this facility.

Item B6 Visual Amenity

It is unacceptable to not have a final external facade designed prior to approval. This means the current exhibited plans could be stamped 'approved plans' under this condition, but the final accepted plans may be completely different and no oversight from Council or the community would be included. In the interests of transparency, 'final plans' should be exhibited after completion and prior to any approval.

Item B7, B8 and B9 Landscaping

It is unacceptable to not have a final landscape design prior to approval. This can be prepared at this stage of the design, and commitment to the preparation of this should be prior to approval.

Item B13 and B14 Fencing and Signage

The details of fencing and signage should be able to be documented prior to approval, this is not complicated and again should be agreed on prior to approval. There are many parameters to signage – where will it be located on the site and the buildings, how large will it be? Will it be illuminated? Will it contribute to visual impacts on the area both in the day and at night? These will impact nearby neighbours and the night sky of Moss Vale.

Item B22 Operational Traffic Management Plan

There is no reason this plan can not be prepared now if the design and operation of the facility is known. If there is not enough information about the operations of the facility to prepare this report, then it raises the question of whether the future operator has a full understanding of the management of the facility.

Item B24 Work Place Travel Plan

This clause has no substance in relation to Moss Vale as it currently exists. There is no public transport network available to service the site. There is no pedestrian access to the site from the town. The road network is the only transport into the town centre, and will be heavily impacted by the 140 employees that will come and go in a 24 hour period. There is no alternative than car usage, and this will seriously impact the already congested roads in Moss Vale, considering there are only two railway crossing points between this site and the town centre for vehicles to use.

Has the DPHI taken into consideration how the current traffic patterns of Moss Vale operate? This is a town with only one two way road running through it which actually traverses the railway line. It is the only route for two way traffic, and the addition of the worker and construction traffic will render the town a parking lot. There is only one alternate railway crossing to this which is single lane low height tunnel, so can only cater for cars. ALL construction vehicles over 2m high will need to use the main street of Moss Vale. There will be no way to control these vehicles and how they get to the site.

Item B34 Stormwater Management System

The stormwater management plan should be prepared and approved prior to approval of the DA. It is unacceptable to allow this to be prepared after the fact. There is no reason the design can not be prepared at this stage – this type of development is integral to the facility design on site, particularly to protecting the riparian zones, and should be complete prior to approval. Water quality is of major concern, both for local residents and the greater Sydney region – the southern highlands water feeds directly into the Sydney Water supply. Any contaminants will be spread throughout the water catchment and to the greater Sydney population. This is an unacceptable risk.

Item B39 Water Management Plan

The water management plan should also be prepared and approved prior to approval of the DA. This should be already known as part of the design of the facility, and should be complete prior to approval.

I note that there is little mention of waste water disposal via council's sewer system. Currently the sewer treatment plant is at capacity and there are currently restrictions on development in Moss Vale until the plant's capacity is increased. Has this been taken into consideration in the assessment?

Item B44 Air Quality Management Plan

This is a critical item, and must be prepared and complete prior to issue of the approval. There should be no guesswork here, this must be completely designed prior to approval to meet requirements, otherwise how can any of the promised targets be guaranteed to be met?

Item B79 Waste Monitoring Program

Who then reviews or regularly assesses the implementation of the waste monitoring program? Just the operator? Who reviews the findings?

B57 Operational Noise and Vibration Management Plan

What if the final building does not meet the noise emission requirements? What then? The modelling and design needs to be done prior to construction, there is no easy way to mitigate noise if there are issues once the building is complete.

Response to the Department of Planning Assessment Report dated October 2024 SSD-9409987

I refer specifically to item 187. This refers to operational shift changeover traffic and declares there would be low impact on the traffic of Moss Vale. One of the changeover times is 3pm – a notoriously busy time of day in Moss Vale when the schools of Moss Vale end their day. There are 4 schools in Moss Vale to consider – Moss Vale Public School, St Pauls International College, St Paul's Catholic Parish Primary School, and Moss Vale High School. There is also Moss Vale TAFE and the University of Wollongong Moss Vale Campus. Generally 3pm is currently a full rush hour and gridlock situation, along with the current 9am and 5:30pm congestion. Adding employees to the traffic at 3pm, who will all be in cars as there is no public transport and no pedestrian infrastructure, will have devastating effects on the traffic flow of the town. There will be a definite negative and noticeable impact both during the construction phase, and the operational phase. Remember, there is only one two way crossing under the railway line. This additional load of traffic would have considerable impact on a town that is already gridlocked at 3pm.

