

Your ref: SSD 9409987  
Our ref: 12524108

19 December 2024

Independent Planning Commission via [submissions@ipcn.nsw.gov.au](mailto:submissions@ipcn.nsw.gov.au)

Attention: Mr Kendall Clydesdale

Dear Mr Clydesdale,

**SSD-9409987 - Response to IPC Request for Information (12524108)**

GHD provides the following responses on the matters raised in correspondence from the Independent Planning Commission dated 6 December 2024 (reference 12524108).

**Item 1 - Zero discharge**

**Question:**

*The Applicant advised the Commission that the Project could effectively operate with nil discharge of process water (Applicant meeting transcript pg. 12). Please provide further information on the proposed process water discharge including whether the proposed 10kl/day is required.*

**Response:**

The process water flow diagram (Figure 7.3 from the EIS) is provided overpage. Additional arrows and notes have been added to illustrate where in the process that the process water (up to 10 kl/day) would be discharged to sewer. Approximately 1,440 kl/day of process water would pass through the wastewater treatment plant, and up to 1,430 kl/day of this water (99 %) would be continuously recirculated.

The main reason for discharging water would be to prevent salts from building up in the process water, which would depend upon whether the containers that are provided from the material recovery facilities are fully washed, and whether there are any salty residues. Fresh water from rainwater tanks would be used to make up for the losses from sewer discharge, evaporation and carry through on the cleaned product.

If salt levels remain low, then there would be no need to discharge any process water to sewer, and it would effectively be a zero-discharge facility. Any discharges to sewer would comply with Council's Trade Waste Agreement levels, and as highlighted in GHD's recent response to the IPC (25 November 2024, Submission on behalf of the proponent: Plasrefine Recycling), the suspended solids concentrations would not exceed 5 mg/l.

