



JEAN MCKERN

OBJECT

Submission ID: 0

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

Submission date: 11/13/2024 6:52:00 AM

Part three submission

ADDRESSING THE CONSENT DOCUMENT – SSD-9409987

The DPHI has recommended Plasrefine's application for a Plastic Waste Recycling Facility to the IPC for determination. We are shocked that DPHI would ever consider such a proposal so close to Moss Vale on such an illogical Site. It appears to us as though DPHI has bundled up the concerns of 1000 previous submissions and said to Plasrefine "if you can sort out all the restrictions and compliances we have set you, we are behind you". The NSW government must really want Plasrefine despite the poor track record of the proponent and GHD's flawed EISs.

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT (A1)

“Watercourse crossings are the point at which tracks and trails come in direct contact with the drainage network. Crossings present a number of significant risks to stream conditions:

- **Sediment from track can easily wash in to the stream.**
- **Direct damage can be caused to the stream bed and banks from construction and maintenance.**
- **The pattern of stream flow can be affected.**
- **This can result in impacts on aquatic and riparian ecology.**
- **Culturally significant sites, which are common along streams, can be impacted.**

At the same time crossings are the sites most at risk of failure due to washing out, flooding and bogging up thus disrupting track use”.

Substitute **HEAVY DUTY ROAD** for track and the hazards are increased exponentially.

The Plasrefine proposed North/South road would go through existing dams and across riparian land on its way to Braddon Road from Douglas Road. Plasrefine is obligated by the DP to ensure all relevant steps are taken to prevent the impact.

Would the Road be built first or would heavy vehicles trundle across the riparian area in order to prepare the Site? The whole development is a threat to the environment as detailed in the many speeches at the IPC meetings.

An Environmental representative is to be appointed prior to commencement of development. **What steps would be taken to ensure the shire residents are advised of his appointment and further consultation?**

WASTE LIMITS (A6)

What safeguards would be put in place to ensure that Plasrefine do not extend their area of operation if it fails to meet its target 120,000 tonnes per year?

Are there safeguards in place to ensure Plasrefine does not import plastic waste internationally?

What happens if Plasrefine finds it is no longer viable as technology is already taking plastic waste recycling in a more effective direction? The Plasrefine Operation as it stands today kicks the problem 10 years down the track.

STAGING, COMBINING AND UPDATING STRATEGIES PLANS OR PROGRAMS (A12 and A13)

By definition this means that DPHI can change their consent document with the stroke of the pen and the shire would be none the wiser. **Is this acceptable?**

COMPLIANCE (A22)

Will Plasrefine ensure that their site preparation vehicle, building construction and employee vehicles use the North South Road and not Beaconsfield and Braddon Roads. If a truckie or employee puts the coordinates into his/her GPS the shortest route to the Site is up Beaconsfield Road. The Council has ruled against. Who will police ingress and egress of the Site? GHD told us it will be our responsibility!!!

WHAT LEGAL STANDING DO THE SHIRE RESIDENTS HAVE WHEN LACK OF COMPLIANCE IS AN ISSUE AS IT UNDOUBTEDLY WILL BE?

Somerton Plastic Waste Recycling Facility has gone into debt owing 65 creditors 33 million dollars. Plasrefine follows Somerton's format and its owner is a great friend of the proponent who told me that herself. Somerton is on the highway between Melbourne and Sydney not on a country side road leading through a village to a town situated in the scenic Southern Highlands. **Somerton was closed down due to lack of compliance leaving businesses in dire financial situations.**

Who picks up the bill? Is it the Government/taxpayers?

SOCIAL IMPACT MANAGEMENT PLAN (B1)

Will Plasrefine use the Ethos Urban SIA which Roberta Ryan corroborated without visiting the Site. I'm sceptical of her judgement. Will we be able to view the SIMP and will residents have to write yet another submission before it can be approved?

COMMUNITY ENGAGEMENT (B4)

Judging by the performance of the proponents and GHD, any community consultation is going to be viewed with scepticism and a fair amount of animosity if the Project goes ahead.

