



MALCOLM POWELL

OBJECT

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Mr Andrew Mills – Chairman IPC Panel

Proposed Moss Vale Plastics Recycling (SSD-9409987)

Independent Planning Commission

Sydney NSW

Tel : 9383 2100 Email : submissions@ipcn.nsw.gov.au

Dear Commissioner Mills

With my wife we have owned since 1984 a small grazing property known as Farview situated at the northern end of [REDACTED]. The Garvan Institute owned Australian BioResources (ABR) property is situated next door on our north boundary. We are therefore located in close proximity to the large scale plastics recycling proposal (ref SSD-9409987) which would greatly impact the amenity & value of our property should the proposal proceed. Knowing how the Garvan mice breeding facility (for vital medical research) would be heavily impacted we have assisted community organizers to oppose the proposal since it first emerged in Feb 2021.

In view of the large number of community submissions (including many with Planning & related expertise) we were most surprised when the NSW Planning 3 Oct 24 approval recommendation document was released. When drafting my attached submission opposing the proposal I have tried to focus on the big picture high cumulative social costs for the whole WSC LGA. NSW Planning issued a Social Impact Assessment Guideline in July 2021 which appears to lack required application.

At age 82 it was not possible for me to attend the in person presentations your Panel conducted at Bowral. Also, did not have the digital skills for an online submission. When operating my mining equipment supply business until 2015 my PA & other assistants handled my on line requirements. Therefore greatly appreciate being able make my attached submission by email. Would also appreciate your email received confirmation.

Many Thanks Malcolm Powell

[REDACTED]

[REDACTED]

Submission to NSW Independent Planning Commission - NSW Planning Ref 9409987

To Oppose The Moss Vale Plasrefine Proposal (MVPP) Plastics Recycling Facility

Main Background Process (to present community understanding of issues)

Following release of a scoping document for the MVPP in late 2020 the MV community quickly realized how the proposal would cause serious social impacts causing forever increasing social costs . Community opposition campaigns then followed to create community awareness of these threats . Over 300 unique submissions were presented opposing the first proposal with site entry from Beaconsfield Road. When the proposed main access road from Lackey Road was not available proponent interests pursued a second (amended) proposal .

Over 500 submissions were made opposing the second proposal with site entry from Douglas Road requiring a change of rail crossing location for the Boral operated rail connection servicing the Berima Cement Works & the nearby Grain Feed Mill .

Submissions from experts on Planning issues were included on both occasions .

Being well above the 50 unique submissions on each occasion reference to an appointed panel of the NSW Independent Planning Commission recently followed .

Many submissions made reference to high social costs regarding FOREVER TOXIC environmental issues & removal of quiet enjoyment rights in nearby living areas. Immediate construction impacts & follow-on operations impacts on the Garvan mice breeding facility performing a critical role for vital medical research were referenced in many submissions . It was assumed NSW Planning would give issues raised in submissions high levels of consideration causing the MVPP to be rejected .

The NSW Planning 3 Oct 24 document gives the impression of analysis but in recommending approval is seen by many in the MV community as a work-back for a predetermined outcome . Throughout the consideration process MVPP proponent interests maintained an attitude that approval would occur notwithstanding community objections lodged . Proponent initiated public meetings discouraged questions on proposal efficacy being raised. This proponent behaviour reinforced community conclusions regarding predetermination by NSW Planning.

Commencing at the scoping stage in early 2021 Wendy Tuckerman local member for the Goulburn Electorate in the NSW Parliament realized the high potential for ever increasing future social costs the proposal would create . On available occasions she expressed opposition to the proposal which included making a statement to the NSW Parliament in Nov 2021 . Fortunately Wendy Tuckerman has a long background in local government to understand planning matters related to land use and transport interaction . Her longstanding opposition work on the MVPP & her recent submission to the IPC Panel at Bowral presentations are widely appreciated .

The NSW Planning Decision to Recommend Approval of the MVPP

It was assumed within the MV & the wider WSC LGA community that the facts submitted in the high number of submissions(including many from experts in Planning matters), would deliver rejection of the proposal .This assumption failed to accommodate the following possibilities for NSW Planning

- Need to rely on the Planning expertise presented by project consultants acting for Plasrefine . NSW Planning appears to lack resources to conduct required investigations into site suitability & high social cost outcomes. There appears to be no upfront triage filtering process for site suitability .
- Need to embrace the announced POLITICAL IMPERATIVE to recycle 80% of plastics waste by 2030 .

This political imperative may be regarded as a ‘thought bubble ’. A major reinvention of chemical engineering would be required for execution to achieve the presented outcome . Attempts to pursue this myth by incineration or other heat application methodology create fine particle toxic emissions . The plastics disposal problem into rapidly reducing landfill sites is then transferred to contamination of air quality. Strong prevailing winds impacting the Southern Highlands region would spread FOREVER TOXIC micro plastics particles over grazing & other food chain supply land areas . Water supply would also be contaminated by plastic fine particles.

