

Environmental Impact Statement

SSD 120888992

Oakdale East Industrial Estate - Project Silverback
Formerly 2-10 Old Wallgrove Road, Horsley Park

Prepared for Goodman Property
Services (Aust.) Pty Ltd

Submitted to Department of Planning,
Housing and Infrastructure

July 2026

Overview and declaration

Project details			
Project name	Oakdale East Industrial Estate - Project Silverback		
SSD number	SSD-120888992		
Folio Identifier	Lot 109 of DP1293112		
Address	2-10 Old Wallgrove Road Horsley Park NSW 2175		
Applicant details			
Applicant name	Goodman Property Services (Aust.) Pty Ltd		
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Declaration by Registered Planner			
I declare that this EIS: • has been prepared in accordance with sections 190 and 192 of the <i>Environmental Planning and Assessment Regulation 2021</i> • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates • does not contain information that is false or misleading • addresses the Planning Secretary's Environmental Assessment Requirements (SEARs) for the project • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development • contains a consolidated description of the project in a single chapter of the EIS • contains an accurate summary of the findings of any community engagement • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.			
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Summary

This Environmental Impact Statement (EIS) has been prepared by Keylan Consulting Pty Ltd to address the following Development Applications:

- **Concept Plan Modification (Mod 6):** Modification to State Significant Development Application 37486043 (as modified) in accordance with Section 4.55(1A) 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 within Lot 109 in DP 1293112, formally referred to as 2-10 Old Wallgrove Road, Horsley Park (the Site).

The proposal is classified as State Significant Development (SSD) in line with Chapter 2 of the *State Environmental Planning Policy (Planning Systems) 2021*. Under Schedule 1, Section 12 of the Planning Systems SEPP, development for the purposes of a warehouse or distribution centre at one location and related to the same operation, with an estimated development cost (EDC) of more than \$50 million is of State significance.

This EIS has been prepared in line with the Secretary's Environmental Assessment Requirements (SEARs), issued by the Department of Planning, Housing and Infrastructure (DPHI) on 8 May 2026 and in line with its 'State Significant Development Guidelines – Preparing an Environmental Impact Statement' as required by Part 8 of the *Environmental Planning and Assessment Regulation 2021*.

Site and context

The site is located at the Oakdale East Industrial Estate (OEE) in the Fairfield Local Government Area (LGA). The broader OEE has a total site area of 88 ha and now consists of several land parcels since the original concept approval (SSD 37486043) as a result of subsequent subdivision of the site, including:

- Lot 104 DP 1293112
- Lot 105 DP 1293112
- Lot 106 DP 1293112
- Lot 107 DP 1293112
- Lot 108 DP 1293112
- Lot 109 DP 1293112

The portion of the site subject to this proposed SSD is Lot 109 in DP 1293112, which covers a site area of approximately 30.5 ha across existing Precincts 2, 4 and 5 of the OEE. Figure 1 below shows the extent of the site boundary. It has an area of 30.5 ha and is irregular in shape. Given the site's history and use as a quarry, the site has been significantly disturbed, with the former masonry plant located in the north-western area

of the site. Vegetation is generally limited to the eastern boundary of the site, in the Reedy Creek riparian corridor.

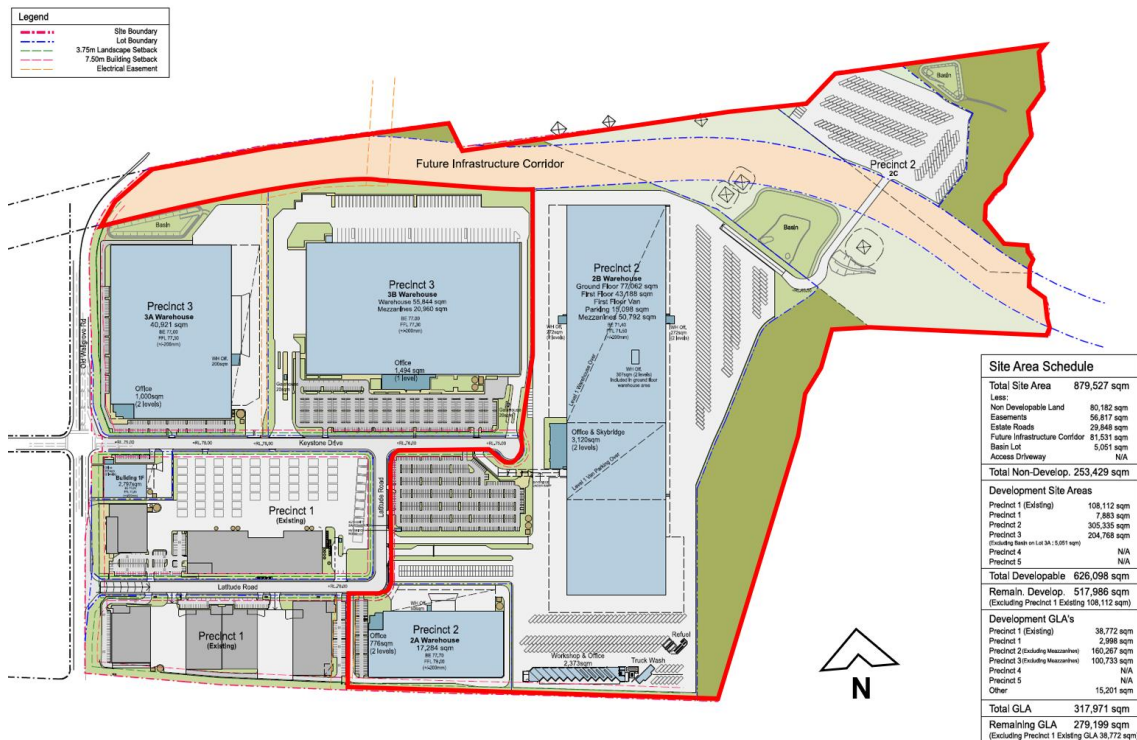


Figure 1: Proposed OEE masterplan with proposed development area outlined in red (Source: Goodman)

The site has historically been utilised for quarrying purposes which has been increasingly scaled back in recent years with portions of the site being relinquished from the Mining Lease (ML M(MO)L7) and associated Mining Operations Permit over time. The broader OEE has been utilised for quarrying and brick manufacturing purposes by Brickworks Ltd since the 1970s under Permit No. 1340 issued by Blacktown City Council.



Figure 2: Aerial view of the current OEE DA 347.1/2021 status looking east (Source: SBA)

Site history - Concept and Stage 2 works approval

On 11 October 2023, a concept masterplan with stage 2 works under SSD 3746043 was approved which included:

- a Concept Proposal for an industrial estate to be built over five stages, including development controls; and
- a Stage 2 development for earthworks, intersection works, construction of estate roads and services, subdivision, noise barriers, biodiversity offsets and construction, fit-out and operation of an expansion of an existing warehouse in Precinct 1 and three new warehouses in Precinct 3.

DA 347.1/2021 (as modified)

On 31 October 2023, DA 347.1/2021 (as modified) was 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. This is further outlined in Section 3.5.

Concept Plan approval Amendments SSD-37486043

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.

Further details on the proposed modifications to the development consent are provided in Appendix 7 with an assessment against the relevant provisions of Section 4.55(1A) of the EP&A Act provided at Section 4.4.

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, car parking, electric vehicle charging, solar panels and signage.

- Dangerous goods (DGs) are proposed to be stored in Building 2A below the threshold quantities under Chapter 3 of the *State Environmental Planning Policy (Resilience and Hazard) 2021*.

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, car parking, 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 in Building 2B 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

Community engagement

Extensive consultation was undertaken during the preparation and approval of the OEE Concept Approval SSD 37486043. Additionally, early engagement has commenced with the community, Fairfield City Council (FCC) and the following agencies prior to submission of this SSDA:

- Transport for NSW (TfNSW)
- Environment Protection Authority (EPA)
- DPHI
- FCC
- Department of Primary Industries and Regional Development (DPIRD)
- Endeavour Energy (EE)
- Transgrid
- Water NSW
- Community

Engagement undertaken in preparing of this SSDA is discussed in the Social and Economic Report by SLR Consulting at Appendix 20 and discussed in Section 5. This includes details on the engagement activities carried out to date, a summary of community views and proposed future engagement.

The application will be exhibited by DPHI whereby the public will be able to make a submission in relation to the proposal. Any submissions received will be considered and addressed by the applicant during the Response to Submissions phase of the assessment.

Assessment and mitigation of impacts

This EIS provides a comprehensive assessment of the potential impacts associated with the development and issues identified in the SEARs. The EIS is supported by multiple specialist consultant reports to consider the potential impacts of the proposal.

Impacts considered within the EIS include:

- built form and visual impacts
- traffic and transport
- heritage
- geotechnical
- contamination
- noise and vibration
- dangerous goods

- bushfire
- flooding
- air quality
- infrastructure servicing
- ground and surface water
- biodiversity
- crime prevention
- waste management
- sustainability
- wind
- stormwater and wastewater

This EIS demonstrates that the proposed development complies with the relevant controls and that potential environmental impacts are minimal and can be appropriately managed through a series of mitigation measures as set out below. Additionally, in accordance with Clause 4.63(3)(a) of the EP&A Act, this assessment has regard to the relevant baseline approvals under DA 347.1/2021 and SSD 37486043, with the associated consents to be subsequently surrendered or modified.

Project justification

The EIS has assessed the proposal in line with the strategic planning framework and statutory planning framework and has also considered the likely environmental impacts and the required mitigation measures as a result. The EIS concludes that the proposal is justified and will result in significant public benefit as set out below:

- it will transform the remaining part of unutilised site and surrounds resulting in a better planning outcome that delivers significant public benefits to the community.
- it is consistent with the strategic planning context including the following strategies:
 - *State Infrastructure Strategy*
 - *Greater Sydney Region Plan*
 - *Western City District Plan*
 - *Fairfield Local Strategic Planning Statement*
 - *Fairfield Community Strategic Plan*
 - *Draft Sydney Plan*
 - *Draft Statewide Policy for Industrial Lands*
- it will facilitate a \$633,697,216 (excl. GST) investment into the construction of the site and will facilitate over 160,267m² of employment generating gross lettable area.
- it will support over 1,203 jobs over the construction period and 1,421 jobs during operation resulting in significant social benefits for the Fairfield LGA and broader Western Sydney Employment Area (WSEA).
- the site is suitable for the development considering:

- the proposal is generally consistent with the approved site-specific development control plan (DCP), noting however, that DCPs do not apply to SSD.
- there is an existing concept and stage 1 DA which approves the use and development of the site.
- the range of specialist reports accompanying this EIS demonstrate that the development can be carried out on the site without any significant environmental impacts, in relation to matters including construction traffic and haulage, fill importation, dust and air quality, operational freight activity, 24-hour operations, lighting, operational noise, visual scale, cumulative industrial development and ecology design, landscape, contamination, traffic and ecology.
- all potential impacts are suitably mitigated through appropriate measures.

1 Introduction

This Environmental Impact Statement (EIS) supports a state significant development (SSD) application for the development of Precincts 2, 4 and 5 within the OEE at Lot 109 in DP 1293112, formerly referred to as 2-10 Old Wallgrove Road, Horsley Park, in the Fairfield LGA. The application is lodged under section 4.38 of the Environmental Planning and Assessment Act 1979 (EP&A Act.)

On 11 October 2023, a concept proposal (SSD 3746043) was approved by the Department of Planning, Housing and Industry (DPHI) for the site. The Concept DA comprised an industrial estate to be built over five stages, including development controls and a Stage 2 development for earthworks, intersection works, construction of estate roads and services, subdivision, noise barriers, biodiversity offsets and construction, fit-out and operation of an expansion of an existing warehouse in Precinct 1 and three new warehouses in Precinct 3.

The SSDA seeks development consent for the carrying out of Precinct 2 in a consolidated manner. This includes consolidating Precincts 2, 4 and 5 to form one precinct (being Precinct 2) with development across this precinct referred to as Building 2A, Building 2B and Lot 2C. This SSDA also seeks to modify the Concept DA (SSD 37486043), pursuant to section 4.55(1A) of the EP&A Act.

The application seeks approval for the construction, fit-out and operation of two (2) warehouse buildings and associated internal site infrastructure works to accommodate the proposed building layout. This application specifically seeks approval for the following:

Concept Plan approval Amendments | State Significant Development Application [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.

Further details on the proposed modifications to the development consent are provided in Appendix 7 with an assessment of the proposal against Section 4.55(1A) of the EP&A Act provided at Section 4.4.

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, car parking, electric vehicle charging, solar panels and signage.
- Dangerous goods (DGs) are proposed to be stored in Building 2A below the threshold quantities under Chapter 3 of the *State Environmental Planning Policy (Resilience and Hazard) 2021*.

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, car parking, 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 in Building 2B 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

The proposal is classified as SSD under Chapter 2 of *State Environmental Planning Policy (Planning Systems) 2021*. Under Schedule 1, Section 12 of the Planning Systems SEPP, development for the purposes of warehouse or distribution centres at one location and related to the same operation with an estimated development cost of more than \$50 million is SSD.

Noting the \$50 million threshold relates to a 'single operation' (interpreted as a single warehouse), a Quantity Surveyor's cost assessment has been prepared by WT Partnership (Appendix 1a) to confirm the estimated development cost (EDC) of the proposal. Building 2B and Lot 2C of the development has an estimated cost of \$633,697,216 (excl. GST) which meets the \$50 million threshold.

Additionally, Building 2A is required to be included within this SSDA to provide the necessary infrastructure works to deliver the Building 2B and Lot 2C development works.

On 8 May 2026, the Secretary's Environmental Assessment Requirements (SEARs) were issued, and the project was assigned the application number SSD 120888992.

Consideration of the SEARs is at Appendix 2.

The Applicant's details are provided in the table below.

Applicant	Details
Name	Goodman Property Services (Aust.) Pty Ltd
Contact	Lachlan O'Reilly
Address	The Hayesbery 1-11 Hayes Road

Applicant	Details
	Rosebery NSW 2018
ABN	40 088 981 793

Table 1: Applicant details

1.1 Site description

The site is located at the OEE in the Fairfield Local Government Area (LGA). The broader OEE has a total site area of 88 ha and now consists of several land parcels since the original concept approval (SSD 37486043) as a result of subsequent subdivision of the site, including:

- Lot 104 DP1293112
- Lot 105 DP1293112
- Lot 106 DP1293112
- Lot 107 DP1293112
- Lot 108 DP1293112
- Lot 109 DP1293112

The portion of the site subject to this proposed SSD is Lot 109 in DP 1293112, which covers a site area of approximately 30.5 ha across existing Precincts 2, 4 and 5 of the OEE.

