New South Wales Government
Independent Planning Commission

KERI DONALDSON		**OBJECT**	Submission ID: 217087
Organisation:	*N/A*	Key issues:	*Social impacts,Visual impacts, design and landscaping,Land use compatibility (surrounding land uses),Traffic,Other issues*
Location:	*New South Wales 2576*		
Attachment:	*Attached overleaf*		

Submission date: 11/22/2024 2:27:38 PM

I strongly object to this proposal. It is not in the right location. Detailed submission attached.

I **strongly object** to the Plasrefine proposal.
IT IS A CRIME AGAINST THE PEOPLE AND OUR ENVIRONMENT

This is ludicrous!
Where is the common sense?
Where is the duty of care?

THIS IS NOT IN THE PUBLIC INTEREST
THIS IS NOT THE RIGHT SITE

HUMAN INTERVENTION

Specifically, this proposal if operational requires far too much human intervention to guarantee adherence to conditions and safety. There are multiple actions that may require human intervention:

- Manually closing roller doors in event of emergency (1)
- Manually changing air filters (2)
- Packing/transporting pellets and other materials
- Driving heavy vehicles and forklifts
- Cleaning up spillages (3)
- Keeping doors/windows closed to maintain the negative air pressure (4)

Yet, the proponent states there is no possibility of microplastics going outside.

In GHD's meeting presentation to the IPC (10), page 10 has an image showing their idea of Plasrefine's recycling, in which I count at least 8 functions that require human intervention, with 140 employees that number is greater. So with 140 potential areas of human error, I seriously question the statements made of "no possibility",

NEGATIVE AIR PRESSURE

The proponent claims the building will have negative air pressure and when the roller doors are open air can't flow through as there are no other windows open. (4)

Yet on the architectural plans (5) there are doors and windows on the side of the building and exits on the eastern side of the building. How can the proponent guarantee that none of these egress points could be opened by human intervention?

In addition, thinking about Bunnings, will there be air conditioning and/or fans to keep the facility temperature acceptable for a working environment?

If yes, what will be the effect on air flow?

I note NSW Planning comment that architectural plans need to be updated but I ask **how a correct assessment can be made when we do not have accurate documents** to rely on, this is beyond ludicrous, it is unprofessional.

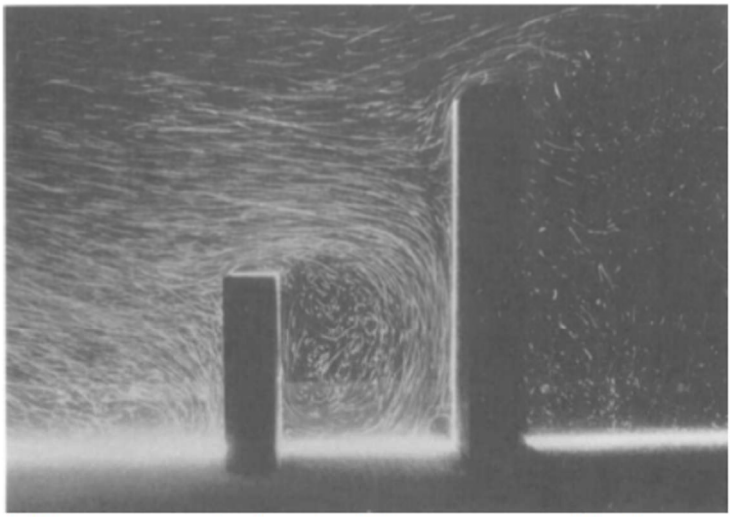
The high-speed roller doors presented in GHD's correspondence with the IPC (11) were the DMF Series RL3000 High Speed Rapid Roll Door. According to DMF's website the RL3000 rapid roll door model **can tolerate wind speeds of about 70-80km/h** depending on the width of the door.

What are the maximum wind speeds at this site?
What can happen to the roller doors if speeds are greater?

In addition, GHD stated the roller doors would be shielded by the WWTP that is 5m in height (11).

> Figure 2, shows that the northern roller doors would largely be shielded from westerly winds by the proposed wastewater treatment plant (WWTP) building. The WWTP is 5 m in height. The southernmost roller door would be protected from north west winds. There is potential for westerly winds to blow inwards through the doors, when open, noting that the time for which the door is open is at the most, 30 seconds, when a semi- trailer is reversing, and 20 second when a semi-trailer is leaving.
>
> The doors would only be open when in use. Therefore, at all times when the door is open, there would be a truck moving through the opening. This would create resistance to wind in addition to the static pressure of the building. A westerly wind direction (blowing towards the building), would not cause material to be carried through the door opening in the opposite direction.

