



ERIN FOLEY

OBJECT

Submission ID: 218300

Organisation: N/A	Key issues: <i>Social impacts, Visual impacts, design and landscaping, Land use compatibility (surrounding land uses), Traffic</i>
Location: New South Wales 2575	
Attachment: Attached overleaf	

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Please see attached written submission.

November, 2024

Opposition to the Moss Vale Plastics Recycling Facility

Independent Planning Commission

Commissioner Mills, Commissioner Sykes, and Commissioner Milligan,

I am making this submission in opposition to the Moss Vale Plastics Recycling Facility. This written submission is an expansion on the speech I delivered to the panel on the 28th October, 2024.

My name is Erin Foley, and I am a Wingecarribee Shire Councillor and Deputy Mayor. The Moss Vale Plastics Recycling Facility is a proposal that the community is passionately opposed to, and this is evident in the number of people who addressed the panel, and those making written submissions, and in attendance at the panel hearings. The project will have adverse social impacts - this is undeniable, as it has already happened and the project isn't even approved yet. The project will impact the communities way of life, how they view the future of their town and how they feel about the state government who have disregarded their concerns and evidence of the wide ranging adverse impacts of this type of project in this location.

Plasrefine proposes to build Australia's largest plastic recycling plant in Moss Vale on Beaconsfield Road, in an area designated by Wingecarribee Shire Council as the Southern Highlands Innovation Precinct, or SHIP. With substantial state government funding, the council has outlined a strategic vision for the area and designed the SHIP to be an innovation focused employment zone. The insightful and progressive planning for the SHIP encourages not only innovation and sustainability in the type of businesses that would set up here, but goes beyond the typical industrial shed aesthetic of most business parks to encourage high quality architectural design that considers sustainable materials and processes, respecting the natural landscape and most importantly, low rise buildings of 1-2 storeys that are of a human scale. Plasrefine's proposed 30,000-square-meter industrial sheds, standing over four storey tall excluding exhaust stacks, falls short of every strategic goal of the SHIP. This is not the vision that we have for Moss Vale and the Southern Highlands. Our community and council have been clear: we do not want the face of Moss Vale permanently altered by an out-of-place industrial facility that does not serve our community's needs or values.

The NSW government's plastic action plan 2021 aims to triple the state's plastic recycling rate. We know that NSW - Australia - has a plastics problem. However, the Plasrefine proposal is not the solution -it is the opposite. It will create more problems that what it claims it will solve. Microplastics in our environment and in Sydney's water catchment are going to be a much harder, costlier and damaging

problem to solve down the track if this project goes ahead here. The damage to the community will be felt for generations, and the opportunity cost of the SHIP is unrecoverable. This isn't a simple case of the community saying no to change. In fact, with the SHIP we are saying YES - encouraging business, encouraging innovation, encouraging community buy-in to development. A hazardous plastic recycling plant at the interface of the ship with residential zones will drive away the very type of innovative, community focussed businesses we want here. Our state member for Goulburn along with Wingecarribee Shire Council have offered to help find a more suitable location for Plasrefine - indicating that we are not saying a flat out NO, we are just saying 'not the right place'.

Locating Plasrefine in this location sets a concerning precedent, as it would introduce a heavy industrial operation into an area endeavor to support a balance of residential, agricultural, and light commercial land use. Introducing a facility of this scale risks undermining this established character and would encourage further industrial developments that are incompatible with the area's identity and planning principles as set out in the SHIP.

Plastics recycling is a relatively new industry with risks that are still being discovered, such as microplastics, air and water pollution and damaging large scale industrial fires. Progress must happen, we know that, however progress needs to be balanced with a sensible and long term perspective on benefits. Yes a solution to NSW's plastic problem is needed urgently. But approving the Plasrefine project without consideration of the evidence of the impacts of this project is shortsighted. With each passing year we learn more about the safe levels of contaminants in our drinking water and environment that force us to change the acceptable level. A recent example is just last month, on October 21 the National Health and Medical Research Centre released proposed guidelines recommending that Australia lowers the acceptable level of PFAs in our drinking water. When we know better, we do better. And in relation to Plasrefine, even though the land is zoned for industry, zoning alone is insufficient justification. Zoning should serve as a guide, not as a blanket approval. Exercising caution now - just like changing the acceptable level PFAS in drinking water - will pay off in avoiding irreversible consequences in the future. The project also poses intergenerational risks, with long-term air and water pollution affecting future generations. When we know better, we do better - and in this case, there will be enough evidence presented by the community to demonstrate that we know enough now about the likely impacts of Plasrefine to do something about it now.

The proposed Plasrefine facility poses significant concerns for the adjacent ABR Garvan Institute. During construction, staff could face disruptions from dust and noise, especially in outdoor break areas, compromising their work environment. Despite landscaping plans, the proposed design lacks adequate tree coverage along the boundary to mitigate the visual impact of Plasrefine's buildings. Wildlife on site contributes to staff well-being, but the compromise of the riparian zones along with planned drainage of the dam and the erection of a concrete barrier jeopardize their habitat, with uncertain long-term effects.