It is generally bound by Sydney Water's Warragamba Pipeline and M7 Business Hub to the north, Reedy Creek and rural residential to the east, the future corridor of the Southern Link Road (SLR) and rural residential to the south, and the broader OEE Precincts 1 and 3 along with the Oakdale Central, West and South Industrial Estates to the west (see Figure 4 below).

Figure 4 below shows the extent of the site boundary. It has an area of 30.5 ha and is irregular in shape. Given the site's history and use as a quarry, most of the site was significantly disturbed, with the former masonry plant located in the north-western area of the site. Vegetation is generally limited to the eastern boundary of the site, in the Reedy Creek riparian corridor. Most of the infrastructure works have been completed and the site now has operating facilities, as detailed below.

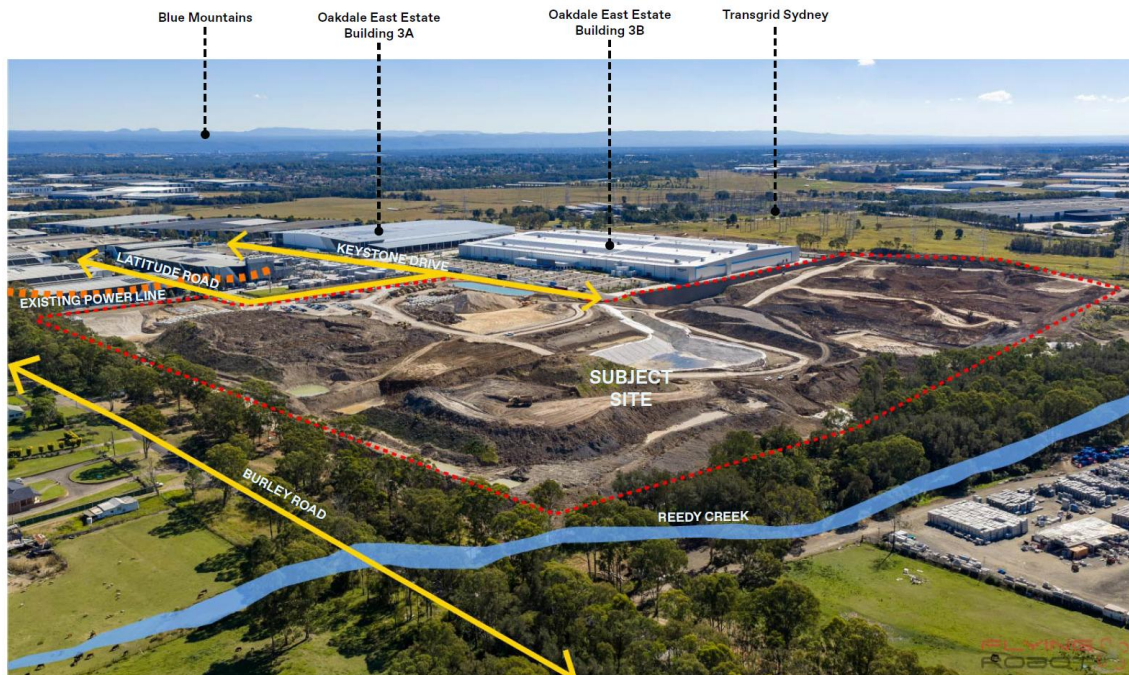


Figure 3: Aerial image of current OEE looking west (Source: SBA)

Current vehicle access to the site is from the M7 Motorway via Old Wallgrove Road, with an additional two access roads (Latitude Road and Keystone Drive) providing internal access to Precincts 1,3, Buildings 2A & 2B.

As indicated by the red outlined area below, most works for Building 2B and infrastructure works are contained within the north-eastern and eastern portion of Lot 109 in DP 1293112, with part of the works for Building 2A taking place within the south-western portion of the lot including the cul-de-sac works.



Figure 4: Current site layout and allotment (Base source: Nearmap)

Figure 5 below shows the estate in the context of its broader locality, which is primarily industrial in nature except for rural residential areas, located to the south and east of the site.

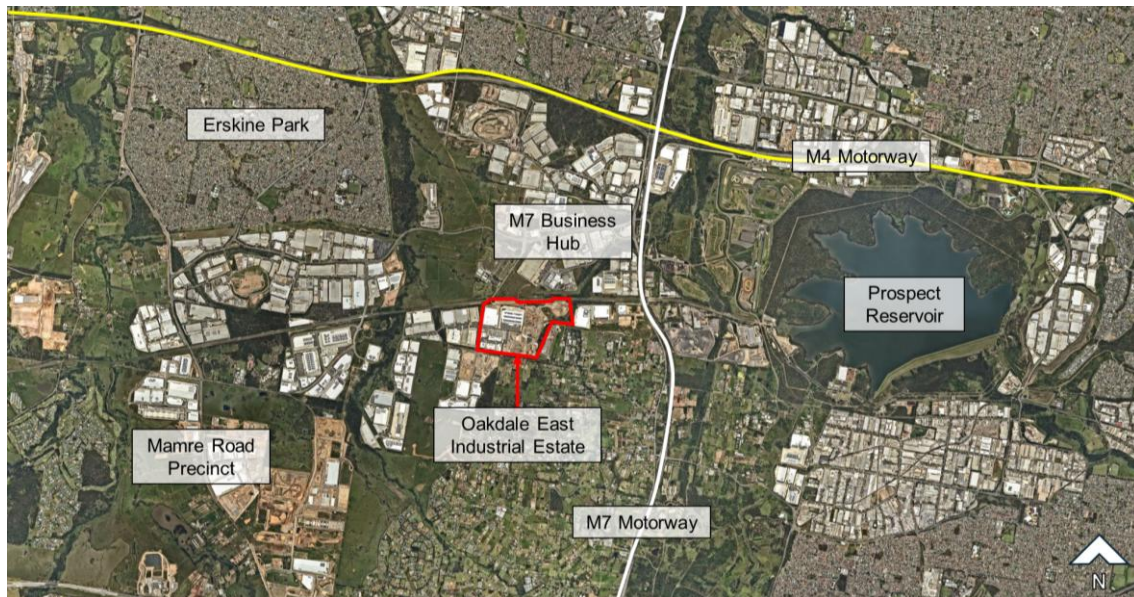


Figure 5: Oakdale East Estate in its regional setting (Base source: Nearmap)

The site generally slopes from north to south and from west to east, with a small portion of the site fronting Reedy Creek affected by flooding in a 1 in 100-year event.

The area is characterised by a variety of largely industrial, rural and rural residential uses as described below:

- There is industrial land (M7 Business Hub) to the north of the Sydney Water Warragamba pipeline. The Eastern Creek Zone substation operated by Transgrid and Ausgrid is also located to the north.
- The Reedy Creek riparian corridor forms part of the eastern boundary.
- There is rural residential land zoned RU4 Primary Production Small under the *Fairfield Local Environmental Plan (FLEP) 2013* lots to the east and southeast of the site. There is undeveloped land zoned IN1 General Industrial under the *State Environmental Planning Policy (Industry and Employment) 2021* further east of the site.
- To the southwest of the site is a warehouse and logistics estate.
- The broader Oakdale Industrial Estate is located west of the OEE across Old Wallgrove Road.
- The Western Sydney Freight Line (WSFL) corridor runs through the northeast of the site separating Precincts 4 and 5.