187. Overall, the Department finds the predicted hourly operational traffic numbers have been conservatively estimated. The Department acknowledges the public concern regarding operational traffic, however notes that 5 trucks per hour in each direction represents a low contribution to heavy vehicle traffic and operational shift changeover traffic (light vehicles) would only occur three times per day, two of which are outside the peak traffic hours (around 3 pm and 11 pm). Also, given the majority (86%) of light vehicles would not travel via the new level crossing or Berrima Road, no additional impacts are expected to roads to the west. In terms of road pavement impacts, the Department has recommended a dilapidation report be undertaken prior to construction and notes that contributions to Council in accordance with the MVEC Contributions Plan would contribute towards road maintenance and resurfacing, as required.

Findings and Conclusions: Fire and Hazards

Text from the report copied here for reference:

- To address these concerns, the Department requested additional information, which included the response capacity of the local fire brigades. The Applicant advised there were three fire trucks near the site, which would be effective as first attack units. More fire trucks are available in Campbelltown and Wollongong, if required.

What is considered 'near the site'? The unmanned fire station in Moss Vale? The fire station in Bowral 15 minutes away? Campbelltown and Wollongong – both a minimum of 45 minutes away? There are not enough resources to cater for a serious fire at this facility. If the local station truck is at another call, where does help come from? The risk of fire is real and is very likely to occur. Other similar facilities have had serious fires due to contaminants like batteries, a real threat. A fire within the facility would be toxic and hard to control. Fires of this nature often take days to be put out as they continue to smoulder, and require turnover of burning waste to get to further ignition spots within the lower piles of waste. The consequences of such a fire are frightening to consider, and will have consequences for all of Moss Vale and surrounds. Is it worth the risk?

Response to Correspondence from the applicant regarding opening door times

The letter from GHD revising the stated door opening times is a farce. The original stated door opening times of 5 hours a day (as quoted on Day 3 of the public meetings) has been miraculously reduced to 42 minutes in a subsequent submitted written document. It seems that the movement of trucks into the building can be reduced to 30 seconds each entry, this seems highly unlikely considering that reversing trucks into a garage door opening is a complicated manoeuvre, not to be taking at speed and without caution. This timing does not take into account human foibles and other factors necessary to safely ingress and egress the factory.

During the day 3 Public Meeting, Ms Janett Milligan from the Panel questioned the DPHI representatives (time code 4.33.40) 'You talked about the importance of the facility only operating when the doors are closed...' and then relayed the stated 5 hour time period to them. The response from Mr Chris Richie was (time code 4.34.40) 'while that facility is operating, which is spelled out in the conditions, the doors have to remain closed while they're operating'.

If the submitted letter from GHD is correct, then during a work day, with 5 trucks per hour arriving at the facility, the plant and equipment would need to be **shut down each time a truck went through the roller door**. If the plant cannot operate with the doors open, then the facility will need to **shut down** each time a truck arrives, and when a truck leaves. If these are separate movements, this means the doors are open 10 times an hour. **Are we expected to believe the facility will cease operations, as stated by the DPHI, 10 times an hour and re-start equipment when the doors have closed?** This is truly the biggest hole in all of the calculations, all of the noise and emission reports rely on the facility being a ‘closed system’. This is obviously not the case, and as such the reports are not accurate. This alone should be the catalyst for refusal of the application.

IN CONCLUSION:

Information pertaining to the complete operation of the facility should be known before commencement. Air quality, noise levels, traffic management – these are all able to be prepared in advance IF the proposal is well considered and thought out. If these items are now known at this approval stage, when will they be known? After the facility starts to operate? At that point failures in the design and management will be impossible to mitigate, and will result in a facility that does not run in accordance with regulations, and is an environmental disaster, an embarrassment to the Government that approved it, and a white elephant that has wreaked havoc on Moss Vale - on the residents, their children, their property values, and their lifestyle.

This final statement from the DPHI report is the most concerning.

199. 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
 - aid NSW’s transition to a circular economy by diverting waste from landfill and transforming it into a useable product
 - generate social and economic benefits through the provision of 140 operational jobs and a capital investment of over \$88 million
200. 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.

Who is the public? If it is the residents of Moss Vale and the surrounding townships, then it is most certainly not in their interest. If it is the children playing in their school playgrounds in the shadow of this facility, then it is not in their interest. If the public is the extended family and friends of residents that they love and care about, then it is not in their interest. If it is the tourists that visit this region for the beautiful countryside, the unspoiled landscape, the wineries and local produce, then it is not in their interest. This seems to only be in the government’s interest, to tick the box to say they tried to do something about plastic waste. This is not the way to resolve the problem of plastic. It needs to be stopped at the source. If as much effort was put into reducing or eliminating plastic as there is in dealing with it as waste, we would not be needing this enormous and potentially dangerous factory inside our town.

This is not the right location for such a facility, it needs to be located with a significant buffer zone far from residential zones, where it does not impact the community. For the safety and welfare of the people of our town, you must refuse this inappropriate development and save Moss Vale – **it is not the right site.**

Alison Stephens.