



**KATE INGHAM**

**OBJECT**

Submission ID: 218047

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

Submission date: 11/25/2024 10:06:35 AM

**INTRODUCTION:**

*This submission is provided by Kate Ingham, a consultant with extensive experience in advising businesses and councils on infrastructure projects within the region. Additionally, I am a breast cancer survivor and recognise the importance of addressing potential environmental health risks, particularly concerning the impact of microplastics.*

**Health Concerns:**

*While this submission does not focus on health grounds, the lack of consideration for microplastics within the Environmental Impact Statement (EIS) raises critical questions about the level of insight and expertise that informed the Health Department's approval of this development. The presence of microplastics and their potential effects on the endocrine system warrant thorough examination before any development is sanctioned. Historical precedents, such as those with thalidomide, engineered stone and tobacco, underscore the importance of proactivity to prevent potential health hazards.*

**ZONING**

*Plasrefine comes into the heavy industrial storage establishment category. Plastics are made up of 13,000 chemicals with 3,200 considered toxic in nature. Plastics are volatile, and often get mixed up with lithium batteries. This all makes for a hazardous mix.*

*Potentially hazardous industry according to the definition in the Act means a development ' which ' . would pose a significant risk in relation to the locality*

- a) to human health, life or property*
- b) the biophysical environment.*

*A waste or storage facility needs to be considered an innominate use and is covered by clause 2.3 of the LEP. As such it needs to be assessed against a heavy industrial storage establishment.*

*A heavy industrial storage establishment as defined by the LEP is also a prohibited use in the E4 zone. Catch 22.*

*There needs to be a significant buffer around hazardous industrial storage establishments. The fact that residents, childcare and a biotech facility are all within 1 km means there is insufficient buffer around this site.*

*I note the state-of-the-art Parkes plastics facility has a 6 km buffer " a sensible development.*

*The Department of Planning, Housing and Infrastructure has failed to correctly determine the permissibility of the Plasrefine proposal pursuant to Wingecarribee Local Environment Plan and caselaw.*

*The Plasrefine proposal is prohibited development pursuant to WLEP.*

*Without permissibility pursuant to WLEP the Plasrefine proposal must be rejected.*



*Both Plasrefine and the Department of Planning have asserted the proposal is permissible with consent but have not undertaken the required processes to factually determine and demonstrate their assertion of permissibility is correct.*

#### **REPROCESSING**

*Plasrefine is a reprocessing and manufacturing facility- not a recycling proposition.*

*The 'mixed plastic waste' coming to site will contain a range of other contaminants (as per the applicant's descriptions).*

*Cleaned plastics are not arriving at the site- the processing description outlines multiple cleaning processes on the feedstocks.*

*The feedstock is contaminated and if stored on site poses explosive, vermin and contamination issues not explored or explained in the document.*

*The patented process to clean the stock is sited without providing any detail as to the patent.*

#### **FIRE & WATER**

*The applicant was required by the Department to prepare a FSS in accordance with the requirements of Hazardous Industry Advisory Paper No 2 in consultation with FRNSW with consideration of operational capacity of the local fire agencies .*

*Here there is an acknowledgement of the hazardous status of this development.*

*The use of an outdated FSS correspondence for the application is misleading. Recent RSS modelling has declared the site to be located in a bush fire zone:*

*In 2019 the Berrima and adjacent community, of which this site falls, were evacuated 3 times. Embers were falling across the entire Southern Highlands. It was a deeply scary experience as fires surrounded the Highlands from 3 directions. All fire trucks, SES and RFS were deployed fighting massive fires.*

*Placing an extreme fire risk site in the middle of this scenario is ludicrous.*

*I attended the IPC hearings with a Director of a Sydney-based recycling facility. A statement made by GHD was the stock would come pre-sorted to Plasrefine. She said to me nonsense. The stock would come from facilities like ours and we have no capacity to pre-sort . We discussed the lithium battery risk and she said they don't have the capacity to deal with materials to such a level as to remove lithium batteries.*

*I note there have been 180 lithium-ion battery fires in NSW since 2022. This is a new risk as more and more products adopt lithium batteries.*