The site forms part of the broader Oakdale Industrial Estates located within the Western Sydney Employment Area (WSEA) under State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP). Figure 6 below details the site in relation to the broader Industrial Estates in the area.

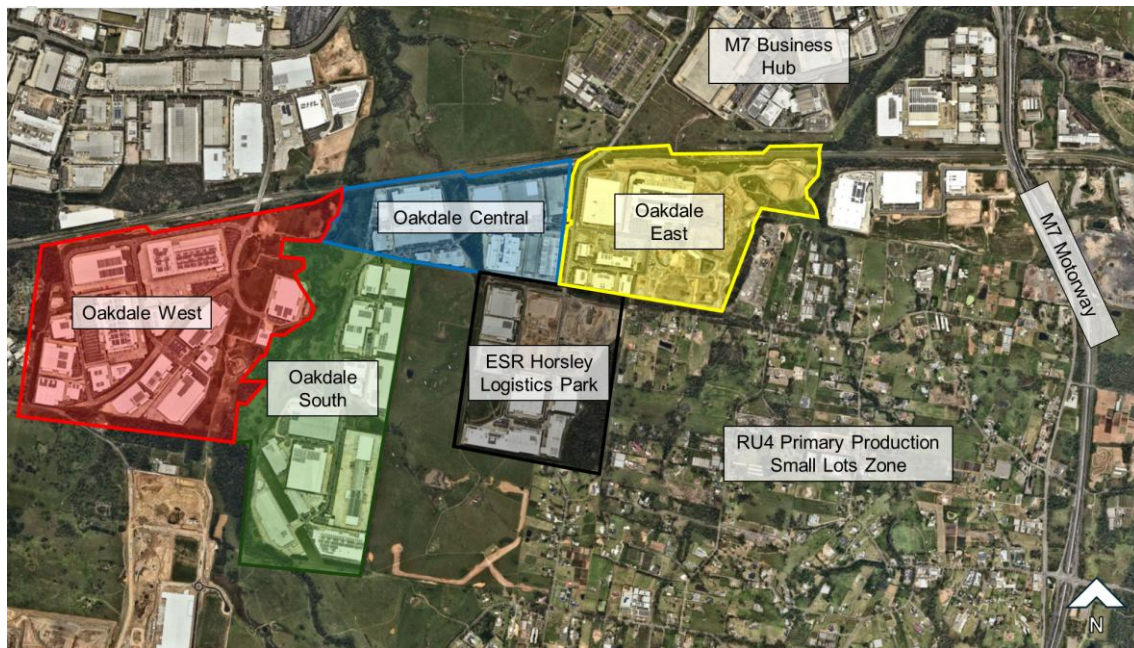


Figure 6: Oakdale East Industrial Estate in context of Oakdale Industrial Estate and WSEA (Base source: Nearmap)

1.2 Development objectives

The objectives of the development are:

- to provide warehousing and distribution centre uses within the OEE consistent with the objectives of the Concept Approval (SSD 37486043);
- to provide for employment generating uses within the WSEA;
- to provide for warehousing and distribution centre uses which are designed to manage and mitigate any environmental impacts; and
- to ensure that any potential impacts to surrounding uses are minimised.

1.3 Background

1.3.1 Relevant history

This section contains a summary of relevant historical development applications that relate to the site.

DA 93.1/2019

Precinct 1 of the OEE was approved by Fairfield City Council (FCC) under DA 93.1/2019 on 1 April 2020. Approval was granted for the following works:

- *Construction of an industrial complex of four industrial warehouse buildings, construction and fit out of a masonry plant and associated site works, signage and subdivision.*

Works under DA 93.1/2019 were completed in 2021.

DA 347.1/2021 - 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.

This SSDA assesses and seeks approval to address these shortfalls as part of the environmental impact assessment.

SSD 37486043 - Concept Approval

The OEE concept proposal was approved under SSD 37486043 on 11 October 2023. The original approval under SSD 37486043 included:

- a Concept Proposal for an industrial estate to be built over five stages, including development controls; and
- a Stage 2 development for earthworks, intersection works, construction of estate roads and services, subdivision, noise barriers, biodiversity offsets and construction, fit-out and operation of an expansion of an existing warehouse in Precinct 1 and three new warehouses in Precinct 3.

SSD 37486043 has been subject to five modifications, summarised as follows:

- Modification 1 – modification to layout in Precincts 1 and 3 approved 21 February 2024.
- Modification 2 – modification to layout and size of Building 3A in Precinct 3.
- Modification 3 - modification to concept masterplan layout in relation to Precinct 5, amendment to Basin C, and landscaping design
- Modification 4 - modification to layout and design of Warehouse 3B

- Modification 5 - modification to layout and design of Warehouse 3A

As noted, this SSDA also seeks to modify the existing development consent at the site (SSD 3746043) pursuant to section 4.55(1A) of the EP&A Act. Further details of the proposed modifications are provided in Section 3.8 and Appendix 7. An assessment against the provisions of Section 4.55(1A) of the EP&A Act is provided at Section 4.4.

DA 118.1/2025 - Precinct 5

DA 118.1/2025 was lodged in April 2025 to FCC and sought approval for construction and fit-out of a warehouse building and ancillary works within Precinct 5 of the OEE. This application may be withdrawn / surrendered following approval of this SSDA.

SSD-77020752 - Precinct 2

SSD-77020752 sought approval for the construction of three warehouse buildings within existing Precinct 2 of the OEE. It was approved on 8 April 2026 by DPHI. This application will be surrendered once a satisfactory DA is received.

Mining Lease

Mining Lease ML M(MO)L7 currently applies to the site. No more works will be carried out under MO M(MO)L7 as there is no approval to import fill under the planning approvals associated with the ML. This SSD seeks approval to fill the circa 250,000m³ of fill required for the BEL levels for Project Silverback.

1.4 Consent transition and surrender

As detailed above, there are several applications approved at the site. Following any future approval of this SSDA, the following consents will be modified or surrendered.

Application	Approval Status	Impact from Project Silverback SSDA
SSD-37486043	Approved	Modified
DA 347.1/2021 (‘Rehab DA’)	Approved	May be surrendered upon SSDA determination. Approved Rehab DA scope captured under this SSDA.
SSD-77020752	Approved	May be surrendered upon SSDA determination.
DA 118.1/2025 (‘Precinct 5 DA’)	Under assessment	May be withdrawn or surrendered, depending on the status of the DA at SSDA determination.
MO M(MO)L7	Approved	Mining Licence may be surrendered and rehabilitation obligations captured.
Historical Mining Consents including: DA1340; DA129/92; and DA313/82.	Approved	Consents to be surrendered once SSDA determined to avoid inconsistencies.

Table 2: Consent transition and surrender

1.5 Related development

Since the approval of Precinct 1 of the OEE in 2019, quarrying operations have been scaled back and the Precinct 1 development under DA 93.1/2019 has been completed. Details of previous DAs approved by Fairfield City Council and the Regional Planning Panel that are relevant to existing development at the site within Precinct 1 and associated subdivision are provided in Table 3.

