



JUDY HANNAN MP

OBJECT

Submission ID: 216715

Organisation:	NSW State Member for Wollondilly	Key issues: Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic, Other issues
Location:	New South Wales 2573	
Attachment:	Attached overleaf	

Submission date: 11/21/2024 2:26:39 PM

**SUBMISSION TO NSW INDEPENDENT PLANNING COMMISSION - State Significant Development (SSD-9409987)
Proposal for Moss Vale Plastics Recycling Facility.**

As the State Member for Wollondilly, I share the disappointment of my constituents who have contacted me on many occasions with their deep and valid concerns about the hazardous Moss Vale Plastics Recycling Project, Plasrefine. Many others have also spoken against this project, including Wingecarribee Council and Wendy Tuckerman MP, the Member for Goulburn.

While the address of Plasrefine lies outside of my electorate Wollondilly, the air and water pollution and social impacts of this project do not stop at the border of the electorate. Many of my constituents work in and visit Moss Vale, and will be impacted by this project. Given the close proximity to residential houses of 240m, the distance of 500m to a childcare centre, the proximity to a school and 1km as the crow flies to the main street of Moss Vale township the impacts of this project will be a daily reality for residents. Regardless of the location of this project however, the merits of the project are so deeply flawed and irreconcilable with the strategic aims of the Wingecarribee Shire Council vision for their area, that anyone - regardless of where they live - could see that this project must not be allowed to proceed. I urge the Independent Planning Commission to carefully consider the vast amount of evidence presented by residents during the panel hearing days, as well as the consequent written submissions, to see that this is a community united by their drive to do right not just for themselves today but for the future generations who will inherit the water, air pollution of Plasrefine if it is allowed to proceed.

The proposed site on Beaconsfield Road Moss Vale is located within the Southern Highlands Innovation Precinct (SHIP), an area deliberately planned as employment lands to attract businesses that champion innovation, sustainability, and community engagement. The SHIP was envisioned to provide not only economic opportunities but also to enhance the Southern Highlands' identity as a forward-thinking, environmentally conscious region. Key to this vision is the integration of high-quality architectural design, the use of sustainable materials, and the preservation of the natural landscape, all while maintaining a human scale with low-rise buildings of one to two storeys.

The Plasrefine proposal is the antithesis of this vision. The project consists of massive 30,000-square-metre industrial sheds towering over 15m tall, excluding exhaust stacks, which would dominate the landscape and irrevocably alter the face of Moss Vale. Such a facility is wholly incompatible with the SHIP's carefully planned goals. Rather than fostering innovation and community pride, it risks sterilising the SHIP with the presence of Plasrefine, stripping Moss Vale of its unique character and appeal.

The Department of Planning, Housing and Infrastructure assessment report, dated October 2024, defending the Plasrefine project's Social Impact Assessment (SIA) and proposed mitigation measures inadequately addresses key community concerns while neglecting to provide sufficient evidence or solutions to mitigate these risks effectively. While the SIA acknowledges severe negative social impacts such as disruption to the area's character, harm to people's sense of place, and psychological distress caused by stress and fear it provides little in the way of substantive remedies. Proposals like a Community Engagement Plan, a Community Consultative Committee, and a Social Impact Management Plan are administrative measures that fail to address the root causes of these impacts. They offer no meaningful protection against the permanent transformation of the



area or the irreversible harm to residents' well-being. This harm is already evident and exists within the community, with residents' health being adversely affected, particularly those whose properties are located on Beaconsfield and Bulwer Roads.

The report also assumes that the formation of these plans and committees will be sufficient to appease the residents. The sheer number of submissions against Plasrefine, from residents all over the Highlands, and the dedicated time and effort that this community has put into fighting this development clearly demonstrates that this community will not be appeased by the formation of a consultative committee at a future date. The true sense of consultation is to hear the concerns of those being consulted, and to proceed with this project and simply form a Community Consultative Committee is merely lip service, with no real substantive capacity to respond to the needs of the community. The reliance on an independent consultant's review within the report does little to strengthen the case. While the importance of mitigation is acknowledged, the report concedes that significant social impacts would persist even with these measures in place. The recommendation to implement additional oversight and community engagement strategies underscores the inadequacy of the existing plans, rather than demonstrating that the project is suitable for the site.