*As such there will always be a fire risk at this site, a fire that will be highly toxic. As stated in the hearings, the fire in Canberra facility took 4 days to burn out. The chemicals used for such fires are forever chemicals and should not be anywhere near a Sydney Water Catchment site, particularly not one built over 2 riparian waterways. This is the site:*

*The 1 fire truck in Moss Vale is not geared for Hazmat fires. Bowral, Mittagong, Moss Vale & Bundanoon Fire & Rescue stations operate as retained fire stations. Unlike permanently staffed stations, our firefighters are on-call and respond from their nearby home or workplace when emergencies arise.*



*The closest fire trucks with Hazmat capabilities are 45 minutes away. This development is a disaster waiting to happen.*

*My understanding is that the area around the site, including the intended planting “ do not adequate space to provide a fire fighting buffer for this kind of facility and is in breach of the Department’s own guidelines.*

#### *Cleaning Solution Fire Risk*

*Plasrefine plans on using a tea tree oil cleaning solution for washing the bottle. This oil is flammable and can harm the environment.*

*Flammability Hazards: This product is considered a Flammable liquid with a flash point of 55 °C (131°F).*

*Reactivity Hazards: None. Environmental Hazards: Release of this product may cause adverse effects in the environment.*

#### *Water*

*The GHD presentation showed the Council water main connected to Plasrefine’s washing tanks which will only be used IF NEEDED. The facility will be more than 80% self-sufficient at full capacity, because rainwater will be collected from the roof areas and used to top up the process water, used for washing the plastics.*

*The Southern Highlands has regularly experienced drought with water restrictions. What occurs during these periods?*

*ï,§ Where does that water come from to operate a facility requiring 15,500 LITRES EACH DAY?*

*ï,§ Who monitors how much of our potable water is actually being used on a daily basis, when it isn’t coming from the roof tops or falling from the sky?*

*ï,§ Will the facility shut down operations in times of drought because it uses SO MUCH water?*

*ï,§ Will Wingecarribee residents have water restrictions in place to compensate for Plasrefine’s use of our potable water?*

*ï,§ What happens when water is needed to fight the fires?*

*This was not addressed in the EIS documentation.*

#### *DESIGN & MODELLING*

*Most deceptive was the visualisation of the building that was used during community consultations that was depicted without smokestacks. There is still debate as to the size of these stacks. There is no visualisation that outlines stacks and vents accurately. When questioned GHD provided a design that was subject to change due to the height of the stacks and the rolling nature of the area. The fact that a recommendation by DPPI has been made upon such a fluid site design is inconceivable and does not reflect well on the Department’s due diligence in this process.*

*The fact a recommendation has been provided despite significant inconsistencies in the documents. For example:*

*- pg7 “ process wastewater about 10 kilolitres per year for disposal to sewer via a new sewer connection*

*- Vs Pg 7 initial estimates of wastewater discharges related to the washing process are of the order of 10 kilolitres per day .*



*Noting that this water would be loaded with microplastics, and the Moss Vale sewerage system has no capacity to filter microplastics. Also that the filtered water released then enters the Wingecarribee river system which is the major contributor of water to Warragamba Dam and Sydney Water catchment.*

*The inaccuracies in the modelling have created deep distrust in the community.*

*The most significant is the modelling for air emissions being based on a closed system. The GHD engineer, during the IPC hearing advised that the doors to allow truck movements were to be open 5 hours a day.*

*It was also noted that the plant could not operate when the doors were open as the system is a closed operating system .*

*However post the IPC it was advised that miraculously the doors would only be open 42 minutes a day.*

*This has been debunked by local truck operators:*

*Can we really trust that they will open and then close the doors behind each individual truck; one at a time!?! Whilst also stopping the production? And having the other trucks sitting and waiting (with more trucks likely to arrive during that time to add to the queue) and polluting the air with their diesel fumes!!*

*Or will the more likely event of keeping the doors open the whole time whilst those multiple trucks reverse in, unload, drive out for the next truck to then enter and so forth until all trucks are cleared out of the area, occur!?! And would they stop the production for this entire time? Highly unlikely. Let alone what that means for noise pollution; all that reversing etc..*