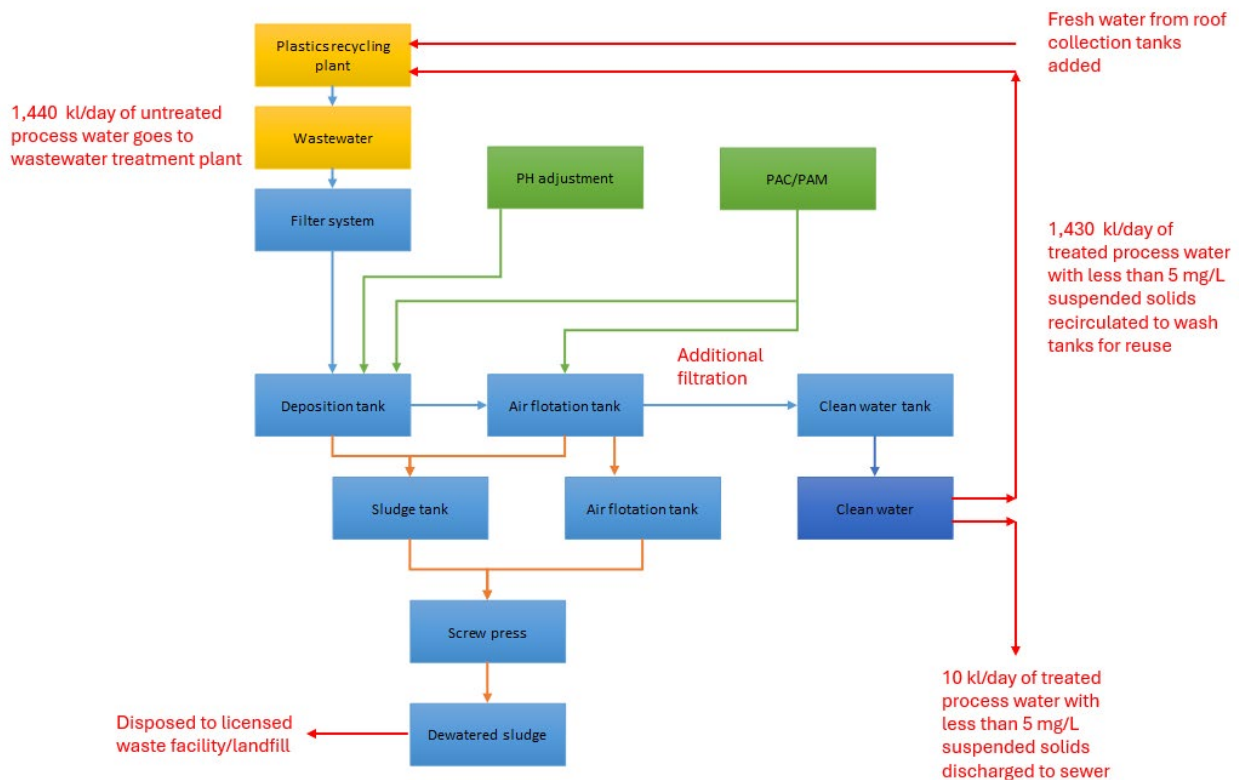


Figure 1 Process water treatment process showing proposed discharge to sewer

## Item 2 - Traffic and access

### Question:

Please provide the following in relation to traffic and access matters:

a. clarification of the access route and access point for construction vehicles (both heavy and light vehicles) during:

i. the earthworks phase of construction; and

ii. prior to the north-south access road being constructed, including in the scenario that the relocation of the level crossing and/or the works on Collins Road and Douglas Road are being undertaken simultaneously with earthworks;

b. clarification of the maximum number of truck movements proposed per hour during operations; and

c. an assessment of the impact of light spill from trucks, specifically when using the north-south access road, on proximal residential receivers.

### Response:

#### Item a)

The Amendment Report nominates that the access route for construction vehicles is the new North South Road, connecting with the recently constructed Braddon Road in the south. This route is identified as 3B on Figure 2 and will ultimately be constructed to meet the standard of a collector road, as identified in Council's Moss Vale Enterprise Corridor Development Control Plan 2008. This is the nominated route for both heavy and light vehicles.

For the earthworks phase of the project, referred to in the Amendment Report as Stage 1 – Site establishment and Stage 2 – Groundworks and excavation, the North South Road would initially be constructed as a temporary access road and Route 3C used. This is the nominated route for both heavy and light vehicles.

Stage 3 and Stage 4 would not commence until the new level crossing is operational which enables Route 3B to be used to complete construction of the project and for the operational stage.

