



STAINLESS TANK & MIX PTY LTD
Established since 1974

STAINLESS TANK & MIX PTY LTD

Factory 4 Pembury Road
Minto NSW 2566
Tel – 02 9820 2112 Fax – 9603 1223
admin@stainlesstankandmix.com.au
ABN 99 162 225 363

7th August 2017

Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Director – Industry Assessments

RE: SSD 7462 – 13 Pembury Road Minto

Dear Sir / Madam,

As the owner of the property at 4 Pembury Road, I wish to voice my objections to this alarming development application.

As a business owner in this street for the past 16 years, and an employee for 13 years prior to that, working in Pembury Road has always a good working environment. Campbelltown council is to be congratulated on the foresight that saw good road widths installed and the planning department's insistence on well laid out developments. This has ensured our good amenity enjoyed heretofore.

Personally, I try to maintain a broadminded outlook towards others in their efforts to make a living in whatever walk of life they chose, but I do have very strong concerns about this development application. Up till now, I have regarded the existing facility as a pain in the neck, and not knowing what I could do about it, I have been too busy running my business to voice my concern. It is also a relevant fact that I don't have to drive past this facility; it being further down the road from our premises, I really pity the businesses down the road.

Current state of Pembury Road

In the current operation of this site, it is necessary for a street sweeper to traverse up and down the road numerous times every day – while I don't have definitive numbers on this I believe it would be every ½ hour. This activity in itself [note – this is before any increase of capacity] is a nuisance, a traffic hazard, and what results is a muddy mess which begs the question – what about the mud that washes down the stormwater drains in the street – is this acceptable behaviour in this enlightened day and age. I note in the DA, there is a proposed in-ground wheel wash which is great, but if the current state of our street is regarded as acceptable, then I can't see there will be too much fuss whether this wheel wash works or not after the first few months of operation. I would strongly suggest the muddy road be viewed personally to evaluate whether my comments are valid. Obviously, so days are worse than others; I haven't bothered with photos as these can be distorted to give a positive or negative slant depending how you present them.

Site capacity increase



It is rather difficult to grasp the audacity of the applicant to increase the capacity of the site from 30,000 tonnes per annum to 220,000 tpa. While I completely understand that the current plant and equipment may well be operating at far below capacity, I don't believe this aspect is the major cause for concern, except for the fact that it significantly increases the possibility dust generated by the facility.

The major cause for concern in regard to this facility is the increase in truck movements in the street. This **increase in capacity is more than 7 times**. Currently, there is no opportunity for trucks to queue while waiting to unload, so if for any reason there is a holdup, trucks are forced to double park making it extremely difficult for other businesses to use the road. Also should the tyre wash not work, the road would become unbearable.

I notice in the EIS in part 6, table 18 on page 86, that the predicted increase in vehicle movements is based on Campbelltown road and the increase to the traffic on that road. While I understand that the basis of this table is on noise levels, there is no study to show the increase of traffic to be introduced to Pembury Road; the increase in capacity to this plant will bring the inevitable substantial increase in traffic to the detriment of other industry in the street trying to operate a business.

I note in the EIS point 4.3.2 Vehicle stacking arrangements – Onsite vehicle stacking spaces would be provided where trucks can queue – how will this be maintained? The proposed layout is shown in Fig 23 in the EIS, but as can be seen from the aerial image below, this area is very likely to be used for temporary storage of waste as it is currently.

I strongly believe in being reasonable, but it is very obvious viewing the aerial image from “SIX-Maps” the operational area is very limited.





If the development had been located in the nearby Culverston Road, I could understand the applicant having a point. This road at the moment only has one entity operating in it and therefore the street has the ability for trucks to queue in the street without blocking access or street parking for other businesses.

Devaluation of surrounding properties

As a business owner, part of the way any business can be made worthwhile is for the property to increase in value over time. The increase in capacity of this site which brings with it the increase in dust, the increase in rubbish falling off the trucks, the increased loss of parking and traffic disruption is an absolute certainty to devalue properties by a considerable margin. It is hard enough in business to stay afloat without submissions like this increase in capacity to ruin plans for property assisted business plans.

Demand for resource in the sub region

A point in the DA is raised that there is demand for resource recovery facilities in the sub-region and I don't hesitate that this may well be true, but the facility should have to comply with the same regulations that every other business has to follow in order to maintain a well laid out local infrastructure in which all local business can be accorded the same respect. Minto is not a high density industrial area and I would like it to remain so.

Site sheds

It is particularly galling to see common site sheds in this submission to operate as the office space for this operation. Every other business has to have a proper permanent type building; why should this be acceptable – does it mean that after the proposal is approved the buildings get moved to squeeze even more out of this site. Minto industrial area has for many years been kept a high quality industrial environment which translates into good investment for property owners. This proposal definitely will downgrade the property price in Pembury Road.

Conclusion

While I am not very conversant with what points carry the most sway in the determination of this application, but I hope common-sense prevails and this site is rejected. It plain doesn't fit this street.

It is obvious that this DA would not have been passed by Campbelltown Council

Yours Sincerely

Brendan Firth
Director