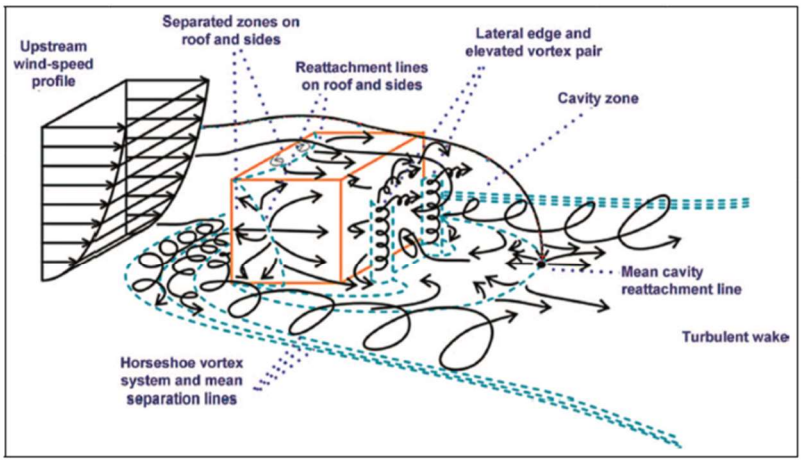
Has it been addressed what effect the WWTP will have on the wind flow as according to the research below "turbulent flow remains one of the unresolved problems of classic physics" (12).



Airflow around a low building arranged in the front of a tall building. From Murakami et al. (1991).

3. Wind-flow field around buildings

The prediction of effects of wind flow around buildings is of primary importance to a wide variety of engineering applications such as designing durable building envelopes, dispersion of air pollutants, natural ventilation, wind loading, etc. (Tutar and Ogguz, 2004). The wind flows in the atmospheric boundary layer over buildings are inherently complex and exhibits a wide range of physical phenomena including large low-speed areas, strong pressure gradients, unsteady flow regions, three-dimensional effects, and confluence of boundary layers and wakes (Deck, 2005). In the case of the present study, the prediction of the nature of a turbulent flow through the urban environment is in principle pre-requisite to the solution of the problem of contaminant dispersion in the urban complex (Lien et al., 2008). The complexity of the flow around an obstacle or group of obstacles has been recognised (Cheng et al., 2003) – as shown by Murakami et al. (1991) in Fig. 4 – and turbulent flow remains one of the unresolved problems of classical physics (Qu, 2011). Consequently, a complete understanding of the wind-flow processes and structures over buildings in urban areas has not yet been attained, despite the many years of intensive research (Davidson, 2004). For studies which involve wind loading, structures and dispersion of contaminants around buildings, the flows with high Reynolds numbers are more closely matching the atmospheric flows characterising flows in an urban environment (Haupt et al., 2011). These flow patterns around buildings within urban canopy layer are influenced by a large number of parameters (e.g. the thickness of the boundary layer, the layout of the buildings, characteristics of the approach flow) that are identified and investigated in details (Cheng et al., 2003). In these cases, the flow patterns are characterised by complex flow phenomena due to the interactions produced between the various buildings already existing within the site, however some of the results cannot be generalised since they probably include local effects such as secondary structures (Mavroidis et al., 2003).



COMMUNITY ENGAGEMENT

In GHD, EIS Main Document "The general public/local community" are listed as stakeholders yet many in the community did not know, still don't know.

Many in the community do not buy local papers or are on social media.

The number of community engaged has increased recently due to the work of the community and not the "extensive" engagement by GHD and yes some via social media, sharing information in an effort to cut down on the time required to digest and research the material which we have not been afforded the time as it is attended to outside of working hours for the community.

How many of the GHD's engagements were unique individuals?

The “extensive” community engagement claimed appears to be quite targeted and for a state SIGNIFICANT development this should be broader.

(13):

[redacted] I might answer this one [redacted] We initially engaged with the closest sensitive receivers, [Redacted] came up to the boundary yesterday, very interested in what was happening, and it’s fair to say that even their position on the project has changed over four years from neighbours interested, “What are the impacts? What will it look like? Oh, that’s a shame the landscape character’s going to change, we really enjoy the view. What are you doing? Can you tell us about?” to – and I’m going to put it out here, social media is toxic.