Employment Impacts in the SHIP Corridor & Other WSC LGA Areas

The need to provide a safe working environment under NSW employment law & regulations requires careful consideration .Lack of prior experience establishing & operating plastics recycling facilities may cause the proponent to overlook or have limited focus on this vital consideration .

Proposed filtration of enclosed areas & other measures may not be adequate to meet required NSW standards for worker safety.

Impacts from forever toxic emissions & toxins from plastics stored for processing would heavily impact personnel employed in the adjacent Garvan mice breeding facility (established in 2008) for vital medical research. These worker safety impacts may also apply for workers at other places of employment in or around the SHIP corridor in the path of prevailing strong winds to spread forever toxic emissions.

The NSW Planning approval recommendation document is silent on the possibility of the MVPP causing a reduction for existing & future employment. This reduction may greatly exceed the expected 140 jobs created to advocate for the proposal.

Also, the current high quality environment sustaining a large Southern Highlands tourist industry with high permanent full time & casual employment may be seriously curtailed.

Reduction of employment opportunities may be seen as forever increasing social costs should the MVPP be approved for construction.

Enforcement of Mitigation Requirements to Avoid Adverse Outcomes

The NSW Planning document mentions many possible procedures which may be used to mitigate high social costs. However, again due to budgetary constraints it is unrealistic to expect ongoing enforcement from NSW government agencies.

Whether the proponent has the required expertise and financial capacity to strictly adhere to project conditions of approval is unknown. Should the proponent suffer financial stress if the project begins to fail it is reasonable to expect lapse in focus on mitigation requirements.

Liability (and Other) Insurance Covers

Also, whether the proponent can obtain & maintain required Liability Insurance cover with reputable insurers is critical. Without insurance cover (or additional bank guarantee indemnities) legal action against the proponent may be impossible to pursue. Site contamination clean-up and/or other high social costs may have to be met by the NSW and/or Federal government.

Whilst impacts on the operations of the Garvan mice breeding would begin as soon as construction activities commence other high social cost impacts may take time to manifest as environmental degradation and/or health issues . Should the MVPP suffer financial failure this manifestation problem may assume high importance .

Community Impacts & Fire Hazard

For construction requirements there may be attempts to use Beaconsfield Road & associated feeder roads for delivery of construction equipment & materials . These roads were not constructed for heavy vehicle use . Immediate loss of quiet enjoyment by many residents in the northern area of MV township would result .

High FIRE HAZARD has been demonstrated in other waste plastic recycling/storage facilities within Australia & overseas. This raises questions regarding availability of hazardous fire fighting facilities and insurance cover from reputable insurers.

Geopolitical Context - Economically advanced nations have increasingly made use of plastic products to advance & support higher living standards raising the following important considerations

- Widespread use of plastics in medical care & hospital procedures to fight infections & contain costs. Likewise, plastics are widely used in food supply chains not only for packaging/presentation but also to mitigate health risks in food supply. In the past, large volumes of plastics waste generated from ever increasing plastics use have been sent to Third World nations & China for required processing .
- Along with the fortunate advance in living & education standards in Third World nations, awareness has developed to understand cumulative environmental & health hazards from plastics waste processing. Former willingness to accept plastics waste has rightly ended . **Therein lies the cause of the political imperative for the NSW Government.**
- The only effective solution to curtail plastics use requires changing behaviours towards consumption of plastics . Urgent political attention to this reality is required is to end the myths of plastics recycling . Programs to reduce consumption of plastics toys would be a good start .

Conclusions – From the above overview of key facts & consideration conclusions are

- Whether the ‘fast-tracking ’attitude in NSW Planning to permit ‘consideration’ for approval as State Significant Infrastructure has created serious ‘efficacy ’ issues for full & proper consideration of both immediate & longer term high increasing social costs. Environmental degradation & health impacts on children & adults with respiratory issues who lack lung capacity to expel fine particles created from attempted plastics recycling is of special importance .
- Adverse impact on the Garvan mouse breeding facility (as presented in Garvan submissions) with high importance for ongoing critical medical research (especially after the recent covid pandemic).
- The longer term adverse impacts for creation of full-time employment in the WSC LGA with flow-on adverse consequences for required economic growth required to fund delivery of local government services in the WSC LGA .
- The need to rethink the future use of plastics types with difficult to solve disposal problems after use .**Upfront costs may be higher for alternatives, but offset by greatly reduced longer term social costs form environmental degradation & public health impacts**

End Notes – This submission aims to present a framework of thinking to

- 1 Question the process used by NSW Planning to recommend approval for the MVPP which appears to embrace a political imperative based on myths which have been established for plastics recycling .
- 2 Address lack of resources available for NSW planning to triage & control investigation of issues involved for SSD proposals to avoid giving the impression of predetermination & build community trust .
- 3 Promote proper accommodation of facts & considerations presented in community submissions and especially submissions from Planning experts.

Malcolm Powell 20 Nov 24

Email: