New South Wales Government
Independent Planning Commission

NAME REDACTED		**OBJECT**	Submission ID: 217919
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*		

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Submitted as attached document

Date: 24th November 2024

To:
NSW Government Independent Planning Commission
GPO Box 3415
Sydney, NSW 2001

Subject: **Objection to the Moss Vale Plastics Recycling Facility**

Dear Members of the Independent Planning Commission,

I am writing to formally object to the proposed development of the Plastics Recycling Facility at 74-76 Beaconsfield Road in Moss Vale NSW (the proposed development, the facility). As a concerned member of the local community, I urge the Commission not to approve the development for the following reasons:

1. The proposed development conflicts with the objectives of the Environmental Planning and Assessment Act 1979
2. The proposed development conflicts with government policies and planning instruments that apply to the land
3. The proposed developments negative impacts on the natural and built environment
4. The proposed developments negative impacts on social infrastructure and public health
5. The proposed developments negative social and economic impacts on the locality
6. The site of the proposed development is not suitable
7. The proposed development will be detrimental to intergenerational equity and goes against the principles of Ecologically Sustainable Development
8. The proposed development is not in the public interest
9. The Assessment Report and Conditions of Consent (SSD-9409987) has serious deficiencies has failed to adequately address the developments environmental, social, and economic impacts

The following sections describe these reasons in greater detail:

1. The proposed development conflicts with the objectives of the Environmental Planning and Assessment Act 1979

The proposed development conflicts with several key objectives of the **Environmental Planning and Assessment Act 1979 (EP&A Act)** website: https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-1979-203. Below is an analysis of these conflicts based on the Act's primary objectives as outlined in Section 1.3 of the Act:

1.1. Promote the Social and Economic Welfare of the Community:

- **Conflict**:
  - While the facility offers economic benefits, such as the creation of 140 operational jobs and capital investment of $88.1 million, it has faced **widespread community opposition**. Over 96% of public submissions during consultation periods objected to the development.
  - High negative social impacts, such as increased stress, reduced sense of place, and fears of health risks, suggest the development will harm the community's welfare, undermining this objective.

1.2. Facilitate Ecologically Sustainable Development (ESD):

The EP&A Act defines ESD as requiring the integration of economic, social, and environmental considerations.

- **Conflict**:
  - **Precautionary Principle**: The facility introduces risks of microplastic pollution, toxic emissions, and potential contamination of the **Sydney Drinking Water Catchment**.

Mitigation measures for microplastics and chemical residues lack transparency and detailed implementation plans, contradicting the precautionary principle.
    - **Intergenerational Equity**: The facility's potential to introduce pollutants like microplastics with **long-term environmental impacts** that harm ecosystems and drinking water quality for future generations.
    - **Biodiversity Conservation**: Though the site is partially industrially zoned, it includes riparian areas and streams feeding the Sydney Drinking Water Catchment. The risks of contamination and habitat disruption conflict with the Act's goal of conserving biodiversity.

1.3. Provide Increased Opportunities for Public Involvement and Participation in Environmental Planning and Assessment:

- **Conflict**:
    - Despite multiple public exhibition periods and outreach efforts, **the local stakeholders are not satisfied with the consultation process**. Concerns about inadequate transparency in technical assessments (e.g., air quality and microplastic risks) and limited responsiveness to public objections suggest a failure to meaningfully involve the community.
    - The **overwhelming opposition from local residents, businesses, and the Wingecarribee Shire Council** demonstrates that stakeholder concerns were not sufficiently integrated into the final recommendations.

1.4. Protect the Environment:

- **Conflict**:
    - The facility's location near the **Wingecarribee River**, which **feeds the Sydney Drinking Water Catchment**, poses a significant contamination risk. This catchment supplies drinking water to Sydney and nearby towns, making it a **critical environmental asset**.
    - Risks associated with stormwater runoff, process wastewater, and chemical discharges have not been fully addressed, raising concerns about the facility's ability to safeguard this sensitive environment.

1.5. Promote the Orderly and Economic Use and Development of Land:

- **Conflict**:
    - While the facility contributes to the circular economy by recycling plastic waste, its placement **conflicts with local strategic plans, such as the NSW Government funded Southern Highlands Innovation Park (SHIP)** vision, emphasizes advanced manufacturing and biotechnology over heavy industrial uses.
    - The development will discourage sustainable, higher-value uses of industrial land within the **Moss Vale Enterprise Corridor**, hindering its long-term strategic potential.

1.6. Encourage the Provision and Coordination of Infrastructure:

- **Conflict**:
    - The reliance on transporting wastewater to the Wingecarribee Shire sewage treatment plant raises concerns about whether local infrastructure can accommodate the additional load without adverse impacts.

1.7. Summary

The proposed development conflicts with the objectives of the **EP&A Act 1979**, particularly in balancing social, environmental, and economic factors, safeguarding critical environmental assets, and ensuring meaningful community participation. While the facility aligns with state-level recycling targets, these

benefits appear to come at the cost of local environmental sustainability, community well-being, and alignment with strategic land-use plans.

2. The proposed development conflicts with government policies and planning instruments that apply to the land

The proposed development conflicts with several applicable government policies and planning instruments that govern land use and environmental protection in the region. These include policies related to regional planning, local land use zoning, environmental conservation, and infrastructure planning.

2.1. South East and Tablelands Regional Plan 2036 (SETRP)

- Website: https://www.planning.nsw.gov.au/sites/default/files/2023-03/south-east-and-tablelands-regional-plan-2036.pdf
- Conflict:
    - The South East and Tablelands Regional Plan 2036 (SETRP) outlines regional priorities for sustainable development, environmental protection, and economic growth. It emphasizes the need to maintain the environmental quality of the region while fostering industrial development in designated areas.
    - The facility is located near sensitive environmental assets, including the Sydney Drinking Water Catchment, which is critical for the region's water supply. The facility's potential to introduce pollutants, such as microplastics, and cause other environmental impacts contradicts the regional plan's goals of environmental sustainability and water quality protection.
    - The development does not align with the SETRP's emphasis on sustainable industrial practices. The location, near the Moss Vale Enterprise Corridor, is not seen as ideal for heavy industrial facilities like the recycling plant, which is seen as conflicting with broader regional planning objectives that promote more environmentally compatible industries.

