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OBJECT

Submission ID: 218342

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

Submission date: 11/25/2024 3:06:04 PM

Please see attached.

I object to the Dept of Planning, Housing and Infrastructure's recommendation to approve the Plasrefine proposal on the following grounds:

1. Site issues. The site is plainly wrong, and no amount of mitigation or conditions attached to its approval can overcome this fundamental issue. The site is too close to homes, too close to rural land, too close to daycares and schools, too close to the Garvan Institute, and too close to Sydney's water catchment. The site is also too small for the size of the development that will sit on it. And the buildings are too large, with not enough (any) buffer zone or reasonable firefighting distance to be able to battle the inevitable fire at the Plasrefine site. Ultimately, Plasrefine can easily be moved to any piece of appropriately zoned, vacant land, with access to highway/train/ship freight infrastructure, and at a safe distance from residents and critical waterways. Plasrefine's success is not hinged on its location on Beaconsfield Road and the overwhelming feedback on this issue has been loud and clear from day one. This is not a new concern, but it is fundamental issue that cannot be overcome.
2. Zoning issues, planning laws and alleged community engagement.
 - a. The constant reliance by both Plasrefine and the DPHI on "its zoned this way, therefore it's ok" simplifies and overlooks the purpose of planning and development, and by extension, appears to render local communities and councils obsolete when contemplating development applications.
 - b. Plasrefine should be classified as a hazardous development. It is not "advanced manufacturing" as alleged by Plasrefine's consultants as, at best, it will burn at high temperatures plastic particles into plastic furniture which have 1 life cycle before ending up in landfill (as they cannot be recycled again). This is not advanced manufacturing. "Advanced manufacturing" is defined as: "Use of innovative technologies to create existing products and the creation of new products. Advanced manufacturing can include production activities that depend on information, automation, computation, software, sensing, and networking."
 - c. The Dept of Planning (as it was then) Hazardous Industry Planning Advisory Paper (Jan 2011) advised as follows:
 - i. Land use safety planning focuses on managing land use conflicts associated with risks to people, property and the environment from accidents at industrial facilities.
 - ii. It should be regarded an essential part of strategic planning and development control.
 - iii. The saying "prevention is better than cure" is particularly true in this context. Land use safety needs to be first considered at the strategic planning stage to avoid later land use conflicts associated with inappropriate zoning and intensification of development.
 - iv. The assessment of potentially hazardous development should be holistic, systematic and "fit-for-purpose" (ie both the depth of assessment and the

imposition of conditions of consent should represent a proportionate response to the hazards and risks being considered).

- v. Particular care needs to be taken when assessing rezoning or development around potentially hazardous development to ensure that such development will not introduce or aggravate existing land use safety conflicts.
 - d. The DPHI's whole purpose is to "ensure that NSW is liveable and prosperous by delivering thriving communities, public spaces, places and economies". It is difficult to understand how Plasrefine fulfills any of the DPHI's aims. The DPHI has not listened to the local community concerns about the issues with (A) Plasrefine (B) Plasrefine's location. Council (although under administration for much of the consult process) has consistently raised objection to the Plasrefine site because of its impact on the Southern Highlands Innovation Park (the SHIP) which was a plan designed in collaboration with the State Government. Whilst the Plasrefine's consultants insist they have engaged with the community. They have not.
 - e. There is no social licence for this development and both Plasrefine and the DPHI have completely overlooked and ignored local sentiment. The Ethos Urban Social Impact Assessment concedes that "the proposal has the potential to result in some negative social impacts in relation to its impact on the community's psychological and physical health, and town character, and way of life through additional heavy vehicles. The proponent will need to continue to build relationships and social licence in the community and show good faith by adhering to conditions of approval". However, in my view, the reference to "will need to continue to build relationships and social licence" completely overlooks and ignores the fact there is **no relationship** between the applicant and the Moss Vale community or indeed the broader Southern Highlands community and there is **no social licence or good faith**. How can Plasrefine "continue to build relationships" when there are none to start with? And when the many, many vital concerns of the community in relation to Plasrefine's appropriateness continue to be overlooked and ignored?
 - f. There is no suggestion in the Social Impact Assessment for how these negative social impacts on the community's physical and psychological health, and the town character and way of life can be minimised or avoided and it seems that the physical and psychological health of the people of Moss Vale community is to be ignored over and above a hazardous development.
3. Uncertainty regarding building design and function, despite approval. The constantly changing building design and safety features, based on whatever issue has recently been raised by the community (examples such as the "fast acting roller doors", the constantly changing building heights, the ventilation stacks, the water treatment onsite, the daily water use, the air vacuum in some parts of the building but not others, the open versus closed production line) makes it very difficult to understand how any of the plans can be relied on. As an example, it is unbelievable that the DPHI approved this development when it appears neither Plasrefine's operators, Plasrefine's consultants, nor the DPHI itself had any idea of