Additionally, odours from water or plastics recycling processes could negatively affect the use of outdoor spaces. Practical challenges such as potential utility disruptions during construction may add to staff workload, while the proximity to the Plasrefine facility could make recruitment more difficult. Vibrant and pollution could compromise the mice that are bred at the facility impacting negatively on the viability of the institute which does essential work for research into diseases and cancer.

With Plasrefine, there is the issue of proximity to residential areas and sensitive sites. Nowhere else in New South Wales has a plastic recycling facility been placed this close to residential homes, childcare centers, or schools. Other plastics recycling facilities, such as Ace Recycling, in St Marys, at 1000sqm is only one thirtieth of the size of Plasrefine, and is not in a water catchment zone and is over 1km to the nearest houses. Its neighbouring businesses are an oil manufacturer, tyre recycler, scrap metal recycling. Australian Recycled Plastics, in Narrabri, slightly bigger at 5000sqm is still 6 times smaller than Plasrefine, also not in a water catchment, and is over 1.5km to the nearest homes, separated by open land. Its adjoining business is a landfill and gas extraction. Another example is a plant currently under construction in the Parkes Special Activation Precinct, has access to interstate railways and is in a strategic location at the intersection of critical transport links. It is also adjacent to established waste and logistics infrastructure. Similarly to the other plastic recycling plants, it is also at a distance of over a kilometer from homes.

These other facilities are much better located, and it gives rise to the question that even if Plasrefine is permissible in this location, it doesn't mean it should go ahead without serious consideration as to whether it should go here. Just because a tomato is a fruit, doesn't mean you put it in a fruit salad. A plastic recycling plant is a high impact project, and examination of other plastic recycling plants across NSW easily reveals that this isn't the right location. Nuance must be applied when considering what types of projects are approved in General Industrial zoning to avoid negative and permanent impact on existing and desired land usage in the surrounding area.

The following is a comparison between the approval document for Circular Plastics Australia (CPA) ("Proposed PET Plastics Recycling Facility, Ettamogah") in the Albury NSW area, and the Plasrefine proposal, demonstrating the vast difference in situation between the two projects, in terms of size, location and social impact. Below is a table comparing Circular Plastics Australia (CPA) and Plasrefine, using information from the document prepared by Habitat "Proposed PET Plastics Recycling Facility, Ettamogah - Development Application Planning Assessment DA 10.2020.37909.1" published December 2020.

Size and capacity	
CPA: “The building will occupy a total area of 7,213m ² and process approximately 29,000 tonnes per annum or 82.85 tonnes per day.”	Plasrefine is 30,000sqm, more than 4 times the size, processing 120,000 tonnes annually which is again more than 4 times the capacity of CPA. Logically, CPA sets a minimum standard for locating a plastic recycling factory. Although the zoning is the same as General Industrial, zoning alone should not be used to determine the merit of a project
LEP and intended land use	
CPA: Albury Local Environmental Plan 2010 (“the LEP”) “defines the proposed use as a waste or resource management facility which is permissible with consent”	Plasrefine: The Southern Highlands Innovation Precinct is designed as business lands, with a masterplan to attract biotech companies to complement the already existing Garvan institute. It is designed as an architecturally significant, innovative precinct that respects the natural surrounds and has a gentle and respectful interface with residential lands to the east and south. Plasrefine completely changes the type of business that will be attracted to the area, as a waste management facility it is completely different to the intended light industrial and employment lands of the SHIP.
Public exhibition and community reaction	
CPA: “The application was publicly exhibited and notified to surrounding properties. No submissions were received.”	Plasrefine: over 1000 objections from residents comprising written and spoken submissions, opposition of Wingecarribee Shire Council, State Members of Parliament Wendy Tuckerman Member for Goulburn, Judy Hannan Member for Wollondilly and Federal treasurer and Member for Whitlam Stephen Jones. Submissions of opposition were received at every stage of exhibition and at the IPC panel. A community action group called Moss Vale Matters formed in 2021 to oppose the project, with over 1000 of members, a facebook group and website, members having put in hundreds of hours individually to research to address the inadequacies in every version of the project proposal, including documents that have the Wingecarribee River flowing in the wrong direction and