Application	Description	Status
DA 93.1/2019	Stage 1 construction of the OEE facilitating an industrial complex including: • site-wide earthworks, infrastructure and services • site contamination investigation and Remediation Action Plan (RAP) • construction and use of a masonry plant with a production capacity of 220,000 tonnes • construction of 4 warehouses for generic warehouse and distributing uses The DA also included the provision of an 'Estate Wide Development Control Plan' applying to Precincts 1 and 2. Works were limited to Lot 100 only.	Approved by Sydney Western City Planning Panel 1 April 2020
DA 133.1/2019	Torrens Title subdivision to create two lots.	Approved by Council 11 March 2021
DA 163.1/2020	Construction of road, drainage works, associated civil works and landscaping within Lot 100.	Approved by Council 24 April 2020

Table 3: DAs relating to the subject site

2 Strategic context

2.1 Strategic justification

The applicant is committed to providing high-quality warehouse buildings that support the local and regional economy, create employment opportunities and provide infrastructure in line with the relevant strategic planning documents.

The site is ideal for the proposed large format warehouse typology and is accessible for future employees given its proximity to major road networks. Specifically, given the site's context and location with the WSEA and proximity to the M7 and M4 Motorways, redevelopment of the site will meet relevant strategic planning directions for the area.

In addition to the above, the proposed development is aligned with the applicable state, district and local strategic plans and policies including:

- *State Infrastructure Strategy*
- *Greater Sydney Region Plan*
- *Western City District Plan*
- *Fairfield Local Strategic Planning Statement*
- *Fairfield Community Strategic Plan*
- *Draft Sydney Plan*
- *Draft Statewide Policy for Industrial Lands*

A detailed assessment of the proposal against each of the above is provided at Appendix 6.

2.2 Key features of the site and surrounding that could affect or be affected

The local and regional setting of the site is characterised by industrial and rural residential land uses. Quarrying on the site has been scaled back since the approval of the Concept Proposal for the OEE under SSD 37486043.

Part of the OEE is zoned E2 (C2) Environmental Conservation associated with the Reedy Creek riparian corridor, which forms the eastern boundary of the site. The proposed setbacks to the Reedy Creek corridor are appropriate to ensure its protection and preservation and manage bush fire risk to the proposed buildings. There are no additional works proposed within the E2 (C2) zone.

There are rural residential receivers to the south and east of the site in land zoned RU4 Primary Production Small Lots. Mitigation measures to protect the amenity of these properties have been incorporated into the proposed design.

A Future Infrastructure Corridor, designated a Major Infrastructure Corridor (MIC) under *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP), runs through the north of the site, running east-west. This corridor has been reserved to facilitate the Western Sydney Freight Line (WSFL), a dedicated freight rail line connecting Port Botany and the Western Parkland City. All

ground levels at the internal driveway within the WSFL corridor to Lot 2C are per TfNSW requirements whereby clearances remain per previous DA/118.1/2025 for Precinct 5. Ongoing consultation will occur with TfNSW following submission of this SSDA.

To the immediate south of the site is the identified future corridor of the Southern Link Road (SLR) to connect the M7 Motorway with Mamre Road. In their assessment of the Precinct 5 DA (DA 118.1/2025), Transport for NSW (TfNSW) confirmed that the SLR alignment will not impact this site. The proposed development will be consistent with the approved site boundary under the Concept DA (SSD 37486043). See below plan that shows the SLR location immediately south of the site boundary.

Given the site's context and location within the WSEA and the directions outlined for the Western City District, the proposed redevelopment of Precinct 2 will meet the relevant strategic plans for the area. The existing zoning is detailed below.

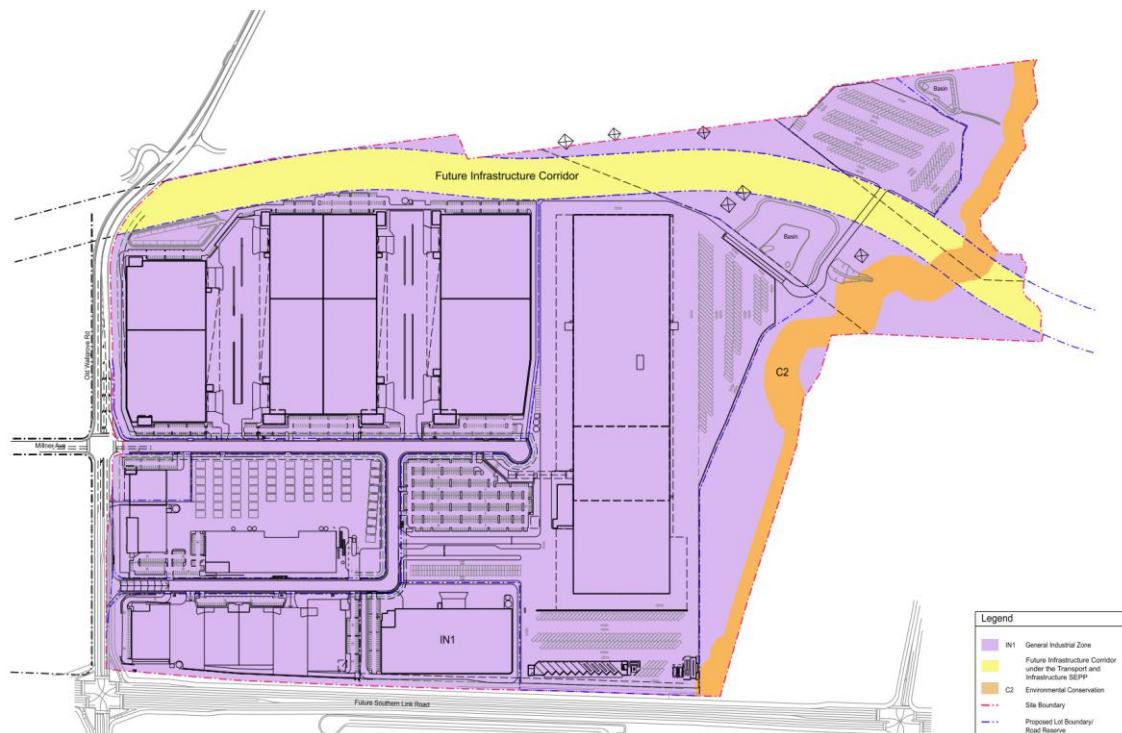


Figure 7: Existing zoning (Source: SBA)

2.3 Potential cumulative impacts

Given the site's strategic location within the WSEA, the main cumulative impacts will be in relation to surrounding industrial and emerging industrial developments. Key potential cumulative impacts include:

- traffic generation
- construction noise and vibration
- ongoing and operational noise
- visual impacts

- air quality

The potential cumulative impacts of the project are addressed in Section 6 in accordance with the *Cumulative Impact Assessment Guidelines for State Significant Projects*.

2.4 Agreements with other parties

A VPA between Goodman and the Minister for Planning in relation to the OEE was entered under section 7.4 of the EP&A Act in 2023. In accordance with the adopted VPA, the application of sections 7.11 and 7.12 of the Act is not excluded in respect of the development. Contributions payable are further discussed under Section 4.4.

3 Project description

3.1 Project overview

The proposal seeks to facilitate the construction, fit-out and operation of two warehouse buildings within consolidated Precinct 2 and associated internal site infrastructure works to accommodate the proposed building layout for Building 2A and 2B. Building 2A will provide approximately 18,110m² of GLA and Building 2B will provide approximately 142,157m² of GLA. Lot 2C will service Building 2B for truck and trailer parking.

