New South Wales Government
Independent Planning Commission

SHARAN KENNEDY		**OBJECT**	Submission ID: 218405
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:	*Attached overleaf*		

Submission date: 11/25/2024 3:55:20 PM

I wish to lodge my objection to the Plasrefine Plastics recycling facility in the strongest possible terms. Unfortunately, I have experienced computer issues and do not have the original submission that I intended for consideration. However, I am submitting the accompanying documents in the hope that they will suffice.

AMENDMENT RTS – UPDATED ARCHITECTURAL PLANS

Preliminary Design Report February 2024

Executive Summary:

Conflicting information between this report and Preliminary Design Report – Final 30 April 24 Appendix C

- A light spill analysis has also been conducted to ensure the surrounding areas will not be impacted by the lights within the site, with detailed calculations in the Appendix This has not taken into account the glare from vehicle headlights on the north-south access road which slopes uphill, aimed directly at residents. It gets dark very early during winter months so headlight glare would be an issue for a much longer period.
- The plant would be available to receive mixed plastics from various waste and recycling collection companies and from material recovery facilities (MRF) and recycling plant operators. No longer specifies exact towns or cities, so could be coming from anywhere. If insufficient feedstock is available state or nation wide, does that mean imported feedstock?
- Design decisions such as the placement of windows, location of toilets, skylights and solar panels, have been based upon a site analysis and building orientation to provide the best views, light and **ventilation** into the building. Anything providing 'ventilation' also provides access for noise, odours and possible emissions to the external environment.
- **P.11. 02 Site Context 2.4 Site Lighting**
  The lights on the roadways and parking areas have no potential to impact the neighbouring developments. With no specified height and only mounds and a smattering of small trees to separate from surrounding residents and a highly suspect light spill analysis, this is no assurance.
  The nearest building structures are approximately 70m away from the east side of Building 1. Facing Garvan with 24 huge windows and internal lighting in addition to external, devoid of an assessment
- **P.14. 0.3 Preliminary Design 3.2 Facade Inspiration**
  "Its rustic qualities suit the countryside feel of the area, overlooking fields and farmland." Suitability of site selection
- Preliminary design drawings show views from Collins Road and Bulwer Road and a barely visible, pale grey montage from Douglas Road muted to show minimal impact.
- Mentions "The large roofs provide ample space to host solar panels, and **with the high loads of energy required for site operations**, the cost of the solar panels will be earned back in likely a few years." **Total** daily energy requirements – **8,500Kwh** With an output from solar panels estimated at **2,000Kwh,** that leaves a **deficit of 6,500Kwh** to be sourced from and therefore **impacting the grid.** What is the considered effect/load on the grid when the solar panels aren't working to capacity, with Plasrefine operating 24/7?
- "The ample roof areas and high levels of solar exposure will **most likely** allow site operations to be run **predominantly** on energy from solar panels hosted on the roofs." No glare study for these but glare is clearly visible in montage images on pages 3 and 25 of Appendix C Preliminary Design Report - Final
- "Design decisions such as the placement of windows, location of toilets, skylights and solar panels, have been based upon a site analysis and building orientation to provide the best views, **light and ventilation** into the building." Anything permitting ventilation creates the potential for emissions, noise and odour issues
- "A light spill analysis has also been conducted to ensure the surrounding areas will not be impacted by the lights within the site." At **10.23.15 AM and all achieved a pass!**
  A total of 180 lights - 105 Wall lights & 75 Pole Top (no height indication which affects light spill, but assurances that screening will obviate these issues)

- **P.18. 03 Preliminary Design 3.4 Administration Building FLOOR PLAN – LEVEL 1** Still has the Driver Lounge diagonally opposite the Café/Bar
- **P.20 Admin Building** – **no solar shades** on any windows facing **east = ABR** or **south = residents** operating 24/7 with internal lighting bgng
- **P.21. 03 Preliminary Design 3.4 Administration Building 3D VIEWS** Clearly shows a montage of "Space between admin building and Building 2 warehouse" devoid of distance measurements for an accurate fire vehicle access assessment
- **P.22** information stated in documents - no more than 4,800 m3 of stockpiled waste **BUT** diagram shows **2x waste stockpile bunkers** each 4,800m3 **Equals 9,600m3 in total. Double the stated amount.**
- **P.24. 03 Preliminary Design 3.5 Building 1 3D VIEWS "**South-Eastern angle showing skylights on roof" No vents or stacks mentioned although visible
- **P. 27. 03 Preliminary Design 3.6 Building 2 3D VIEWS -** Clearly shows a montage of "space between two large warehouses" again devoid of measurements
- **P.38 04 Summary 4.2 Conclusion** The facility's design also prioritizes sustainability by incorporating solar PV panels and energy-efficient systems. No mention of how much power will be drawn from the grid, only the output from their own system.
- **P.38** "Accessibility Safe access to car and truck parking must be considered in the coming stages of this project. This task should be carried out alongside landscaping, to ensure there will be no clashing between elements."
- **P.39.** "Furthermore, the design has been considered within the context of the surrounding environment. The rolling hills around the building have been mirrored in the facade design." How ironic that the 'workers' will be able to enjoy the views that the factory will be obscuring, from the long-term residents and businesses.

Appendix C Preliminary Design Report – Final 30 April 24

P. 9 An important omission:

Axonometric view of site montage: 3 air conditioning plants, 33 rooftop vents and 4 stacks are shown on both the diagram and montage, as barely discernible tiny specks devoid of labelling. BUT…unspecified heights of vents and stacks Measurements not indicated on diagrams or in documents. **No mention anywhere in preliminary documents of rooftop vents or plants.**. How will noise, odour, emissions from these be mitigated since they are 14.5/15.5m high on top of the buildings???
Axonometric view of site montage also shows **3 roller doors on the eastern side, facing Garvan**

P.15 03 Preliminary Design
3.2 Facade

- Its rustic qualities '**suit the countryside feel' of the area, overlooking fields and farmland.** With an 8-acre building footprint of 14.5/15.5m in height with 4 rooftop stacks, 33 vents, an undetermined number of solar panels and air conditioning plants? How does that suit the countryside feel? This mega factory will destroy that "countryside feel…overlooking fields and farmland."
- In certain areas of the facade membranes, translucency can be integrated **to lighten the visual weight of the enormous warehouses and improve their aesthetic appeal.**
- Larger windows will also assist in the **blurring of height perception** of the buildings. Both points are an acknowledgement of the oversized bulk and scale of this proposal.

