



GRAHAM HORDERN

OBJECT

Submission ID: 215996

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

Submission date: 11/20/2024 10:08:36 AM

see attached

IPC Submission re proposed Plasrefine Development SSD- 940987, Moss Vale

This submission is provided with the following context:

- **Opposition** to the proposed Plasrefine Pty Ltd development at 74-76 Beaconsfield Rd, Moss Vale;
- As an adjunct to the three prior opposing submissions in response to GHD Environmental Impact Statements under this source;
- Perspectives gained as a prior practicing ISO9000 management system Lead Auditor, trainer, consultant in the private and public sectors;
- Through the lens of a defined “sensitive receiver”- 250 metres from the development’s south west border;
- Particular focus on the limitations of the DPHI project assessment document (in no specific order of priority).

1. Compliance

DPHI have provided approval for the Plasrefine development on the basis of a significant (28) conditions and additional referenced recommendations that in aggregate would represent a major compliance burden for any business operation.

This burden is generically increased where:

- There is no recorded prior industry specific experience;
- Management leadership does not foster operational compliance ;
- Workforce literacy issues impact on the effectiveness and practicality of documented operational plans, procedures and guidelines and as a preventive action measure;
- The company/industry experiences high staff turnover and the absence of effective induction programmes.

The ability of a business to meet its compliance obligations is further heightened where the nature of the operation has broad health, safety and environmental implications for the operations staff, adjoining businesses, adjacent residents and community.

DPHI’s broad scope of conditions provide a low level of confidence (at best) of a business to achieve sustained compliance through the allocation of requisite resources, operational discipline and in the absence of specified incident selfreporting requirements. Collectively, these operational conditions and associated recommendations highlight the potential risks and hazards overrepresented in the waste management industry globally.

2. On site Transport issues

On site noise and emission levels (eg diesel exhaust emissions, reversing truck ‘beepers’ noise, air truck braking) emanating from the cited number and frequency of truck and

associated vehicle movements are not captured with any reliable site data or empathy for sensitive receivers. An issue exacerbated by the site's surrounding landform features.

The incidence of truck "hot loads", their prevalence in the plastic waste industry, is not referenced as a specific hazard in the fire risk assessment. An issue that has by incident frequency gained significant focus since the Plasrefine development was assigned State Significant Development status.

3. Amenity

Amenity in its broadest sense is highly conflicted by the Plasrefine proposal and seriously under stated/valued in DPHI's assessment report.

As represented in the recent meetings with the IPC, the community has on multiple grounds highlighted the development site's unsuitability on social, environmental and economic amenity impacts.

Amenity issues are especially profound for immediate identified sensitive receivers given previous and frequently referenced lifestyle concerns including :

- Factory scale; noise, 24/7 operation, emissions (VOC, micro plastics, odour) air, water, vegetation, soil contamination), truck and vehicle movements, fire risk and management, light pollution, environmental degradation, property values, Southern Highland Innovation Plan disruption, Sydney Water catchment protection
- In brief, legitimate significant health and wellbeing issues are not accurately represented and underlined by the absence of an agency report on the development by NSW Health.

Amenity in all its representations is a community owned asset the governance for which the DPHI assessment report has failed to adequately represent in its project approval.

4. Environment

Environmental issues continue to be well represented in submissions.

Of importance is the critically endangered status of Southern Highlands Shale Woodland community.

" In view of the restricted and fragmented distribution of this community, its inadequate representation within conservation reserves, the extensive disturbancesand threats from ongoing development, the Scientific Committee is of the opinion that Southern Highlands Shale Woodlandsis likely to become extinct in nature in New South Wales unless the circumstances and factors threatening the survival or evolutionary development cease and that the community is eligible for listing as an endangered community. Ref. NSW Scientific Committee

Gazettal date: 15/06/01

*“On 28 August, 2015, under the Environment Protection and Biodiversity Act 1999 the Minister Approved Conservation Advice (including listing advice) for Southern Highlands Shale Woodland of the Sydney Basin Bioregion (EC62) be included in the **critically endangered category.**”*

A private woodland species rehabilitation project was implemented on the writer's land in 2016 drawing on tube stock from the Wariapendi native nursery Colo Vale, and as an extension of a Wingecarribee Council initiative shown on Council's local area mapping.

This regularly attended forestry 'patch' has demonstrated the challenges of nurturing this tree stock with particular pest disturbances from rabbits and increasingly variable weather extremes. Successes however have been hard won and are reflected in targeted tree species development and in native bird population.