There are people who live 40 km away who are rallying the troops. It’s a waste project, there was concern about who the proponent was and the connection with [Redacted]. I’m going to say that here because that came out in the town hall. There was some clear very spiteful and vindictive comments made. So it’s a waste project, it’s divisive to start with, who the proponent is and then a fearmongering.

And it’s been very tricky because even going slowly with the [Redacted] with [Redacted], we’ve gone and spoken within our consultation teams and social impact teams have spoken with the nearest receivers who started at a point of wanting to know information to now a Facebook frenzy and a Moss Vale Matters Group of many people who don’t live within 10 km of the site, don’t want it, don’t want the change, don’t want the Southern Highlands to be an industrial dumping ground.

So there is misinformation circling, there are people who won’t have any interaction with this site at all who are fuelling fire with comments around PFAS and microplastics and there is now a storm that we are not invited to share the actual content into. And so I think that that’s just – it’s grown and it’s grown and it goes down when there’s no change to the project and it’s flared back up again because the project has now been referred to IPC.

“There are people who live 40km away who are rallying the troops.” (13)

Yet nearly half of the submissions lodged in support came from postcodes way in excess of 40 km.

Extract of support from ANALYSIS OF SUBMISSIONS 11/10/24 - 14/11/2024

POSTCODE 2000 (Sydney)

I would like to express my support for this project as I believe it will provide significant benefits to both the environment and the local community. By promoting sustainable practices, this initiative can help reduce environmental impacts, improve natural resource management, and contribute to a healthier ecosystem.

Moreover, the project has the potential to create numerous job opportunities in the area. It can stimulate the local economy by providing employment in green industries, infrastructure development, and related services. This would be especially beneficial for local residents, boosting livelihoods and long-term economic growth.

I strongly encourage the government to move forward with this project to ensure a positive outcome for both the environment and the local workforce.

POSTCODE 2220 (Hurstville)

I am supportive of this project as NSW needs more recycling centres

POSTCODE 2207 (Bexley/Bardwell Park)

This project will greatly improve the environment

POSTCODE 2154 (Castle Hill)

good for environment

POSTCODE 2138 (Concord West/Rhodes)

It is much better to recycle the plastic rubbish, landfill is not environmentally.

POSTCODE 2064 (Artarmon)

I highly support this development, because it's good for the environment. Our state and our country need the plastics to be recycled instead of going to landfill.

POSTCODE 2064 (Artarmon)

This is good for our environment, I am really support it.

POSTCODE 2207 (Bexley/Bardwell Park)

As a environmentally conscious individual, i support this initiative to recycle waste

POSTCODE 2296 (Islington/Newcastle)

I support the development of this critical piece of recycling infrastructure. Australia lacks this capacity locally and the environmental impacts of landfilling or exporting this waste are more important than the various injections being raised by wealthy residents concerned about trucks in their neighbourhoods.

I believe GHD are now hearing from the "silent majority":

ANALYSIS OF SUBMISSIONS 11/10/24 - 14/11/2024

	Comment	Object	Support	Grand Total	Percentage
BALMORAL VILLAGE (2571)		2		2	0.13%
BARGO (2574)		2		2	0.13%
BOWRAL (2576)		344		344	22.24%
BUNDANOON (2578)		45	1	46	2.97%
EXETER (2579)		41		41	2.65%
MITTAGONG (2575)		157	1	158	10.21%
MOSS VALE (2577)	2	540	2	544	35.16%
QUEENSLAND		4		4	0.26%
SOUTH AUSTRALIA		1		1	0.06%
SYDNEY/NSW	1	116	8	125	8.08%
VICTORIA		4		4	0.26%
WESTERN AUSTRALIA		2		2	0.13%
Other		16	1	16	1.03%
Redacted		251	6	258	16.68%
TOTALS	3	1,523	19	1,547	100.00%
		98.45%	1.23%		
Local Objections		1,131	73.3%		
Local Support		4	0.3%		
Non Local/Redacted Objections		394	25.5%		
Non Local/Redacted Support		15	1.0%		
		1,544	100.0%		

SOCIAL IMPACT

In addition to impacts mentioned elsewhere, it should be noted that for the community there is an equity imbalance:

- GHD are paid to perform their role,
- GHD function within working hours
- GHD have access to experts
- The community acts outside of working hours,
- The community incurs their own personal cost,
- The majority of the community do not have the expertise,
- The community incur personal cost to engage any experts
- The majority of the community require additional time to understand the documentation

FIRE ISSUES

GHD claim there will be no lithium batteries (a potential source of fire) at the facility (6) yet some batteries can be as small as a few millimetres (7). How can this be guaranteed, in addition to requiring human intervention?