P.18 Landscape Plan
GHD states…The landscape plan has been further updated to include: – **One to four metre mounds to increase the efficiency of the planted screen** – Over 170 mature trees (between 2.5 metres and 3.5 metres in height) to provide screening support while the new screening vegetation is established. Additional

details relating to the mature planting are included below. Mature plants of three different advanced pot sizes are proposed for the screen planting - 200 litre, 400 litre and 600 litre. What is not mentioned is that the vast majority of these plantings are either **plugs or tubestock**

The dotted lines in the legend for the Landscape Site Plan indicating Top of Bank, Inner Riparian Boundary and Outer Riparian Boundary, **are non-existent** on the Landscape Site Plan diagram**.**
Planting types include:
TYPE 2: Bushland Screen Planting - Mass **tubestock** planting of trees, shrubs, **grasses and groundcovers** that will **help screen the facility**. Only trees will effectively screen these huge factories. 178 trees are intended to screen a factory complex with an 8 acre building footprint, only 37 of which are merely 3.5m in height.
TYPE 3: Steep batters - **Shrubs grasses and ground covers** used to help stabilise soils associated with batters along the access road. When the extensive rabbit populations feast on the grasses and ground covers, what will stabilise the steep batters? Do the unprotected soils wash into the riparian creeks?
TYPE 4: **Groundcover Planting** - Includes a monoculture planting of Purple Coral Pea in a strip landscape bed around the perimeter of Building 2. All of which are a smorgasbord for the multitude of rabbits, so completely ineffective. No watering system shown on plans, which is a necessity, especially for newly established plants and trees. It also drains the water supply.
P.18 also shows the intended trees which **at mature height,** reach between **15 and 50 metres However, they are ALL TUBESTOCK.** It would take a **minimum of 10 years** for the fastest growing trees to reach those heights and in the meantime, the **facility is very sparsely screened,** the exception being that provided by the scattering of 37 x 3.5 metre-tall trees**.**
Plasrefine plan to **remove nine endangered Eucalyptus Macarthuraii** from **Council owned land** and **claim bio credits**. They have stated that **they will plant 150 new trees** to replace them. The Landscape Plan clearly shows **only 105 Eucalyptus Macarthuraii and all are tubestock.**

P. 20 Admin Building– **no solar shades** on any windows facing **east = ABR** or **south = residents** operating 24/7 with internal lighting No light spill assessment **for internal lights,** positioned **on the ceilings** of buildings !4.5m/15.5m high
P.22 information stated in documents - no more than 4,800 m3 of stockpiled waste **BUT** diagram shows 2x waste stockpile bunkers at 4,800m3 **Equals 9,600m3 in total. Double the stated amount and one of which is double the size of the 4,800m3 .** The stockpile bunkers are placed directly adjacent to 2 non-recyclable waste storage bins. As there are no specific measurements included, it is impossible to know whether they have the 6m minimum separation distance as required by RFNSW.
Recently presented slide have instead shown 12 smaller "stockpile pens" still with the same **4,800m3 total capacity, contravening the FRNSW regulations**
P.25 LIGHT SPILL ASSESSMENT -
OBTRUSIVE LIGHT – COMPLIANCE REPORT
"A light spill analysis has also been conducted to ensure the surrounding areas will not be impacted by the lights within the site." **Calculations recorded** on 7/7/2022 at **10.23.15am** and **all achieved a pass.** No doubt the a.m. timing accounted for the passes in all sections
A total of 180 external lights –
105 Wall lights (specified height location on buildings 6m, indicative design montage only)
75 Pole Top No total height indication which affects light spill, just assurances that effects on residents will be minimal, ostensibly screened out by landscape planting of mature trees. However, the tallest trees are only 3.5m and there are 37 of them to be distributed around an 8 acre footprint
A mitigation measure proposed by GHD – "Street lighting would be designed to direct light away from rows of adjacent trees and to **limit the impacts** of light spill on native fauna habitats." All 75 of them? Given many of our native fauna are nocturnal how is this possible?

The lights on the roadways and parking areas" **have no potential to impact the neighbouring developments…"** Ostensibly because they will be screened by the smattering of mature trees (no taller

than 3.5m), the **remainder being either tubestock or smaller plugs**. Despite screening, there will be significant sky glow. **All internal lights** of this 24/7 operation, will be located **on the ceilings** of buildings 14.5/15.5 metres high and will most likely be fluorescent in nature. "The nearest building structures **are approximately 70m away** from the east side of Building 1." The approved **3 block subdivision** for new homes to the southwest of the complex is only **90 metres away and not taken into account**
No internal light spill assessment has been conducted. Garvan is facing the **huge 24 window façade** of the east facing multi use building and will be impacted. Use of spandrel glass – what is the fire rating and glare factor?
P.41 Figure 18 Shows labelling "Street signage located at entrance of site" This **street signage is on the southern side of Building 2 warehouse**. The **entrance and exit of the site** also **face residents** opposite Braddon Road. **Why?**
The photomontages prepared as part of the EIS (dated January 2022) included a viewpoint located about 205 metres north-west of 54-56 Bulwer Road (Viewpoint 02). Viewpoint 02 is considerably closer to the proposal site than 54-56 Beaconsfield Road. As the photomontages prepared as part of the proposal are representative of the nearest residential and commercial sensitive receivers to the east, south-east, south-west and west of the proposal site, **it is considered that additional photomontage locations are not required. Despite an approved 3 lot subdivision 90m distant and not considered.**

ADR APPENDIX J Architectural Plans

Facade Inspiration
States:

- Its rustic qualities '**suit the countryside feel' of the area, overlooking fields and farmland.** With an 8-acre building footprint of 14.5/15.5m in height with 4 rooftop stacks, 33 vents, an undetermined number of solar panels and air conditioning plants? How does that suit the countryside feel?
- In certain areas of the facade membranes, translucency can be integrated **to lighten the visual weight of the enormous warehouses and improve their aesthetic appeal.**
- Larger windows will also assist in the **blurring of height perception** of the buildings. Both points are an acknowledgement of the oversized bulk and scale of this proposal.

ADMINISTRATION BUILDING FLOOR PLAN - LEVEL 1
P.22 Shows: **A driver lounge** positioned diagonally opposite a café/**bar…**accessible to those **operating heavy machinery in addition to drivers of heavy 19m semi-trailers.** This onsite availability effectively negates support for **local** cafes and businesses.

03 Preliminary Design

3.7 Building 1

P.26 Shows:

- **A forward-facing semi-trailer** clearly **not in reverse** and **3 roller doors** on the **eastern side**, facing Garvan. Previous design drawings in ADR APPENDIX J Architectural Plans showed 2 marked exit doors on the eastern side, facing Garvan. What appears to be a 3rd door is unmarked.
- 2 non-recyclable waste storage bunkers of undetermined capacity
- 2 feedstock bunkers with a height of 4m and capacity of 4,800m3 **despite 1 being twice the size** of the other but with identical labelling
- East elevation clearly shows those **3 roller doors** on the **eastern side** Does this indicate an intension to drive through rather than reverse in and drive out, as stated?