The report notes that the zoning of the area is long-standing. Currently, the area is mostly undeveloped and remains a mostly greenfield area of rural pasture, typical of the Highlands. However, arguing that the project is appropriate simply due to rezoning decisions made more than a decade ago, rather than to this specific project, and the town and community as they exist today is both flawed and misleading. While zoning may have allowed for industrial uses, it does not justify the approval of a facility of this scale and impact in a location so close to residential areas. There must be nuance applied in the consideration of what type and size of industrial facility is being located in a General Industrial zone, especially one so close to homes. The community's opposition clearly indicates that this development exceeds what they envisioned or were prepared to accept as part of the area's evolution.

Claims that perceived social impacts can be 'satisfactorily managed' through landscaping changes, access adjustments, and environmental controls are unconvincing. Suggestions such as planting trees to obscure the view, or staying indoors to mitigate exposure to air pollution are inadequate. Such measures fail to address the fundamental incompatibility of a massive plastics recycling facility in this well established location and third most town in the Wingecarribee Shire. While some technical issues may be superficially addressed, they do not alleviate the disruption to residents' quality of life or the psychological toll of living near a high-impact industrial operation.

The conclusion of the report that the project would not significantly impact the local community disregards the overwhelming evidence presented by residents. These are not mere perceptions but deeply rooted concerns supported by research, data, and lived experience. Suggesting that an Environmental Representative would provide sufficient oversight during construction and operation is another attempt to downplay the risks and appease the community without addressing their legitimate objections.

The Southern Highlands forms the drinking water catchment for Sydney. The social impact of this project extends to the responsibility that the residents feel to protect the waterways and safeguard the drinking water supply not just for themselves, but for all of Sydney. Plasrefine is an industrial scale plastic recycling plant which will cause air and water pollution and release microplastics, in the Sydney drinking water catchment area. The site itself has riparian zones running through it which are threatened by the development.

Studies have shown that anywhere between 6 percent and 13 percent of plastic processed at United Kingdom plastic recycling facilities could end up being released as microplastics into the environment. Plasrefine has proposed to recycle up to 120,000 tonnes. To put it in context, in 2023 NSW produced 800,000 tonnes of plastic and only recycled approximately 10% of that. Plasrefine's 120,000 tonnes is proposing to recycle 1.5 times that amount, in the one site, 240m from someone's home in Sydney's drinking water catchment. The scale of this, and its location, are illogical. In the process, the project will create pollution, disregard the community and



ignore the will of the local council while doing nothing to address the real issue of plastic usage, consumption and production.

Discharge of microplastics that would have to be treated at the Moss Vale Sewer Treatment plant. In the letter published on the IPC website 'Correspondence from Applicant Email Attachment 1 redacted' dated October 2024, GHD states that they expect 400gm of microplastics to end up in the water headed to the Moss Vale STP. Wingecarribee Shire Council has stated that they currently receive between 400gm - 4kg estimated of microplastics at the STP. Plasrefine as one single entity will potentially singlehandedly increase the amount of microplastics going into the STP by 100%, which represents a huge burden on Council to manage into the future, along with the added hazard of microplastics.

Plastics recycling, while necessary, is a relatively new and under-researched industry with significant risks that are still being uncovered. Peer-reviewed studies, such as one recently published in the Journal of Hazardous Materials Advances, highlight the lack of understanding about the pollution potential of such facilities. Risks such as microplastics contamination, air and water pollution, and large-scale industrial fires are well-documented concerns. These risks are exacerbated by the proposed site's proximity to residential areas and its location within the Sydney water catchment. If these risks materialise, they could result in long-term, intergenerational damage to the environment and community, particularly as we continue to uncover the harmful effects of contaminants like PFAS in drinking water. Recent updates to health guidelines, such as those from the National Health and Medical Research Council, underscore the importance of exercising caution in decision-making to avoid irreversible consequences.