2.2. Wingecarribee Local Environmental Plan (LEP) 2010

- Website: https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0245
- Conflict:
    - The Wingecarribee LEP 2010 outlines land use zoning in the region. The site is zoned E4 General Industrial under the LEP, which does permit waste and recycling facilities with consent. However, the LEP also requires that such developments conform to broader planning principles, including environmental protection, residential amenity, and compatible land use.
    - The proposed facility directly conflicts with the LEP's requirements for residential amenity protection and compatible land use. The site's proximity to residential areas, schools, and the ABR facility, as well as its potential to disrupt the area's visual and social character, creates significant concerns that have not been adequately addressed in the assessment.
    - The facility's large scale, potential pollution risks, and associated traffic impacts are incompatible with the E4 zone's intended balance between industrial development and the protection of nearby residential uses and the environment.

2.3. Moss Vale Enterprise Corridor Development Control Plan (MVEC DCP)

- Website: https://www.wsc.nsw.gov.au/files/assets/public/v/1/plan-and-build/dcps/mvec6.pdf
- Conflict:

- The Moss Vale Enterprise Corridor Development Control Plan (MVEC DCP) was created to guide development within the Moss Vale Enterprise Corridor (MVEC). This plan seeks to ensure that industrial development is consistent with broader planning goals such as creating a business park that promotes sustainability and high-value industries like medical research, advanced manufacturing, and clean technology.
- The proposed plastics facility, with its heavy industrial nature, potential environmental risks (e.g., microplastics, air pollution), and low-tech processes, is not aligned with the MVEC DCP's strategic vision for advanced, clean, and sustainable industries. The facility's industrial character and its environmental and social impacts contradict the planning principles that envision the area as an innovation hub.

2.4. Southern Highlands Innovation Park (SHIP) Master Plan

- Website: https://hdp-au-prod-app-wgcb-yoursay-files.s3.ap-southeast-2.amazonaws.com/4017/1894/4953/240613_SHIP_DraftUDreport_Update_LR.pdf
- Conflict:
  - The Southern Highlands Innovation Park (SHIP) is a proposed master-planned area that is designed to attract high-value research, technology, and bio-tech industries. The goal is to foster a clean-tech and advanced manufacturing precinct that can attract investment in innovation and medical research, particularly in proximity to the ABR facility.
  - The location of the proposed development within the Moss Vale Enterprise Corridor, which is on the edge of SHIP, poses a significant conflict. The facility's environmental footprint and its heavy industrial nature would detract from the clean-tech and research-focused identity that SHIP aims to establish. The facility **will discourage more sustainable and higher-value industries** from setting up in the area, undermining the vision for the park.

2.5. NSW EPA Waste Avoidance and Resource Recovery Strategy (WARR Strategy)

- Website: https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/warr-strategy
- Conflict:
  - The NSW Waste Avoidance and Resource Recovery Strategy (WARR Strategy) aims to reduce waste and promote recycling in a way that aligns with sustainable development principles. One of its goals is to triple the plastics recycling rate by 2030 and to encourage recycling facilities that contribute to a circular economy.
  - While the proposed development would seem to align with the WARR Strategy's objective of increasing recycling capacity, the scale and environmental risks associated with the facility, especially related to microplastic contamination, stormwater runoff, and chemical pollutants, create a potential conflict. The environmental impacts undermine the broader environmental goals of the WARR Strategy, which seeks to reduce the negative effects of recycling activities.

2.6. Biodiversity Conservation and Environmental Protection Policies

- Conflict:
  - Several state-level environmental protection policies (such as the NSW Biodiversity Conservation Act 2016 website: https://legislation.nsw.gov.au/view/html/inforce/current/act-2016-063) aim to protect the environment and ensure that development does not harm biodiversity or sensitive environmental assets. The site is located near watercourses, and **the development poses risks to the Sydney Drinking Water Catchment, which provides water to Sydney and surrounding localities**.

- Pollution from stormwater runoff and microplastic **contamination will degrade water quality in the Wingecarribee River, which feeds into the catchment area**. These risks conflict with the state's environmental protection policies.

2.7. Summary

The proposed development conflicts with several key government policies and planning instruments:

- The SETRP's focus on environmental sustainability and water protection.
- The Wingecarribee LEP 2010, which requires compatible land uses and protection of residential amenity.
- The MVEC DCP and SHIP Master Plan, which aim for clean-tech, advanced industries and sustainable economic development.
- The Waste Avoidance and Resource Recovery Strategy, which promotes sustainable recycling processes that align with environmental protection.
- Biodiversity Conservation policies focused on safeguarding the environment and water resources.

These conflicts highlight significant misalignments between the development and the broader planning goals for the area, especially concerning environmental protection, sustainable development, and regional economic strategy.

3. The proposed developments negative impacts on the natural and built environment

The proposed development will have significant detrimental impacts on both the **natural** and **built environment**. These impacts span across various environmental, social, and infrastructure considerations, including the surrounding community, water resources, and infrastructure systems. Below is a detailed description of the key detrimental impacts:

3.1. Impacts on the Natural Environment

a. Water Contamination and Microplastics Pollution

- **Sydney Drinking Water Catchment**: The site is located near critical watercourses that feed into the **Sydney Drinking Water Catchment**, which supplies water to Sydney and nearby towns. The recycling process will result in **stormwater runoff**, **wastewater discharges**, and inevitably **microplastics** entering local streams and rivers, despite containment and treatment strategies. These pollutants **will degrade the Wingecarribee River and ultimately the Sydney drinking water supply**.
- **Microplastics**: The processing of plastic waste, especially through washing and sorting operations, poses a risk of **microplastic contamination**. These tiny particles, if released into the water, could have long-term negative effects on the river's ecosystem, wildlife, and the water quality in the catchment. The recycling facility's processes generate both primary and secondary microplastics that could accumulate in local ecosystems, harming aquatic species and entering the food chain.

b. Biodiversity and Habitat Disruption

- **Watercourse Disruption**: The site contains two watercourses, which are **critical riparian habitats**. The facility's development will disturb these natural watercourses, potentially leading to **habitat loss** or degradation. Pollution, sedimentation, and altered water flow from industrial activities will damage aquatic habitats, affecting the local flora and fauna.
- **Impact on Biodiversity**: The construction and operation of the facility will result in **vegetation clearing**, loss of and disruption to the habitat of the native species that live there. The local biodiversity in riparian zones and the surrounding landscape will be significantly impacted by changes in the natural environment and introduction of pollutants.

c. Air and Noise Pollution

- **Air Quality Degradation**: The facility could release **volatile organic compounds (VOCs)**, **odorous fumes**, and possibly harmful emissions during plastic processing. The **burning** or **melting** of plastics could release **toxins**, which will affect both **air quality**, **and the health of living organisms (including humans)**. This would be particularly concerning given the facility's proximity to residential areas and sensitive facilities such as the **Australian Bio Resources (ABR)**.
- **Noise Pollution**: The operation of machinery for sorting, crushing, and processing plastics could generate **excessive noise**. Noise from trucks and heavy vehicles accessing and operating at the site (e.g. reversing alarms) would disturb the surrounding residential area, leading to **quality of life impacts** for local residents. These impacts could affect the peace and tranquillity of the area, particularly given the proximity of residential zones and schools.