P.27 PRELIMINARY DESIGN – BUILDING 1
Does not show any total building height indications However, a height of **15.5m** is shown in the February report which also shows more details of the vents and stacks.
BUILDING 1 - 3D VIEWS
P.12 Shows: A montage labelled… Space between wastewater treatment building and warehouse No measurements or swept paths to indicate how 2-3x 19m semi-trailers will reverse into the building as GHD

has stated, between Building 1 and the wastewater building and IF they are reversing in, why are there exit doors on the eastern side? What will prevent the factory from filling with diesel fumes once doors are closed?

BUILDING 2 FLOOR PLAN - GROUND FLOOR

P.13 Shows:

- 2 entry doors on the western side and 1 entry to loading zone door **not marked on northern elevation of p.14**
- 2 large loading zones on the western side of the Multi-Use Building

WASTEWATER TREATMENT BUILDING FLOOR PLAN - GROUND FLOOR

P.21 Shows:

- Wastewater Tank 752.39 **m²**
- Clean Water Tank also 752.39 **m² No cubic capacity for either**

P.22 Shows:

- Building height – **5m HOWEVER P.A7. ADR Appendix A Updated Proposal Description** states: The wastewater treatment plant **would be an enclosed structure** placed on a slab-on-ground with a building height of **at least six metres.**
- Roller door entry on the Eastern elevation, in addition to single door worker entry on the eastern, southern and western sides. Not a closed system for removal of micro plastics via air flotation

P.24 SHADOW ANALYSIS

States: The ample roof areas and high levels of solar exposure will most likely allow site operations to be run predominantly on energy from solar panels hosted on the roofs. No guarantees and when the solar panels fail to the required kilowatts of electricity, the factory will be grid dependent. That high level of solar exposure also has an unassessed glare factor, clearly visible on montage image

Additional Information (10)

DPHI requirements:

- **Fire - Due to risk of fire at the site,** provide information to demonstrate there is sufficient operational capability at local fire agencies in the case of emergency. GHD has relied on outdated fire prone information and has not included evidence-based assertions that the site is located on fire prone land.
- Prepare a FSS **in accordance with the requirements of the Hazardous Industry Planning Advisory Paper** No. 2 in consultation with FRNSW with consideration of the operational capacity of the local fire agencies. **Why then is Plasrefine not considered a Hazardous Industry and therefore part of the zoning consideration?**

Appendix C – Updated Mitigation Measures

Concerning Statements by GHD –

Table C.10

Detailed design/pre-construction –

Waste management:

- WM1 Excess waste generation Detailed design will include measures to minimise quantities of waste requiring off-site disposal
- WM2 Construction waste management A construction waste management plan will be prepared prior to construction and implemented as part of the CEMP for the proposal.

Soils and water:

- SW1 General soil and erosion management A detailed soil and water management plan will be developed after the construction contractor has been engaged and a detailed construction method has been developed.
- SW2 Riparian vegetation management A detailed riparian vegetation management plan will be developed prior to the commencement of construction.
- SW3 Embankment stability Embankment engineering would be undertaken during the detailed design phase to confirm the ongoing stability of the basins.
- SW4 Soils and water quality A detailed soil and water management plan would be developed after the construction contractor has been engaged and a detailed construction method has been developed. The detailed soil and water management plan would be developed in accordance with Managing Urban Stormwater: Soils and Construction – Volume 1 and include management procedures, operations and controls as well as monitoring and maintenance processes to ensure compliance requirements are satisfied.
  ***Fairly Significant Inclusions to be left until AFTER a contractor is engaged**
  It would also include: – the final water management configuration and staging of key activities – final sediment basin sizing requirements, with the basins operating as Type D/F 'wet' basins based on the soil conditions at the site – construction phase water quality monitoring of the sediment basins, as well as any discharge during construction hours.
- SW5 Unexpected finds An unexpected finds procedure would be developed and incorporated into the CEMP for the proposal.

Noise and vibration: Of Concern for ABR/Garvan

- NV1 Managing the potential for noise and vibration impacts during construction A construction noise and vibration management plan would be developed after the construction contractor has been engaged and a detailed construction method has been developed.

  The construction noise and vibration management plan would also include:
  – details of the construction methodology
  – feasible and reasonable work practices and mitigation measures to be implemented
  – updated noise predictions at sensitive receivers
  – a noise monitoring procedure and program for the duration of works
  – a community consultation plan to liaise with the noise affected receivers.
- NV2 Noise and vibration impacts during operation
  As the design progresses, the proposal would continue to be refined to minimise the potential for operational impacts and ensure compliance with the requirements of the Noise Policy for Industry. Table 6.2 in Technical Report 2 – Noise and Vibration lists the design features that would be considered during detailed design.

  In addition, during detailed design and once vendor noise data is made available, the operational noise model would be updated to include manufacturer noise data (third-octave band) for all significant items of plant associated with the plastics recycling and reprocessing facility. Noise modelling would be undertaken during detailed design, using the updated noise model, to ensure the final design complies with the relevant environment protection licence conditions and the requirements of the Noise Policy for Industry.

Fire and incident management:

- FS1 Fire safety The fire safety system for the proposal would be refined during detailed design and developed in consultation with FRNSW.
- FS2 Compliance with building codes A detailed Building Code of Australia review and assessment would be undertaken as part of the detailed design.

Aboriginal cultural heritage:

- AH1 Avoiding and minimising impacts on Aboriginal heritage An ACHMP would be developed prior to construction commencing to manage Aboriginal cultural heritage within the study area.

