



ROSALYN MILLER

OBJECT

Submission ID: e27

Organisation: N/A	Key issues: N/A
Location: N/A	
Attachment: Attached overleaf	

Submission date: 11/25/2024 1:38:00 PM

Dear Commissioners

I had some difficulties using your online submission form so I now attach a PDF copy of my written submission objecting to the approval of the Moss Vale Recycling and Reprocessing Facility.

I am a member of the community with a view about the proposed development, making a submission on my own behalf, and do not object to publication of this submission, my name or State.

My objections in this submission are primarily regarding fire risk, traffic impacts and general lack of detail in the proposal which should be provided prior to approval and not be covered in plans to be submitted after approval has been granted.

Thank you for your time and consideration.

Yours sincerely

Rosalyn Millar

[Redacted signature]

[Redacted address line 1]

[Redacted address line 2]

Submission of Rosalyn Millar – 25.11.24

Thank you for providing an opportunity for me to elaborate on my earlier spoken submission on 2 November 2024. Today, I would like to cover some additional areas of concern:

LOCATION AND LACK OF BUFFER ZONE

I have previously submitted that the lack of buffer zone between this hazardous industrial process, the Garvan Institute, nearby residential areas and the riparian zone feeding the Sydney Water Catchment area makes the proposal impossible to approve. I note that the proposed Brightmark 200,000 tonnes plastic recycling facility being constructed in Parkes is located in a Special Activation Precinct. According to our State Government department Invest Regional NSW (<https://www.investregional.nsw.gov.au/success-story/brightmark>)

“Special Activation Precinct the key to success for advanced recycling facility Bob Powell, Founder and CEO of Brightmark commented, “Collaborating with the NSW Government in their Parkes precinct is ideal due to the sustainably minded business environment and community, and its location as a transportation and logistics hub.”

We have a sustainably minded business environment and community here in the pristine Southern Highlands but what we do not have is a **transportation and logistics hub**. The Special Activation Precinct is kilometres from residential areas serviced by proper industrial roads close to main transport arteries.

Mr Chris Ritchie of the DPHI remarked during the question/answer segment of the online Public meeting on 12 November 2024 “**Interface with Residential Areas**

Now, we in our space do a lot of industrial development, we deal with waste, and we do a lot of distribution facilities and industrial activities. **And it is not unusual to have an interface with residential areas.** [my emphasis] We’ve got some particular locations **in western Sydney** [my emphasis] where we do have to look at these very regularly, and required experience in dealing with that interface to make sure we’re achieving expectations around meeting those government requirements.” How can you compare the Southern Highlands with Western Sydney? This is a pastoral area, a tourist destination known for its green hills and trees where the residents of Sydney (and elsewhere) come to relax and unwind from the pressures of city life – this is NOT western Sydney.

CONDITIONS OF APPROVAL SHOULD BE MET PRE-APPROVAL

You have heard from Ms Susan Stannard, Executive Strategic Outcomes for Wingecarribee Shire Council who states in her submission on 12 November 2024: “The listing of an operational traffic management as a condition of consent is especially concerning, given one of its key intents is network efficiency. The proposed site could hardly be more demanding on both the existing and future road network.... The inability to manage this volume of traffic and vehicle movements with any certainty would effectively monopolise the existing road system for significant repercussions for both existing and future businesses within the SHIP.”

I note that Commissioner Mills directed a question to GHD their Zoom video conference on Tuesday 22 October 2024 (at p.19 of the transcript):

” MR MILLS: And can I ask a follow up question and this is more a case of the why at this site, given that you’re seeking to I guess collect plastic waste in the first instance from Sydney, Canberra and Wollongong, would a site closer to the highway have made more sense?”

YES, Commissioner Mills. THIS IS NOT THE RIGHT SITE.

Our local MP, the Honorable Wendy Tuckerman has offered to assist the Applicant find a site closer to Goulburn and the Hume Highway, however I understand the Applicant has not taken up her offer.

The DPHI conditional approval states in conclusion on p.65 [par 197]:

“These conditions require the Applicant to consult with and consider the advice of Water NSW, FRNSW, TfNSW, the EPA and Council when preparing the detailed design and management plans to manage the environmental performance of the facility.”

I however further concur with Ms Susan Stannard, of Wingecarribee Council who has advised in her submission:

“Council remains deeply concerned that so many matters considered fundamental to the overall viability of the project have been relegated to conditions of consent, rather than being integral to the assessment process itself.”

As Mr Derek White submitted to you on 28 October 2024 submitted: There is a complete lack of detail, description, analysis and specification provided by the Applicant which beggars belief that an approval has been made at this stage. Please do not approve this development prior to receipt of the various plans that the Applicant is being asked to prepare AFTER approval. It is the wrong way around.

I am particularly aware that Fire NSW could be unable to sign off on a satisfactory plan due to the huge footprint of the buildings with only 2 6m wide access roads to the west and south of the buildings for the fire appliances to set up, stabilize and attempt to fight a 1200C fire emitting noxious fumes. Finding this out AFTER approval is granted is FAR TOO LATE. There is no doubt that the site is on bushfire prone land despite what Mr Gamble of GHD stated to you during questions at the end of Day 3 of submissions on 12 November 2024. I have conducted a search on the NSW Rural Fire Service website:

<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>

which provided this result:



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

And continues to advise down the page:

Planning development on your property?

Any proposed development upon the property will be required to comply with Planning for Bush Fire Protection for new works.

More information is available in our [building in a bush fire area](#) section including information on types of development, legal obligations, bush fire protection measures and how to get further assistance.

Surely this is planning and approval that should be done prior to this site being granted Development Approval.

ZONING

My second area of concern with this proposal is that the Site is completely incompatible with the State funded Southern Highlands Innovation Park. I note Commissioner Mills sent a letter to Ms Joanna Bakopanos of the DPHI on 28 October 2024 asking whether this project would constitute “Advanced Manufacturing” and requesting a response by 1 November 2024. I have telephoned the Commission today and been advised that a response has not as yet been received. What a shame.

So, I have read the NSW Advanced Manufacturing Industry Development Strategy at www.investment.nsw.gov.au

and I find it highly unlikely that this Plastics Recycling Factory would be considered an “Advanced Manufacturing” facility as contemplated to be compatible with the other SHIP low intensity pursuits envisioned to “*enhance the quality of life for our residents.*” [Hamish McNulty, Acting General Manager, WSC - <https://www.wsc.nsw.gov.au/News/Media-Release/Review-the-Draft-Plans-for-Southern-Highlands-Innovation-Park>]

In conclusion I refer to the submission by Mr Barry Anstee, Architect, on 28 October 2024 who submitted that this development constitutes Heavy Industrial Storage which is a prohibited development and not “permissible with consent” as stated in the DPHI’s Assessment Report (p.15 Par 17). Accordingly, I submit this Site is not zoned correctly for this development.