GHD state repeatedly that the site is not in a bush fire zone. (8)
Yet NSW Rural Fire Service list the site as in a bush fire zone. (9)
If GHD are reporting with out-of-date information it is not in the public interest.

Thank you.

SOURCES

1. *P70/35*

"Now, if there was an emergency and there was a shutdown, then there would have to be an override to basically manually shut those doors."

2. *P66/45*

"...all the process equipment will have air filtration systems. So, the amount of potential microplastics is potentially or obviously very low."

3. *P60/20*

"So, if there is any sort of plastic pieces that come out of the bales, then they will need to be kept clean using, you know, vacuums and drive-around type cleaners."

4. *P61/35*

"...and I'm not an air quality specialist..."

P57/45

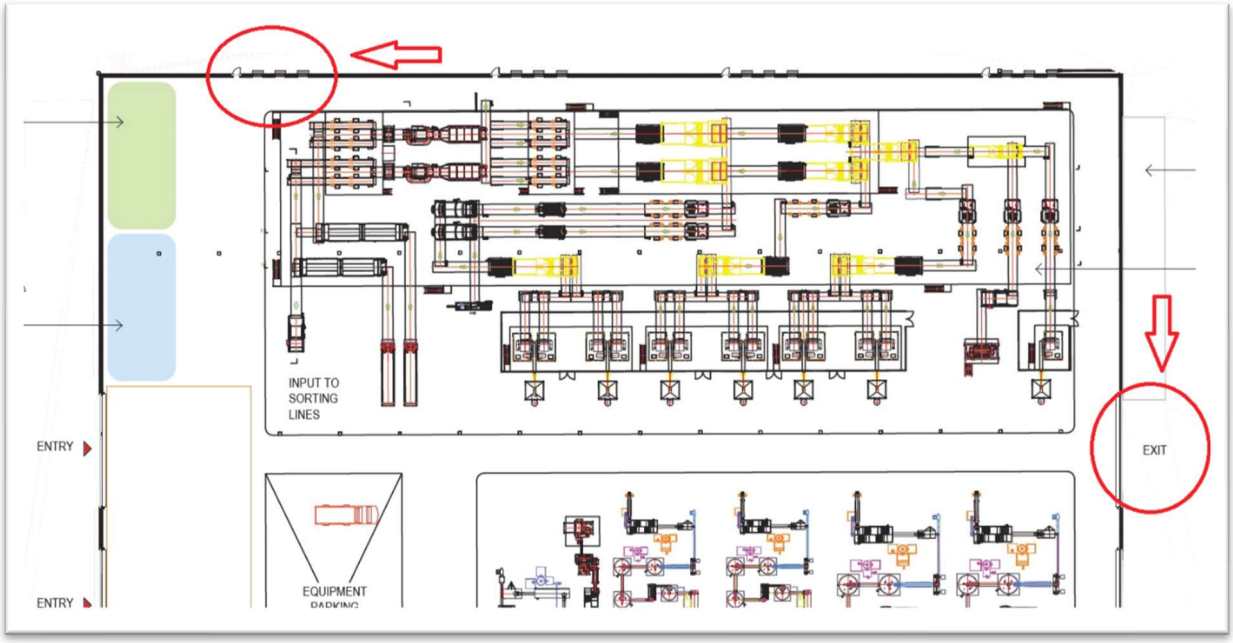
"There would be a negative air pressure situation set up with roof ventilators drawing air into the building"

"There's **no possibility** of microplastics or other plastic pieces going outside" 1.
How can Mr. Gamble guarantee "no possibility"

P58/25

"No. the entire building will be like fully enclosed, so it's like if you open a roller door, you open a door and **there's no other window open, air can't flow through**."