The known (and unknown) environmental risks associated with the proposed development on the listed NSW critically endangered Southern Highlands Shale Woodland Community requires critical independent recognition and review.

The Plasrefine development's construction of a north – south access road includes the removal of a mature stand of eucalyptus macarthurii trees. An important seed producing specimen in the woodland community. Any potential offsets sought for these trees would represent an unacceptable downgrading of their significance to the local environment.

5. Climate change considerations

The realities of unprecedented weather episodes and their potential for catastrophic consequences for the natural and built environments are now a regular feature globally.

There is an absence in GHD's, NSW government agencies and DPHI's assessment report of how climate change impacts are considered in relation to the Plasrefine development, including:

- the efficacy of existing local 1 in 100 flood data;
- the site's cut and fill proposal and riparian management;
- the ability to contain operational site runoff;
- On proposed manmade landscaping embankments;
- Protection of Sydney's water catchment;
- Unprecedented drought, bush fire and storm occurrences;
- Other.....

The inability to model for the now, ever present unprecedented climatic phenomena further highlights risks associated with the development site's suitability.

6. Project documentation

The development has from initiation been poorly supported by accurate detail with GHD provided 'generous' rectification opportunities/timeframes by DPHI. Rectifications more frequently identified by astute examination of EIS content by community members eg site access and conditions, building montage representations, operational water use budget anomalies, SIA claims, modelled meteorological conditions, truck size and movement frequency, employment numbers, building design, and now, roller door operation.....

The extent of incomplete or detailed documentation and changes underpinning the development proposal have been allowed ongoing project gateway acceptance by DPHI. Limitations that individually and collectively underpin the community's distrust in the modelling of critical assessment criteria.

7. Industry classification

DPHI's determination that the Plasrefine development does not represent a potentially hazardous industry classification is disputed on the basis of published research and incidents globally concerning waste facility fire frequency, safety and environmental impacts.

An updated SEPP assessment is sought for the Plasrefine development.

Noting:

*"The SEPP ensures that the only proposals can proceed if they are suitably **located** and able to demonstrate they can be built and operated **without posing significant offsite risk**".*

NSW Planning circular PS21-031, 2 Dec. 2021

Ref. Planning and assessment guideline for hazardous industry

- Re -Dangerous Goods storage

*"....however these are unlikely to exceed the threshold quantities in applying SEPP33 and as such the development was not considered as potentially hazardous and a **Preliminary Hazard Analysis was not required**.....can be managed through complying with storage requirements for dangerous goods, the Waste Facility Fire Safety Guidelines"*

Ref. DPHI Assessment Report Oct. 2024

Given the proposed site storage of (highly) flammable material up to 20,000 tonnes, the nature of product being produced by the operation, recent fire episodes in the waste industry, local firefighting response limitations the absence of a Preliminary Hazard Analysis is a critical omission in DPHI's project assessment process

- Air Quality

“ Australian BioResources staff would be working in an enclosed building”

Ref. GHD consultants EIS 202

“ the AQIA found that odour generation would be minimal.....filter cake would be bagged immediately.”

“ a series of air quality validation events at 6 months, two years and when fully operational”

Ref. DPHI Assessment Report Oct. 2024

- Re - Noise

“for the most affected residences noise levels remained compliant assuming only two trucks leave the site in any fifteen minute period.”

“ EPA raised some concerns given the uncertainty in source noise and mitigation”

“ Department assessment concludes operation of the development is unlikely to have adverse noise inputs on sensitive receivers” Ref. DPHI Assessment Report Oct. 2024

Comment

The above random sampling of fundamental assessment shortcomings reflect a lack of professional judgement and comprehension of their impact on people’s health, wellbeing and financial status. Multiple issues support revisiting the SEPP assessment process.

There remain a host of further significant issues relating to the Plasrefine development either referenced in prior submissions by this “sensitive receiver” but not ventured into above and which defy any reasonable or informed judgement in DPHI’s assessment.

To suggest that the weight of compliance should ultimately be vested by example, in a Community Consultative Committee is a statement in its own right that the development represents a totally unacceptable opportunity cost to our community.

The case for an independently conducted risk assessment (eg Risk Management standard ISO 3100) provides an opportunity to address perceptions of bias in the determinations made to date regarding the Plasrefine development.

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