

SUBMISSION OF OBJECTION

State Significant Development Application SSD-123834490

Application: SSD-123834490 — Grundy's Waste Solutions Resource Recovery Facility

Applicant: Ian's Transport Pty Ltd trading as Grundy's Waste

Site: 68–72 Links Road, St Marys NSW 2760 (and 7 Dunheved Circuit, St Marys)

Submission by: Gulf Western — 84 Links Road, St Marys NSW 2760 & 17-19 Dunheved Crt St Marys (both sites immediately adjoining landowner and occupier) and 92 Links Rd St Marys

Made by: Benjamin Vicary, Managing Director, on behalf of Gulf Western Oil.

Position: **OBJECTION — the application should be REFUSED**

Date: 20.7.26

The Planning Secretary

Department of Planning, Housing and Infrastructure

Lodged via the NSW Planning Portal – Major Projects

1. Introduction and summary of objection

This objection is made on behalf of Gulf Western by Benjamin Vicary, Managing Director. Gulf Western operates an established warehousing and lubricants business at 92 Links Road, St Marys, and commissioning a new warehouse at 84 Links Rd St Marys, immediately adjoining the subject site. We employ **150 people nationally, 75 of them at our St Marys operations immediately adjoining the subject site** — who work there every day, and our business turns over **more than \$150 million annually**. Our operations involve the storage of combustible product. We have reviewed the Environmental Impact Statement (EIS) prepared by Benbow Environmental (Report 221179_EIS_Rev5, June 2026), together with the accompanying Transport Impact Assessment prepared by Stanbury Traffic Planning (Technical Report 10, 19 June 2026), and we **object in the strongest possible terms** to this proposal.

Grundy's seeks to convert an existing waste-transport depot into a **24-hour, 7-day resource recovery facility processing up to 159,000 tonnes of waste per year**, including 60,000 tonnes of commercial, industrial, construction and demolition waste, 93,000 tonnes of liquid waste and 6,000 tonnes of clinical (medical) waste. In our view this is a heavy, high-impact industrial use that is fundamentally unsuited to this location, and the EIS understates its impacts on the surrounding businesses — including ours — in several critical respects.

Our objection rests on five grounds, set out below.

2. Grounds of objection

2.1 The EIS classifies our site as merely 'Industrial' and then discounts it as 'no nearby sensitive receiver'

The EIS identifies our property. In Table 3-1 ("Nearest Sensitive Receptors Considered", page 3-8), receptor **R15** is expressly listed as **"84 Links Road, St Marys, Lot 44 DP 1185482, Adjacent W"** with the Type of Receptor recorded

as “Industrial.” Having named us, the EIS then classifies our workplace as merely “Industrial” rather than as a sensitive receiver, and assesses noise, dust and air quality against the more lenient industrial criteria that follow from that classification.

The EIS goes further and, in the sections that matter most, treats the neighbourhood as if we were not here at all. It defines sensitive receivers (page 3-7) as places where “people or ecological systems may be more susceptible to environmental impacts”, and then, to justify not preparing a Social Impact Assessment, states in its Social Impact assessment (Section 6.3.1, page 6-69) that the site is “*surrounded by other industrial land uses, and no sensitive receivers such as residences, schools, or hospitals are located nearby*”. The Executive Summary (page ii) makes the same point, describing the area as having “no nearby sensitive receivers”. Tellingly, the EIS even contradicts itself on this point: Section 3.5.1 (page 3-7) states that the “nearest sensitive receivers include adjacent industrial premises”, while other sections declare there are none nearby.

This classification is where the assessment goes wrong. Gulf Western is a substantial, continuously occupied workplace with **75 employees at this St Marys site** who are present throughout a 20 hour working day over two shifts (4am – 12am), forming part of a business that employs 150 people nationally and turns over more than \$150 million a year. Those 75 people are exposed to precisely the noise, dust, odour, traffic and fire risks that this facility would generate, yet the EIS assesses those impacts against industrial thresholds and uses the “no nearby sensitive receivers” conclusion to avoid a dedicated social impact assessment altogether. A workplace of 75 people is not a vacant buffer that can absorb the amenity and safety impacts of an intensive 24/7 waste operation next door. We ask that the Department require the impacts on our premises and workforce to be assessed directly and on their merits, rather than discounted by a receptor classification.