Urban design and visual:

- UV1 Visual amenity 'Early works' screening planting on the adjacent C4 portion of Lot 11 DP 1084421 (also owned by Plasrefine Recycling) would be implemented at the earliest opportunity, to reduce impacts from both the construction phase and operation phase. **Plans show plugs and tubestock**
- UV2 Seed collection of local provenance species would be undertaken for use in the revegetation.
- UV3 As the design progresses, the proposal would continue to be refined to minimise the potential impacts on landscape character and views to the plastics recycling and reprocessing facility site. Design features that would be considered during detailed design include:

Amendment RTS Additional information in response to submissions on visual -

- A site inspection was undertaken by a Landscape Architect on 23 November 2023. The weather was dull and overcast with rain. **Sunset was at 7.49pm**. "The purpose of the inspection was to capture site photography suitable for photomontage preparation at identified locations **representing day and night conditions** to address the DPE's request for additional information (see Table 1.1) and a community submission (submitter ID S-63680962)." It is not dark enough to effectively emulate night-time conditions at7.49pm in November, as clearly shown in photographs taken.
- **P.2** "Due to the adverse weather conditions the daytime photography has been brightened in post-production to better match conditions experienced on site." Not a true indication of night-time light spill. Why take photos in adverse weather conditions?
- **P.3 As per Scottish Natural Heritage Guidance:???** "Visual Representation of Wind Farms v2.2 February 2017 (SNH 2017) recommendation, the photography was captured with the following considerations: 'approximately 30 minutes after sunset provides a reasonable balance between visibility of the landform and the apparent brightness of artificial light, as both should be visible in the image'. To allow for multiple locations to be captured within this time frame, the photography for the first site was captured just after sunset." **Not "a reasonable balance between visibility of the landform and the apparent brightness of artificial light"** since nearby residents, flora, fauna and other commercial neighbours, will experience the most adverse effects **at night** when it is **significantly darker than the photos indicate. 180 lights several metres in the air are hardly insignificant.** Why is it referenced against 7year-old data from wind farms in the Northern Hemisphere?
- "The viewpoints were selected to include views from the most affected residential and commercial receivers." None have been taken from the approved 3 lot subdivision only 90 metres away, to the south-west
- "It is the opinion of the author that while there would be **additional light impacts associated with the proposal these would not be uncharacteristic within the area**, which already contains a number of commercial developments of a similar scale with night-time lighting." None of those other "commercial developments" have 180 external lights several metres above ground level, in addition to all the internal lighting on the ceilings of buildings at heights of 14.5/15.5 metres operating 24/7 That is a considerable addition to the existing lighting of the area.

Night-time light spill photos – None showing true darkness, merely cloud cover and all buildings heavily screened by mature trees several metres high. It will take **many years** for the **plugs and tubestock to reach maturity,** therefore minimising screening in the present. The mature tree plantings used by a nearby

factory were not included in the montage however, only those belonging to Plasrefine, whose tallest trees, **all 37 of them are only 3.5m tall.**

Amendment RTS Updated Project Description – Appendix A

New Access Road

P.13 Figure A.5 defines the proposed new north-south public access road to access the plastics recycling and reprocessing facility site. It would be a two-way road with one lane **4 metre wide** in each direction, and with **2.5 metre-wide shoulders** and have a total length of about 1,050 metres. **Total of 13m road width.** It would include relocation of the level crossing on the Berrima Branch Line, an extension of Collins Road, a north-south road (currently a Council road reserve), **and a portion (about 245 metres) of Braddon Road (also currently a Council road reserve).**

- **Alarmingly**, a **barrier** and/or **lights** at the new rail crossing were **considered unnecessary** and **signage was instead proposed**
- The proposed **new rail crossing** has a **height of 1 metre above ground level**, which **cannot** be successfully **negotiated by a 19m long articulated vehicle**, despite the inclusion of swept path diagrams

Waste Water Treatment Plant

A-7 The plant would have a processing capacity of about **60 kilolitres per hour**. About **30 to 40 kilolitres per hour of wastewater** would be generated by processing activities. **The vast majority of wastewater** would be treated and reused. Initial estimates of wastewater discharges related to the washing process are up to **2.3 kilolitres per day.**

- **P.9** The plant would utilise a disinfectant solution patented in Australia by the operator, to assist in treating the water used in the process for washing the plastics. This solution contains tea tree oil, essential oils and other natural plant-based ingredients. It contains approximately **300 millilitres of turpentine** per 20,000 litres, as turpentine accounts for approximately 0.0015 per cent by volume. **The disinfectant solution is not flammable or classified as a dangerous good.**
- The disinfectant solution **would arrive on-site as concentrated liquid** and be diluted before use. Therefore, it arrives as a concentrate which **would be flammable** and is then diluted to become a solution.

Truck Parking

P.10 Parking would be provided on the eastern side of the facility for **up to eight medium rigid sized vehicles on-site.** Diesel trucks leave engines running, to minimise wear and tear on the engines, therefore noise, while queuing for weigh bridge access or waiting to depart. Also parking for 37 cars. These provisions on the eastern side, face the Garvan Institute which will be affected by the noise and vibration noise, vibration and pollution. **No noise, vibration or emissions study for this aspect.**

Electricity

The expected maximum load demand would be of the order of **8,500 kWh**, which would be **met by a combination of solar and power sourced from the grid**. Solar panels with an estimated capacity of up to 2,000 kW would be installed on the roofs of Building 1 and Building 2 to provide renewable electricity to the site. That leaves a **deficiency of 6,500kWh** to be sourced from the grid **per day.**

Water Supply

- The plastics recycling process and amenities would have a net water demand of about 10 kilolitres (10,000 litres) and 2.5 kilolitres (2,500 litres) of water **per day** respectively. **Roof water** would be collected in rainwater tanks with a minimum capacity of 150 kilolitres. **Additional roof water storage is potentially available underneath Building 1.** Secured how??? What effect would this

have on the riparian zones and where is the assessment? **Roof water can only be collected, if it rains.**

- …preliminary modelling indicates a longer-term average of about **80 per cent of net water demand** could be sourced from rainwater and ground surface runoff, the balance would be supplied from the potable water main…. assuming it rains sufficiently. That **'balance' will create a huge imposition on the town water supply when inconsistent weather and long periods without rain, mean that Plasrefine's demand will increase exponentially.** Will operations cease during those periods? Will the Shire be forced to compensate the facilities operations through water restrictions?
- The **mains water supply would also provide water for firefighting services** with a booster hydrant located at the southwest corner of the plastics recycling and reprocessing facility site.

Wastewater Management

- An on-site wastewater treatment plant (see section A-2-3) would facilitate re-use of water used for washing of the plastics. It is estimated that the plastics **recycling activities and wastewater** treatment plant operations **would generate up to 2.3 kilolitres** (2,300 litres) **per day of effluent** requiring **off-site disposal**. To where?
- About **2.5 kilolitres per day of sewage** (2,500 litres) generated from the amenities would be discharged to the Council sewerage system. **A new gravity sewer** would be required to be constructed by the proponent **to transfer** sewage and process wastewater **to an existing connection point on Douglas Road. Total of 4,800 litres of discharge PER DAY.**

Feedstock receival and unloading

All vehicles would enter the facility at the western entry point and pass over the weighbridge before **reversing into Building 1** and entering it via high-speed roller doors on the western side of the building. The waste unloading zone … would provide **sufficient space for three vehicles to be unloaded concurrently**. **How?** What is the space allowance for 3 x 19 metre articulated semis to reverse together or sequentially in the 15-minute timeframe allowance to ensure only 5 trucks per hour??? **NOTE: 5 trucks per hour is 12mins each NOT 15.** The fast-acting roller doors would have to open for longer than 15 minutes to allow this to happen **if** it was even physically possible. This is to occur on the western side of the building and Moss Vale experiences strong westerly winds. Where are the other incoming vehicles queuing while waiting??? Who is co-ordinating this, considering they are coming from Sydney, Canberra, Wollongong, Melbourne and possibly other states as well?

