



**CATHRYN BENSLEY**

**OBJECT**

Submission ID: 217895

Organisation: N/A	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues</i>
Location: New South Wales 2576	
Attachment: Attached overleaf	

Submission date: 11/24/2024 11:02:57 PM

*I absolutely oppose this development. Please find attached my submission.*

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Moss Vale Plastic Recycling Plant. SSD-9409987

I vehemently object to this project being approved on a number of grounds. The two I want to cover here are:

1). Risk of contamination the The Sydney Water Catchment and the water supply for Wingecarribee and Goulburn.

2). Not in the community interest.

I urge the Commission to approach their decision from a “First, do no Harm” perspective.

This project site has been opposed by all 3 levels of our elected representatives. Along with offers to help the proponent find an alternate suitable site.

Federal member. - Stephen Jones (ALP)

State member - Wendy Tuckerman (LIB) Goulburn

State member - Judy Hannan (IND) Wollondilly

Wingecarribee Council - 7 (IND)

1 (ALP)

1 (Greens)

Their opposition cannot be call political bias as they represent the full spectrum of political views.

Facts that are already agreed supporting my concerns.

1) PFAS will be present in the feedstock in the plant.

Source - Letter Dr M Bowman dated 30 October 2024

2) Microplastics will be present in the plant

Source - Letter Dr M Bowman dated 30 October 2024

3). Moss Vale Sewerage treatment plant has no treatment element to remove microplastics or PFAS.

Source - Letter Wingecarribee Council undated but uploaded 31.10.2024

4) Prevailing winds strongly from the West, significant winds of Moderate, Strong and Gale force.

Source - BOM wind rose for Moss Vale weather station.

5). No Air quality sensor to the East of the facility on top the escarpment.

Source - EIS

6). No Buffer zone to residential development or to Sydney Water Catchment.

Source - DPHI doc dated October 2024

In regard facts 1 & 2, Dr Bowman’s claim that PFAS and microplastics will not escape the facility cannot be considered independent, considering his conflict of interest as an employee of GHD.

I urge you to look at independent studies, such as Professor Faisal Hai and Dr Michael Staplevan Et.al from UOW. Published 1 December 2023

<https://www.sciencedirect.com/science/article/pii/S0048969723047150>

<https://www.science.org/stoken/author-tokens/ST-1733/full>

Their research backed up similar studies from the UK E Brown Et al.  
These studies finding significant microplastic escape from plastic recycling facilities.

Dr Bowman himself, in a podcast - Talking PFAS. Ep 40, Clean up Conference Adelaide 2022, stated

***“We need to really not let these chemicals out into the environment in the first place. We don’t want them in our drinking water. We don’t want them in our food. We want to have safe breathable air. We want to have safe drinking water and it is best to ensure that we are not releasing chemicals into areas we are using for food and water.”***

Yet in his letter date 30 October describes the plant

***“Designed to MINIMISE release of Microplastic and PFAS”***

And

***“Spadeable filter cake may or may not contain PFAS”***

### **NOT GOOD ENOUGH.!**

Growing evidence of health issues related to microplastics and for PFAS contamination to our drinking water are of great concern, highlighted by the fact that there are currently 3 reviews looking into this.

- 1) NHMRC - Review of PFAS in Australian Drinking Water
- 2) Federal Select Committee calling for submissions on extent, regulation and management of PFAS
- 3) NSW Parliament Select committee on PFAS contamination in Waterways and drinking water throughout NSW.

There appears to be enough red flags here to warrant halt to any suspect development in Water Catchment areas Nationwide. And great caution applied in consideration of any project where PFAS and Microplastics are a risk.

Concern surrounding Community Interest.

This project, if approved, will scuttle the Wingecarribee Council’s concept of the SHIP (Southern Highlands Innovation Park). This Masterplan aims to develop areas grouping similar projects together. As the ABR is an existing development it should be surrounded by similar sensitive projects. Not an industrial dinosaur as proposed by Plasrefine. The SHIP has the potential to generate much employment for the younger population. Far greater than the 140 mostly unskilled positions that could be offered by Plasrefine.

The increase of 100 large truck movements through New Berrima and down Douglas Road burdens locals and Council alike. Road maintenance will add cost to locals though higher council rates in the future. Funds already do not go far enough to maintain our many kilometres of roads.