*Given the inconsistencies in the responses from GHD and the DPHI when questioned by the IPC about the doors opening and closing, how can anyone take in good faith they would do anything they say....'*

*Westerly Winds*

*The emissions were modelled without taking into consideration the high exposure of the site to prevailing westerly winds, the fact the open doors face westward and will be exposed to extreme wind conditions.*

*Most ridiculous of all was that the suggestion in the EIS that the stack emissions would have a vertical flow " rather than disperse with the winds across the entire Southern Highlands.*

*Did the Department only rely on GHD modelling or did it undertake its own rigorous and reasonable due diligence process that takes into consideration independent expert modelling? The community suspects not.*

*The gaps are significant and will form the basis of challenges if the recommendation proceeds to development.*

**SOUTHERN HIGHLANDS INNOVATION PRECINCT**

*The state government paid \$270k to develop the masterplan for the SHIP. It is zoned Light Industrial.*

*This use is supported by the community.*

*The Plasrefine project slipped through whilst our council was in administration, with no representation, with the SHIP community consultations underway, and with Plasrefine's community consultations undertaken largely during covid. To add to matters, the development was scaled to such a size that it bypassed local decision-making to become a state significant development.*

*The civil engineering firm that is working with Plasrefine has extensive connections with Wingecarribee Shire Council and state government agencies.*

*On the SHIP front - for 10 years I personally have been working to build the innovation culture in this area. Working with iAccelerate, local tech entrepreneurs and business stakeholders. The region has all the right elements " natural amenity, great schools with university access, a capacity to invest in its own.*



*The SHIP will bring high value jobs to this region “ a great counterbalance to the tourism industry which is seasonal.*

*The vision for the SHIP:*

*Encouragingly a local entrepreneur has recently purchased 500 hectares and is consulting with stakeholders to make the SHIP a reality. He has the experience and investment backing to create the kind of development this area needs. Low impact. High value.*

*But tech is fickle. Lifestyle and amenity are essential to such developments.*

*Putting a heavy industrial storage establishment in the middle of this development may jeopardise these plans. There is always Byron or Noosa for such a site.*

*Whilst Plasrefine is siting jobs, we know the jobs are unlikely to go to locals after the build.*

*The jobs that will be created through the SHIP will be high value, providing a solid pathway for our young people. The proposed tech park also incorporates affordable accommodation “ again, in jeopardy because of this development.*

#### *OPERATIONAL CAPACITY*

*The business case for Plasrefine doesn’t stack up. It’s been modelled with the number of trucks, the 40% attrition, the sale price for the material created. It doesn’t stack without local, state and federal subsidy.*

*And what will the company do when there is an unstoppable fire? Fire in these facilities is commonplace and toxic.*

*Do the owners exit quietly, offering no compensation to the community and leave the council and state government to clean up the mess? [REDACTED]*

[REDACTED]

*All advice comes from external advisors who have no fiduciary responsibility but will benefit from government grant and subsidy largesse, providing an ongoing advisory role. No expertise exists within the company to operate or manage such a facility.*

*There is a general view that this is a prospecting play “ secure lower cost land, secure the license to operate, then on-sell to an unknown company to operate. Again, the community will remain in the dark.*

#### *POLICY IMPERATIVE*

*The state government is under pressure to deal with plastics recycling. It has recently posted recycling infrastructure plans.*

*Why not define the project, identify industry experts, right locations and build a public private partnership to do it right?*

*Infrastructure NSW would not allow this project through the first gate for viability and contestability. Whereas the Southern Highland’s community has to fight this on zoning law, not project viability.*

*Our local representatives, state government representatives and our federal representative say this development should not proceed. That it is not the right site.*



*Our state representatives have even attempted to work with the owners to identify preferred sites “ but have been stonewalled. So too, local developers have met with the owners to identify different sites. Wollongong representatives have identified potential locations with hazmat capabilities as alternate sites.*

*We trust that the IPC will implement the Department’s own vision statement and reject the recommendation based on flawed modelling, wrong location and inconsistent and often incorrect information:*

*Ensuring that NSW is Liveable and Prosperous by providing thriving communities, public spaces, places & economies.*

*The Southern Highlands is a growing, flourishing community with a very engaged population. This is reflected in the high the number of quality speakers and extraordinary number of submissions against this development.*