A-5-7 Process wastes: Table A.3

About 10,000 tonnes per year of residues from the sorting process would require off-site landfill disposal and **a further 9,000 tonnes per year of mostly filter cake residue** from the on-site wastewater treatment plant **would either be converted to product onsite or otherwise disposed at landfill.**
That totals 19,000 tonnes of processed waste to landfill per year. The amount of wastewater from plastics cleaning stated as treatment at on-site wastewater treatment plant purportedly for re-use, is extremely concerning. **That figure equates to 3,360,000 litres and yet only 10,000 litres is mentioned for discharge. This information needs to be verified.**

Appendix G Responses to Agency and Community Comments

G-2 Response to the recommendation for the completion of a human health impact assessment (GHD, 2023

Ethos Urban has prepared a Social Impact Assessment for the proposal and as result of this process has identified that a human health impact assessment may be required to assess the potential impacts of the facility.

Using this conservative approach, the EIS AQOA concluded that:

– There are no predicted incremental exceedances of the air quality standards.

The worst-case impacts for all pollutants are significantly below the air quality standards

Given that the modelling approach was highly conservative, the risk of the proposal contributing significantly to cumulative impacts at the nearest receptors at all other times was deemed to be low. These statements are highly questionable.

The following features have also been included in the project design, to mitigate the potential for air quality impacts: – All loading/unloading, storage and processing equipment will be located within buildings. Yet the highly flammable disinfectant solution used to wash the plastic, will be delivered to the site as a concentrate, and stored externally, in small stackable containers.

– Response to recommendation for the completion of a human health impact assessment 3

– All machinery will be enclosed and fitted with individual dust collection equipment (fabric filters) to collect particulates.

– Carbon filters will be used to treat VOC emissions associated with heating of plastics for forming.

– Wet grinders will be considered for use to minimise the possibility of airborne particles being generated during size reduction. Based on the above, the potential for air quality and health related impacts is considered to be low.

In conclusion. the EIS AQOA and AQ RtS have demonstrated that there is a low risk that the proposal will be associated with air quality and health related impacts. Hence GHD considers that a human health impact assessment is not warranted.

Appendix E Updated responses to community submission

Impacts to fauna - The proposal is not anticipated to have any adverse impacts on native flora or fauna, including threatened species, populations and ecological communities, and their habitats.

Appendix F Letter from the Department of Climate Change, Energy, the Environment and Water

21st Dec. 2020. Reply letter of encouragement from Hon Tanya Plibersek's office to Nancy re-funding and grants. **As early as 2020, there is clear evidence of the commercially related incentives propelling Plasrefine's intentions, in direct conflict with the proponent's stated concerns regarding the need for plastic recycling.**

TfNSW Input into SEARS

1. Traffic Impact Assessment (TIA): The TIA also needs to include, but not be limited to:

a. Details on the types of vehicles that will access the development site (both heavy and light vehicles) during its operation. **Not documented** For heavy/service vehicles details are required on their size, their associated carrying capacity, etc. for both the receipt of required raw materials and the despatch of product. This should also include details on the maximum number of vehicles per day and per annum that

the proposed development will generate including a breakdown into vehicle types and how these numbers correlate to the daily and annual limits for which approval is being sought. Details on how maximum vehicle numbers will be monitored to ensure ongoing compliance should also be provided; **Not documented**

c. Consideration of the impacts to the state road network and identification of appropriate measures to mitigate the impact (i.e. intersections to be used by the development that connect with the classified road network). The assessment of impacts on key intersections, depending on traffic volumes generated by the development, may require SIDRA modelling to be provided (including the electronic files). Any SIDRA modelling undertaken must ensure the base model has been calibrated with on-site observations (i.e. queue lengths, delays, etc.), must be provided for AM and PM peak periods as well as a 10-year growth scenario and provide details on any defaults changed along with supporting justification; an

d. Swept path diagrams to demonstrate the largest vehicles that will be using the classified road network where it connects with the local road network can undertake all required manoeuvres to enable access to and from the development site Swept path diagrams mention 26m B-Doubles, not 19m semi-trailers.

EPA Advice on Amendment Report

The applicant has advised the project will require an Environment Protection Licence (EPL) under Section 43 of the Protection of the Environment Operations Act 1997 (POEO Act) for:

- Chemical Production - plastics reprocessing - Clause 8 of Schedule 1 of the POEO Act.
- Recovery of General Waste - Clause 34 of Schedule 1 of the POEO Act

Given the number of pollution and building code breaches for industries in China, it is questionable as to whether the applicant qualifies to hold such a licence.

ATTACHMENT A: EPA COMMENTS ON THE AMENDMENT REPORT

Inclusion of noise generated on the access road to be included in the operational noise assessment **No request for additional noise, emissions or vibration assessments on the internal roadways and parking areas.**

I strongly object to the proposed construction of a massive 8-acre plastic recycling factory within the town limits of Moss Vale, especially its close proximity to residential areas and a world recognised medical research facility – the Garvan Institute. I believe that this development poses insurmountable detrimental impacts to both the Southern Highlands community and the environment.

Detrimental Impacts:

Site Location

The factory's location, only 90 metres from the boundary of an approved 3-lot subdivision and less than 200 metres from residences and businesses, is completely unacceptable. It is situated in a fire hazard zone between two riparian zones and in the Sydney water catchment, threatening the quality of life for the Southern Highlands community, the environment and surrounding flora and fauna. The peace, well-being, health and general amenity enjoyed for decades is at risk of being completely destroyed. The sheer bulk and scale of this factory complex has been referenced by the proponent in their many attempts to create solutions, as evidenced throughout several of the architectural documents. GHD has provided assurances that these issues can be adequately addressed through considered external building treatments and landscape mitigation measures. Close examination of the landscape plan reveals that the vast majority of the 152,204 proposed plantings are merely plugs and tube-stock, which will provide the local rabbit population with a veritable smorgasbord. Despite the proposed mounding, this will do little to screen such a vast complex, thereby obviating that claim. Of the total number of plantings, only 178 are classified as 'mature' trees, 37 of the tallest, being a mere 3.5 metres in height. There is no provision for a watering system in place and therefore no additional water usage calculations provided.