VISUAL AMENITY (B6)

No stacks appear on the photo heading this Consent Document. That in itself is misleading - a GHD trait encountered throughout the last four years! As the final design of the buildings will be made after determination, we have no accurate description of the buildings other than they must be consistent with architectural plans dated April 2024. **What does consistent mean in this context? And why has the 22m stack suddenly become 2m above roofline? All pictures of comparable Recycling facilities found on line have soaring stacks.**

Landscaping (B7 and B8)

Whilst the GHD Landscaping Plan appears to be acceptable on site, the removal of 9 Eucalyptus Macarthurii along the access north south access road **is not**. Currently the trees help shield residents from the industrial growth on the northern side of Douglas Road. GHD's plan to plant 150 E.Ms. will be lovely in 30 years!!!! Also the trees planted on the C4 land south of the Braddon Road will take time to grow. Root stock needs time to establish. Mature Trees will not find the nourishment they need from the soil in wet or dry times and will result in a very ragged line up. ABR/Garvan has that experience and I have had to ask on several occasions for the gaps to be filled.

DPHI has asked that Plasrefine supply affected residents with trees and is charged by the DP to ensure all relevant steps are taken to prevent the impact of their development on nearby properties for five years. DPHI is missing the point. We like our distant views of the Berrima Hills. Why should we be the ones who have to compromise? The Proponent could quite well plant trees all along my fence line as it is. Thank goodness I can't see the ugly blue and orange buses from my sitting room window!!! (Sorry I got a bit carried away). And we get **one** opportunity to ask

the Applicant to implement visual impact mitigation? **The whole project is an abomination on paper before a sod is turned.**

Why can trees planted on adjoining C4 land be relevant to the Plasrefine's Development application? The plantings should be contained on the E4 SITE only. The Proponents can plant trees on their C4 land if they want but they must not be even considered in the DA. In other words there is NO compulsory sight pollution compliance from the south of site being part of the DA.

LIGHTING (B12)

Does DPHI think that 180 lights, 75 pole and 105 wall lights, will not be a NUISANCE? GHD compares Plasrefine's lights with those of the Eilbeck building which has only 17 visible lights and states that its own buildings and roads will have minimal impact. Yes, there will be more lights as the SHIP fills up but they will not be on the scale of Plasrefine's as the SHIP plan does not include 24/7 industry on that SITE.

"DarkSky International says that artificial light at night has negative and deadly effects on many creatures including amphibians, birds, mammals and insects. To that I will add human beings. Circadian disruption may increase our risk of obesity, diabetes, mood disorders, reproductive problems and cancers. An increased amount of light at night lowers melatonin production, which results in sleep deprivation, fatigue, headaches, stress, anxiety and other health problems". What a treat I have to look forward to!!!!

To whom do I address my concerns about Plasrefine's over the top lighting system after a sleepless night?

TRAFFIC AND ACCESS (B15-B26)

Traffic in its many forms is a huge bone of contention.

If the IPC and/or the Minister for Planning determine that Plasrefine should go ahead with all its restrictions and compliances, does that mean that Wingecarribee Council has to resign itself to a hazardous Industrial Complex and roads that it do not conform with the SHIP plan?

1. A traffic Management Plan **must** be prepared in consultation with Council.

2. Driver code of conduct. **Minimise** is such a loose word in this context. Who is going to police the impacts of earthworks and construction on the local regional and local roads, all of which are substandard by any criteria. Who will police road traffic noise and police the use of unspecified routes to and from the site?
3. Plasrefine Traffic Plans are an accident waiting to happen:

Incoming trucks navigate 3 rail crossings to access the site. Barrier is up at Boral. Delay. **Trucks bank up**

Roller doors fail to work due to wind or other malfunction. **Trucks bank up.** Trucks have inflammable content. Catch fire, ditch content on road or land onsite or off site. Contamination enters land, air and waterway. **Trucks bank up.**

Truck noise pollution

Trucks offload content inside Building 1. Is content wrapped? How can it be inspected? If content is loose, how is it to be contained in the proposed bays to stop it blowing around when the roller doors are open **five hours a day!!** and there is a prevailing westerly wind blowing, or an easterly come to that? Who will police whether the truck drivers have the necessary licences for carrying plastic waste?

Which Sorting Depots will Plasrefine be using in Sydney, Wollongong and Canberra?

Are the truck drivers included in the 140 employees?

Will trucks be cleaned before leaving the Building 1 to save micro plastics being carried out of the premises. If so, what extra water will be needed?

What precautions will the truck drivers take to avoid being contaminated?

