

Susan Stannard Wingecarribee Shire Council

Good afternoon Commissioners

Council acknowledges that the Department has required numerous changes to the original and subsequent Plasrefine proposals during its assessment process. However, Council remains strongly of the opinion that the subject land is most inappropriate for the proposal and that several aspects of the proposal itself require further investigation prior to any determination for its progression.

Council remains deeply concerned that so many matters considered fundamental to the overall viability of the project have been relegated to Conditions of Consent rather than being integral to the assessment process itself.

The listing of an Operational Traffic Management Plan as a condition of consent is especially concerning, given one of its key intents is network efficiency. The proposed site could hardly be more demanding on both the existing and future road network.

The proposal nominates 100 truck movements per day over an 11 hour operational timeframe. That is one truck every 6.6 minutes entering or leaving the site. But of course they are not just entering or leaving the site, they are also traversing the SHIP in both directions with all the consequent impacts on existing and future traffic movements.

Depending on whether trucks are coming from the north or south, it is between 7.5 and 9 kilometres from the Hume Motorway to the site involving three level crossings of an active train line. To make that trip in 6.6 minutes would require an average speed of between 68 and 82 kilometres per hour. Clearly that is not possible. The reality would be a constant stream of trucks in both directions throughout that 11 hour time frame.

Exacerbating these demands on the road network are the 280 worker vehicle movements per day, resulting in a peak of 93 vehicles across the three shift changeovers at 7am, 3pm and 11pm. There are no route restrictions on these vehicles so it is expected that both Braddon and Beaconsfield Roads, which are currently unsuited to such a large increase in traffic volumes, would also be affected.

And it can't be assumed that all workers will be local with many also making their way across to the Hume Motorway as they travel between their homes and the site, further compounding traffic demands on those roads.

The inability to manage this volume of truck and vehicle movements with any certainty would effectively monopolise the existing road system with significant repercussions for both existing and future businesses within the SHIP.

And these repercussions challenge the fundamental viability of the business itself to achieve its functional service objectives emphasising why Council believes that a

realistic and comprehensive Operational Traffic Management Plan needs to be prepared and assessed before any determination to proceed.

Nor does Council consider that the many outstanding environmental matters can be relegated to post determination conditions of consent. Conclusions from state agencies that the environmental impacts of discharges can be 'managed', or are 'acceptable' or 'not significant' offer little confidence and place the burden of compliance fully on Council.

Research into microplastic impacts is still evolving and much remains unknown about their long term impacts. What **is** known, is that each year, 400 grams of microplastics will be discharged into the Moss Vale Sewage Treatment Plant which has no specific process to remove them, thereby releasing microplastics directly into the environment including the Sydney Drinking Water Catchment. Grouping microplastics in with 'total suspended solids' does not provide any measure of their specific potential impact on the catchment and therefore there can be no true measure of neutral or beneficial effect.

A further shortcoming is a lack of clear data on the cumulative impact of airborne microplastics, where they will settle and their impacts on human health, agriculture, biodiversity and waterways.

Council also remains concerned that the views of the community have not be fairly represented in the assessment report although Council does appreciate the extent to which the **Commission** has facilitated community engagement on this occasion.

The Department's report acknowledges 'considerable and ongoing public concern' with the social impacts of the development, but attributes this concern, on more than one occasion, to community distress with 'the changing character of the area and its effect on their sense of place and surroundings'.

This comment would appear to be inconsistent with page 22 of the Assessment Report which notes that, of the 329 submissions to the Department's exhibition of the draft proposal, 71% referenced **traffic** concerns, with numerous submissions referencing air quality, water quality and noise. Almost 1/3 specifically questioned the suitability of the site.

These are not just concerns about the changing character of the area. These are legitimate and relevant concerns about the potential adverse impacts of a development for a purpose not suited to its location. The implied reference to these concerns being simply a NIMBY response is not fair or accurate.

The independent assessment by Professor Roberta Ryan acknowledges that social impacts would remain despite proposed mitigation measures by the applicant and recommends the applicant prepare a Social Impact Management Plan. Council

recommends that such a Plan be independently prepared to ensure it honestly reflects community concerns.

Professor Ryan also recommends that a Community Consultative Committee be established. But until the community believes that its concerns are being accurately portrayed and acknowledged, it is doubtful any useful dialogue would result.

Its all this lack of detail that concerns both Council and the community and the fact that so much detail won't be revealed until the numerous identified Management Plans have been prepared and assessed. If these remain as conditions of consent, their value to the decision making process is lost.

It is Council and the community that will be left to manage the outcomes from any decision to proceed. Those outcomes include significant impacts on the ongoing viability of the SHIP to deliver the type of positive and appropriate enterprise hub articulated in the state-funded Master Plan and Governance Strategy.

Yes, we need a circular economy and recycling of plastics is central to its success. Perhaps a more proactive strategic approach to this at the state level would be to identify potential localities or sites across the state where such recycling facilities could be best placed to optimise access, minimise community impact and more equitably share the environmental burden.

If such an analysis were undertaken, it is highly doubtful that the proposed Plasrefine site would be on that list.