The Ethos Urban SIA dated September 2023 and the DPHI assessment document dated October 2024 are obviously done as desktop evaluations and evidence of some parts (or maybe all) of the documents written by AI and failed to be checked by actual research. How else can explain statements such as Quote ***“The combined flow of water travels in a NE direction, under Collins Road, until it reaches the Wingecarribee River. THE WINGECARRIBEE RIVER FLOWS TO WINGECARRIBEE RESERVOIR, WHICH SUPPLIES DRINKING WATER TO NEARBY TOWNS, GOULBURN AND SYDNEY.”***

This is incorrect.

The Wingecarribee River actually flows the other direction through the platypus habitat at Berrima and joins the Wollondilly River, flowing onto Warragamba Dam.

The Ethos Urban document shows no evidence of actual, on the ground, research of the population or growth in the September 2023 update. States expected population growth from 2022 - 2041 in the SSA to be a mere 410 people.

Even rudimentary research show major housing development Ashbourne Estate underway now, will have a minimum 1200 new homes, could be up to 1500.

Next stage of Darraby Estate some hundreds of new sites

Our schools and childcare centres are all bursting at the seams, again would have been found if actual research completed.

Neither of these document can be trusted and its no wonder the community has no trust in the process to date.

A final comment

Roller Door opening times.

Referring to letter from David Gamble dated 15 November 2024.

Point 1.1 Trucks entering the building.

Errors in his interpretation of the Architectural Specification document provided by DMF International. Series RL3000 Rapid Roller Door.

Quote from document ***“The motor drive is to be a 3 phase geared motor with electric brake. Door speeds to be adjustable with standard opening speed of up to 1.3m / sec and closing set at 0.7m/sec.”***

Being a geared motor with electric brake means there will be a slowing of the door at both the top and bottom limits.

Mr Gambles calculation of 5 seconds to open and to close is therefore incorrect, it will be far greater.

Also the time calculated for the truck to reverse in appears to be saying the truck will already be in motion. Not starting from stationary. What truck driver would be prepared to already be reversing prior to doors fully open. Same errors in calculation into trucks leaving building.

The Series RL3000 Rapid Roller Door has a maximum application of 36sqm so the doors here will be pushing the limit possible. Also states ***“However, it is limited in external doorways exposed to high wind. Heavier windbar available to tolerate winds speeds of about 70 - 80 km/h.”***

It has been shown a number of times that winds will regularly exceed these.

I am not an expert in these calculation and request that you insist a door of exact size and wind conditions is tested and timed for the truth.