What controls would be in place to ensure only 19m trucks access the SITE?

HOW CAN PLASREFINE POSSIBLY COMPLY. IT IS NOT IF BUT WHEN AN ACCIDENT WILL HAPPEN. IT IS TOO LATE AFTER THE EVENT.

WASTE WATER MANAGEMENT PLAN (B39)

The Sydney Wate Catchment area is sacrosanct. We on the hill are not linked to the town sewerage system. Septic tanks in the Highlands are regulated and inspected to make sure there is no seepage into the Catchment yet DPHI recommends that a polluting Industry such as Plasrefine is OK albeit bound by multiple restrictions and compliances. It is quite beyond belief. Plasrefine says its waste is at an acceptable level but how many “acceptables” from industry, businesses and residents make it “unacceptable”?

AIR QUALITY (B41-B47)

HOW MANY STACKS ARE THERE? CAN MORE STACK BE BUILT IN THE FUTURE? HOW HIGH ARE THEY?

When Braddon Road was being constructed there were often days when there were mega dust clouds following the graders. If site construction is held up due to adverse dust conditions and its affects on ABR, residents and other businesses in the area, Plasrefine could have long delays and cost blow out. **Words written on paper do not reflect the reality of the situation.**

Will the Environment Representative be on site every day to police the site preparation and building construction? Who will monitor the odour emanating from the operation?

NOISE AND VIBRATION (B48-B59)

Whilst DPHI has placed many restrictions on NOISE and VIBRATION, it is unlikely that Plasrefine can comply. If Braddon Road construction resulted in the death of many embryos at Garvan's mouse breeding facility, how can months of SITE preparation not greatly endanger the life of significantly greater numbers. **ABR STANDS TO BE SEVERELY IMPACTED OVER A LONG PERIOD OF TIME BY THE PROJECT.**

On a personal note, the noise from heavy vehicles maneuvering, beeping constantly, over a long period of time, will be a mental aggravation of the highest degree. As my home is within the impact zone, I would ask that a vibration receiver be placed permanently on my fence line should Plasrefine go ahead. I feel sick just saying that!!.

HAZARDS AND RISKS (B60-B68)

HEALTH

Why is Plastic Waste Recycling not classified as a HAZARDOUS INDUSTRY? Its effect on staff and community health at Türkiye's Plastic Waste Recycling Factories should be the canary in the coalmine. The hazards and risks are enormous.

How can Plasrefine eliminate, not minimise or mitigate, the hazardous effects of its operation – the buildup on land and in waterways of forever chemicals affecting every living cell?

FIRE

How will Plasrefine comply 'when not if' there is a real threat from Bush Fires?

How will Plasrefine comply 'when not if' there is a conflagration internally caused by toxic chemical storage or even a stray cigarette stub.

Can Moss Vale fire brigade cope with toxic fires? We have all seen pictures of black roiling smoke as another Plastic Waste Recycling Facility catches fire. All the residents have to do is 'stay inside'!!!

Again, words do not translate into reality.

WASTE MANAGEMENT (B79-85)

Where will waste, toxic or otherwise, be taken? How often will it leave the SITE? Are there regulations in place to ensure waste is not spread on land? There may well be a plan but how can compliance be assured.

WATER

Has the Waterboard's consent for proposal taken into account the water table and springs. The foundations of building would be unstable with so much fill in a predominantly wet area. Springs don't stop running and nor should they be stopped as they drain the surrounding land efficiently. **Where did the water tanks under the floor suddenly come from? (Nov 11th IPC Meeting – Mr Gamble speaking)**

The proponents are clearly not familiar with Australian weather conditions, drought one year and wet the next. **How can Plasrefine comply with stated water usage during drought conditions when the Southern Highlands are on water restrictions?**

The Proposed Rail crossing still has so many obstacles to overcome. Can DPHI overrule when Council has the final say for any new roads and rail crossings?

When I mentioned to the proponent that toxins, however little, would be spread far and wide on the westerly wind, the reply was: "Oh not to worry. We build near you out of the way. We be good neighbour."

The proponents cannot be trusted to manage the C4 and E4 land at 74-76 Beaconsfield Road which is infested with blackberries and other weeds, and already a bush fire hazard, so how can we trust them to manage a Plastic Waste Facility?

I am apprehensive.