A summary of the key elements of the project is provided in the table below. The proposed site layouts for both Building 2A and Building 2B is shown in Figure 8 and Figure 9.

Key element	Description
Project area	The subject site has a total area of 305,301m ² . The site consolidates existing Precincts 2, 4 and 5 within the OEE, proposed to now be referred to as Precinct 2.
Physical layout and design	Warehouses and Distribution Building – Building 2A The proposed works, design and layout consist of: • site area of 34,566m² • 18,110m² of GLA comprising approximately: ○ 14,267m² of warehouse GLA ○ 735m² of office GLA ○ 46m² of dock office GLA • maximum building height of 15m (excluding solar) • 79 car parking spaces Warehouses and Distribution Building – Building 2B The proposed works, design and layout consist of: • site area 270,735 m² (combined total site area for Lot 2B and Lot 2C) • 142,157 m² of GLA comprising approximately: ○ 120,320m² of warehouse GLA ○ 21,837m² of office and ancillary GLA ○ satellite office ○ PUD office ○ fleet workshop and office ○ van parking/staging level 1 ○ mezzanines • maximum building height of 25m (excluding plant, roof access points and solar) • parking spaces comprising: ○ 646 car parking spaces

Key element	Description
	○ 290 van/PUD parking spaces ○ 44 B-double parking spaces ○ 205 trailer parking spaces ○ 184 heavy rigid parking spaces ○ 90 prime mover parking spaces • 100 x recessed docks and 53 x on-grade docks • bridge to provide access to Level 1 of the warehouse for vans • egress walkway and stairs • skybridge pedestrian link connecting the carpark and main office • provision of parcel storage lockers. including 10 short-term parking spaces Lot 2C • heavy rigid and trailer parking spaces to service Building 2B and associated hardstand, retaining walls, crash barriers and fencing • flood mitigation works, including a stormwater detention basin • road infrastructure
Uses and activities	• The proposal seeks approval for two warehouse and distribution buildings. • Building 2A is a speculative building with no identified tenant at this stage. Building 2B will be a 24/7 warehouse and distribution use for parcel processing. • The facility will operate 24 hours, 7 days a week.
Stages	The development is proposed to be carried out in one stage.
Hours of operation	Construction hours • Standard construction hours for warehouse construction (i.e. 7am-6pm Monday - Friday, 8am-1pm Saturday) • 24/7 works for fill importation only. This is to work with infrastructure contractors to take import material at nighttime (i.e. Western Harbour Tunnel) • 24 hours, 7 days a week
Infrastructure	• Bulk earthworks and rehabilitation work, including export of any unsuitable material (i.e. topsoil) • Retaining walls • Stormwater Basin D (including fit-out) • Construction of Stage 1 stormwater discharge line through Building 2B to Basin C • Stage 1 road and servicing amendments to reflect revised Precinct 2 - 5 building layout • Noise barriers

Key element	Description
	- Expansion and on-going management of DA 347.1/2021 Containment Cell (Ancillary to Warehouse & Distribution Works proposed under this application) 11kv feeder - Amendments to Stage 1 infrastructure (i.e Sewer, Potable Water and Telecommunications)
Subdivision	The proposal seeks approval for subdivision in accordance with the subdivision plan provided at Appendix 30.

Table 4: Main elements of the project

3.2 Building 2A

3.2.1 Project area

The proposed Building 2A will be located within Lot 2A of the OEE which has a site area of approximately 34,566m². It is bound by the proposed Building 2B site to the north and east, rural residential uses and the future SLR corridor to the south and Precinct 1 of the OEE to the west.

3.2.2 Physical layout and design

The proposed development of Lot 2A will include the construction of one warehouse as shown in Figure 8. Access to the warehouse will be via Latitude Road to the northwest of the site.

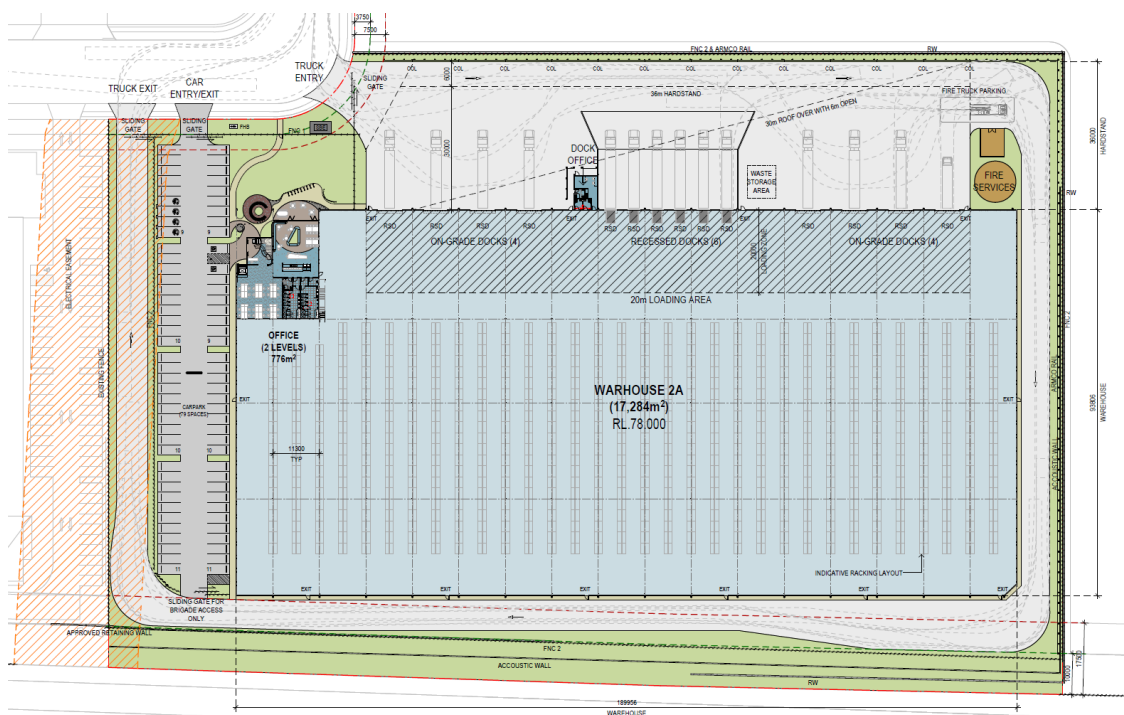


Figure 8: Proposed Building 2A site plan (Source: Goodman)

3.2.3 Built form

The proposed development incorporates a total warehouse area of (update GLA as above) 17,284m² and a total office area of 826m² including a two-storey main office and one-storey dock office.

The proposed building will have a maximum ridge height of 14.6m (excluding solar). This is consistent with the Concept Plan approval.

3.2.4 Landscaping

Landscape plans prepared by Scape are provided at Appendix 9.

In Lot 2A, tree and vegetation planting is proposed to be provided around the perimeter of the site, in the tree pits within the car parking area and at the breakout space adjoining the main office.

Lot 2A has a total landscaped area of 4,716m² which is 13.6% of the site area. The proposal provides a mature canopy cover of 10.20%.

3.2.5 Access and parking

Building 2A provides 79 car parking spaces on the east of the site with driveway access from Latitude Road.

14 loading docks are provided including six (6) recessed docks and eight (8) 11.3m wide on-grade docks. Truck entry is provided via Latitude Road with a driveway around the building perimeter leading from the docks to the exit.