3.2. Impacts on the Built Environment

a. Infrastructure Strain and Traffic Impacts

- **Heavy Vehicle Traffic**: The development would lead to **100 heavy vehicle movements per day** (50 inbound and 50 outbound). These vehicles would use local roads such as **Douglas Road**, **Braddon Road**, and **Berrima Road**, and residential roads which may not be able to support such heavy traffic without significant wear and tear. This will increase maintenance costs and cause **road degradation**, especially on smaller, less robust residential roads that were not designed for industrial traffic. The routes taken by heavy vehicles and light vehicles to and from the site will be uncontrolled
- **Heavy Vehicle Traffic Safety Concerns**: The heavy vehicle routes run through areas close to **residential properties**, **schools**, and **community infrastructure**. The routes taken by heavy vehicles and light vehicles to and from the site will be uncontrolled. The increased traffic volume poses significant safety risks, including **accidents**, **pedestrian hazards, exposure to contaminants** and **traffic congestion**. Residents, particularly those near **St. Paul's Catholic Parish Primary School**, have raised concerns about the safety of children and pedestrians in the area.
- **Public Health and Quality of Life**: Increased vehicle noise, air pollution, and road congestion could degrade the **quality of life** for local residents on the routes used to access the site. The facility's operations, particularly heavy traffic, could also contribute to **mental health issues**, including stress and anxiety, due to the perceived decrease in amenity.

b. Visual Impacts and Urban Aesthetics

- **Industrial Scale and Structure**: The proposed facility consists of large, industrial buildings (e.g., Building 1: **22,800 m²** and Building 2: **8,400 m²**), which would dominate the landscape and be visible from surrounding **residential properties**. This would change the character of the **Moss Vale area**, which is currently a mix of rural residential and semi-rural lands.
- **Visual Pollution**: The scale of the buildings, along with their associated infrastructure (e.g., lighting, fences, and signage), would introduce **visual pollution** to the area, negatively impacting the aesthetic quality of the environment. Despite landscaping proposals, the size and bulk of the structures would remain partially visible from nearby homes, altering the rural feel of the area.

c. Impact on Local Infrastructure

- **Utilities and Sewage**: The development requires significant water and sewer infrastructure to support its operations. **Wastewater management** could stress the local sewage system, as the facility's wastewater (including sludge and filter residues) will be transported to the **Wingecarribee Shire sewage treatment plant**. There are concerns about whether the STP has the capacity to handle the additional waste without contamination or overload.

- **Stormwater Management**: Although **stormwater management** strategies (e.g., bioretention basins and swales) are proposed, the site's proximity to watercourses and the large scale of the facility raise questions about whether the stormwater systems will be sufficient to capture and treat runoff in the event of extreme weather conditions. Even with strategies in place accidents can still occur.

4. The proposed developments negative impacts on social infrastructure and public health

4.1. Social Impact and Community Well-being

- The **Social Impact Assessment (SIA)** identifies several **negative social impacts**, including the potential **change in community character** and **psychological stress** on residents due to increased traffic, noise, and visual intrusion. The proposed developments operation will lead to **reduced property values** and **anxiety** within the community.
- **Community opposition and social division** (over 96% of submissions objecting) demonstrates that the development has not been perceived as beneficial for the local community. The facility may create a sense of **alienation** and **disconnection**, which could harm community cohesion. There will be social division between the overwhelming majority of community members whose oppose the development and the members of the community who work there and their families.

4.2. Health Impacts

- The community has concerns about **air quality**, particularly the potential for the release of **volatile organic compounds (VOCs)** and **toxic chemicals** during the plastic processing stages. This could have both **short-term and long-term health impacts**, especially for vulnerable populations such as children and those with respiratory conditions (e.g., asthma).
- **Noise pollution** from facility operations, including the continuous movement of heavy vehicles and machinery, could also contribute to **health problems**, including **sleep disturbance** and **stress**.

4.3. Summary

The proposed development presents several detrimental impacts on both the **natural** and **built environment**. These include:

- **Environmental pollution** (microplastics, air quality degradation, water contamination).
- **Biodiversity loss** due to habitat disruption and pollution.
- **Infrastructure strain**, including increased traffic, road wear, and pressure on local utilities.
- **Visual and aesthetic pollution** altering the rural character of the area.
- **Social and public health impacts**, with concerns over community well-being, quality of life, and health risks due to air and noise pollution.

These impacts highlight the mismatch between the development and the surrounding natural and built environment, with concerns raised about whether sufficient mitigation measures are in place to protect local residents, infrastructure, and the ecosystem.

5. The proposed developments negative social and economic impacts on the locality

The proposed development will result in several **detrimental social and economic impacts** on the locality. These impacts will significantly affect the local community, economy, and overall quality of life. Below is a detailed breakdown of the consequences:

5.1. Social Impacts

a. Decline in Community Well-being and Mental Health

- **Psychological Stress and Anxiety**: The facility's construction and operation will cause **increased stress** and **anxiety** for local residents. The proximity of industrial activity to residential areas, along with the noise, air pollution, and traffic disruptions, will cause a **reduced sense of well-being**. Residents will experience constant **disturbance** from the noise of machinery, heavy vehicle movements, and **vibration** impacts, leading to mental health challenges such as **sleep deprivation** and **chronic stress**.
- **Community Alienation**, **Disenfranchisement, Social Division**: Local residents and businesses have overwhelmingly opposed the facility. The development if it proceeds will lead to a sense of **alienation** or **disenfranchisement** in the community who will feel their concerns have not been adequately addressed. There will also be social division between the overwhelming majority of community members whose oppose the development and the members of the community who work there and their families.
- **Impact on Quality of Life**: The **visual intrusion** of large, industrial-scale buildings in a rural and residential setting, along with the environmental degradation from noise, air quality, and traffic, will diminish the **amenity** of the area. It is abundantly obvious that this will cause **decreased property values** and a general reduction in the overall **quality of life** for residents. For nearby residents the sense of living in a rural, peaceful environment will be replaced with the stress of living in close proximity to a heavy industrial operation.