Proximity to ABR Garvan Institute

Placing the factory 62 metres from the boundary of the ABR Garvan Institute, endangers the institute's operations, research, and the safety of its personnel. This world-renowned medical research facility is one of only TWO in Australia, conducting this type of critical work. Despite assurances to the contrary and various contrived 'mitigation measures' to satisfy the DPHI, the Garvan Institute WILL be impacted by noise, vibration, emissions, odour and light spill. Their approved extension plans would place them a mere 48 metres from the boundary. Their choice to expand and develop further critical research into a myriad of diseases and conditions, should not be jeopardised by the Plasrefine proposal.

Traffic Congestion

Heavy Vehicle Traffic

The estimated 100 daily semi-trailer truck movements will result in traffic congestion, deteriorated road conditions, significantly impacting ratepayers and compromising the safety of both residents, visitors and commuters. There is no guarantee that the specified routes can be adequately managed or ensured. With vehicles travelling from various locations throughout the states, the arrival times, travel routes, queuing and noise impacts would need to be centrally co-ordinated. GHD cannot and has not provided clarification details on any of these aspects, other than constant mention of 19 metre semi-trailers, despite a request by DPHI to do so. However, Appendix D Updated Design Drawings and several other documents, mention 26 Metre B-Doubles, which is concerning.

Light Vehicle Traffic

With 240 light vehicles daily, the increased traffic will disrupt the daily lives of residents and exacerbate existing congestion issues, particularly via Moss Vale's main thoroughfare, Argyle Street, which is already severely congested. There is also the possibility that those vehicles will use a direct route via Beaconsfield Road, a quite residential road traversing homes and a childcare centre. There has been no definition provided to establish exactly constitutes a 'LIGHT' vehicle.

Light Pollution

With 180 external lights, the factory's operations will contribute to significant light pollution and inevitable sky glow, disturbing the tranquillity of Moss Vale's nighttime environment not only for residents and ABR Garvan Institute, but also for surrounding fauna, fauna and habitats. The light spill assessment, due to its morning data, is flawed and does not include any internal lighting which will be at much higher elevations due to being installed on the ceilings of buildings 14.5 - 15.5 metres high. Being an elevated north – south site operating 24/7 it is surprising that no light assessment has been conducted regarding traffic headlights, which would directly impact residents to the south, south-east and south-west. The community has been assured that no feedstock deliveries are admissible after 6pm. However, during the winter months, darkness descends at a much earlier time. Therefore, the headlights will inevitably create issues which have not been addressed.

Noise and Vibration

The constant noise and vibration initially during construction and afterwards, generated by factory machinery operating on a 24/7 basis, will disrupt the peaceful and quiet surroundings of the residential areas. The fast-acting roller doors are extremely unlikely to contain any internal noise from either reversing semi-trailers or operating machinery, when opening and closing. Semi-trailers will be predominantly diesel and for efficiency purposes and the use of air conditioning, the majority of drivers, leave engines running when parked or waiting. There is a weigh bridge located on the eastern side of the complex, together with truck parking and no noise assessment has been conducted in relation to this issue, which will directly impact ABR.

Toxic and Carcinogenic Emissions

The inevitable release of toxic and carcinogenic emissions poses a significant and unacceptable health risk to residents and businesses, schools, daycare centres, hospitals, aged care facilities and the Garvan Institute in particular, situated only 62 metres from the boundary. GHD have made assurances that there is minimal chance of emissions escaping to the external environment which is simply not possible in the event of a fire. Carcinogenic emissions of benzene, carbon monoxide and hydrogen cyanide were released in huge quantities during a fire in an Indianna plastics recycling facility, a similar size to Plasrefine. It burned for days and over 2,000 residents required evacuation. There are a total of 33 rooftop vents positioned on the factories at heights in excess of 14.5 metres. They have simply 'appeared' on recent design drawings and montages (as have the air-conditioning 'plants' not previously mentioned), so relatively inconspicuous as to require manual counting. No height indications, filtration systems or purpose for the vents, have been mentioned or satisfactorily explained in any reports. These vents are additional to the 4 rooftop stacks also without satisfactory design details and definitive heights. **Most disturbing** is a statement by the EPA, Advice on Amendment Report, point 3, **"The plant must be designed to not preclude the retrofit or inclusion of additional air emission controls and/or increases in stack heights from air emission sources."** There has been no noise assessment of the air-conditioning plants.

Fire Hazard

The site location is well within a designated Bushfire Prone Zone, as evidenced by information currently available on the RFNSW website. The very nature of recycling processes, means that the factory's operations could easily become a fire hazard. Recycling facilities are notoriously prone to fire, putting the surrounding community at risk. The statistics are frightening. Plastic recycling facility fires generate their own fuel load, making them extremely difficult to contain. None of the Shire's local fire brigades are manned on a 24/7 basis. They are primarily voluntary and not equipped to deal with a fire of the magnitude that would be created by this huge factory complex, when such an event occurs. There are only

4 trucks and 1 hazmat vehicle in the Highlands. Others are 76 kms distant in Campbelltown, a minimum 50-minute travel time, similar to Goulburn and even further to Shellharbour, for additional assistance. Additional lead in time, would extend this estimation even further.

Untrustworthy Operators

The operators' previous fines in China for pollution and building code breaches have raised serious concerns about their trustworthiness and commitment to environmental responsibility. There is no corporate history. They have admitted to having no experience in operating a plastics recycling facility, which is extremely concerning. Their intention to operate this highly technology-based facility without stipulating the identity or qualifications of the operators, regulators responsible or senior technical advisors appears to be a work in progress and will not be considered until AFTER approval.

Location within Sydney Water Catchment

The factory's location within the Sydney water catchment, between two riparian zones, threatens the region's vital water resources and poses potential contamination risks, through the release of emissions, micro plastics and nano plastics. GHD claims mitigation measures in place will eliminate the majority of micro plastics onsite and that Moss Vale Treatment Plant will obviate a high percentage of the remainder. However, extensive scientific research has revealed that the particulate matter in nano plastics is so miniscule as to be invisible to the naked eye and cannot be removed or mitigated. Therefore, contamination at the source of Sydney's high quality drinking water is inevitably at risk.

Community Rejection

The factory is unwanted by the local community, as evidenced by hundreds of protests, petitions, emails and expressions of opposition. Our position is strongly supported by local, State and Federal Government representatives and has also been raised several times in Parliament. Why then are we being ignored and stone walled? Where is the duty of care to our Southern Highlands community? Our entire community has been extremely frustrated by the disrespectful and dismissive treatment we received at the community consultation sessions from the very beginning. Assertions made by GHD, of genuine community engagement are a matter of serious dispute. I am attaching email evidence of the discrepancies in the information they provided to prove otherwise.

