



CHRISTINE HANNAN

OBJECT

Submission ID: 217875

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

Submission date: 11/24/2024 9:58:05 PM

I question the judgement of the DPHI recommending this project for approval .

Rather than approving this project with multiple conditions relying on complex regulation and compliance, I urge the Panel to view this project from a wider lens and recognise the broader health, economic and environmental impacts and principles at stake. The impacts of the project cannot be reasonably and satisfactorily avoided, mitigated and managed through conditions.

The lack of buffer embeds risk:

The proximity to residences, childcare, businesses and it's position within a water catchment and riparian zone place all these surrounding parties at risk of harm.

This plant performs a range of complex actions with hazardous materials producing compounds and byproducts " the impacts of which we don't yet fully understand. Evidenced by EPA's own round of recent grants exploring harmful plastics and knowledge gaps .

The risk of approving such a project without an appropriate buffer places people and environmental systems at risk of harm, and businesses and the region at risk of reputational damage resulting in economic loss.

The lack of safe buffer means, that when operational failures occur, as they undoubtedly will " due for example to parts failure, human error or extreme weather " the impact may result in significant damage with long term effects to the health and well being of people, families and environmental systems.

Recent research in the Journal of Environmental Law, discusses this:

Environmental Enforceable Undertakings: An Innovative Tool to Repair and Prevent Environmental Harm

Miranda Forsyth, Felicity Tepper

*Journal of Environmental Law, Volume 36, Issue 3, November 2024, Pages 385-411,
<https://doi.org/10.1093/jel/eqae021>*

Published: 03 October 2024

The preventive dimension is particularly important in addressing environmental harm. All too often, environmental harm can be irreversible and exponential in terms of triggering other harms.⁴¹ When chemicals in factories catch on fire, the toxic plume immediately impacts the lungs and eyes of residents for miles, while leaching chemicals continue to pollute local creeks, kill native fish, and render the local amenity unsuitable for recreation long term. Emily Newburger, citing Richard Lazarus, explains this difficulty:⁴²

"What nature does," he said, "is spread out cause and effect when it comes to environmental contamination and pollution over time and space." "Accidents in one place have consequences in another. Accidents at one time have consequences at another. "We are not talking about minutes. We are talking about years and decades," he said. "We are not talking about yards. We are talking about miles and thousands of miles.

The Project will result in in range of adverse social impacts and I challenge the way GHD and DPHI has characterised social impact by reporting the main concern as concern about 'the changing character of area.'



I believe the social impact assessment to be an inadequate assessment of the impact of this proposal on the community.

The proposal will impact:

** residents' way of life*

** the community*

** surroundings*

** personal and property rights, and*

** the community's fears and aspirations.*

** the Project would result in land use conflicts and social impacts that cannot be appropriately managed and would have long-lasting negative amenity impacts on surrounding landholders.*

** Additionally the Project does not align with the aims and objectives of relevant strategic plans developed by the local community and Council.*

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