b. Disruption to Local Identity and Character

- **Loss of Rural Charm**: Moss Vale has historically been a semi-rural, picturesque town with strong community ties. The establishment of a large industrial recycling facility in a location that is adjacent to residential areas and rural properties will change the **visual and social fabric** of the area. The **industrialization** of the area will erode the **local identity**, which relies on its rural charm and connection to nature. Local businesses, particularly those that depend on tourism or the rural setting (e.g., cafes, art galleries, wineries), will suffer from the **perception of an industrialized community**.
- **Devaluation of Residential and Commercial Properties**: It is abundantly obvious that the construction and operation of the facility will cause residential and commercial **property assets to lose value, especially those in close proximity,** due to the **visual impact** of the facility, the **traffic congestion** it brings, and the potential for environmental degradation (e.g., pollution and noise). This is because the area will be less attractive for potential buyers thereby reducing demand for the affected assets.

c. Impact on Education and Community Institutions

- The facility's proximity to **schools** (e.g., **St. Paul's Catholic Parish Primary School**) and **community centres** (e.g. **Southern Highlands Early Childhood Learning Centre**) will result in **health and safety concerns** for children and vulnerable groups. The routes taken by heavy vehicles and light vehicles to and from the site will be uncontrolled. **Increased traffic** and the presence of heavy vehicles on local roads could pose **hazards** for pedestrians, particularly students and parents commuting to and from school.
- **Noise and air pollution** from the facility and its associated traffic will affect the **learning environment**, especially for nearby educational institutions. These impacts could affect the **overall health and safety** of students, potentially leading to complaints from the school community and parents.

5.2. Economic Impacts

a. Economic Disruption to Local Businesses

- **Business Relocation or Closure**: Local businesses that rely on the area's semi-rural charm or peaceful environment, such as **tourism operators**, **agricultural producers**, or **small retailers**, will be negatively affected by the introduction of a large-scale industrial facility. The **increased traffic**, **noise pollution**, and **loss of amenity** will discourage customers, particularly those who visit the area for its scenic beauty or rural atmosphere.
- **Potential for Reduced Foot Traffic**: The facility will reduce the overall attractiveness of Moss Vale as a **destination for visitors**. Businesses that rely on a steady flow of tourists, such as **restaurants, cafes, shops**, and **farmers' markets**, will see a reduction in customers who would otherwise be drawn to the area's rural appeal. The industrial presence will deter tourists from visiting, especially those interested in outdoor activities, natural beauty, or local produce.

b. Negative Effects on Property Values and Local Investment

- **Decreased Real Estate Appeal**: The introduction of a heavy industrial facility adjacent to **residential or semi-rural properties** will lead to a **decline in property values**, which would reduce local wealth and discourage future **property investment**. This would especially impact homeowners and those with real estate holdings in areas directly affected by the facility's presence.
- **Discouraging Future Investments**: Investors and businesses looking to settle in the **Moss Vale Enterprise Corridor** or nearby areas will be deterred by the prospect of **heavy industrialization**, particularly in an area that is transitioning toward a more **diverse, high-tech, and sustainable economic future** (such as with the **Southern Highlands Innovation Park (SHIP)**). The industrial development will send the wrong message to potential investors about the area's future direction, undermining efforts to create a business-friendly, innovative ecosystem.

c. Strain on Local Infrastructure

- **Increased Costs for Local Government**: The **Wingecarribee Shire Council** will face increased costs associated with maintaining **local roads** and **infrastructure** due to the **additional wear and tear** caused by heavy vehicle traffic. With **100 heavy vehicle movements per day**, roads in the area will require more frequent repairs and upgrades, diverting funds from other vital community projects. The **stormwater management systems** and **wastewater treatment** systems may also require additional investment to handle the increased demand from the facility's operations.
- **Pressure on Local Services**: In the event of large industrial fire or similar emergency at the facility enormous strain would be placed pressure on **local services** such as **fire, police, ambulance, and healthcare**. This would result in reduced availability of services for the existing population.

5.3. Long-Term Social and Economic Consequences

a. Undermining Regional Development Goals

- **Incompatibility with Strategic Objectives**: The facility's proposed location conflicts with the region's broader goals, particularly those outlined in the **Southern Highlands Innovation Park Master Plan** and the **Moss Vale Enterprise Corridor Development Control Plan (MVEC DCP)**. The area is being developed to support **advanced manufacturing**, **research**, and **sustainable industries**, such as bio-tech and clean technology. The presence of a **heavy industrial facility** focused on **plastics recycling** may undermine the long-term **economic vision** for the region, discouraging other **high-value businesses** and **investment** in the area.
- **Missed Opportunities for High-Tech Development**: The development will close off opportunities to attract industries aligned with the **Southern Highlands Innovation Park's** focus on **high-tech** and **clean industries**. These industries could offer **higher-paying jobs**, **long-term sustainability**, and a **diverse economic base**, unlike the **plastics facility**, which will primarily provide **low-skilled jobs** that do not align with the region's future direction.

5.4. Summary

The proposed development has the potential to cause significant **detrimental social and economic impacts** on the locality, including:

- **Social strain** from mental health issues, social division (social division between the overwhelming majority of community members whose oppose the development and the members of the community who work there and their families), and a loss of rural character.
- **Economic disruption** for local businesses, reduced property values, and increased infrastructure costs for the council.
- **Long-term consequences** in terms of misalignment with regional development goals and the potential for undermining the **Southern Highlands Innovation Park's** future vision.

These impacts will outweigh the economic benefits of the facility.

6. The site of the proposed development is not suitable

The site of the proposed development is unsuitable due to several key factors related to location, environmental concerns, infrastructure limitations, and conflicts with regional planning objectives. Below is an explanation of why the site is unsuitable for the proposed plastics facility:

6.1. Proximity to Sensitive Environmental Assets

a. Sydney Drinking Water Catchment

- The site is located near critical watercourses that feed into the Sydney Drinking Water Catchment, which supplies drinking water to Sydney and surrounding areas. The proposed development poses significant risks to the catchment, including the potential for microplastics contamination and other pollutants to enter the water system. This would negatively impact the quality of drinking water for millions of people.
- The proposed development lacks sufficient mitigation strategies to address these risks, such as advanced water treatment technologies or systems that eliminate the risk of pollutants being released into the watercourses.

b. Biodiversity and Riparian Habitats

- The facility would be situated within important riparian habitats, which support local biodiversity. The development would disrupt these sensitive ecosystems, leading to habitat loss, water pollution, and changes in aquatic habitats due to altered water flows and increased sedimentation. The site's proximity to the Wingecarribee River means that any disturbance in the water quality would have long-term effects on local wildlife, including fish and aquatic plants.