3.2.6 Uses and activities

Building 2A is a speculative facility. There is no identified tenant at this stage. The building will be used as a warehouse and distribution centre.

3.2.7 Sustainability

The proposal incorporates measures to improve sustainability and energy performance in the construction and operation of the development. This includes:

- heating, ventilation, and air conditioning (HVAC) as per National Construction Codes (NCC) requirements
- roof and external wall insulation as per the NCC requirements
- low flow fixtures and fittings, including taps and shower heads
- 5% of total parking spaces are dedicated to electric cars with charging stations proposed
- target 5 Star Greenstar Rating
- AC and lighting control provided to offices

3.2.8 Signage

The proposal seeks approval for business and building identification signs comprising the following:

- Sign C: One 11 x 2.5m illuminated wall sign. The sign will be fixed to the northern elevation beside the main office entrance approximately 10.6m above ground. The tenant artwork and dimensions are subject to future details.
- Sign B: One illuminated building identification sign. The sign will be fixed to the western elevation beside the main office entrance. The artwork and dimensions are subject to future details.
- Sign S3: One 2.8m high illuminated pylon sign for truck wayfinding located beside the truck entry. Tenant artwork subject to future details.
- Sign S4: One 2.1m high illuminated pylon sign for car wayfinding located beside the carpark entry. Tenant artwork subject to future details. The exact location of signs is shown in the Architectural Plans at Appendices 3a, 3b and 3c.
- Sign S6: One 2.5 x 2.5m illuminated wall sign with the 'Goodman' logo. The sign will be fixed to the western elevation.

3.3 Building 2B

3.3.1 Project area

The site area for Building 2B and ancillary facilities is approximately 270,769m². This includes the ancillary parking on Lot 2C which is further discussed in Section 3.4.

The site is bound by the Reedy Creek riparian corridor to the east, rural residential uses and the future SLR corridor to the south, the broader OEE to the west and the Warragamba pipeline to the north. The WSFL corridor runs through the site separating the existing Precinct 4 and 5 in the north-east.

3.3.2 Physical layout and design

The Building 2B component of the proposal includes the construction of a two-storey warehouse building comprising a total warehouse area of 120,320m² and ancillary buildings and facilities comprising 21,837m² along with 15,110m² of van loading and unloading (parking and staging) area.

Warehouse

The warehouse building contains the following facilities:

- Automated parcel sortation facility on ground floor and level 1
- Van/PUD parking on level 1.
- Satellite office space located on each level of the warehouse (each 307m²)
- PUD office space located on each level adjacent to the van parking area (each 200 m²)
- Mezzanine areas across ground floor and level 1 for automation conveyors and equipment (51,962 m²)

Main office

The proposal includes a main office located to the west of the warehouse building and accessible via a pedestrian bridge from the carpark. The main office is a rectangular two-storey building that is approximately 23m x 68m. It adjoins the warehouse building and both levels have internal access to the ground floor. It contains the following amenities:

Ground Floor	Level 1
• Meeting rooms • Call centre • Lunch room • Outdoor area • Storage • Combined physio and first aid room • Water closets (WCs) with locker rooms • Multi faith room	• Open workstations • Quiet rooms • Meeting rooms • WCs • X-ray room • Comms room • Lunch room with outdoor balcony

Table 5: Building 2B components

Ancillary offices and facilities

The proposed development includes the following ancillary office buildings and facilities outside the main building:

- A fleet workshop and office located at the southern boundary of the site (2,323m²)
- Two-storey dock offices located on the east and west of the warehouse (each 262m²)
- Truck wash and refuel area at the southern boundary of the site

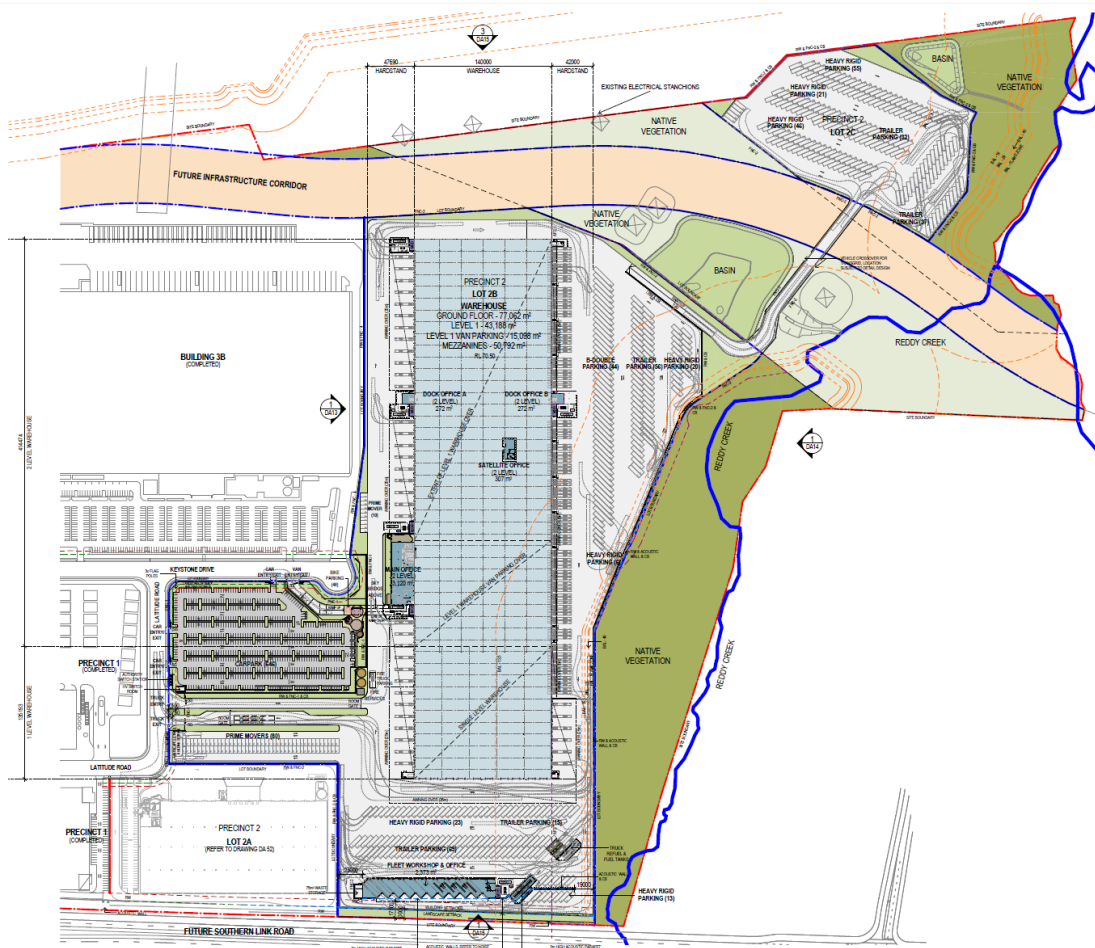


Figure 9: Proposed Building 2B layout (Source: Goodman)

3.3.3 Built form

The warehouse is a rectangular building measuring 140m x 550m. It has a maximum ridge height of 24.6m not including plant, roof access points and solar infrastructure. The ground floor height is 13.5m and level 1 height is 11.1m. There is 51,621 m² of ground floor and level one mezzanine structures to accommodate the automation conveyors and parcel sortation equipment.

