



**SUSIE E**

**OBJECT**

Submission ID: e34

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Location: <i>N/A</i>	
Attachment: <i>Attached overleaf</i>	

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*See attached*

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Reference: SSD-9409987

To: The Commissioners

Andrew Mills (Panel Chair)

Clare Sykes

Janett Milligan

RE: Opposition to Proposed Plastics Recycling Facility Development

I am writing to strongly oppose the development application SSD-9409987 for a plastics recycling facility with a capacity to process 120,000 tonnes of plastic waste annually. This submission outlines multiple significant concerns regarding environmental impact, location suitability, community effects, and serious deficiencies in the Environmental Impact Statement (EIS).

#### 1. Critical Deficiencies in Environmental Impact Statement

The EIS demonstrates significant inadequacies that render it unsuitable as a basis for decision-making:

- Prepared by individuals with materials and mechanical engineering backgrounds, lacking essential environmental expertise
- Fails to adequately assess or address the unique ecology of the area
- Omits crucial environmental considerations and potential catastrophic impacts
- Demonstrates a fundamental lack of understanding of the local ecosystem's complexity
- Excludes proper consultation with Traditional Owners, including the Dharawal and Gundungurra peoples, violating principles of proper stakeholder engagement

#### 2. Environmental Impact and Water Quality

The proposed development poses severe environmental risks to the Southern Highlands' pristine environment:

- Microplastic contamination of local waterways and landscapes, threatening the region's water quality and drinking water supply
- Direct impact on a high-value riparian zone with documented Aboriginal heritage significance
- Threat to local wildlife including platypus, water dragons, frogs, wombats, and rare bird species
- Potential contamination of waterways that are crucial for both environmental and human health
- Irreversible damage to land and riparian area that holds significant cultural and environmental and conservation value

### 3. Location Unsuitability

The proposed greenfield site is inappropriate for this development:

- The area is currently designated for innovation-focused development to complement existing businesses like DUX that require clean, quiet operating conditions
- The facility would be incompatible with the existing and planned industrial ecosystem
- Brownfield sites in alternative locations (such as Goulburn) would be more appropriate and already have suitable infrastructure
- The site's proximity to residential areas and schools raises significant health and safety concerns

### 4. Infrastructure and Traffic Impact

The development would place unsustainable pressure on local infrastructure:

- Existing road infrastructure is inadequate for the proposed heavy vehicle traffic
- Narrow, aging roads are unsuitable for the volume of trucks required for 120,000 tonnes annual processing
- 24-hour operation would create constant traffic disruption in a predominantly residential area

### 5. Economic and Community Impact

The development fails to align with local economic and community needs:

- Limited job creation potential for local residents
- Lack of affordable housing to accommodate operational staff
- Inconsistency with the region's circular economy initiatives
- Potential negative impact on property values and local amenity
- No substantial economic benefit to the local community
- Foreign ownership structure raises concerns about long-term commitment to community interests

### 6. Company Background Concerns

Serious concerns exist regarding the project proponent, Plasrefine:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## 7. Cultural Heritage Impact

The development process has failed to adequately:

- Consult with Traditional Owners
- Respect the cultural significance of the land
- Include Indigenous voices in the decision-making process
- Address the concerns of the Dharawal and Gundungurra peoples
- Protect significant cultural heritage sites

## 8. Alternative Recommendations

I propose the following alternatives be considered:

- Prioritize lighter industrial developments aligned with circular economy initiatives (glass, concrete, or textiles recycling)
- Redirect the development to established industrial areas with brownfield sites
- Focus on industries that complement existing businesses and maintain the region's environmental integrity
- Ensure genuine consultation with the local community and Traditional Owners in future development proposals

## Conclusion

This development would fundamentally alter the character and environmental quality of the Southern Highlands region. The combination of environmental risks, inappropriate location, infrastructure limitations, community impacts, and serious concerns about both the EIS and the project [REDACTED] makes this development entirely unsuitable for the proposed location.

We cannot afford to destroy this precious land for a development that offers no genuine benefit to our community and poses catastrophic risks to our environment.

I urge the Commission to reject this development application on the grounds that it:

1. Is supported by an inadequate and inappropriately prepared EIS
2. Fails to properly consult with Traditional Owners
3. Poses unacceptable environmental risks to a sensitive ecosystem
4. Is inappropriately located on a greenfield site near residential areas

5. Would create unsustainable infrastructure pressure

6. Fails to align with local economic development goals



The Southern Highlands' unique environmental and cultural heritage deserves protection through appropriate and sustainable development choices that enhance rather than degrade our community's assets.

Yours sincerely,

Susan Maloney

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