The placement of the Plasrefine facility just 200 metres from homes, schools, and childcare centres is unprecedented in New South Wales. Comparable facilities, such as Circular Plastics Australia in Albury, are located at least 1 to 1.5 kilometres from residential areas and surrounded by similar heavy industrial operations. Plasrefine's proposed facility is six times larger than this example and would process significantly greater volumes of plastic waste, 5 times closer to homes. Locating the facility in such close proximity to residential areas demonstrates a profound disregard for community well-being and safety.

This is not a case of the community saying no to progress. On the contrary, the SHIP vision reflects an enthusiastic embrace of growth, innovation, and sustainability. The opposition to Plasrefine stems from the recognition that this project is fundamentally incompatible with the community's needs and values, and that the social impacts of this project cannot be mitigated. It imposes heavy industrial burdens without delivering meaningful local benefits, leaving residents to bear the social and environmental costs now and into the future. Residents have already expressed significant stress and discord, feelings that will only deepen if this proposal proceeds. These social impacts are not theoretical they are real and present, affecting the mental health, cohesion, and quality of life of the community. This deeply engaged and motivated community has made their stance clear: the current proposal is unacceptable, and no amount of consultation or mitigation will change that.

Zoning alone cannot justify this facility's approval. Approving this project as it stands would disregard the social value of the area, risk the health and safety of future generations, and undermine the trust and respect the government owes its constituents. Community members are not only disappointed; they are furious that their voices and concerns are being discarded. They have fought the plant for over four years. They are united in their conviction that it is the wrong project for the particular site. Residents feel unheard and undervalued, their voices drowned out by the pressure to prioritise state-wide needs over local values and the social impacts of this cannot be mitigated by the solutions proposed.

This project is fundamentally incompatible with its location and the community it seeks to impose upon. Administrative measures and token consultation cannot undo the harm or mitigate the long-term consequences of placing a high-impact industrial facility in such a sensitive and inappropriate setting. The community has clearly and persuasively articulated why this project should not proceed, and their concerns deserve genuine action.



I have left my submission until today as I had the opportunity to ask the Premier of NSW, Chris Minns a question in parliament. The question related to the rising concerns around PFAS and micro plastic processing near Sydney Water Catchment areas.

The Premier's response was that it is an emerging problem for the government and across the country. NSW have minimum standards and those minimum standards have been applied.Â The Commonwealth Government has indicated that they are soon going to change the requirements. He did inform the house that the NSW Minister for Environment is also concerned about the waste management and that it must be well located in communities that can take it.Â

It is evident that not only is this proposal not well located but the community of the Southern Highlands CANNOT take it!



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21/11/2024

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architectural design, the use of sustainable materials, and the preservation of the natural landscape, all while maintaining a human scale with low-rise buildings of one to two storeys.

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Sydney drinking water catchment area. The site itself has riparian zones running through it which are threatened by the development.

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This is not a case of the community saying no to progress. On the contrary, the SHIP vision reflects an enthusiastic embrace of growth, innovation, and sustainability. The opposition to Plasrefine stems from the recognition that this project is fundamentally incompatible with the community's needs and values, and that the social impacts of this project cannot be mitigated. It imposes heavy industrial burdens without delivering meaningful local benefits, leaving residents to bear the social and environmental costs now and into the future.

Residents have already expressed significant stress and discord, feelings that will only deepen if this proposal proceeds. These social impacts are not theoretical—they are real and present, affecting the mental health, cohesion, and quality of life of the community. This deeply engaged and motivated community has made their stance clear: the current proposal is unacceptable, and no amount of consultation or mitigation will change that.

Zoning alone cannot justify this facility's approval. Approving this project as it stands would disregard the social value of the area, risk the health and safety of future generations, and undermine the trust and respect the government owes its constituents. Community members are not only disappointed; they are furious that their voices and concerns are being discarded. They have fought the plant for over four years. They are united in their conviction that it is the wrong project for the particular site. Residents feel unheard and undervalued, their voices drowned out by the pressure to prioritise state-wide needs over local values and the social impacts of this cannot be mitigated by the solutions proposed.

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Yours sincerely,



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