5. APPENDIX F Architectural Plans
https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9409987%2120230926T040743.245%20GMT *(Page 11)*



APPENDIX F Architectural Plans
https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9409987%2120230926T040743.245%20GMT *(Page 12)*

6. *P60/45*

"...there will need to be contracts with suppliers to ensure that there are no lithium batteries before they arrive. That's the only way of guaranteeing that there will be no lithium batteries at the facility."

7. *https://www.lithium-polymer-batteries.com/smallest-micro-lithium-polymer-battery/#:~:text=These%20lithium%20polymer%20Batteries%20can,less%20than%20one%20milliampere%2Dhour.*

> Other manufacturers offer even smaller lithium polymer batteries for medical devices, such as hearing aids and implantable sensors. These lithium polymer Batteries can be as small as a few millimeters in length and width, and less than a millimeter in thickness, with a capacity of less than one milliampere-hour.

8. *P62/25*

"....one thing I wanted to firstly correct is that the site is not in a bushfire zone."

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

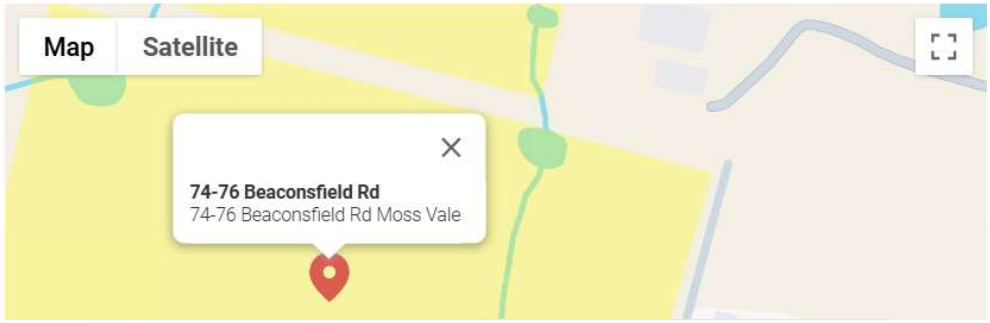
Check if you're in bush fire prone land

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

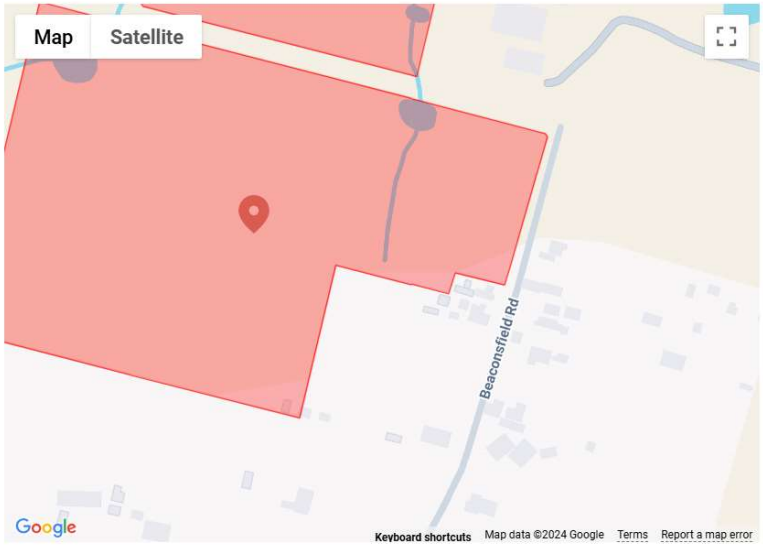
- Enter your address including house number, street and suburb or town. Select your address from the drop down options provided.
- Check the map has correctly located your property. If not drag and drop the red marker on to your property.
- Click the 'Get Results' button to see if you're in a designated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

Your Property

74-76 Beaconsfield Road, Moss Vale NSW, Australia | Get Results



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.mapping@rfs.nsw.gov.au

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

10. *https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/transcripts-and-material/2024/moss-vale-plastics-recycling-facility/applicant-meeting-presentation.pdf*

11. *https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2024/10/moss-vale-plastics-recycling-facility/case-correspondence-to-and-from-the-commission/correspondence-from-applicant-on-roller-doors-opening-times-redacted.pdf*

12. *https://www.sciencedirect.com/science/article/pii/S0269749115003723*

13. *https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/transcripts-and-material/2024/moss-vale-plastics-recycling-facility/applicant-meeting-transcript.pdf*
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