

JBS&G 71973 | 175,840

L01 – SSDA 120888992 Prelim LTEMP Project Silverback Oakdale East Industrial Estate (Rev 2)

2 July 2026

Luke Ridley

Goodman

Via email: Luke.Ridley@goodman.com

SSDA 120888992: SEARs Preliminary Long Term Environmental Management Plan (LTEMP) Advice Rehabilitation, Project Silverback Oakdale East Industrial Estate, 2-10 Old Wallgrove Road, Horsley Park, NSW

Dear Luke,

JBS&G Australia Pty Ltd (JBS&G) has been engaged by Goodman Property Services (Aust) Pty Limited (Goodman, the Client) on behalf of GMG 14 Pty Ltd (ACN 661 888 884) as trustee of BGMG 1 Oakdale East Trust No.2 (Owner) to provide specialist site contamination consultancy services associated with Project Silverback, Oakdale East Industrial Estate (OEIE), located at 2-10 Old Wallgrove Road, Horsley Park, NSW, 2175 (the site). The site is legally identified as Lot 109 Deposited Plan (DP) 1293112 total area of approximately 43 hectares (ha).

This advice has been prepared by JBS&G to address the site-specific Secretary's Environmental Assessment Requirements (SEARs) received in respect of the proposed State Significant Development Application (SSDA) No. 120888992.

The SSDA seeks approval for the construction, fit-out and operation of two warehouse buildings and associated internal site infrastructure works to accommodate the proposed building layouts. Specifically, this includes the following Development Applications:

- **Concept Plan Amendments (Mod 6):** Amendments to State Significant Development Application 37486043 (as modified) in accordance with Section 4.24 of the *Environmental Planning & Assessment Act 1979*
- **Detailed Application (Proposed Works):** State Significant Development Application (SSDA) No. 120888992 based on Industry-Specific Secretary's Environmental Assessment Requirements (SEARs) dated 8 May 2026.

The proposed development is being undertaken by Goodman Property Services (Aust) Pty Ltd (Applicant) on behalf of BGMG 14 Pty Ltd (ACN 661 888 884) as trustee of BGMG 1 Oakdale East Trust No.2 (Owner). The development is located at 2-10 Old Wallgrove Road, Horsley Park (the Site). The folio identifier number is Lot 109 of Deposited Plan 1293112.

The below further outlines the respective works the Development Applications seek approval for.

Concept Plan Amendments | State Significant Development Application SSD - 37486043 (Mod 6)

As part of the proposed works under SSD No. 120888992, the following amendments are proposed to the Concept approval and Stage 1 Infrastructure works approved under SSDA 37486043:

- Amendment to approved Masterplan and Subdivision plan to accommodate revised Precinct 2-5 layout which will consolidate Precincts 2, 4 and 5, resulting in a total of three (3) precincts. (Precinct 1, 2 & 3).
- Amendment of Stage 2 infrastructure scope to accommodate revised and consolidated Precinct 2-5 layout
- Amendment of Development Controls, including those prescribed under Condition A9 & A10 of the consent, specifically:
 - Building Height
 - Maximum GLA
- Increase maximum permissible vehicle from a 30 m super B-double to a 36.5m B-triple (Condition D14)

This application, inclusive of the amendments to the Concept approval under SSD 37486043, seeks to facilitate the development of Building 2A, 2B & Lot 2C and associated Internal infrastructure changes.

Detailed Application | State Significant Development Application SSD-120888992

The SSDA seeks approval for the construction, fit-out, operation and use of 2 warehouse buildings and associated internal site infrastructure works to accommodate the proposed building layouts. Specifically, this includes:

Warehouses and Distribution Building – Building 2A

- 24/7 warehouse and distribution use.
- Construction, operation, fit-out (warehouse racking and office fit-out) and use of approximately 18,110 sqm warehouse with ancillary office GLA. Proposed ridge height of 14.6m (excluding rooftop plant and solar).
- Includes hard stand, dock offices, loading bays, landscaping, electric vehicle charging, solar panels and signage.