CONCLUSION.

There are a multitude of detrimental impacts posed by the establishment of Plasrefine's plastics recycling factory, on what can only be deemed a totally inappropriate site in Moss Vale. Coupled with the misinformation, conflicting statements, lack of detail and anomalies in GHD's documents, I urge the Government authorities to reconsider this location for this development. Protect the well-being and safety of our community, preserve the widely recognised pristine environment of the Southern Highlands and do not jeopardise the Sydney drinking water catchment. I believe that the potential risks, disruptions, economic losses and unmitigable impacts to be inflicted on the Southern Highlands community, are too extreme and far outweigh any expressed and dubious benefits, that this proposal could possibly offer.

The 3 areas of concern that I wish to address this evening, are: FIRE, EMISSIONS and LIGHTING.

On Christmas Eve 2020, several Moss Vale residents received devastating news via a letterbox drop. Tucked inside a plain white envelope was notification of a proposal that would ultimately change their lives to establish an enormous plastics recycling factory, literally on their doorstep. These "sensitive receivers," as they have been constantly referred to in GHD documents, were not only shocked but also devastated. With no immediate recourse over the Christmas break, due to holiday closures, those residents were left beyond desperate for clarification and information not immediately available. So began our 4-year David and Goliath battle against the establishment of a totally inappropriate facility on a site, which despite its zoning, has for years retained an essentially a rural residential aspect. The proposed site is less than 200 metres from homes, only 90 metres from an approved new home subdivision, with many of the closest residents having lived their entire lives in that area. It is considerably closer to businesses without any effective buffer zone, apart from proposed mounds and trees and is proposing to operate 24/7. Within a mere 62 metres proximity, is the Australian Bio Resource (ABR) Garvan Institute, an internationally recognised medical facility, researching cures for a vast variety of diseases and conditions. To place such an important lifesaving institution at risk is beyond reprehensible. Plasrefine has become the Christmas 'present' that keeps on giving.

The fact that IN1 General Industrial zoning (now E4) exists for that specific area and therefore allows such a proposal to be considered, does in no way make it appropriate for the area, particularly in light of Council's draft design for the SHIP – Southern Highlands Innovation Park. This is a community supported and State Government funded initiative to establish facilities within the SHIP which will promote and foster such enterprises as education, technology, innovation, employment opportunities, etc. It should not be placed at extreme risk of failure, to accommodate an unwanted plastics recycling industry that should, by rights be reclassified as Heavy Industry or even Hazardous, due to the chemicals used in cleaning and processing, the resultant emissions produced, the inevitability of a fire, the effects on the surrounding environment, homes and businesses, the health impacts and the destruction of our community's way of life. Why should the community's multitude of concerns and extreme opposition, be set aside in the headlong rush to achieve State Government recycling targets? Where is the duty of care to its citizens?

Of paramount importance in the establishment of any industrial proposal, should be the health, safety and welfare of the community and yet, there has been no health study conducted which should have been a mandatory requirement. The location of such a factory without a suitable buffer zone, particularly in light of the draft design for the SHIP, simply beggars belief.

The bulk and scale of Plasrefine is enormous. Its factories total 8 acres in size, far exceeding the building to land ratio considered essential for any development approval. The land size to accommodate such a huge complex is simply too small and in terms of a fire, the access and available resources are severely restricted, therefore placing surrounding homes and businesses in peril. Our local fire stations are not manned 24/7 and our members are on call.

Our fire brigades are ill-equipped to deal with such a chemical catastrophe, which would undoubtedly also require aerial support. Plasrefine has stated that our local fire crews at Moss Vale, Bowral and Mittagong, would initially respond with 3 Class 2 pumper trucks and 1 Class 1 hazmat tanker. IF additional support is required, it would need to come from Campbelltown and Wollongong, a distance of some 45 minutes away. Meanwhile Plasrefine burns, sending highly toxic, carcinogenic emissions towards our northern neighbours on the prevailing westerly winds, so common in the Highlands.

Plasrefine's total disregard of the community for which they profess to want as a "good neighbour" is clearly on display. Having been quizzed by the DPHI regarding their onsite fire management infrastructure, Plasrefine has stated that they will be prepared with "emergency fire tanks (up to 1,200kL storage volume), internal and external hydrants, a fire hose reel system, a hydrant and sprinkler booster assembly, a pumping station and a firewater containment system." This all sounds highly satisfactory and professional, that is, until we drill down into the details….their fire tank may have sufficient capacity in storage volume, but our area is often prone to drought, so if there is no rain for long periods at a time, where does this water come from? The answer is….Wingecarribee's own potable water supply. Secondly, since the facility proposes to operate on a 24/7 basis, there are no details as to who is sufficiently qualified to operate this equipment. No mention of an experienced onsite firefighting team. Instead, they are relying on local and external sources to deal with the issue, which is highly unsatisfactory and unacceptable. There does not appear to be a plan in place for this eventuality and a hazardous chemical fire in a facility of this size will be enormous, ferocious and fast acting. What warning system is in place to notify residents and businesses of this eventuality? Building 1, the main processing building, is 22,848m2 or approximately 6 acres, whilst Building 2 is 8,496m2 or approximately 2 acres, which would make evacuation procedures extremely difficult.

In earlier documents, GHD stated that a Plasrefine representative would door-knock residents to advise of an incident, which is beyond ridiculous. Even if such an "initiative" was possible in the time available, most of the "sensitive receivers" live on rural acreages, not small residential blocks easily accessed for notification purposes and in the event of a catastrophic fire, time is critical. Given the massive height and proximity of the buildings to one another, it is fair to assume that they would be extremely difficult to extinguish in such an event, without considerable aerial support, which is not immediately available. Again, a time critical factor. From the visuals provided, there exists a corridor between the two factories, which in theory, would allow for fire truck and tanker access, although the height would surely preclude this, being far too dangerous in terms of the high probability of building collapse, falling debris and potential worker injuries or worse.

A fire at a plastics recycling facility burns with extreme ferocity, fuelled by the highly flammable materials being both stored as bulk waste (in this instance, 2 bins totalling 9,600 tonnes) and also being used during processing.

On a global scale, since 2019, there have been over 70 fires in plastics recycling, sorting and reprocessing facilities, resulting in loss of life, injured workers and fire fighters requiring hospitalisation, highly toxic carcinogenic emissions, contaminated waterways and

environment, a rise in serious health conditions and in several cases, mass evacuations for indefinite time periods. Australia has not been immune from these dangers, with more than 18 such fires since 2019. These fires are unfortunately, a regular occurrence due to the nature and flammability of the industry and in consideration of the Plasrefine proposal, it's not a matter of 'IF' but 'WHEN' particularly since it is located in a bushfire prone area.

