



ERIN LEEVEE

OBJECT

Submission ID: 218351

Organisation: <i>The Southern Highlands Greens</i>	Key issues: <i>Land use compatibility (surrounding land uses)</i>
Location: <i>New South Wales 2576</i>	
Attachment: <i>N/A</i>	

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*November 2024*

*Submission to the NSW Independent Planning Commission*

*Objection to the Moss Vale Plastics Recycling Facility, [œPlasrefine](#)*

*SSD-9409987*

*Erin Levee, convenor of Southern Highlands Greens, on behalf of the Southern Highlands Greens*

*Note: This submission reflects the views of the author and those of the Southern Highlands Greens members.*

*Wingecarribee Shire lies on unceded Gundungurra Country. I acknowledge the traditional custodians of this place, who have cared for its land, waterways and skies since deep time, and pay my respects to Elders, past and present.*

*We submit this objection to the proposed Moss Vale Plastics Recycling Facility (known as [œPlasrefine](#)): as residents and members of the Southern Highlands Community, as parents concerned for the future health and safety of this region, and as representatives of the Southern Highlands Greens which has many local members who object to this proposed development on grounds of environmental protection, safety, and health.*

*We want to see our water, air and environment protected for our children™s future. This includes careful, consultative and sensitive planning for waste reduction and recycling. This proposal is not consistent with any of those hopes for our community™s future.*

*The Southern Highlands Greens support recycling. As NSW faces a waste crisis, it is urgent that we fast-track our transition to a circular economy using all the tools at our disposal, including large-scale improvements in our plastics recycling infrastructure.*

*However, this submission is not adequately considered in our opinion. From a health and safety perspective, from an environmental perspective and from a community and First Nations perspective this proposal is not feasible.*

*We propose that a site which has many risks associated is not the right site.*

*The Bowdens Silver Mine decision by the NSW Land and Environment Court (LEC) provides critical guidance applicable to the assessment of State Significant Developments (SSDs). The court™s emphasis on robust environmental assessment, thorough community consultation, and enforceable mitigation strategies exposes significant gaps in the Plasrefine application:*

- 1. Environmental Risks and Mitigation Flaws: In Bowdens, inadequate analysis of groundwater contamination and biodiversity impacts rendered the EIS insufficient. Similarly, the Moss Vale facility™s failure to comprehensively address fire / flood risks and environmental threats more broadly highlights its lack of readiness.*



2. *Community and First Nations Engagement: Bowdens revealed the necessity of formal consultation with Indigenous communities. The absence of engagement with the Gundungurra Traditional Owners in the Moss Vale proposal mirrors this procedural flaw.*

3. *Lack of Certainty in Mitigation Commitments: Just as vague, deferred mitigation plans were criticised in Bowdens, the reactive introduction of negative pressure systems and fast-closing roller doors in the Plasrefine application indicates inadequate upfront planning and undermines confidence in the project.*

4. *Economic Viability and Transparency: The Bowdens case underscored the importance of substantiating economic claims. Reliance on unspecified government grants for Plasrefine™s initial capital expenditure parallels Bowdens™ shortcomings, demanding scrutiny of financial and operational feasibility.*

*These precedents underscore the need for the IPC to reject the Plasrefine proposal based on procedural and substantive deficiencies.*

#### *1. Inadequate Risk Analysis*

##### *Fire Risk*

*The Environmental Impact Statement (EIS) and supporting documents fail to adequately assess fire risks posed by the facility.*

*The facility proposes to store up to 20,000 tonnes of combustible plastic materials on-site”a quantity far exceeding the 150 tonnes stored at the ACT™s Hume Materials Recovery Facility, which was destroyed by fire in under an hour. The scale of this facility is unprecedented and the fire management plan does not address this scale at all.*

*The fire management plan relies on the availability of three fire trucks stationed locally, with reinforcements arriving 50 minutes later from Campbelltown or Goulburn. This is insufficient given the scale and potential intensity of a fire. It also does not consider that fire stations in the Southern Highlands are unmanned, adding to response time.*

*Proximity to sensitive sites, including residences and the Australian BioResources (ABR) facility, exacerbates the risk of catastrophic impacts.*

##### *Lack of Effective Mitigation Measures:*

*While the proponent now proposes measures such as negative pressure systems and fast-closing roller doors, these were absent from the initial application. This reactive approach raises questions about the reliability of the risk assessment and the financial viability of implementing such costly measures.*

*There is also no detail within the submission around the intended machinery and process and management of the site. The style of machinery used has a significant impact on the running and outcomes of the site and should form part of the assessment for this proposal.*

*Further, we have concerns over the efficacy of the council™s most recent flood mitigation reports and what they mean for the water quality of the Wingecarribee with respect to health and safety standards in the event of a flood near or around the Plasrefine site; and consequently the Warragamba dam which houses Sydney™s water supply.*

*There has also been a notable absence of consultation of traditional owners in the area. The Gundungurra Traditional Owners have not been involved in a formal consultation processes and their representative (Aunty Trish) has spoken on the public record about her mob™s objection to this proposal. This oversight violates principles of respect and inclusion embedded in NSW™s planning framework and should be considered a significant procedural flaw.*



**New South Wales Government**  
Independent Planning Commission

*In conclusion, the processes for ensuring adequate risk management for this sensitive area close to a day care centre and with inadequate transportation routes for large trucks, make this an aberration of NSW planning procedures and we urge the state government to reconsider approval for this potentially disastrous situation.*

*Thankyou for your time and consideration.*

*Yours sincerely,*

*Erin Levee and the Southern Highlands Greens*

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