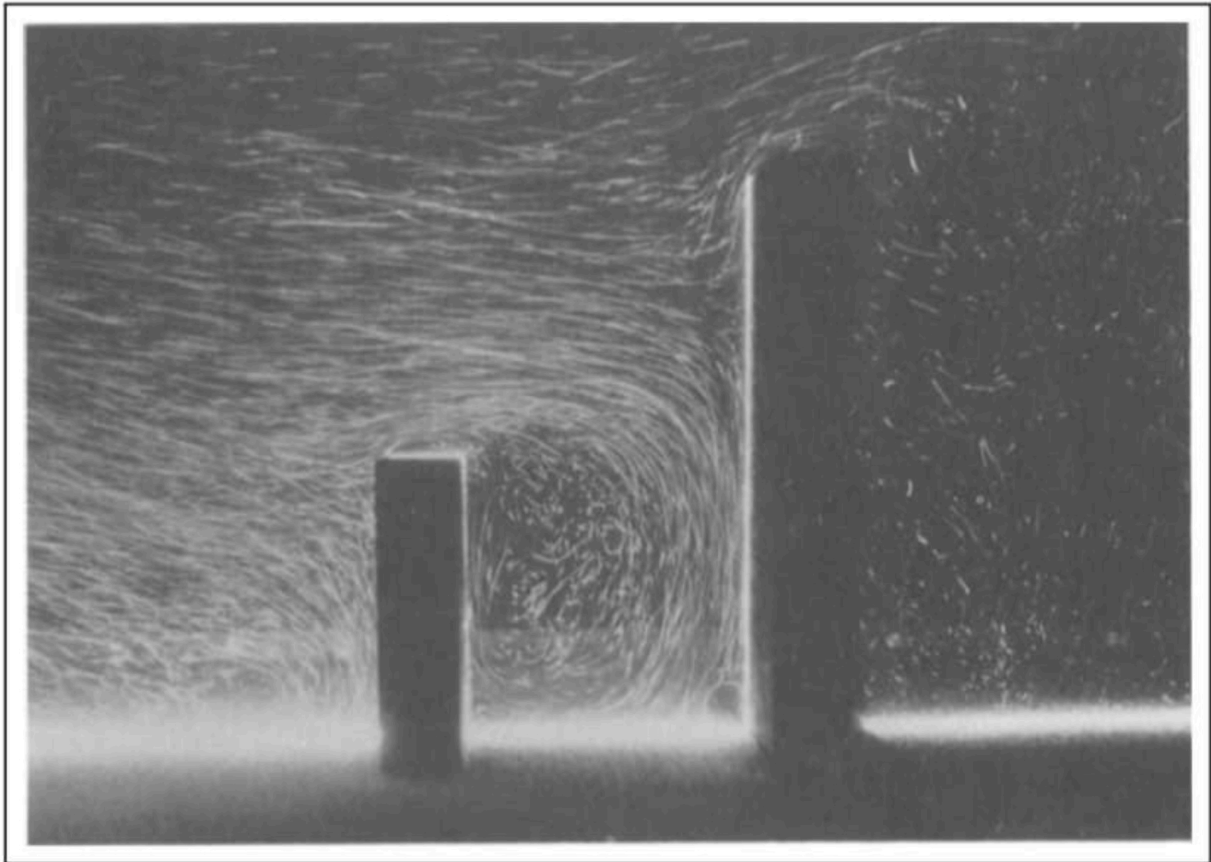
Point 2

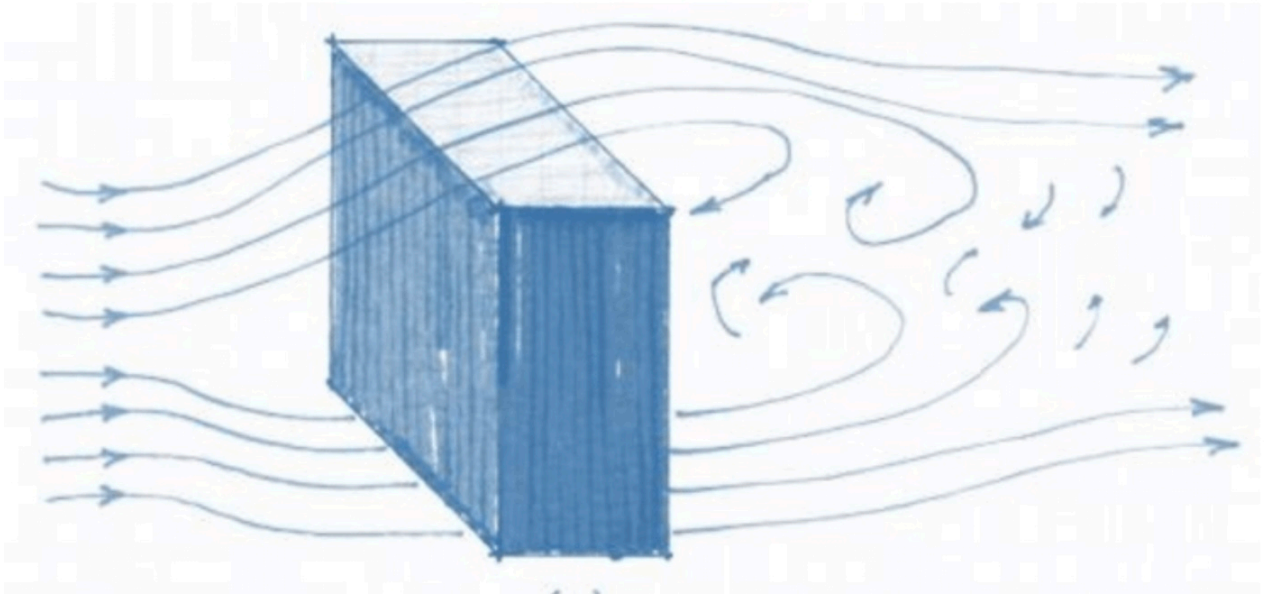
Potential for Microplastics escaping from open roller doors.

As shown above the opening times quoted are incorrect and Mr Gamble also claims roller doors will be shielded by the shorter water treatment plant. Any rudimentary research into air flow around two buildings clearly shows turbulence created by wind flowing over the top of the shorter building. Blowing directly into the open roller doors.

Several flow diagrams below.

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Thank you for listening to the community during the meetings and the written submissions.

Don't let this be the next asbestos or engineered stone.

This will never be the right site for such a risky project.