2.2 Unacceptable fire risk — a very large combustible waste load immediately beside our own combustible storage

This is our gravest concern. By the EIS’s own figures, the facility would hold **up to approximately 1,020 tonnes of combustible waste at any one time** in the C&I/C&D processing area (paper, cardboard, timber, plastics, rubber and textiles), with up to 730 tonnes of mixed waste in the processing area alone. The EIS confirms the site will store well in excess of the 50 m³ threshold that triggers the full Fire and Rescue NSW *Fire Safety in Waste Facilities Guideline*, and it calculates that a worst-case fire would generate roughly 509 m³ of contaminated firewater.

Gulf Western stores combustible product — lubricants and oils — in our adjoining warehouses. Placing a ~1,000-tonne combustible waste fire load directly against a neighbour that also holds combustible material creates a serious risk of **mutual fire escalation**: a fire at the waste facility threatens our premises and our employees, and the combined fuel load in this part of the estate is far greater than the EIS considers in isolation. **Waste-facility fires** are a **well-recognised hazard** that can be difficult to extinguish and slow to bring under control — this is exactly why Fire and Rescue NSW maintains a specific guideline for them.

This is not a hypothetical concern. The recent history of comparable recycling and waste-recovery facilities in this immediate area is alarming, and directly relevant — each of the following handled the same or similar material to that which Grundy’s proposes to process:

- **Cardboard King Recyclers**, an immediate adjoining neighbour of our site, burnt to the ground approximately two years ago in a major fire.
- **Cleanaway Recycling**, around 1 km from our warehouse and operating a facility very similar to that now proposed, has suffered two serious fires in recent years. The most recent, in February 2025, cut off access to the industrial estate and forced widespread evacuations, taking an estimated 100–150 firefighter-days to bring under control.

- **Coopers Recycling** — again processing the type of material proposed for the Grundy's site — caught fire in November 2025 in a major blaze that reportedly sent fireballs some 150 metres into the air, took in excess of 200 firefighter-days to extinguish, and caused serious and ongoing environmental contamination, destroying neighbouring facilities and damaging nearby homes. We urge the Department to review the available footage of that fire to appreciate its severity.
- **Solveco Recycling**, 38 Links Road — in 2017, our own staff were trapped on site during a major fire there, once again at a facility handling material similar to that now proposed.

Four major fires at comparable facilities in this area within recent years, several of them within the last two, cannot be dismissed as coincidence. They reflect the inherent fire risk of the very activity Grundy's now proposes to carry out on our boundary — a risk this EIS treats as 'readily controllable'.

Compounding this, the EIS makes clear that the detailed **Fire Safety Study and fire engineering design have been deferred to the Construction Certificate stage** and are yet to be finalised or endorsed by Fire and Rescue NSW. The community and adjoining owners are therefore being asked to accept the fire strategy in principle, without the actual sprinkler design, hydrant layout, firewater containment sizing or FRNSW sign-off being available for scrutiny. The proponent's own Land Use Conflict Risk Assessment ranked "fire and chemical spill incident" as the **highest residual risk** of the four land-use conflicts it assessed — a residual ranking of 9, against 5 for both dust and noise. That risk has not been adequately resolved and, given what sits on our side of the boundary and the recent record of fires at comparable facilities set out above, it is not a risk we are prepared to accept.

2.3 Traffic and emergency access — ~60,000 truck trips a year onto a single, failing road, with no safe way out in an emergency

The applicant's Transport Impact Assessment concludes that the road network has "sufficient capacity" and that the development will cause only "minimal change". That conclusion cannot be reconciled with the figures in the very same report. Far from being minor, the traffic this facility generates is enormous — and the favourable conclusion is reached only through a series of methodological choices that systematically understate it.

