



NAME REDACTED

OBJECT

Submission ID: 213821

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

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1. *In the event that the development is approved, I am not satisfied that the proposed Condition B22(g) addresses the inevitable haulage of plastic waste to the site from areas outside of Sydney, Canberra and Wollongong. For example, Plasrefine may decide it's going to haul plastic waste from places South of Wollongong, such as Shellharbour and Nowra etc. In that case they'd be wanting to haul plastic waste to the site through Kangaroo Valley, up Jamberoo Mountain Pass Road or up Macquarie Pass, all of which ultimately feed straight through the centre of Moss Vale via the Illawarra Highway, Yarrawa Road and Moss Vale Road. Accordingly, the condition should be amended so as to prohibit access to the site by trucks travelling on any section of the Illawarra Highway, Yarrawa Road and Moss Vale Road.*

2. *I am profoundly concerned about the human health and general environmental health impacts of microplastics, nanoplastics and other chemicals including PFAS on the local population and general local environment of the Wingecaribee Shire, and Sydney's Water Drinking Catchment arising from Plasrefine's proposal. Nano plastics are plastics that are too small to be filtered out of water. The Departments Assessment report gives no consideration to the impacts of nano plastics on the human health impacts from nano plastics on the local population and general local environment of the Wingecaribee Shire, or Sydney's Water Drinking Catchment.*

Microplastics, nanoplastics, PFAS and other chemicals will be discharged in high concentrations from Plasrefines proposal directly into the Moss Vale Water Treatment Plant and from there into the Wingecaribee River and ultimately Sydney's Drinking Water Catchment. In the event that development is approved, it should be on the basis that no water can be discharged into any water treatment plant within the Wingecaribee Local Government Area or any other water treatment plant in a drinking water catchment anywhere, including without limitation Sydney's Drinking Water Catchment. In the event that development is approved, my preferred condition would be for the contaminated water to be required to be trucked to a Water Treatment Plant in Sydney and/or a Canberra, not feeding into the drinking water catchment of either of those cities, so that the contamination is returned to where it came from.

There is mounting evidence worldwide of the human health and environmental impacts of microplastics, nano plastics, PFAS and other chemicals. The development should be refused outright on the basis of the precautionary principle that lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage. The precautionary principle is required to be applied under various provisions of the Environmental Planning and Assessment Act 1979, Protection of the Environment Administration Act 1991, Protection of the Environment Operations Act 1997 and NSW State Environmental Planning Policies including without limitation (Biodiversity and Conservation) and (Water Quality Management). The Department has completely ignored the requirement to apply the precautionary principle when recommending the development for approval. I recommend to the Planning Commission that it doesn't similarly walk away from its responsibility in this regard.

Australia is a member of the High Ambition Coalition to End Plastic Pollution. A goal of this coalition is to stop the production of single use plastic products by 2040. This is the correct approach, not constructing recycling facilities in environmentally sensitive areas adjoining residential areas of country towns, which spew out



contaminants into the environment including Sydney's drinking water catchment and impact on the environment and human health.

3. I am astounded by the number of conditions proposed by the Department which commence with Prior to the commencement of Works and Prior to the commencement of Operation of the Development and the like. When conditions are imposed, they need to be able to be complied with, with certainty. Many of the conditions starting with Prior to the commencement of Works and Prior to the commencement of Operation of the Development cannot be complied with, with certainty.

As one example. If the Road Safety Audit and or Australian Level Crossing Assessment Model required by Condition B17 results in a conclusion that the safety risks from the proposed level crossing alterations cannot be reasonably mitigated, then this condition can never be complied with. The Department should never have proposed this condition because there is no evidence that this condition can be complied with. What the Department should have done is recommended the development for refusal unless the applicant performed the requisite Road Safety Audit and or Australian Level Crossing Assessment Models as part of its development application to demonstrate that the Plasrefine's proposal is feasible.

Another example is the requirement for a Section 68 approval from Council under Condition A16. Council might quite rightly allow Plasrefine to connect its toilets to its sewer system, but refuse to allow Plasrefine to connect a discharge for its water contaminated with micro plastics and nano plastics to its sewer system. I hope and expect that Council will take the aforementioned action if the development is approved. The Department should have demanded that Plasrefine reach agreement with Council for the requisite Section 68 approval, prior to recommending the development for approval, or instead recommended it for approval. But it did neither.

There are too many other examples of unfeasible and/or uncertain conditions proposed by the Department for me in my personal capacity to list here. I ask that the Planning Commission reviews all conditions to ensure that all conditions proposed by the Department can be complied with, with certainty and to refuse the development on the basis of any conditions that cannot be complied with, with certainty.