The close proximity of the site, to category one and two riparian zones, both within the drinking water catchments of Sydney and the Wingecarribee Shire, places additional significance on a factory fire event. There is an extreme and unacceptable risk of contamination from airborne toxins, falling debris, micro and nano plastics and additionally, firefighting foam. The fire aspect is only one of countless reasons why our community is so determined to protest against the acceptance of this proposal on this highly unsuitable site.

My second concern, revolves around the 4 emissions stacks and 33 rooftop 'vents.' It took considerable scanning of several GHD documents to ascertain exactly where these stacks were located, at what height and more significantly, precisely how many were intended. This information was not readily available in one easily accessible location. It is of considerable concern and relevance, not only to the wider community and northern towns and villages, but also to the most immediate "sensitive receivers" and businesses, the Garvan Institute in particular and also the EPA. Perhaps this could be considered a strategic move by the proponent. Obtaining this information required trawling through several documents and pouring over designs, updates, figures and tables, to unscramble the information and finally establish the statistics required. The main processing building, also referenced as Building 1, at a height of 15.5m has 2 rooftop stacks on the Northern Elevation, of no specified height and what appears to be 9 rooftop 'vents,' again, of no specified height in any design documents. Mention is made of each of the 4 stacks being attached to an air pollution control system in Appendix J of the RTS. It states that "each process area would have a series of air collection hoods and that all captured air would be piped to the 4 air pollution control systems for treatment, prior to being emitted from a stack above the roof."

However, there does not seem to be any indication anywhere, of a filtering system for the vents, meaning any additional noise, emissions and odour will disseminate into the environment. An Admin/Multi Use building at a height of 15.5m which adjoins the remainder of Building 2 (14.5m) with an additional 2 stacks and what appears to be 24 rooftop 'vents.' There has been no mention anywhere in preliminary documents of rooftop 'vents' or 'plants,' only skylights and solar panels. Preliminary documents did, however, show a diagram of a single stack, greater than 22 metres high. If this is still the anticipated height, then obviously being a rooftop stack on a building of 15.5 metres, the stack would need to rise a further 6.5 metres, to achieve that height, not 2 metres, as mentioned by GHD.

Of extreme concern is bullet point 3. contained in the EPA document entitled, "EPA Advice on Amendment Report." Point 3. of the document states, "The plant must be designed to not preclude the retrofit or inclusion of additional air emission controls and/or increases in

stack heights from air emission sources." So, the final design or amendment as needed, could mean an enormous, unspecified increase in the height of those stacks.

Additionally, a document entitled "Updated Architectural Plans" states "Design decisions such as the placement of windows, skylights and solar panels, have been based upon a site analysis and building orientation to provide the best views, light and ventilation into the building." Anything permitting ventilation creates the potential for emissions issues. Earlier documentation recommended that residents could limit their time outdoors to combat any possible emissions released thereby defeating the whole purpose of living in the Highlands and that the employees of the Garvan Institute would not be affected as their facility is air conditioned, despite the fact that they frequently enjoy sitting outside for lunch.

All Highlands residents are fully aware of the unique weather conditions experienced each year. The designated site and the township of Moss Vale itself, are prone to prevailing westerlies, which can frequently reach speeds of between 60 – 100 knots. This is not an uncommon occurrence. Also to be considered, are the heavy fog conditions to which this area is prone, particularly during the winter months. The fog on these undulating rolling hills, quite often does not lift until lunchtime. The relevance of these weather conditions relates directly to the transfer of all and any emissions, noise and odours produced which will either be dissipated into the local environment and settle over surrounding areas and waterways, or in other instances, far more likely to be blown towards the townships of Burradoo, Bowral and surrounding areas, impacting not only those local residents, but also the schools and businesses. The facility makes no mention of having an Offensive Industry Licence, merely a requirement to conduct an annual air quality audit!

My final area of concern is the lighting of this facility. There are a total of 180 external lights on the building perimeters and along the driveways and parking lots. 105 of these are wall lights @ 11 watts, described as floodlights, at an approximate height of 6 metres, whilst the remaining 75 are pole top luminaire lights @ 90 watts with unspecified heights. The Amendment RTS Updated Architectural Plan states: "A light spill analysis has also been conducted to ensure the surrounding areas will not be impacted by the lights within the site." Interestingly enough, the assessment clearly shows a pass being achieved in all aspects. However, that would not be difficult to accomplish, given that the assessment was conducted at 10.35.15 AM. There is no mention of internal lighting, particularly with regard to the Administration Building which will face east, towards the Garvan Institute at a height of 16.7 metres. The adult mice and more particularly the embryos, within that facility, are particularly susceptible to light and noise. GHD has claimed that an analysis from their light spill assessment "showed that the lighting design complies with the relevant standards and regulations and does not cause any significant disturbance or nuisance to the neighbouring properties…while also creating a pleasant and inviting atmosphere." I'm sure there are many nearby residents who would dispute that statement and would love to continue enjoying the pleasant and inviting atmosphere that already exists, specifically the "rolling green hills" mentioned by GHD and the "large windows, which create a sense of openness and spaciousness, while also allowing the occupants to enjoy the views and the natural elements." These are the same views and natural elements that have been enjoyed for decades by the residents and business owners, who are now to be denied of those same pleasures.

The montages supplied to indicate the nighttime light spill effects from various angles and distances and proposed mitigation measures, have also been created at questionable timeslots. Some were photographed at 7.50pm on November 24th and again at 8.20pm. Unsurprisingly, as it isn't properly dark at those times, due to Daylight Saving, there was minimal light spill evident. The lack of suitable darkness for an accurate light spill indication, is clearly evident in the photographs' sky images. A genuine nighttime light spill assessment would have been far more accurate, had the photographs been taken at least one hour later. None of the montages presented showed accurate darkness, and all buildings were heavily screened by mature trees several metres high. The mature tree plantings used by a nearby factory, were not included in the montage however, only those belonging to Plasrefine.

In conclusion, I am hopeful that the community's concerns and multitude of objections to Plasrefine on a site which is not suited to this type of heavy industry and all it entails, will be sufficient to reject this proposal. There are areas that have been specifically set aside within the draft design for our Southern Highlands Innovation Park supported by the community. It has been designed by the community for the community and does not include the Plasrefine plastics recycling facility. To paraphrase the "design principle of less is more," espoused by GHD…less Plasrefine and more community supported developments in our SHIP.