The scale is set out in the applicant's own report (Stanbury Traffic Planning, Section 5.1.2.1), which states:

- 159,000 tonnes of incoming waste = **35,568 truck trips per year**;
- 108,120 tonnes removed from the site = **a further 24,186 truck trips per year**;
- that is **approximately 59,750 loaded truck trips every year** and, because each truck must both enter and leave, **roughly 120,000 heavy-vehicle movements a year** on Links Road.

The report's own daily distribution (Table 14) spreads this into **approximately 219 heavy vehicles in and 219 out on a busy weekday — about 438 heavy-vehicle movements in a single day**, and its own conclusion concedes the site generates "*approximately one vehicle movement approximately every two minutes*" at peak. At an average of only about 4.5 tonnes per load (159,000 tonnes across 35,568 trucks), this is a fleet dominated by small collection trucks, tankers and bin lifters making constant, all-day trips — precisely the frequent, stop-start heavy traffic a congested road can least absorb.

Having established that scale, the report then makes it disappear. Its impact conclusions rest not on those hundreds of daily movements but on a single, much smaller figure — "35 peak-hour trips". It arrives there by:

- presenting only the "net" figure left after subtracting the existing use, so that **the facility's own gross output of around 438 heavy-vehicle movements on a busy weekday** is hidden behind a much smaller "net additional" number;

- comparing the proposal against a large “existing” baseline of roughly 190 movements a day, when **the existing waste-transport use operates under 1980s–90s building approvals with no development consent** (as the EIS itself concedes) — inflating the lawful baseline to shrink the apparent increase;
- assessing **only two intersections in only two peak hours**, when a facility accepting deliveries from 5:00am to 8:00pm six days a week does the bulk of its several hundred daily truck movements outside those two hours — none of which is tested against congestion;
- building in **unenforceable assumptions handed to the consultant to improve the result** — that “80% of outbound waste” will be moved between 8:00am and 2:00pm, and that trucks will “avoid peak commuter periods”. The benign peak-hour figure is **manufactured** by assuming the very truck behaviour that cannot be guaranteed nor controlled, and **impossible to enforce**.

Most tellingly, the applicant’s own SIDRA modelling shows the network **already failing**. At the Links Road / Ropes Crossing Boulevard / Forrester Road intersection — the single junction through which the report assumes all site traffic will travel — the Links Road approach **already operates at Level of Service F (the worst possible rating), with a degree of saturation of 1.293 and a queue of some 266 metres in the PM peak, before a single Grundy’s truck is added**. The report accepts that the development pushes it further into failure (degree of saturation rising to 1.359). It then waves this away by attributing the delay to “the downstream intersection” and by assuming future road projects will relieve it. In plain terms: the applicant concedes its development worsens an intersection that is already over capacity, and relies for comfort on roads that do not yet exist.

That reliance is not a safeguard. The assurance that congestion will ease “once Links Road is connected to Wianamatta Parkway” depends on external road projects (DA18/0221 and DA18/1163) that are only partly built, with the Christie Street connection expressly deferred to a “subsequent DA”. The applicant does not control these works and none is a condition of this consent. **If they are delayed or never delivered, the facility still discharges hundreds of heavy-vehicle movements a day onto a road whose critical intersection its own consultant rates Level of Service F.**

The report’s claim that the Links Road / Dunheved Circuit intersection “operates well... Level of Service A” is flatly contradicted by the daily experience of the businesses on this road, where **it routinely takes around 20 minutes to travel a single kilometre along Links Road** — sustained congestion that a peak-hour SIDRA snapshot simply does not capture, and which the report half-concedes by locating the “real” delay at the very intersection it rates Level of Service F. On-site queuing is not resolved either: the entry weighbridge sits just **31 metres inside the Links Road boundary**, and the report’s queuing assessment assumes trucks will not “simply turn up” because a “computer program” will schedule them. The report concludes those 31 metres are sufficient for a modelled queue of about three vehicles, but that depends entirely on the scheduling program working as intended. If deliveries bunch — as they readily can on a road already subject to 20-minute delays — there is a real risk that trucks bank back across those 31 metres and **queue directly onto Links Road**, blocking our access and everyone else’s.

