

6 August 2026

Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

By submission to the NSW Major Projects Planning Portal

Dear Ms Fishburn,

Re: SSD-123834490 – Grundy's Waste Solutions Resource Recovery Facility – Review of Planning Application and Submission

JEP Environment & Planning (JEP) has been engaged by Talart Pty Ltd (Talart), the owner of the property at 8-24 Dunheved Circuit, St Marys NSW, to prepare a submission regarding the State Significant Development (SSD) SSD-123834490 'Grundy's Waste Solutions Resource Recovery Facility' (the Proposal). Talart is concerned about the potential impacts of the Proposal on the occupiers of their property, particularly with regard to increases in heavy vehicle traffic and general amenity impacts to the area.

Our client would appreciate the matters as outlined in the submission to be addressed in the assessment process.

About Talart Pty Ltd

Talart Pty Ltd owns the property at 8-24 Dunheved Cct. The property consists of a large warehouse divided into two approximately equal sections that is surrounded by concrete hardstand. Passenger vehicle parking is provided along the Dunheved Cct frontage, and the rear hardstand is used for outdoor storage and truck access around the entire building perimeter.

JASCO Holdings Pty Ltd (JASCO) operate a receival and dispatch warehouse for the JASCO and Eckersley's art, craft and stationery supplies brands in the northern section of the building. The warehouse receives goods from overseas suppliers via 20ft and 40ft shipping containers, delivered by semi-trailer, and from local suppliers via smaller trucks carrying pallets. The distribution centre ships cartons and pallets to retail and commercial operators (business to business) via semi-trailers and heavy rigid vehicles and ships direct to customers through StarTrack and Australia Post (heavy rigid vehicles). Typical operations involve 10 heavy vehicles accessing the property per day, with approximately 41 staff members attending the site daily.

The southern portion of the warehouse is leased to Wesbeam Pty Ltd for their warehousing and dispatch operations. The warehouse receives manufactured timber products (timber beams and joists) from their manufacturing plant in Western Australia via semi-trailers. The warehouse and hardstand are used for the temporary storage, picking, packing and staging of products for transport to hardware retailers and direct to construction sites. Dispatch of products occurs via semi-trailers. Typical operations involve 14 heavy vehicles accessing the property per day, with approximately 30 staff members attending the site over two shifts.

Wesbeam also use the property at 17 Dunheved Cct for the temporary storage and staging of timber products. This property is located approximately opposite the main warehouse site and shares a boundary with the Grundy's Waste Solutions property that is the subject of the Proposal.

Concerns with the Proposal

Grundy's Waste Solutions (Grundy's) is proposing to develop a resource recovery facility capable of processing up to 159,000 tonnes per annum of waste material, including construction & demolition, commercial & industrial, liquid and chemical waste. It is understood that Grundy's currently operate a waste transport business from the property, with the site being used for truck parking and maintenance activities, empty skip bin storage and office operations. No waste management (storage, handling or disposal) currently occurs on the property.

The Proposal will see redevelopment of the property to remove the existing shed, awning and truck wash at the southern end of the property and construct two purpose-built sheds to house the resource recovery operations. Building 1, at the southern end of the property, will process up to 60,000 tonnes/annum of construction and demolition (C&D) waste and commercial and industrial (C&I) waste. Building 2, in the eastern portion of the property with a frontage to Dunheved Cct, will contain two compartments. One compartment will be used to process up to 93,000 tonnes/annum of liquid waste streams, including grease trap waste, oily water and industrial wastewater, whilst the other compartment will process up to 6,000 tonnes/annum of clinical waste.

Talart is concerned about the potential impacts the Proposal may have on the warehousing and distribution operations of their tenants JASCO and Wesbeam. Further clarification is required in the Environmental Impact Statement (EIS) and supporting technical studies to determine whether actual impacts to JASCO and Wesbeam's operations are likely to occur. The major concerns and areas requiring clarification/further assessment are discussed in the following sections.

Traffic and Transport

The Transport Impact Assessment (TIA) indicates that the Grundy's site currently generates approximately 190 vehicle movements/day (inbound and outbound), with 56 movements (29.4%) being heavy vehicles and the remaining 134 movements (70.6%) being light vehicles (e.g. utes, delivery vans, staff cars). Under the Proposal, a total of 582 vehicle movements are predicted per day, with 75% of those being heavy vehicles (from 56 heavy vehicles/day to 438 heavy vehicles/day). This represents a significant increase in heavy vehicle movements.