*There is zero community license for this plastic waste and storage facility.*

*The community DOES NOT CONSENT in any way to this development occurring.*

*The community is mobilising and it will play a long range game to counter Plasrefine. Think direct-action, high-tech monitoring of all trucks on roads (and reporting all breaches), high-tech monitoring of air and water (and reporting each and every breach), citizen science groups mobilising to ensure our community is protected with expert monitoring and reporting. We have an army of retirees who will make this their mission. We have school children who will make science projects out of environmental monitoring.*

*The community will leverage media, social media, legal and political capital.*

*This community has not given consent for this development. Council has outright rejected the development. Our state representatives have opposed the site selection. Our federal representative has opposed the site selection.*

*For the state government and the IPC to override all the objections would be very curious.*

*We trust you will not ignore the poor science that has been tabled, the inadequate data that has led to a recommendation to proceed and overlook any health consequences for this community and potential contamination events of the Sydney Water Catchment. To approve the building of such a facility in a designated fire zone is foolhardy.*

*Reject the recommendation for Plasrefine to proceed.*

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# PLASREFINE

Our Future Our Choice

SUBMISSION

Independent Planning Commission

Kate Ingham | Ki Media

25 November 2024

## **INTRODUCTION:**

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## **ZONING**

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There needs to be a significant buffer around hazardous industrial storage establishments. The fact that residents, childcare and a biotech facility are all within 1 km means there is insufficient buffer around this site.

I note the state-of-the-art Parkes plastics facility has a 6 km buffer – a sensible development.

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rfs.nsw.gov.au/plan-and-prepare/building-in-a-bush-fire-area/planning-for-bush-fire-protection/bush-fire-prone-land/check-bfpl

... Xero Accounting So... +++NEW CONTENT... Microsoft Office Ho... SCS Basecamp vpn Install AUSKey Kaspersky Protectio... Chat GDP

NSW GOVERNMENT NSW RURAL FIRE SERVICE

Search the NSW RFS website GO

HOME FIRE INFORMATION PLAN AND PREPARE VOLUNTEER NEWS AND MEDIA RESOURCES ABOUT US

**Plan and prepare**

- Bush fire survival plan
- Know your risk
- Prepare your home
- Prepare yourself and family
- Fire Danger Ratings
- Alert Levels
- Neighbourhood Safer Places
- Building in a bush fire area**
  - What you need to know
  - Building after bush fire
  - Planning for Bush Fire Protection
    - Bush fire prone land
    - Additional Information
- Travelling in a bush fire area
- Managing bush fire risk
- AIDER
- Home fire safety
- 10/50 vegetation clearing
- Rural Boundary Clearing Tool
- Farm fire safety
- Fire Trails
- Static Water Supply (SWS)

Home » NSW RFS » Plan and prepare » Building in a bush fire area » Planning for Bush Fire Protection » Bush fire prone land » Check if you're in bush fire prone land

### Check if you're in bush fire prone land

You can check here if your land is in a bush fire prone area.

- Enter your address including house number, street and suburb or town. Select your address from the drop down options provided.
- Check the map has correctly located your property. If not drag and drop the red marker on to your property.
- Click the 'Get Results' button to see if you're in a designated bush fire prone area.
- You should consider seeking expert advice before commencing any development.

Your Property

**Your search result**

You have conducted a search of the online bush fire prone land tool for the land in the map above. This search result is valid for the date the search was conducted. If you have any questions about the Bush Fire Prone Land Tool please contact [bushfireprone.mappings@rfs.nsw.gov.au](mailto:bushfireprone.mappings@rfs.nsw.gov.au)

**!** The parcel of land you have selected is within a designated bush fire prone area.

In 2019 the Berrima and adjacent community, of which this site falls, were evacuated 3 times. Embers were falling across the entire Southern Highlands. It was a deeply scary experience as fires surrounded the Highlands from 3 directions. All fire trucks, SES and RFS were deployed fighting massive fires.

Placing an extreme fire risk site in the middle of this scenario is ludicrous.

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### **DESIGN & MODELLING**

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### ***Westerly Winds***

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Reject the recommendation for Plasrefine to proceed.