6.2. Incompatibility with Surrounding Land Uses

a. Residential and Semi-Rural Area

- The site is surrounded by residential areas, including nearby homes, schools, and community facilities. The presence of an industrial facility in such close proximity to residential areas is problematic due to noise, traffic congestion, air quality concerns, and visual pollution. The introduction of a large industrial facility would disrupt the existing rural character and residential amenity of the area, which is largely reliant on its peaceful, semi-rural environment.
- The routes taken by heavy vehicles and light vehicles to and from the site will be uncontrolled. The heavy trucks and large vehicles would pass through residential streets, which were not designed for industrial-scale traffic, leading to potential safety hazards for pedestrians and residents.

b. Proximity to Australian Bio Resources (ABR)

- The Australian Bio Resources (ABR) facility, located nearby, plays a critical role in medical research by breeding genetically modified animals for scientific studies. The proposed developments operations will present vibration and fire risks to ABR's sensitive research activities. Even if these risks are mitigated to some extent, the proximity of such a heavy industrial operation to a medical research facility makes the site unsuitable for a plastics recycling facility.

6.3. Conflict with Regional Planning and Strategic Objectives

a. Moss Vale Enterprise Corridor Development Control Plan (MVEC DCP)

- The Moss Vale Enterprise Corridor (MVEC) is intended to support industrial development but with a focus on advanced manufacturing, bio-tech industries, and sustainable technologies. The plastics recycling facility, being a heavy industrial facility dealing with waste processing, is misaligned with the corridor's strategic vision. The facility's environmental impact and its focus on processing large volumes of waste would detract from the corridor's long-term goal of attracting clean technologies and high-value businesses.
- The MVEC DCP envisions a mix of uses that would be more compatible with higher-value industries, not a plastics recycling facility with significant environmental risks and lower-skilled labour.

b. Southern Highlands Innovation Park (SHIP) Master Plan

- The SHIP Master Plan aims to foster a high-tech, clean-tech, and innovative economic zone in the region, supporting industries like medical research, biotechnology, and advanced manufacturing. The location of the facility in the southern part of the Moss Vale Enterprise Corridor undermines the vision for the Southern Highlands Innovation Park (SHIP), which seeks to attract investment in sustainable and innovative sectors. A plastics recycling facility, with its inherent environmental risks and industrial scale, does not align with this vision and could deter future high-tech investments.

6.4. Inadequate Infrastructure to Support Heavy Industry

a. Road Network Limitations

- The facility would generate up to 100 heavy vehicle movements per day plus the traffic associated with the 140 employees moving to and from the site, in multiple shifts. The local road infrastructure is not suited for the volume and weight of traffic associated with the facility. The routes taken by heavy and light vehicles to and from the site will be uncontrolled. Heavy truck and light vehicle traffic would pass through residential streets, exacerbating concerns about traffic congestion and safety risks.
- The level crossing on the Berrima Branch Line, which would be used by heavy vehicles, raises additional concerns about safety and logistical challenges for large vehicles.

b. Strain on Local Services and Utilities

- The facility would place significant pressure on local services, such as stormwater management and wastewater treatment. Local infrastructure would not be equipped to handle the increased demands from the facility, leading to potential overload or contamination risks. The proposed reliance on transporting wastewater to the local sewage treatment plant (STP) introduces a further risk to the environment.
- Local stormwater management systems may also struggle to manage runoff from the large industrial site, leading to flooding or contamination of nearby watercourses.

6.5. Environmental and Social Risks

a. Pollution and Health Risks

- The facility's processes, particularly the cleaning and sorting of plastics, pose significant risks of airborne pollutants such as volatile organic compounds (VOCs) and toxic fumes. Residents and businesses in the area, particularly those more vulnerable in schools and community facilities, could be exposed to health risks from these emissions. Additionally, the release of microplastics into the environment could contaminate local water systems, negatively impacting local wildlife and water quality.
- The facility's operation would lead to long-term noise pollution, with trucks, machinery, and industrial processes operating at all hours, affecting the health and well-being of nearby residents.

b. Social Impact and Community Opposition

- The facility's development has been met with overwhelming community opposition (with 96% of public submissions opposing the project). Residents and local businesses feel that the facility would detract from the rural, semi-rural character of the area, negatively impacting their quality of life and mental health. The visual impact of large industrial structures in a rural-residential area, along with increased traffic and pollution, would significantly diminish local social cohesion and community well-being.

6.6. Summary

The site of the proposed development is unsuitable for the following reasons:

- Environmental risks, particularly to the Sydney Drinking Water Catchment and local biodiversity, are not adequately mitigated.
- The site's location so close to residential areas, schools, and medical research facilities introduces significant health and safety risks for the surrounding community.
- The facility conflicts with regional development plans, such as the Moss Vale Enterprise Corridor Development Control Plan (MVEC DCP) and the Southern Highlands Innovation Park (SHIP), which are designed to promote clean-tech, high-tech industries, and sustainable development.
- The existing infrastructure is inadequate to handle the demands of a heavy industrial facility, leading to potential traffic congestion, road degradation, and strain on local services.
- Community opposition highlights the lack of social acceptance and the negative impact on local amenity and quality of life.

In light of these issues, the site is not an appropriate location for such a large scale development of the nature proposed.

7. The proposed development will be detrimental to intergenerational equity and goes against the principles of Ecologically Sustainable Development

The proposed development is detrimental to intergenerational equity and goes against the principles of Ecologically Sustainable Development (ESD) for several reasons. These principles, enshrined in Australian environmental policy, aim to balance economic, social, and environmental considerations in a way that does not compromise the ability of future generations to meet their needs. Below is a detailed explanation of how the development conflicts with these principles:

7.1. Intergenerational Equity

Intergenerational equity refers to the idea that future generations should have access to resources and a liveable environment similar to what the current generation enjoys. The proposed plastics facility threatens intergenerational equity for the following reasons:

a. Long-term Environmental Damage

- The facility's operations, such as plastic sorting, washing, and processing, carry inherent risks of environmental contamination, including microplastics pollution, toxic air emissions, and wastewater discharge. These pollutants would have long-lasting effects on the Wingecarribee River, the Sydney Drinking Water Catchment, and local biodiversity.
- Microplastics released during the recycling process can persist in the environment for centuries, accumulating in water bodies and ecosystems, harming aquatic life and entering the food chain. This type of environmental degradation would significantly limit the ability of future generations to enjoy clean water, healthy ecosystems, and a stable climate.

b. Strain on Natural Resources

- The facility would put significant pressure on local natural resources, including water and air quality. The stormwater management and wastewater treatment systems are already under strain, and the additional burden from the facility would worsen pollution levels, making it harder for future generations to access clean and safe resources.
- The facility’s reliance on off-site wastewater treatment (transporting wastewater to the local sewage treatment plant) poses a risk to the plant's capacity, especially during peak periods. This raises concerns about potential resource depletion, where future communities would struggle with the same infrastructure constraints.

c. Impact on Land and Community

- The industrialization of rural land in Moss Vale undermines the long-term potential for the area to remain a sustainable and attractive community. Future generations may face a situation where the natural, semi-rural character of the region is permanently lost, and the community's social fabric is weakened by the disruption caused by the facility’s operation. The social dislocation caused by the facility, including reduced property values and social division (social division between the overwhelming majority of community members whose oppose the development and the members of the community who work there and their families), will affect future generations' ability to enjoy a stable, cohesive environment.

d. Limited Reversibility

- Once the facility is built and operational, the environmental and social changes it causes may be irreversible. The long-term impacts on the local ecosystem, community health, and visual landscape would persist for generations. The damage to biodiversity, water quality, and community well-being would take decades to address, leaving future generations with the burden of costly remediation and recovery efforts.