Warehouses and Distribution Building – Building 2B & Lot 2C

- 24/7 warehouse and distribution use for an automated mail and parcel processing and sorting facility.
- Construction, operation, fit-out (office and warehouse) and use of approximately 142,157 sqm of warehouse and office GLA across two levels spanning a proposed ridge height of 25.0m (excluding rooftop plant, roof access stairs and solar).
 - Warehouse fit-out includes automation and sortation equipment along with associated mezzanine structures.
- Building 2B will include hardstand, heavy rigid parking, guardhouses, dock offices, loading bays, landscaping, electric vehicle charging, goods collection lockers, solar panels six lithium-ion battery energy storage systems (BESS) external to the main warehouse building and fleet workshop, weighbridges, fleet workshop, dock temperature control with external units, emergency generators, refuelling bay, truck wash and signage.
- Dangerous goods (DGs) are proposed to be stored at the site, which are below the threshold quantities under Chapter 3 of the *State Environmental Planning Policy (Resilience and Hazard) 2021*

- Ground Improvements to Warehouse 2B building footprint (i.e. pilling), including a 200mm thick layer of Cement Treated Fine Crushed Rock (CTFCR) placed under the entire warehouse footprint.

Internal Estate Infrastructure

- Bulk Earthworks to Precinct 2 (formally Precinct 2, 4 & 5)
 - Approximately 550,000m³ fill importation required as either virgin excavated natural material (VENM), excavated natural material (ENM) or Resource Recovery Order under Section 286A of the *Protection of the Environment Operations Act 1997* (PoEO Act 1997) Importation proposed to be 24 hours, 7 days a week during the Fill Importation program
- Export any unsuitable material (i.e Topsoil and Clay)
- Retaining Walls (including importation of Engineered backfill)
- Stormwater Basin D (including fit-out)
- Construction and associated Easement to Drain of Stage 1 stormwater discharge line through Building 2B to Basin C
- Stage 1 road and servicing amendments to reflect revised Precinct 2, 4 & 5 building layout
- Noise barriers
- Lead-in services including additional 11kv feeder via the extension of HV feeders from existing Endeavour Energy switching stations within Roberts Road and Capicure Drive

Other

- Expansion and on-going management of DA 347.1/2021 Containment Cell
- Subdivision of Precinct 2, 4 & 5 to suit revised precinct plan and ultimate lot layout

Related Applications/Activities

Fairfield City Council Development Application DA 347.1/2021 (as modified) – Rehabilitation Works

A Fairfield City Council Development Application DA 347.1/2021 (as modified) has previously been approved over the site facilitating Bulk Earthworks and Rehabilitation (including an initial Containment Cell) Works at the Site to provide relative levels suitable for future industrial development.

These levels are:

- Precinct 2 (western portion): BE 77.5
- Precinct 2 (eastern portion): BE 71.5
- Precinct 3: BE 77.0
- Precinct 4: BE 70.0

Proposed SSD-120888992 assumes these levels and works in respect of assessment of environmental impacts previously assessed in accordance with Clause 4.63 (a) *Environmental Planning & Assessment Act 1979*. Further re-assessment is therefore not required.

DA 347.1/2021 assessed the Environmental Impacts associated with the required rehabilitation to achieve the above Bulk Earthworks levels.

Notwithstanding, DA 347.1/2021 (as modified) is currently unable to be fulfilled as the consent approves a shortfall of:

- Fill importation required to achieve the above FCC approved rehab levels

- Contamination cell size required to fulfill rehabilitation obligations under the Fairfield City Council consent and associated Rehabilitation Action Plan.

SSD-120888992 assess and seeks approval to address these shortfalls as part of the Environmental Impact Assessment.

To address the SSD-120888992 SEARs requirements¹ as detailed below in **Table 1.1**, JBS&G has prepared the following documents:

- *Detailed Site Investigation – Project Silverback (SSDA 120888992), Oakdale East Industrial Estate (OEIE) ‘Project Silverback’ Horsley Park, NSW, 2 July 2026, Rev 3, JBS&G Australia Pty Ltd (JBS&G 2026a).*
- *Remedial Action Plan – Project Silverback (SSDA 120888992), Oakdale East Industrial Estate (OEIE) – 10 Old Wallgrove Road, Horsley Park, NSW, 2 July 2026, Rev 2, JBS&G Australia Pty Ltd (JBS&G 2026b).*