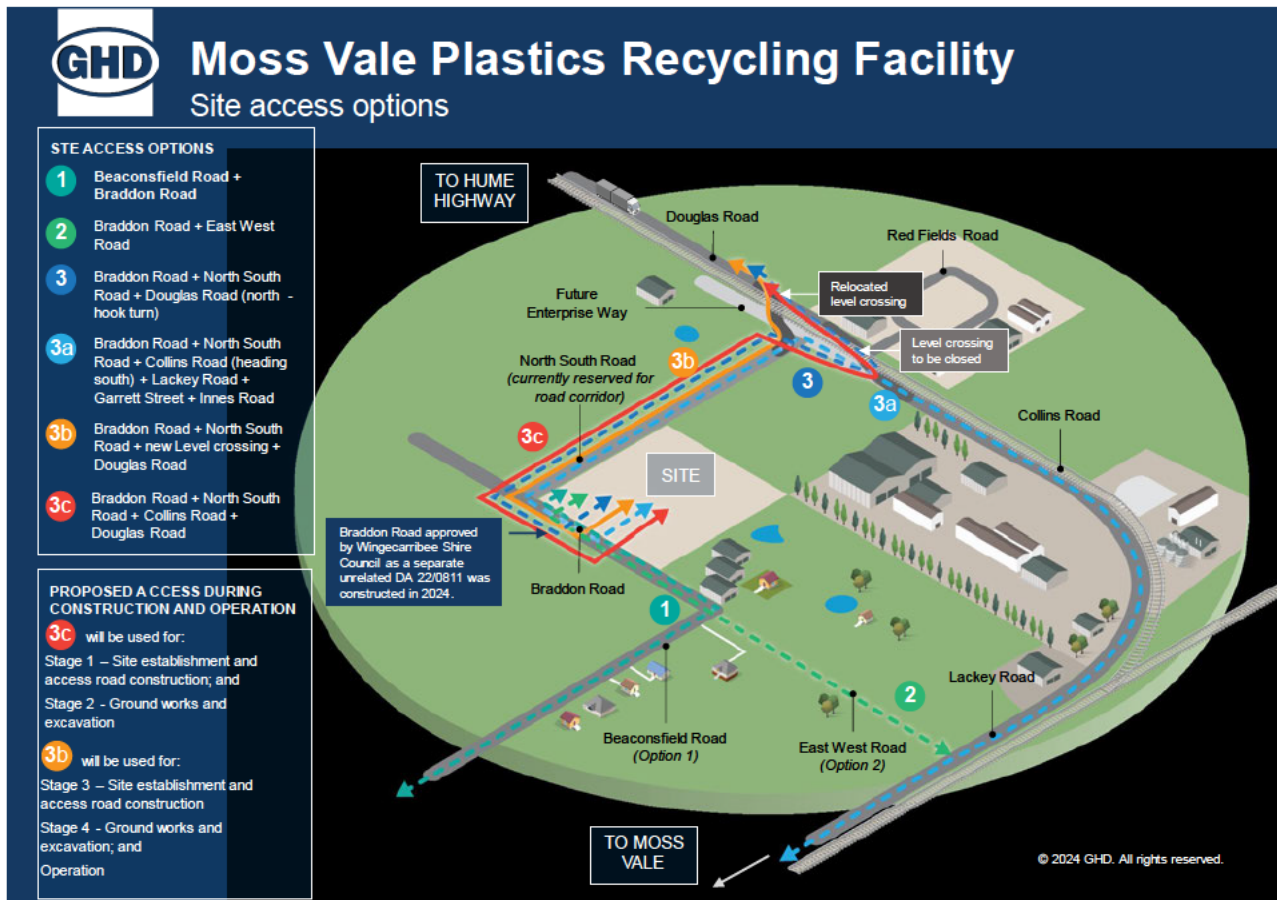


Figure 2 Access road options

**Item b)**

The maximum waste limit to be processed at the site is 120,000 tonnes per annum of mixed plastics. When the facility is operating at its maximum capacity, the maximum number of trucks per hour is 5 trucks, which equates to 10 movements per hour. Truck movements are limited to Monday to Friday 7am – 6pm.

**Item c)**

The potential maximum time period when trucks could be using head lights on the North South Road is during the one hour at sunset on the shortest days of the year (three months of winter, between 5-6pm). This would equate to a maximum of five trucks each day, during this period.

In addition, there could be instances when truck lights are needed, during fog conditions in daylight hours. However light spill would be expected to be dulled by the fog.

The nearest resident on 50A Bulwer Road would be ~ 290 m from the corner of the North South Road and Braddon Road, and elevated by approximately 25 metres. The degree of light impact on this residence and others (at a higher elevation and greater distance) would be minimal. In addition, the proponent has proposed mature vegetation planting along the southern boundary of Braddon Road which would provide a further barrier to minimise any light spill.

### Item 3 - Biosecurity measures

**Question:**

Please provide details of proposed biosecurity measures (i.e. pest and vermin control) to be implemented as part of the development.

**Response:**

Pest and vermin controls are normally required for waste facilities that receive significant amounts of food and mixed wastes containing food residues, such as landfills and waste transfer stations. The proposed facility would not receive food waste.

The mixed plastics material received will already have been processed at a material recovery facility, which would not attract vermin such as birds or rats. Material received would be sprayed with disinfectant whilst waiting processing.

