



SKYE POPE

OBJECT

Submission ID: 217935

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 2577	
Attachment: N/A	

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I am writing to express my strong objection to the recommended approval of the Plasrefine facility in Moss Vale. After careful review of the Department of Planning, Housing and Infrastructure's (DPHI) assessment, I believe there are significant failures in the evaluation process that warrant rejection of this proposal.

As a lifelong resident of The Southern Highlands, a concerned community member and employee of one of the closest impacted receivers, I strongly object to the proposed construction of this plastic recycling factory on this grossly inadequate site, especially with its close proximity to residential areas and Australian Bioresources (Garvan Institute). I believe that this development will pose numerous detrimental impacts on our community and the environment.

The serious impacts of noise, vibration, and pollution on the Australian BioResources (Garvan Institute) mouse breeding facility and their staff have nowhere adequately addressed. The fire risk alone to such a sensitive operation and the catastrophic impacts it will have on the staff and the business are simply not acceptable .Australian BioResources is located at 9/11 Lackey Rd , Moss Vale and is the closest sensitive receiver at <50m from the proposed factory.

As noted directly from Technical Report 3 " Air Quality and Odour:

The worst-case impacts for all pollutants occurs at the commercial receptor R001, the Australian BioResources Facility is repeated more than once but presents no solutions or mitigations.

As noted directly from Technical report 2 - Noise and Vibration:

It should also be noted that mice are nocturnal and the worst impact would occur during daylight hours during the construction phase of the proposal " this does not consider the fact that this factory will operate 24/7 and that mice are disrupted by noise and vibration even during those hours designated by GHD that they should be asleep. The proposed measures (notifications of works, community relations , community liaison , complaints handling) are quite frankly inadequate when it comes to the impact on the mice housed at Australian BioResources as these impacts will not apparent until construction / operation commences. This risk is simply unacceptable, not only for the 60+ staff that Australian BioResources employs but also the mice housed within the world class facility and the Medical Research Industry in Australia and around the world. GHDs assurances are just empty words as on every report or document they have the disclaimer that clearly states that GHD are not responsible for anything that happens following approval.

The Air Quality and Odour Appendix J advises:

"that employees or laboratory mice at Australian Bioresources would ordinarily spend the majority of time in controlled air conditioned environments, and would therefore not be exposed to external, elevated air pollutant concentrations "which is ludicrous as it will be their own responsibility to monitor the air conditions as "all persons potentially exposed to elevated background air quality levels, including employees of Australian Bioresources, would be made aware of degraded air quality through DPE's ~Current and forecast air quality' page, and would be able to further minimise their exposure to air pollution during these periods. As a current employee of one of the closest impacted receivers (with over 15 years working on this site) I can categorically state that we CAN detect odours and changes in the external environment from inside the buildings. There are no windows within the animal holdings but we can smell when it rains, smoke from bushfires / burn offs,



fertilisers and when the grass is being mown from within the animal holdings . The insistence from GHD / Plasrefine that the odour and air quality from their factory will not impact the staff and research mice is both misinformed and farcical and will lead to irreversible impacts if not fully and adequately investigated.

The proposal lacks sufficient consideration for the potential effects on residents and the local roads adjacent to the intended transportation route for contaminated plastic waste. Even though Taylor Avenue is expected to bear the greatest impact from the designated haulage route, the 1500 residents of New Berrima have been completely ignored and offered no specific consultation during the exhibition period. They were also omitted from the independent Social Impact statement even though this development also directly impacts their lives due to the increased heavy vehicle traffic movements.

The proposed haulage route presents significant safety concerns, particularly regarding the presence of three level rail crossings within a 3.5km distance that will cause significant delays and queuing along the designated route due to the frequency of rail movements. As this is a single line the same vehicles encounter the same train at all 3 crossings “ this unfortunately leads to drivers trying to race the train to not get stuck at multiple crossings for extended periods of time. These safety issues have not been adequately addressed. Moreover, the proposed relocation of the level crossing will have a severe impact on other road users who rely on accessing Red Fields Rd, Collins Rd, Douglas Rd, and Lackey Rd all for the sole benefit of Plasrefine being able to access their factory from what is effectively an access road to a private site. Trucks queuing along both Douglas Rd and Collins Rd from the proposed access road will have detrimental impacts on other road users and pose safety issues with the rail movements along the line.