Table 1.1: SEARs Investigation Checklist

Agency / Documentation Requirement	Relevant Section of Report
Department of Planning, Housing and Infrastructure (DPHI)	PSI/DSI – JBS&G (2026a) RAP – JBS&G (2026b)
Contamination and Remediation	A draft LTEMP – the entirety of this current letter.
<i>In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.</i>	
<i>Required documentation:</i>	
• <i>Preliminary Site Investigation</i>	
<i>If required:</i>	
• <i>Detailed Site Investigation</i>	
• <i>Remedial Action Plan</i>	
• <i>Preliminary Long-Term Environmental Management Plan</i>	

In relation to the SEARs checklist for 120888992, the combined PSI/DSI (JBS&G 2026a) identified the occurrence of site contamination conditions that will require management/remediation to ensure the suitability of the site for the proposed future commercial/industrial land use. Subject to the successful implementation of the measures detailed in the RAP (JBS&G 2026b) it is considered the site can be made suitable for the intended uses and that the risks posed by contamination can be managed in such a way as to be adequately protective of human health and the environment, thereby satisfying the planning requirements listed in the *State Environmental Planning Policy (Resilience and Hazards) 2021*.

All works will be the subject of a technical review by the appointed NSW EPA accredited independent site auditor enabling issue for each Lot/stage a Site Audit Statement (SAS) endorsing the suitability of the land for the proposed commercial/industrial land use.

The current remedial strategy as outlined in the RAP (JBS&G 2026b) establishes the remedial objective to make most of the site in general, suitable for the proposed land use without ongoing management (such that a Part A1 site audit statement may be issued for most of the eventual development lots).

However, as discussed in the RAP (JBS&G 2026b), an exception to this is any area within the site with an on-site cap and containment of contaminated material as approved under the existing development consent (DA 347.1/2021) and detailed in the pending building information certificate (BIC) as well as the proposed additional containment cell capacity as presented in the Silverback SSDA RAP (JBS&G 2026b). These are located/proposed to be located in proposed Lot 111 (with current/proposed storage volumes detailed below

¹ *Planning Secretary’s Environmental Assessment Requirements, Project Silverback Oakdale East Industrial Estate, SSD-120888992.* Department of Planning, Housing and Infrastructure (DPHI), 8 May 2026 (DPHI 2026)

in **Table 1.2**). As such, the final site status for the proposed Lot 111 will be considered suitable for the proposed land use subject to ongoing application of a long term environmental management plan (LTEMP), with an associated A2 site audit statement.

Table 1.1: Summary of material volumes currently contained onsite and how it has been approved

Planning approval/consent	Storage Volume
DA 347.1/2021	30,000 m ³ asbestos contaminated material
BIC (currently under consideration)	121,472 m ³ asbestos contaminated/impacted and TRH/HGG impacted material (total material stored within the two onsite containment cells to date)
SSDA 120888992	Proposed additional 40,000 m ³ asbestos contaminated material

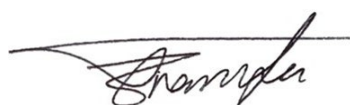
Given that an LTEMP would only be applicable to one of the final development lots where no warehouse structures are proposed to be built, not the whole site, and all details of what will require inclusion within the LTEMP is not currently completely understood, the need to supply a preliminary version of this document is considered extremely onerous and as such, it is recommended that DPHI further consider the applicability for this requirement prior to consent.

It is further suggested that in lieu of submission of a preliminary LTEMP at this stage, instead the requirement for such a document could be the subject of a consent condition, consistent with relatively generic/standard conditions widely used for many years, such as:

Where the ongoing land use suitability and release of the Final (Site A) Site Audit Statement is dependent upon the implementation of a Long Term Environmental Management Plan (LTEMP), the LTEMP must be approved by the Site Auditor and a copy submitted to Council for their records prior to operation.

This letter has been prepared in accordance with the Limitations provided in **Attachment A**. Should you require clarification, please contact the undersigned on (02) 8245 0300 or by email abowyer@jbsg.com.au.

Yours sincerely:



Skye Tranfa
Project Consultant
JBS&G Australia Pty Ltd

Reviewed/Approved by:



John De Martin
Senior Principal
JBS&G Australia Pty Ltd

Attachments:

Attachment A Limitations

Attachment A Limitations

This report has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties. The report has been prepared specifically for the client for the purposes of the commission, and no warranties, express or implied, are offered to any third parties and no liability will be accepted for use or interpretation of this report by any third party.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. This report should not be amended in any way without prior approval by JBS&G, or reproduced other than in full including all attachments as originally provided to the client by JBS&G.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements or agreed scope of work.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.