The TIA does not provide an assessment of the potential impacts the significant increase in heavy vehicle movements, and the overall increase in total vehicle movements, may have on the following:

- The safety and general operation of the Links Rd / Dunheved Cct intersection located approximately 100m east of Grundy's exit driveway. Vehicles (heavy vehicles and staff) accessing the JASCO and Wesbeam sites are most likely to use this intersection to enter and leave as it provides the shortest route to Forrester Road. The significant increase in heavy vehicle traffic in this location may have safety implications for vehicles turning right from Dunheved Cct onto Links Rd;
- The ability of Links Rd and Dunheved Rd between Forrester Rd and the Proposal site to safely cater for the increased heavy vehicle traffic. Talart note that trucks and trailers are regularly parked along the length of Links Rd and Dunheved Rd throughout the day making navigation along the road difficult under existing conditions;
- The safety of the broader road network resulting from an increase in the volume of heavy vehicles using the road network. The TIA considers the level of service for two intersections but does not include an assessment of crash data for the area and the additional impacts the Proposal may have on road safety;
- Operation of the Forrester Rd / Boronia Rd / Christie St round-about. Christie St through to Dunheved Rd provides a major link between the industrial area and the Parker St (A9), the main north-south link between Richmond to the north and the Great Western Highway (A44), the Western Motorway (M4), the M12 Motorway and the Western Sydney Aerotropolis to the south; and
- For a project of this scale, the TIA should consider the potential impacts over a 10-year design horizon.

Additional information should also be provided regarding potential queueing on-site and on the public road. The TIA indicates that there is sufficient space within the entry driveway to accommodate up to three vehicles within the site entry (including one on the weighbridge) at any one time. However, the analysis does not provide for delays caused by trucks manoeuvring within the site. The swept path drawings indicate that an incoming truck would not be able to leave the weighbridge whilst another truck was reversing into the western side of Building 1, or whilst leaving Building 1 and manoeuvring into the truck wash. The TIA should consider the impacts of these movements on queueing at the site entry. Furthermore, the queueing analysis should identify the maximum number of trucks that can safely enter and exit the site within any given hour to determine whether the site has the capacity to receive the predicted number of trucks and to inform scheduling of the site operations.

The EIS and TIA are unclear regarding the provision of parking. The TIA indicates a total of 55 parking spaces will be provided, which will adequately cater for the 48 staff members. However, the 'Proposed Overall Site Plan' only includes 47 passenger vehicle spaces. Furthermore, the reliance on tandem spaces may be

problematic. It is noted that Grundy's intends to implement a parking management system to allocate spaces to staff; however, the use of tandem parking will increase the chance of staff opting to park on the public road reserve.

An increase in on-street parking has the potential to impact road user safety and the operation of other neighbouring businesses. It is noted that Links Rd in the vicinity of the Grundy's site does not permit on-street parking. As such, any vehicles not parked within the Grundy's site will most likely park on Dunheved Cct in the vicinity of the Talart property. As shown by the photographs in Attachment 1, unauthorised parking on the western side of the road already occurs, and the parking area on the eastern side is well-used, including by heavy vehicles.

The swept path plans demonstrate that individual trucks can manoeuvre through the site; however, the plans do not indicate whether each vehicle can manoeuvre whilst other vehicles are on-site. Consideration needs to be given as to whether the site can accommodate the necessary truck movements when the expected peak number of trucks are on-site. This information is important to reduce the risks of hazards from vehicular collisions on-site, potential fires and possible impacts to neighbouring properties from heavy vehicles queuing or parking in the road reserve.

Waste Management

The EIS and supporting Waste Management Plan (WMP) do not provide sufficient detail to determine whether the site has the capacity to handle and store the 159,000 tonnes of waste materials per annum. The EIS and WMP state that some waste materials received at the site will be processed and sold for application to land under a current resource recovery order (RRO). To determine a material's compliance with a relevant RRO, laboratory testing will be required for each batch of material received and processed through the facility. Each batch will need to be stored separately whilst testing is undertaken to ensure it is not mixed with any subsequent batches. The plans for Building 1 (the proposed MRF) do not indicate there are sufficient separate storage bays to enable batches of materials to be held whilst awaiting testing.