The only mitigations offered — scheduling to “avoid peak commuter periods *where practicable*” and the voluntary 8:00am–2:00pm outbound assumption — are unenforceable aspirations with no regulated or monitored control, and a 24-hour operation cannot in any meaningful sense confine hundreds of daily truck movements to “non-busy” times. On the applicant’s own figures this is a facility generating **tens of thousands of heavy-truck trips a year and hundreds of movements a day** onto a single-access road that is already congested and, at its critical intersection, already failing. It does not belong here, and no condition of consent could realistically fix that.

These impacts are not confined to the industrial estate. Because the precinct has effectively a single access, **every one of these waste trucks must travel to and from the site through built-up residential areas one way or another** — passing near homes in Ropes Crossing, North St Marys, Werrington and the surrounding suburbs. The Transport Impact

Assessment funnels all site traffic through the Forrester Road / Links Road / Ropes Crossing Boulevard intersection, yet does not grapple with the amenity, noise and safety consequences for the residential streets these heavy vehicles must use to reach it. A 24-hour stream of waste trucks routed through residential Western Sydney is a broader community impact that the application simply does not confront.

Most seriously of all, the estate's single access turns this traffic problem into a **life-safety hazard**. Links Road is effectively the only way in and out of this part of the precinct. A major fire at the proposed facility — which fronts Links Road for some 173 metres and would hold up to around 1,020 tonnes of combustible waste — could close Links Road through smoke, emergency response and firewater operations. If that happens, **every business, worker and visitor downstream of the fire is effectively trapped on Links Road with no alternative route out** — including the staff, members and visitors at the Dunheved Golf Course some 900 metres along Links Road — at the very moment they most need to evacuate. The same closure would obstruct Fire and Rescue NSW and other emergency vehicles trying to reach the estate. The EIS does not confront this: its emergency planning is confined to evacuating the Grundy's site itself and is silent on the flow-on entrapment of the wider estate if Links Road is cut.

The danger is not limited to a fire at the facility. The sheer volume of waste trucks, the on-road queuing risk at the weighbridge (with only 31 metres of buffer to the Links Road boundary) and the increased likelihood of heavy-vehicle traffic incidents mean Links Road can also be blocked at our end of the estate by a truck queue or a collision — again trapping traffic and cutting off egress. There is no fallback: until the additional road connections the applicant relies upon (the Wianamatta Parkway and Christie Street links) are actually built — and they are not — **there is simply no second way out of this precinct**. Concentrating a large combustible fire load and tens of thousands of heavy-truck movements a year on a single-access road is not merely an amenity or congestion problem; it is a serious risk to the safety of everyone who works in and visits this estate.

2.4 Noise — a 24-hour operation beside a workforce of 75 people

The facility is proposed to operate **24 hours a day, seven days a week**, generating noise from heavy vehicles, reversing, loading and unloading, crushing, screening, shredding and materials handling. Our 75 St Marys employees work immediately next door. The EIS assesses noise only against industrial criteria and relies on the assumption that neighbouring premises are not sensitive — the same flawed premise addressed in Ground 2.1.

We are gravely concerned about the noise impact of continuous day-and-night operations on our staff and on the amenity and usability of our own premises. The EIS itself concedes that certain equipment (such as the tracked crusher) cannot operate at night without breaching noise limits, which demonstrates that the noise generated by this plant is significant. We do not accept that round-the-clock waste processing can be conducted at this boundary without unreasonable noise impact on the 75 people who work at our site.