how long the doors will be open within a 24 hour period. This is astounding when the DPHI made it a condition of approval that the doors had to be closed for Plasrefine to operate its plastics recycling processes. Only at the last of the public meetings did Plasrefine's consultants reveal that the doors would probably be open for up to 5-6 hours a day (see the transcript for day 3), and yet, this was not known to the DPHI who has made it a condition of the approval that the doors must be closed, whilst Plasrefine's processing is underway. Then a few weeks later, (and 4 years after the proposal first took form) Plasrefine's consultants have revealed the doors will somehow only be open for 42 minutes a day, relying on the fastest possible speeds of opening and closing doors (and not factoring in high speed wind gusts), that based on all the drawing plans available to the public, there is no certainty on either door height or door width so it is not clearer how they've now come to this timeframe. The infinite uncertainty by Plasrefine's own consultants demonstrates the lack of understanding of their own project, and in turn, the lack of understanding the approving DPHI has of it.

4. **Water.** The issue of water continues to be another primary concern that has been severely overlooked by the DPHI. Australia is often dealing with either an overabundance of water (in the case of flood) or the drastic shortage of water (in the case of drought). These issues are only becoming more pronounced due to the changing climate. The site is subject to floods and there is no mitigation for floods in the plans. In addition, Plasrefine proposes to use far too much water (daily) than the Moss Vale area can provide during times of water shortage. The State Government was involved in increasing the dwelling sizes for the residential development at Ashbourne Estate Moss Vale (the State Govt. made the block sizes smaller so there'd more dwellings – now 1,200 dwellings), which will only increase the demand of water in Moss Vale in the future as well as the impact on the already now coping sewerage system. It is therefore hard to resolve how Plasrefine's proposal adequately (or at all) addresses these issues and in turn, how the DPHI has overlooked such fundamental concerns. There is also the impact on the wastewater with micro and nanoplastics that has not been addressed by Plasrefine except by its own in-house consultant. The DPHI has overlooked the impact to Sydney's drinking water, even whilst a NSW Senate Inquiry is currently underway examining PFAS in NSW waterways.
5. **Air quality.** Plasrefine's consultants seem to be satisfied that because there are some other industries in the area, that if there are any negative impacts to the Moss Vale (or broader) air quality by Plasrefine, that this is nullified, because "there are other possible polluters". DPHI also seems to consider this appropriate. This is lazy if nothing else. But worse than that it flies in the face of DPHI's own planning guidelines. As addressed above, some ways identified by Plasrefine to limit its impact on the Moss Vale air quality is by using fast acting roller doors. However, there remains significant uncertainty about exactly how big these doors will be, how long trucks will need to reverse in, how long they will sit idling waiting to get access, and how the significant wind gusts in the area will be managed. In addition, the DPHI condition to approval that Plasrefine not be operational whilst the doors are open is farcical when there will be multiple production lines and conveyor belt systems in operation. How will these be shut down and then restarted across the day?
In addition, the issue of microplastics has just not been properly addressed by either Plasrefine or the DPHI and remains an issue at large.

6. Fire risk. The risk of fires in plastics and recycling facilities is very well documented. The risk of fire was well covered in a number of talks at the public meetings. Neither the fire risk or the fire mitigation processes have been adequately dealt with by Plasrefine or the DPHI. The site is a bushfire zone and whilst State significant developments are exempt from bushfire zoning, common sense would suggest that if the State significant development is its own fire risk, that the bushfire zone would be given some credibility. In addition, the fire mitigation is largely to rely on local, volunteer, unmanned fire trucks and then wait back-up firefighting assistance from 45mins-1hour away. This is just not acceptable particularly when Plasrefine will be located so close to houses and a daycare.

For all the reasons above, as well as many others, the Panel should reject the DPHI's recommendation for approval.