GHD has made at least 4 changes to the site access and haulage route over the past three years, prompted solely by community research and fact-finding rather than their own desktop analysis and Google Maps which has quite clearly proven inadequate. This pattern of changes highlights GHD's lack of thoroughness and their failure to fully understand the community and the proposed factory site. This lack of understanding is evident in various aspects of the Environmental Impact Statement (EIS), which undermines confidence in the submitted documentation. The frequent alterations to the haulage routes have caused stress and anxiety within the community. It is necessary to clarify the availability of support and consent from Wingecarribee Shire Council regarding the use of the paper road.

The proposed relocation of the level crossing has raised concerns among business owners and road users on Douglas Rd, Collins Rd, Red Fields Rd and Lackey Rd. The lack of consultation about this relocation has led to suspicions that GHD / Plasrefine is prioritizing their own agenda over the interests of the community, as well as other business owners and operators. This new road construction is not included in the Wingecarribee Shire Council's State Government funded SHIP Masterplan and as such is a purely self-indulgent undertaking serving only the purpose of the proponent and GHD.

The Sydney Water Catchment area will be severely impacted during both construction and operations, as the proposal has not addressed the potential issues of ground water contamination especially in case of a catastrophic fire at the factory.

The proposal does not effectively address its impact on other land uses, as required by the Wingecarribee Shire Council LEP 2010. The council has repeatedly stated that this proposal is out of sequence with the proposed development of the SHIP and as such jeopardizes the long-term viability of the whole precinct. The proposal also fails to meet the objective of the LEP, which is to ensure that new development considers its spatial context and mitigates potential impacts on neighbourhood amenity, character, and road systems.

The proposal shows a complete disregard for the community of North-West Moss Vale and New Berrima. The potential socio-economic impacts, including changes in their lives, safety, and land values, as demonstrated in the SIA by Ethos Urban, must be considered.

The proposal continues to lack specific technical information about the machinery selected for operations (among many other to be advised details) and does not provide concrete data on emissions from these



machines. Measurements, quantifiable data, and dimensions are missing or omitted from the information GHD has submitted, making it impossible to form a well-educated outlook of the proposal as a whole. Health issues associated with dust, vibration, and noise within 250m of the site cannot be assessed without accurate technical data from the individual machines. As this is yet another after approval proposal, there is insufficient consideration of resident amenity, including visual impact, given the scale and potential overdevelopment of the site. Landscape screening appears to be off-site and to have negligible impact on what can only be described as an enormous factory.

The amended water usage details are unclear, particularly how the water reduction will be achieved, which is in direct contradiction of the high sewer outputs still predicted in the current amendment.

The proposal does not adequately address the effects on New Berrima, Bowral, Burradoo, and the Southern Highlands as a whole, including traffic impacts, the impact on agriculture, fumes, microplastics, the impact on tourism, dust from construction, the impact on the residents of the WHOLE shire, and odour dispersion due to prevailing winds.

Insufficient information is provided about local employment opportunities. The Director's statement about recruiting specialist services from outside Australia and the plant's automated nature further clouds employment prospects for the community. Most community members have had negative interactions with GHD and minimal engagement with Plasrefine Recycling. The community engagement has been lacking and failed to foster a positive relationship. No further engagement regarding the now 4th change in access has occurred, even with the other businesses already using these roads.

Given the expected negative impacts (as outlined in the SIA by Ethos Urban) on the community and the lack of confidence in the proponent's capabilities to manage or even fund a project of this magnitude, it is impossible to identify any public benefit from this proposal. With the downturn in value of these limited life recycling facilities and closure of many similar facilities in Australia over the recent years I do not believe that approving a facility such as this, with inexperienced operators and on such an inappropriate site benefits anyone other than the proponent and facilitates GHD receiving their final pay cheque. I urge the IPC to take the communities concerns and look at this proposal and see all that is lacking. This is simply not the right site for this development.