7.2. Ecologically Sustainable Development (ESD)

The principles of Ecologically Sustainable Development (ESD), as outlined in the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and NSW Planning policies, include:

- The precautionary principle (taking action to prevent environmental harm when there is uncertainty).
- The principle of intergenerational equity (considering the needs of future generations).
- The principle of conservation of biological diversity and ecological integrity (protecting ecosystems and species).
- The principle of integration of economic, environmental, and social considerations.

The proposed development fails to meet these principles of ESD:

a. The Precautionary Principle

- Uncertainty about Environmental Risks: The potential risks of microplastics pollution, toxic chemical releases, and water contamination are not fully understood or quantified, especially in the long term. Given the facility's proximity to sensitive water catchments, the precautionary principle suggests that the development should not proceed.
- Insufficient Mitigation: The mitigation measures proposed in the Environmental Impact Statement (EIS), such as stormwater retention basins and wastewater treatment plans, may not be sufficient to address the scale of the potential environmental impact. If these measures fail or are insufficient, the consequences could be irreversible, damaging the environment for future generations.

b. Conservation of Biological Diversity and Ecological Integrity

- The site is located within critical riparian areas upstream from the Sydney Drinking Water Catchment. The development poses significant risks to the biodiversity of local ecosystems, particularly in terms of:
    - Water pollution from stormwater runoff and wastewater discharge, which would affect both aquatic life and local species dependent on clean water sources.
    - Habitat disruption, as the construction and operation of the facility would disturb local flora and fauna, displacing species and causing long-term ecosystem imbalances.
- The recycling process itself does not align with the principle of sustainable resource use, as it does not adequately prevent the release of microplastics and chemicals into the surrounding environment, thus failing to protect the region’s ecological integrity for future generations.

c. Integration of Economic, Environmental, and Social Considerations

- Economic Viability vs. Long-Term Environmental Health: While the facility offers potential short-term economic benefits, including job creation and recycling capacity, it conflicts with long-term sustainable development goals. The risks to local biodiversity, public health, and water resources could outweigh these benefits, especially when considering the long-term costs of environmental restoration and social mitigation.
- Impact on Local Economy and Quality of Life: The facility may provide some local employment; however, the potential negative impacts on property values, local businesses, and community health would outweigh any economic gains. The facility's industrial nature is not in line with the region's shift toward more sustainable and high-value industries like bio-tech and advanced manufacturing. These sectors offer greater long-term economic benefits while preserving the region’s natural beauty and social fabric.

7.3. Long-Term Sustainability

The proposed development fails to meet the key goals of Ecologically Sustainable Development for the following reasons:

- Environmental Sustainability: The potential for pollution, ecosystem degradation, and water contamination poses long-term threats to the environment, with impacts that may last for generations.
- Social Sustainability: The facility’s social impacts, including social division (social division between the overwhelming majority of community members whose oppose the development and the members of the community who work there and their families), decline in quality of life, and health risks, undermine the social fabric of Moss Vale, leaving future generations to cope with these disruptions.
- Economic Sustainability: The potential harm to local industries and property values may lead to economic losses that could far exceed any short-term economic benefits. The facility’s heavy

industrial nature is out of alignment with the region's sustainable economic vision, which focuses on high-tech, low-impact industries.

7.4. Summary

The proposed development contradicts the principles of intergenerational equity and Ecologically Sustainable Development. The development poses long-term environmental risks, disrupts local biodiversity, fails to consider precautionary measures for pollution, and undermines both social and economic sustainability for future generations. The facility's impacts will likely leave future generations with a legacy of environmental damage, reduced quality of life, and strained local resources. As such, the facility does not align with the goals of sustainable development, which aim to protect the environment, promote social well-being, and ensure economic stability for future generations.

8. The proposed development is not in the public interest

The proposed development **is not in the public interest** for several key reasons related to its **environmental**, **social**, **economic**, and **health impacts**, as well as its misalignment with regional planning and development objectives. The public interest should prioritize long-term community welfare, environmental sustainability, and the overall well-being of residents and future generations. Below is a detailed explanation of why this development does not serve the public interest:

8.1. Environmental Concerns and Public Health

a. Potential for Water and Environmental Pollution

- **Microplastics and Contaminants**: The facility's operations, including plastic sorting, cleaning, and processing, could lead to the release of **microplastics** into local watercourses. These pollutants can enter the **Wingecarribee River**, which feeds into the **Sydney Drinking Water Catchment**, affecting water quality for millions of people. The potential contamination of drinking water with microplastics and chemicals poses a significant **public health risk**, undermining the quality of water for the surrounding community and broader regions.
- **Lack of Adequate Mitigation**: The proposed measures to mitigate water pollution, including stormwater retention basins and wastewater treatment, are **insufficient** to address the scale of the potential environmental impacts. Without effective and proven technologies to deal with **toxic chemicals** and microplastics, the risk to the environment and public health remains high.

b. Impact on Biodiversity and Ecosystem Health

- The development is situated within **riparian habitats** and **watercourses**, which are important for maintaining local **biodiversity**. The facility will disrupt local ecosystems, destroying and polluting **habitats**, and **altering water flows**. Such environmental degradation will reduce the overall quality of the natural environment, which is a public good for both current and future generations.
- The facility will also lead to long-term **ecosystem imbalances**, affecting wildlife populations, water quality, and the health of natural systems. This conflict with public interest lies in the detrimental effect on environmental resources that many people rely on for recreation, health, and local biodiversity.

c. Public Health Risks

- **Air Pollution**: The recycling process will release **volatile organic compounds (VOCs)** and **toxic fumes** into the air, especially if plastic materials are not processed properly. This would result in significant **air quality issues** for nearby residents and the broader community.
- **Noise Pollution**: The heavy machinery, truck movements, and operational noise from the facility will cause **long-term noise pollution** that impacts nearby residents' quality of life, especially in adjacent areas that are characterized by **peaceful residential living**.

