



Stanton Corporation Pty Ltd T/as Universal Mobile Tower Hire
Allison Feldman – Director 18 Davis Road W/park 2164

Industry Assessments, Planning and Assessment,
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta
NSW 2124

11/10/2020

RE: **Application No** SSD-7401-Mod-1
 Location 24 Davis Road, Wetherill Park
 Applicant Bettergrow Pty Limited
 Council Area Fairfield City Council
 Consent Authority Minister for Planning and Public Spaces

Dear Sir or Madam:

I object to the application to increase the capacity and type of waste to be processed at 24 Davis road as applied for. I believe the site location is unsuitable for scope and scale of the proposed amendments and their impact on:

1. Traffic levels on Davis Road
2. Air Quality -Ancillary noise associated with air quality
3. The contribution this application makes to a location with a number of similar waste industry proposals concentrated around Davis Road and the effect on amenity of the area on smaller business and those that work in open air.
4. A lack of community consultation.

Traffic Levels

As mentioned in the Davis Road is one lane each way with parking permitted on most of either side of the street. A number involve heavy vehicles, heavy haulage and in the case of Suez, loading, unloading and transfer of containers between vehicles on the public road, including the handling of asbestos at all hours and in the case of Infra Build large vehicles lined up to dislodge often on both sides of the street requiring personnel to signal to trucks they have to park up. Our own vehicles parked on the street have been hit over the years by other heavy vehicles attempting to navigate the street.



Our security cameras which capture only a small portion of Davis Road in their front gate view can confirm that this street is heavily utilised 24 hours a day. A number of business on this road operate 24 hours.

The application indicates that the traffic will increase roughly 74 additional movements but maintain the ratio of heavy vehicles, yet it is doubling the number of weighbridges. While I appreciate if the number of vehicles is accurate, they potentially will flow faster, it can also indicate that the actual number vehicles will be more and Bettergrow is building-in, future vehicle capacity.

This road in our view is at maximum safe utilisation given the type of goods typically carried as well as the style of utilisation - as it is not just a throughfare but a transfer point. Additionally, the on street public parking available is typically utilised by heavy vehicles queuing up. The vehicles are often blocked from turning towards the main road on exit, and longer vehicles turn towards the cul-de sac for a clearer turning point.

Over the years including recently there have been queries from the council about dirt and debris on the road. I can only see this increasing.

The traffic report does not adequately consider the M4/Davis Road Route and its impact on Davis Road as a whole. It is not to the point what route the applicant says it will be used; unless there is a logical reason why it is not feasible that the M4 route will not end up being used. Egress to, and entry from, the M4, is a boon to every business on Davis Road.

While the report considers most dust implications while processing within the confines of the site, it does not adequately consider the dust and dirt implications on the transporting of materials, and the possibility of less than optimal containment practices by transporters.

Air Quality and Ancillary Noise.

24 Davis Road is not affected by Power Line issues and there is no suggestion otherwise. However, Power Lines run along the other side of Davis Road in Reasonable Proximity to the road. There has been in recent years an upgrade to those lines for 330kv capacity, and the electricity authority has flagged that over time, the voltage will probably increase in lock step with demands by consumers. The noise emitted by the lines is (on the information provided to us) impacted significantly, but not solely, by the amount of dust and dirt in the air. The application does not address this impact.

We work primarily outdoors as we need to test equipment at full height. Our clients are primarily B2B but do pick up and undergo some induction on site. The single most common complaint is noise on the lines and anxiety over sound and we are concerned that the scale



of the increase and the nature of the material being transported will have an impact on the factors affecting the noise both currently and at the planned increased load going forward.

The application states open air or partially open-air storage of organic matter. Davis road is already an odour challenged location for those that work in open air at this end of the road. Any increase in the odour adds to that handicap.

Overdevelopment and Similar Industry Applications

It is not clear to me how much waste industry development is going to be permitted in Davis Road. Suez in recent years was granted an increase in capacity and is increasing its asbestos handling. Halgan at 10 Davis Road also has an application in that will also increase traffic on Davis Road. It is not clear on where the oversight is for the area as a whole and at what point amenity of the area for a more diverse range of businesses is adversely affected.

There have been a few articles recently on these concerns. One I believe citing a number of pending proposals. The most recent general article on community concern is the one in the Telegraph:

<https://www.dailytelegraph.com.au/newslocal/fairfield-advance/wetherill-park-grease-trap-waste-facility-50000-tonnes-to-be-treated-each-year/news-story/6241ebd4decdd78cf91bfaf9cf30f5ee>

I accept that this is an industrial precinct, but it is not clear whether this is not considered exclusive to a waste processing and handling area and diversity of SME's in other open-air industries are to be discouraged.

Community Consultation

I do not accept there has been much community consultation as at least a handful of businesses listed in the proposal no longer operate at those locations. I received one flyer that ended up on the ground in the rain and had someone not been at the gate we would have never known.

Conclusion

Universal did not object to the original proposal and it is not the activity we object to it is simply the scale of the increase in context with the surrounding area.