### Item 4 – Enclosure of the process

**Question:**

Noting the Applicant's response on Day 3 of the Public Meeting, please provide a visual representation identifying points in the recycling process, from the unloading of feedstock to the loading of the finished products (either in pellet/flake form or as remanufactured products). The representation must clearly demonstrate where in the process plastic materials are not fully enclosed and/or encapsulated.

**Response:**

A diagram of the process that appears in the EIS (Figure 7-6) has been adjusted to show photos of the various items of processing equipment and their degree of enclosure. Specific processing equipment is still to be selected with the final equipment selection to take place during the detailed design process, which typically follows the planning approval stage.

Notwithstanding the final equipment selection, all key steps of the process are enclosed with the exception of the sorting phase, which is partly open due to the need for operators to see what items are on the conveyors and ensure that no unsuitable items are there.

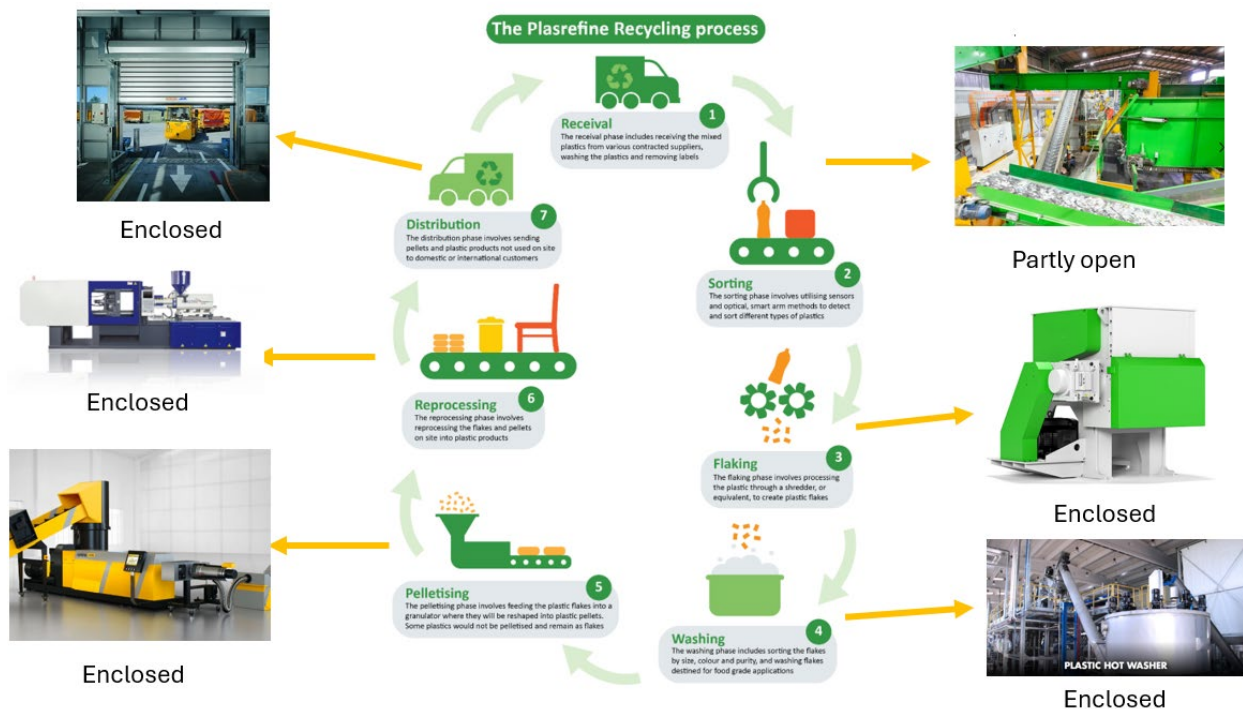


Figure 3 Level of enclosure of equipment

Regards



**David Gamble**  
Senior Technical Director - Waste Infrastructure



Copy to: Department of Planning Housing and Infrastructure