8.2. Social and Community Well-being

a. Community Opposition and Lack of Social License

- There has been **overwhelming opposition** from local residents, with **96% of public submissions** opposing the development during the consultation process. This demonstrates that the **majority of the local community** does not support the development, making it clear that the proposal **does not have the social license** to proceed.
- The facility's location near residential areas and schools, along with its industrial scale, would disrupt the local **sense of place**, diminish **property values**, and reduce the overall **quality of life**. Such disruption to community well-being undermines the social fabric of Moss Vale, making it a **poor fit** for the area and, by extension, not in the public interest.

b. Increased Traffic and Safety Risks

- The proposed development would result in **100 heavy vehicle movements per day**, causing traffic congestion, road wear, and **safety hazards** for local residents, particularly children walking to and from nearby schools, and parents ferrying their children to the Southern Highlands Early Childhood Learning Centre at 50 Beaconsfield Rd. The routes taken by heavy vehicles and light vehicles to and from the site will be uncontrolled. **Increased traffic** and the presence of large trucks in residential areas would directly threaten the **safety and convenience** of community members, further contributing to the negative social impacts of the development.

c. Negative Impact on Local Businesses

- The introduction of such a large industrial facility in a predominantly **residential and semi-rural area** will negatively impact local businesses, particularly those that rely on the **area's rural charm** and aesthetic. **Tourism**, local **agriculture**, and **small businesses** will suffer as the area becomes less attractive to visitors and residents alike due to the **industrialization** of the region.
- The presence of the facility **will reduce the demand for (because nobody will want to be near the facility), and thereby value of, nearby residential and commercial real estate**, making it more difficult for homeowners and local businesses to thrive, which again goes against the public interest by diminishing the economic viability of the community.

8.3. Economic Misalignment with Regional Goals

a. Conflict with Regional Development Plans

- The facility's **heavy industrial nature** is at odds with regional development goals outlined in the **Moss Vale Enterprise Corridor Development Control Plan (MVEC DCP)** and the **Southern Highlands Innovation Park (SHIP) Master Plan**. These plans aim to attract **advanced manufacturing**, **bio-tech industries**, and **clean-tech businesses** that contribute to a **sustainable** and **innovative economy**.
- The facility does not align with the vision for the **Moss Vale Enterprise Corridor**, which seeks to foster industries that are more **sustainable** and **technologically advanced**. Instead, the facility's plastic recycling operation, which relies on potentially **polluting technologies** and **low-tech industrial processes**, could hinder the growth of industries that are better suited to the region's long-term **economic sustainability**.
- The introduction of such a facility could also undermine the **regional appeal** of the area for future **high-value investments**. The facility's presence will discourage investment in sectors like **clean technology**, **advanced manufacturing**, and **biotech**, which are seen as more aligned with the region's **strategic goals**.

b. Long-Term Economic Costs vs. Short-Term Gains

- While the facility may generate some **short-term economic benefits** (e.g., job creation and capital investment), the long-term **economic costs**—in terms of environmental damage, public health impacts, and infrastructure strain—will far outweigh these benefits.
- The damage to **property values**, **local businesses**, and the **tourism industry** would result in a net loss for the community and the broader region, undermining the economic stability of Moss Vale and surrounding areas. Additionally, the strain on **public services** and **infrastructure** will impose further costs on local government, which will ultimately fall on the public.

8.4. Alignment with Public Policy and Sustainability Goals

a. Misalignment with Ecologically Sustainable Development (ESD) Principles

- The facility does not align with the principles of **Ecologically Sustainable Development (ESD)**, which advocate for the protection of the environment, social equity, and economic sustainability. The potential long-term **environmental damage** caused by microplastics, air pollution, and water contamination, combined with the facility's negative **social and economic impacts**, is inconsistent with the goal of ensuring that development does not compromise the ability of future generations to meet their needs.
- The development fails to adhere to the **precautionary principle** by not sufficiently addressing the risks of **environmental harm** and **public health impacts**, particularly when **those risks are uncertain but potentially catastrophic.**

8.5. Public Safety and Quality of Life

- The introduction of heavy industry into a **residential and semi-rural area** is likely to create lasting negative effects on public **safety**, **health**, and overall **quality of life**. The proposed facility would bring **traffic congestion**, **pollution**, and **visual impacts** that degrade the community's amenity. It would also increase risks for **vulnerable groups**, such as children and the elderly, in terms of **air quality**, **noise**, and **safety hazards** from industrial traffic. The routes taken by heavy vehicles and light vehicles to and from the site will be uncontrolled.
- The public interest prioritizes community well-being and safety, both of which would be compromised by the introduction of a large, heavy industrial facility in a residential area.

8.6. Summary

The proposed development is **not in the public interest** for several reasons:

- It poses significant **environmental risks**, including potential contamination of water resources and harm to local biodiversity.
- The facility is **misaligned with the region's economic and social goals**, particularly the vision for **sustainable development** in the **Moss Vale Enterprise Corridor** and **Southern Highlands Innovation Park**.
- The development would lead to **social division** (between the overwhelming majority of community members whose oppose the development and the members of the community who work there and their families), **reduced quality of life**, and **increased public health risks**.
- It creates **long-term economic costs** that outweigh the short-term benefits, harming local businesses, property values, and infrastructure.
- The **overwhelming opposition** from local residents demonstrates that the facility does not meet the **social license** to operate in the area.

In light of these factors, the development does not serve the public interest and would create more harm than benefit for the local community and the broader region.

9. The Assessment Report and Conditions of Consent (SSD-9409987) has serious deficiencies has failed to adequately address the developments environmental, social, and economic impacts

The **Moss Vale Plastics Recycling Facility State Significant Development Assessment Report (SSD-9409987)** contains several critical **deficiencies** in its evaluation of the proposed development. These deficiencies concern various aspects of the **environmental**, **social**, **economic**, and **infrastructure impacts**. Below are the key areas where the report falls short:

9.1. Inadequate Consideration of Environmental Impacts

a. Microplastics and Contamination Risks

- **Deficiency**: The report does not adequately address the **risks of microplastic pollution**. Despite acknowledging the scale of the facility's operations (processing up to **120,000 tonnes of plastic per year**), it provides insufficient detail on the **measures to prevent microplastic release** into nearby waterways, particularly the **Wingecarribee River**, which feeds into the **Sydney Drinking Water Catchment**.
- **Impact**: The potential for **long-term environmental harm** from microplastics, which could enter the food chain and contaminate water supplies, is not fully explored or mitigated. This is particularly concerning given the facility's proximity to a **critical water source**.