There is also a direct impact on our business. As a major local employer, our ability to **recruit and retain staff** depends on providing a safe, healthy and reasonable working environment. We are genuinely concerned that persistent noise and dust pollution from an adjoining 24-hour waste facility will make it harder to attract and keep staff — including the 75 people employed at our St Marys operations. The consequences of this proposal are therefore not confined to amenity — they extend to the viability of our St Marys operations and the 75 jobs based here.

2.5 Dust — our operations are highly susceptible, and outdoor crushing cannot be controlled by 'dust suppression'

Gulf Western's operations are **highly susceptible to dust**. Airborne dust and particulates from waste handling, crushing and screening pose a direct risk to our product, our equipment and the health of our workforce.

The EIS's proposed dust controls are inadequate and, in places, contradictory. It relies on "dust suppression of *external* stockpiles through use of water sprayers" and states that processing will be enclosed only "*where practical*". The EIS elsewhere asserts that all processing occurs within enclosed buildings; this qualified language nonetheless leaves open that dust-generating material and activities may occur **outdoors**. Crushing is a significant dust-generating activity, and it cannot be adequately controlled in the open air by water sprayers alone — wind will carry respirable dust across the boundary onto our site regardless. If this facility were ever to be approved (which we say it should not be), crushing and all dust-generating processing would need to be fully enclosed and filtered, not merely dampened with water "where practical". The qualified, discretionary language used throughout the EIS provides our business no reliable protection.

3. Conclusion — this depot is not suitable for this area

For the reasons set out above, Gulf Western submits that this proposal is fundamentally unsuited to its location and **should be refused**. It defies logic and common sense to concentrate a further intensive, 24-hour waste-recovery operation — processing up to 159,000 tonnes a year, including liquid and clinical waste — onto a precinct and a single access road that already cannot cope. The application asks its neighbours to absorb a very large combustible fire load, round-the-clock noise, uncontrolled outdoor dust and, on the applicant's own figures, tens of thousands of heavy-truck movements a year onto a road whose critical intersection its own consultant already rates Level of Service F. Because Links Road is the estate's only way out, a fire or a blockage would trap the businesses, workers and visitors downstream, including the Dunheved Golf Course.

This is not a theoretical fear. In recent years there have been major fires at four comparable recycling facilities in this immediate area — Cardboard King, Cleanaway, Coopers and, in 2017, Solveco — several of which cut off access, forced evacuations, took hundreds of firefighter-days to control and caused lasting environmental harm, each handling the same or similar material that Grundy's proposes to process on our boundary. Against that record, the assurances in the EIS ring hollow: it reaches its favourable conclusions only by treating neighbouring businesses as insignificant, by presenting a netted peak-hour traffic figure in place of the true daily volumes, and by relying on vague, unenforceable and deferred commitments — "where practicable", "where practical", unbuilt future roads, and a fire safety design left to a later stage. We ask the Department to weigh that optimism against what has actually happened, repeatedly, at facilities like this one.

We respectfully request that the Department **refuse** State Significant Development Application SSD-123834490. In the alternative, if the Department is minded to consider the application further, we ask that it require, at minimum: a site-specific assessment of impacts on our premises and workforce; full enclosure and filtration of all crushing and dust-generating processing; a finalised Fire Safety Study endorsed by Fire and Rescue NSW and assessed against the combined combustible load of the surrounding sites *before* any determination; a traffic assessment based on the full daily truck volumes (not a netted peak-hour figure) and not reliant on road projects that are not yet built; enforceable and monitored controls on truck movement timing, volumes and on-site queuing; a whole-of-precinct emergency access and egress assessment addressing the risk of Links Road being closed by fire, a truck queue or a traffic incident; and enforceable 24-hour noise limits protective of neighbouring workplaces.

We would welcome the opportunity to discuss this submission and to be kept informed of the progress of the application.



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Declaration of reportable political donations

In accordance with the requirements for submissions on State Significant Development, I declare that **[I / Gulf Western have NOT** made any reportable political donations in the previous two years.

Signed: 

Benjamin Vicary, Managing Director, Gulf Western Oil

Date: 20.7.26