	mitigation statements advising nearby residents to manage their exposure to degraded air quality by staying indoors.
Traffic impacts	
<p>CPA: “The application has been referred to Transport for NSW (TfNSW) in accordance with Schedule 3 of State Environmental Planning Policy (Infrastructure) 2007. TfNSW advised that they raised no objection as the proposed development was unlikely to have any significant impact on the state road network.”</p>	<p>Significant local road issues, with access to site a major challenge which is still not resolved satisfactorily by the proponent. Major road works required including the proponent proposing to move a railway crossing. The facility will produce over 100 daily truck movements leading to congestion and degradation of road surfaces, meaning increased maintenance costs and potential safety hazards. The influx of large trucks on roads shared with passenger vehicles, cyclists, and pedestrians raises safety concerns, particularly near intersections, school zones, and residential areas. Increased emissions from heavy vehicle traffic may deteriorate air quality in the area, potentially affecting public health and the well-being of nearby workers and residents. Insufficient on-site parking or loading zones for Plasrefine vehicles could lead to illegal parking or queuing on public roads, creating additional congestion and inconvenience for local road users.</p>
Social impacts	
<p>“It is considered that the overall social and economic impacts of the proposed development are positive, and that potential impacts on the natural and built environments can be appropriately minimised and mitigated through design measures and the imposition of specific conditions of consent.”</p>	<p>The residents and community have been deeply affected by this project for many reasons including the proximity to homes, the closest being 240m, childcare facilities, businesses and being with 1km of Moss Vale, the third most populated town of the Wingecarribee Shire. Nearby Garvan institute have stated that their financial viability is threatened due to the impacts of pollution and vibration from the site, and are faced with difficulties keeping and attracting staff who don't want to work 150m from a plastics recycling waste facility. Residents are concerned about the pollution, environmental impacts and businesses are concerned about reputational damage to Moss Vale’s reputation as a rural attraction, with many businesses relying on tourist visitors</p>

Public interest	
CPA: “The site location, zoning and existing land use make it suitable for the proposed development, and the proposal is considered satisfactory with regard to the public interest.”	The very vocal public participation in objections to this project indicates that it is not in the public interest. The social impacts cannot be mitigated by conditions of consent.
Proximity to intermodal transport options	
CPA: “The masterplan was prepared to guide future development of the Albury Industrial Hub and to maximise the potential of the land for larger scale industrial uses, encourage utilisation of the intermodal terminal”	Plasrefine’s site is accessible only by local and residential roads, and located over 2km off the Hume Highway. Unlike other plastics sites which have been deliberately selected with proximity to transport hubs such as interstate railways, highways or state roads, Plasrefine is at a significant distance from any suitable transport modes, which will have a huge impact on the local council's ability to maintain the roads and financial impact due to heavy vehicle movements, 100 per day, damaging roads that weren't designed to manage the weight loads.
Distance to closest residential homes	
1500m	200m

The broad and specific site incompatibility, the traffic and environmental impacts, and the lack of precedent for a project of this scale in close proximity to residential areas show that the proposed location of the Plasrefine plant is fundamentally flawed. No amount of community consultation will convince this highly engaged and deeply affected community to accept a large-scale plastic recycling facility in the water catchment area, so close to homes. This community is already grappling with significant stress and discord, feelings that will only deepen if the plant proceeds in such close proximity to residential areas. Furthermore, the western end of the SHIP contains a designated heavy industry zone far better suited to a project of this type and scale, which would help prevent the irreversible social and environmental impacts feared by the community. This is not the place to test a trial-and-error approach, hoping to mitigate pollution concerns or manage social impacts through limited engagement efforts. *This is a deeply engaged and motivated community, committed to upholding their values and safeguarding the quality of Sydney’s drinking water, and they have made it clear that their stance will not change.* Attempting to push forward with the current plan disregards the social value of the area and risks the health, safety, and harmony of a community that deserves respect and thoughtful, responsible planning from the state government.

The project will result in numerous unavoidable and unmanageable impacts, including significant and irreversible damage to water quality and risks to Sydney's drinking water catchment. Plasrefine's presence must be considered within its landscape setting, given the scale of the proposed buildings and the associated risks to surface water. The project also poses intergenerational risks, with long-term air and water pollution affecting future generations. Visual amenity will be negatively impacted, The project will result in numerous unavoidable and unmanageable impacts, including significant and irreversible damage to water quality and risks to Sydney's drinking water catchment. Plasrefine's presence must be considered within its landscape setting, given the scale of the proposed buildings and the associated risks to surface water.. Visual amenity will be negatively impacted, and there will be adverse effects on current residents, businesses, and the Southern Highlands Innovation Precinct (SHIP). The social impacts, particularly the stress and discord already felt by the community, cannot be adequately addressed through the community consultation proposed by the planning department.

It is evident that this project is not suitable for this location. The Wingecarribee Shire Council is committed to the future of the Southern Highlands Innovation Precinct, a project that represents opportunity for the local community in future proofing the area through employment, business, environmental and economic opportunities, and this vision can only become a reality without Plasrefine project in that location. The social value of the area is at risk due to these impacts, which will be impossible to manage in the future. Compared to other plastics recycling projects, the project lacks the local infrastructure to mitigate local impacts, and the environmental and intergenerational impacts are too great to approve this project.