

NELLY LAY		OBJECT	Submission ID: 213915
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: 11/14/2024 4:37:04 PM

I am writing to you as a concerned resident of Moss Vale and the proposed construction of the Plastic Recycling Facility (Plasrefine). As someone deeply invested in long-term sustainability and well-being of our community, I ask you to implore the NSW Government and Independent Planning Commission (IPC) to explore alternatives for the Plasrefine facility and includes in its determination why the Beaconsfield proposal is the best option in terms or risk-reward trade-off.

The consequence of being wrong is high.

As you would be aware, construction for the largest plastic recycling plant in Parkes NSW is currently underway by Brightmark in partnership with the NSW government. This facility is proposed to accommodate 200,000 tonnes per year and will be located exclusively in the Parkes Special Activation Precinct in Australia, Australia's first eco-industrial park, more than 4800-hectares in size. The new Precinct will provide appropriate infrastructure to support the industrial economic activities.

In contrast, the proposed facility on 74-76 Beaconsfield Road, Moss Vale, is proposed to receive up to 150,000 tonnes per year of mixed plastics, a comparable capacity to the Brightmark facility, but will not have the same supporting infrastructure and risk management strategies. In fact, it will be the only industrial refinery facility in the area and located a mere 220 metres from the nearest resident, 300 metres from residents of Bulwer Rd, and all the residents on Beaconsfield road.

The NSW Department of Planning, Housing and Infrastructure Assessment Report concludes the environmental, traffic, social and health impacts of the proposals can be sufficiently mitigated to an acceptable level. However, the consequence of an unfortunate event occurring (fire, unintended air/water pollutants) are significantly higher for the Moss Vale facility being located in close proximity to residential properties. Mitigations might reduce the likelihood of an event occurring but not the potential health and safety impacts for local residents should they occur. This is not withstanding the credibility of Plasrefine where the owner has been censured by their government for environmental violations. This seems to be an unnecessary risk for the Moss Vale proposal, one which could be mitigated by selecting a location further away from residents.

Alternative sites should be considered to minimise the impact and risk

Further consideration should be given to alternative sites which minimise the likelihood and consequence of risk and the trade-off the NSW Government and the IPC are inherently making between the economic cost of the project and the risks they are willing to accept.

For example, the scoping report notes Plasrefine investigated a number of possible sites before considering the Moss Vale option. However, it concluded the Moss Vale site was optimal because it was $\hat{a} \in \mathbb{C}$ located near the Hume Highway, with good connections to the M7, M5 and M4 motorways, which makes transport by heavy vehicles from various part of Sydney quite economic $\hat{a} \in \mathbb{Z}$. This would suggest that the decision to build a facility in Moss Vale is an economic decision saving the costs of construction for Plasrefine but at the expense of risks to residents.

As part of its determination, the IPC should request further examination from Plasrefine on the alternative sites considered and why the Beaconsfield Rd facility represents the preferred site with the lowest impact/risks levels



to the community post-treatment. This information should be made publicly available so the community can understand why the Beaconsfield Rd facility is the best-case scenario among other alternatives.

This request would be consistent with the s4.15 of the Environmental Planning and Assessment Act 1979 to consider the suitability of the site for development (Clause c refers) in its determination of developmental applications. It would also support greater transparency of decisions by the IPC consistent with its Transparency Policy Guidelines.

By considering these alternative locations, the government could mitigate the risks of environmental degradation, minimize disruption to local communities, and still achieve the goal of fostering industrial growth and job creation in the region.

¹ Global company to transform Australian recycling with \$260-million plant in NSW Central West - ABC News

² Page 12 of the GHD Report for Plasrefine Recycling Pty LTD accessible online at: https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?Att achRef=PDA-8963444%2120200922T042710.606%20GMT