Similarly to materials subject to an RRO, the Proposal intends to discharge some treated water to sewer via a trade waste agreement. It is not clear whether there is sufficient tank space within the wastewater treatment plant to hold treated water whilst testing for compliance with the trade waste agreement is undertaken. The application should provide information on the frequency that each waste stream will be removed/discharged from the site to determine whether the proposed storage capacity is adequate to accommodate the entire 159,000 tonnes of waste per annum. Inadequate storage may have health and safety implications for the site and surrounds.

It is noted that page (ii) of the EIS notes that a maximum of 2,253 tonnes of waste will be held on site at any one point in time, yet 4,250 tonnes is then specified on page (v) of the EIS. This creates significant uncertainty in relation to the quantity of waste held on site, the potential fire risks and hazards posed to the locality.

Fire and Hazard Management

A Preliminary Hazard Analysis (PHA) was prepared to address the risks associated with fire within the site (particularly within Building 1) and the release of pathogens from clinical waste processing. A plan should be provided that clearly identifies the location of all hazards within the site, including the storage location for any flammable/combustible materials.

Section 4.3 of the PHA notes that the medical waste treatment facility includes a natural gas boiler. No further details are available within the application package about the boiler. Clarification is needed as to whether this feature was included in the PHA erroneously. If not, the PHA should be amended to factor in the risks associated with natural gas use, including the risks to the Proposal itself and to the adjoining premises.

A thorough assessment of the risks posed by the Proposal to the Cleanaway site (that shares the north-east boundary with the site), as well as the risks posed by the Cleanaway site to the Proposal, is required. The Cleanaway site stores a range of dangerous goods and hazardous chemicals including flammable gases, solids and liquids, corrosive and toxic substances. The architectural plans for the Proposal indicate Building 2 will be built against the boundary, leaving no separation between Building 2 and the Cleanaway building. The potential cumulative risks and hazards to each operation and the surrounding sites associated with the proximity of these two operations should be assessed.

The EIS notes that a bin wash area will be included in the clinical waste processing area to wash bins and return them to customers for reuse. It is understood that the wastewater from this process will be pumped through to the wastewater treatment plant for treatment prior to discharge to sewer. The package also indicates that sewerage/septic wastewater and/or sludges will be accepted for treatment at the facility. However, the package does not provide sufficient information on the suitability of the proposed wastewater treatment plant to effectively treat the pathogens and other contaminants that may be present in the wastewater. The application should provide details of the treatment train effectiveness and any testing to be undertaken prior to commissioning to confirm the effectiveness. Additional detail should also be provided regarding the method of bin washing and how workers and the surrounding environment will be protected from pathogens contained in water and any mists discharged during washing.

The 'mixed waste stockpile fire' scenario for Building 1 assumes a worst-case stockpile size of 150 tonnes with a 100m² surface area; however, the WMP notes a maximum storage capacity for the incoming materials receival area of 600 tonnes and 800m². Similarly, the 'light weight fractions stockpile fire' scenario assumes a worst-case stockpile size of 60 tonnes and 50m², whilst the WMP indicates a maximum storage capacity of 80 tonnes and 120m². The modelling should be reflective of the proposed storage capacity to more accurately reflect the worst-case scenarios. It is further noted that the modelling of these scenarios does not discuss the potential for a fire to impact other storage areas within the building. For example, the heat radiation contours for the mixed waste fire scenario extend across the processing equipment, the lightweight fractions storage bay, the overflow storage bay and the storage bins for timber, paper and cardboard.

Air Quality

The Air Quality Impact Assessment (AQIA) prepared for the Proposal indicates that no air quality impacts, including odour emissions, are likely to occur because of the Proposal. However, to ensure a robust assessment has been undertaken, the following recommendations are made:

- A café is located at 18/54-60 Links Rd, approximately 120m east of the Grundy's site. The AQIA should include this business as a commercial receptor to adequately reflect any potential impacts on the café's operations, particularly with regards to odour;
- The AQIA does not address the potential for air emissions from the bin washing process in the clinical waste treatment area. The application package needs to provide more information and assessment on this process to demonstrate that it does not pose a risk to environmental or human health;
- The odour assessment criteria adopted for the Proposal is 7 odour units (OU) based on the absence of residential properties close to the site. However, the *Technical Framework: Assessment and management of odour from stationary sources in NSW* (Department of Environment and Conservation NSW, 2006) states that odour assessment criteria are used to assess the likely acceptability of odour impacts "...at the nearest places where people are likely to work or reside (both existing and any likely future sites). These places are referred to in subsequent instances as 'sensitive receptors' or, more simply, 'receptor'...". The Technical Framework also defines a sensitive receptor as "a location where people are likely to work or reside; this may include a residential dwelling, school, hospital, office or public recreational area". As the Proposal is adjoining a number of workplaces, a more conservative odour criteria may be more appropriate to consider the impacts of the Proposal;
- The stack location used in the odour modelling is not consistent with the location shown on the architectural plan set. The architectural plan set shows the stack approximately 32m closer to the eastern boundary than the modelled location. The model should be adjusted;
- The odour assessment does not consider background odour levels and the potential for cumulative impacts. The St Marys sewage treatment plant is located approximately 300m north-east of the Grundy's site. Other industrial activities in the local area that potential produce odours and/or VOC emissions include:
 - Cleanaway St Marys – 66 Links Rd;
 - Gulf Western Oil – 92 Links Rd;
 - Clean Earth Tyre Recycling – 98-102 Links Rd; and
 - reDirect Wood Recycling – 21 Dunheved Cct.

Noise and Vibration Impact Assessment

The Noise and Vibration Impact Assessment (NVIA) prepared for the Proposal indicates that no noise or vibration impacts are likely to occur because of the Proposal. However, to ensure a robust assessment has been undertaken, the following recommendations are made:

- The unattended background noise monitoring location at 11 Townsend Cres, Ropes Crossing selected for the assessment does not represent the closest (thus, most likely affected) residential location. The logger was located approximately 1.2km from the site. Residential land at Charlie St, Ropes Crossing, is approximately 910m from the site, with additional residential-zoned land being developed adjacent to the Charlie St properties. The NVIA should provide justification for the selected logger location;
- The worst-case operational scenario assumes that 12 trucks per hour will enter/exit the site. This is not consistent with the details provided in the TIA which predicts an average of 24.3 truck movements per hour (assuming an 18-hour operational window) and a peak of 36 trucks per hour between 7am and 1pm. The NVIA should be updated to ensure consistency with the TIA; and
- Similarly, the road noise assessment should be updated to align with the TIA.

Other Concerns

Talart has expressed concerns about the general social and economic impacts the Proposal may have on the operations of the tenants JASCO and Wesbeam. JASCO has historically had trouble recruiting and retaining staff to their business, generally attributed to the need to locate their operations within an industrial area. The area is not easily accessible by public or active transport, and there are very limited nearby amenities for staff (e.g. food outlets), resulting in staff looking for employment in other locations.

Talart is concerned that the Proposal will further impact the ability to attract and retain staff to these businesses due to the reduced amenity of the area and the potential traffic issues that may arise from the significant increase in truck movements. Should the Grundy's Proposal result in negative impacts to the traffic and general amenity of the area, there is a risk the tenants may look to move from the premises. It is crucial that the proponent demonstrate the Proposal can be delivered without negatively impacting the operation of neighbouring businesses to ensure their continued safe and efficient operation.

To ensure a comprehensive assessment of the Proposal is undertaken, it is recommended that the above issues are addressed by the applicant. The additional information is necessary to ensure the Proposal can function as described in the application without negatively impacting the operations of surrounding businesses or the health and welfare of their staff.

Should you require any further information, please contact Chloe Rich, Principal Environmental Planner on 02 8056 1848 or email chloe@jacksonenvironment.com.au or myself.

Yours sincerely,



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Attachments:

1. Photographs of street parking in the vicinity of the Talart property.

Figure 1. Photograph of the street frontage along Links Rd looking west. The frontage to the Cleanaway site (66 Links Rd) is shown in the foreground, and the Grundy's site at 68-72 Links Rd in the centre and right of the photo. Note that with unauthorised parking on the Council verge of these properties, in the vicinity of the Talart property. The photo demonstrates that vehicle parking demands from commercial and staff vehicles in the area is very high. Photo was taken approximately 8am on 6 August 2026.



Figure 2. On-street parking in front of 8-24 Dunheved Cct, in front of the Talart property. This on-street parking is heavily used by staff and commercial vehicles by neighbouring businesses, which is likely to be exacerbated by the Proposal. Photo was taken approximately 8am on 6 August 2026.