b. Stormwater and Wastewater Management

- **Deficiency**: The report outlines basic measures like **stormwater retention basins** and wastewater management through the local sewage treatment plant. However, it does not provide sufficient detail on the **effectiveness** of these systems, particularly in extreme weather conditions or over the long term.
- **Impact**: There is a risk that stormwater and wastewater systems could fail to prevent pollutants from entering local watercourses. The **potential for contamination** of the **Sydney Drinking Water Catchment** and surrounding environments is not adequately addressed.

c. Biodiversity and Ecological Integrity

- **Deficiency**: The report lacks a comprehensive analysis of the **impact on local biodiversity**, especially considering the facility's proximity to **riparian habitats** and the **Wingecarribee River**. It does not fully assess the **cumulative impact** of the facility's construction and operation on local flora and fauna, especially in the event of **pollution** or **habitat destruction**.
- **Impact**: Without proper mitigation strategies, the facility could significantly disrupt local ecosystems, harming plant and animal species that depend on clean water and undisturbed natural habitats.

9.2. Insufficient Social Impact Assessment

a. Community Opposition and Social Well-being

- **Deficiency**: Despite the **overwhelming community opposition** (96% of public submissions objecting), the report fails to sufficiently address the **social impact** of the development on local residents. While it mentions some mitigation measures (e.g., Community Engagement Plan, landscaping), the report does not adequately consider the **psychological impact** of living near a large industrial facility.
- **Impact**: The facility could lead to **social dislocation**, with diminished **quality of life**, **reduced property values**, and increased **stress** for residents. These factors are not sufficiently explored or mitigated in the assessment.

b. Traffic and Safety Risks

- **Deficiency**: The report acknowledges the increase in traffic (100 heavy vehicle movements daily), but it does not thoroughly evaluate the **cumulative impact** on local roads and communities. The adequacy of the proposed traffic management strategies, such as alternative routes for heavy vehicles, is not fully demonstrated.
- **Impact**: The proposed development could exacerbate **traffic congestion**, **safety risks** for pedestrians, and **road wear** in residential areas. Increased heavy vehicle traffic could also lead to **accidents**, particularly near schools and residential zones.

c. Impact on Local Businesses

- **Deficiency**: The report does not sufficiently assess the impact of the facility on local businesses, particularly those reliant on the area's **rural character** or **tourism**. It overlooks the potential for **economic losses** due to reduced tourism, decreased property values, and the disruption of businesses located near the facility.
- **Impact**: Local businesses, especially those in the **tourism**, **agriculture**, and **service sectors**, may experience reduced foot traffic, a decline in customer interest, and a loss of revenue. The facility could also harm the **local economy** by discouraging other **higher-value industries** from investing in the area.

9.3. Inadequate Risk and Safety Management

a. Fire and Toxic Smoke Risks

- **Deficiency**: While the report mentions fire suppression systems and emergency response plans, it does not fully assess the **long-term risk** of **toxic smoke** from a **plastic fire** reaching nearby sensitive facilities, such as the **Australian Bio Resources (ABR) medical research facility**. The report fails to evaluate the full **magnitude of the risk** posed by fire-related pollutants, particularly given the toxic nature of burning plastics.
- **Impact**: There is a **real threat** that a fire could release harmful substances into the air, which could disrupt critical medical research and pose health risks to the surrounding community. The risk management strategies proposed in the report do not fully address these concerns.

b. Vibration and Impact on Sensitive Facilities

- **Deficiency**: The report includes some mention of vibration management, but it does not adequately assess the **impact of construction and operational vibrations** on the **ABR facility**, which conducts **sensitive medical research**. There is no clear explanation of how **vibration monitoring** will be managed to ensure it does not disrupt ABR's operations.
- **Impact**: Vibration from construction machinery or ongoing operations could significantly disrupt the **research processes** at ABR, potentially harming **medical research projects** and the integrity of experiments. The lack of detailed vibration mitigation plans raises concerns about the facility's compatibility with nearby sensitive uses.

9.4. Misalignment with Strategic Regional Plans (Moss Vale Enterprise Corridor and Southern Highlands Innovation Park)

- **Deficiency**: The report fails to adequately address how the facility **conflicts with the long-term strategic vision** for the **Moss Vale Enterprise Corridor** and the **Southern Highlands Innovation Park (SHIP)**. These areas are designated for **advanced manufacturing**, **biotech**, and **clean technologies**, not for **heavy industrial recycling operations**.
- **Impact**: The proposed facility undermines the **economic vision** for the region, which aims to attract **high-value industries** and create a **sustainable economic future**. The facility's heavy industrial scale and its potential environmental risks will deter **clean-tech** and **advanced manufacturing** industries from settling in the area.

9.5. Lack of Comprehensive Cumulative Impact Assessment

- **Deficiency**: The report does not fully assess the **cumulative impacts** of the facility in the context of other proposed developments in the region. It does not consider how the facility, along with other industrial or residential developments, will impact **local infrastructure**, **environmental quality**, and **community health**.
- **Impact**: A cumulative impact analysis would provide a clearer picture of how the facility fits into the broader development plans for Moss Vale and its potential **long-term environmental, social, and economic consequences**. Without this analysis, the report overlooks the **cumulative burden** on the community and the environment.

9.6. Summary

The **Moss Vale Plastics Recycling Facility State Significant Development Assessment Report (SSD-9409987)** contains several critical deficiencies:

- **Environmental Concerns**: Inadequate mitigation of **microplastics**, water contamination, and ecosystem disruption.
- **Social and Community Impact**: Insufficient consideration of **community opposition**, **traffic** and **safety risks**, and the impact on **local businesses**.
- **Risk Management**: Failure to fully assess **fire**, **vibration**, and **toxic emission risks** to **sensitive facilities** and the surrounding community.
- **Strategic Planning Misalignment**: Conflict with **regional development plans** for **sustainable industries** in the Moss Vale area.
- **Cumulative Impact**: Lack of a **cumulative impact assessment**, which would have clarified the broader consequences of the development.

The report, with these deficiencies, has failed to adequately address the developments environmental, social, and economic impacts, and the IPC on this basis should not approve the development.

Objection Conclusion

For the reasons outlined above, I respectfully urge the Independent Planning Commission not to approve the proposed development. The potential environmental, health, and social impacts are too great, and the proposal has not sufficiently addressed these concerns.

Thank you for your attention to this matter. I trust the Commission will the concerns of the local community take into account and make a decision that reflects the best interests of both current and future generations.

Sincerely,
[submitter name redacted]