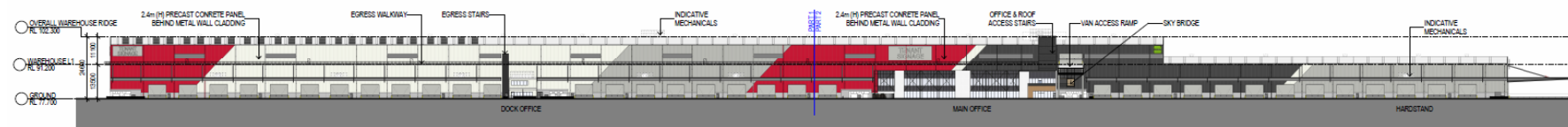
The proposed building elevations, which illustrate the height and built form, are provided at Figure 10. An indicative render of the proposal is detailed in Figure 11 below.

The building will have generators and BESS as part of the electrical infrastructure.

Additionally, Building 2B will include hardstand, heavy rigid parking, guardhouses, dock offices, loading bays, landscaping, electric vehicle charging, solar panels, weighbridges, fleet workshop, refuelling bay, truck wash and signage. Temperature control will be required to the recessed dock locations only.

3.3.4 Operation

The proposed development is intended to operate as an automated parcel sortation facility. Parcels will be delivered to the site then scanned, grouped and dispatched to their final destinations and customers.



1 WAREHOUSE ELEVATION - WEST 1:800



2 PARTIAL WAREHOUSE ELEVATION - WEST 1 1:400

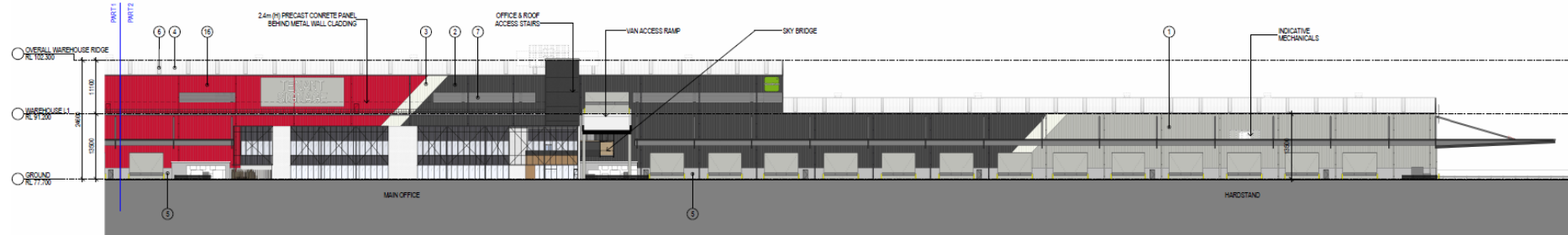


Figure 10: Proposed Building 2B elevations (Source: Goodman)



Figure 11: Artist impression of proposed Building 2B (Source: Goodman)

3.3.5 Landscaping

Landscape plans prepared by Scape are provided at Appendix 9. An extract of the proposed landscaping plan is at Figure 12 below.

The trees will comprise both native and exotic trees. Planting is proposed to be located around truck entry and exit, main office, internal access road, Lot 2B and 2C parking areas, at the boundary adjoining Building 3B and in tree pits provided within the carparking area.

Lots 2B and 2C have a combined total landscaped area of 57,415m² which is 18.6% of the site area. The proposal provides a mature canopy cover of 10.98%.

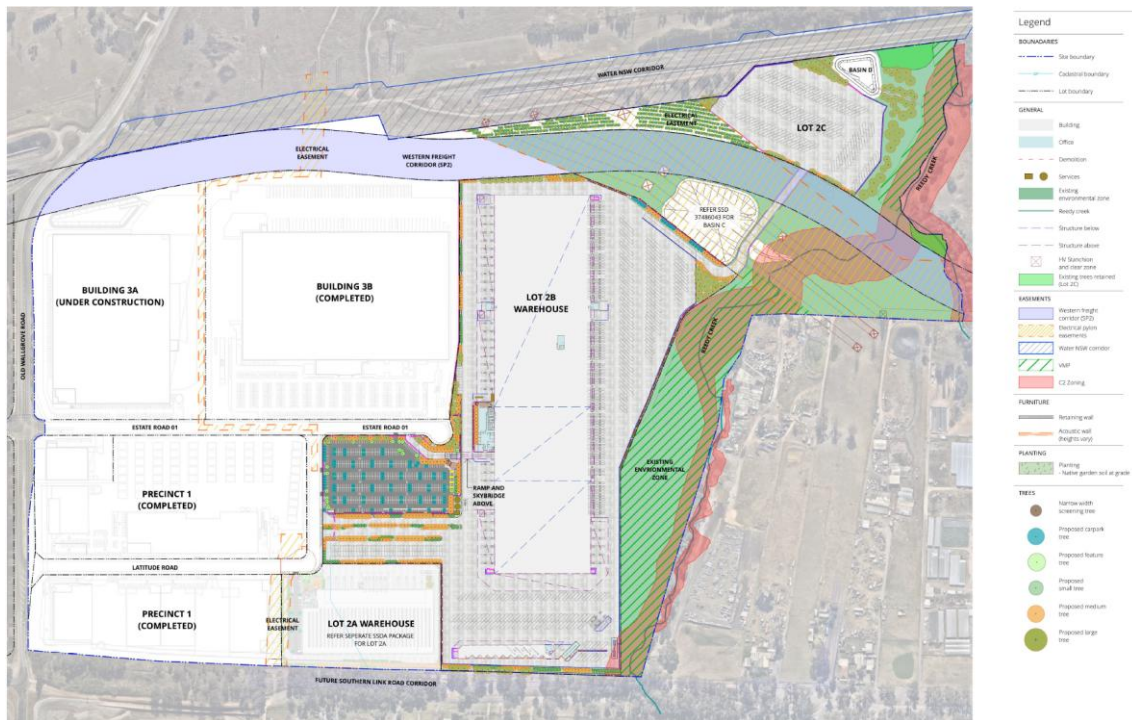


Figure 12: General arrangement landscape plan for Building 2B and Lot C (Source: Scape)

3.3.6 Access and parking

Vehicle access to Building 2B will be provided via Keystone Drive and Latitude Road. Driveway locations are shown in Figure 13 to demonstrate access to the site from the broader OEE.

Building 2B incorporates the provision of 646 car parking spaces including 7 accessible spaces. 20 bicycle parking spaces are also provided within the carpark, adjacent to the skybridge lobby. The carpark is accessed via Latitude Road and located west of the main office.

290 van and PUD parking spaces will be provided on Level 1 of the warehouse, accessible via ramp entry from Keystone Drive.

Remaining heavy rigid parking is located around to the south and west of the warehouse building and on proposed Lot 2C (current Precinct 5, refer Section 3.4). The truck entry and exit driveway is located on Latitude Road as shown in Figure 13 below. Access to the parking area at Precinct 5 will be provided via a new private internal access road and is reserved for heavy rigid and trailer parking. Heavy vehicle parking spaces will be provided as follows:

- 44 x B-double parking spaces
- 205 x trailer parking spaces
- 184 x heavy rigid parking spaces
- 90 x prime mover parking spaces

To service the warehouses, 153 loading docks are provided including 100 recessed docks and 53 on-grade docks.

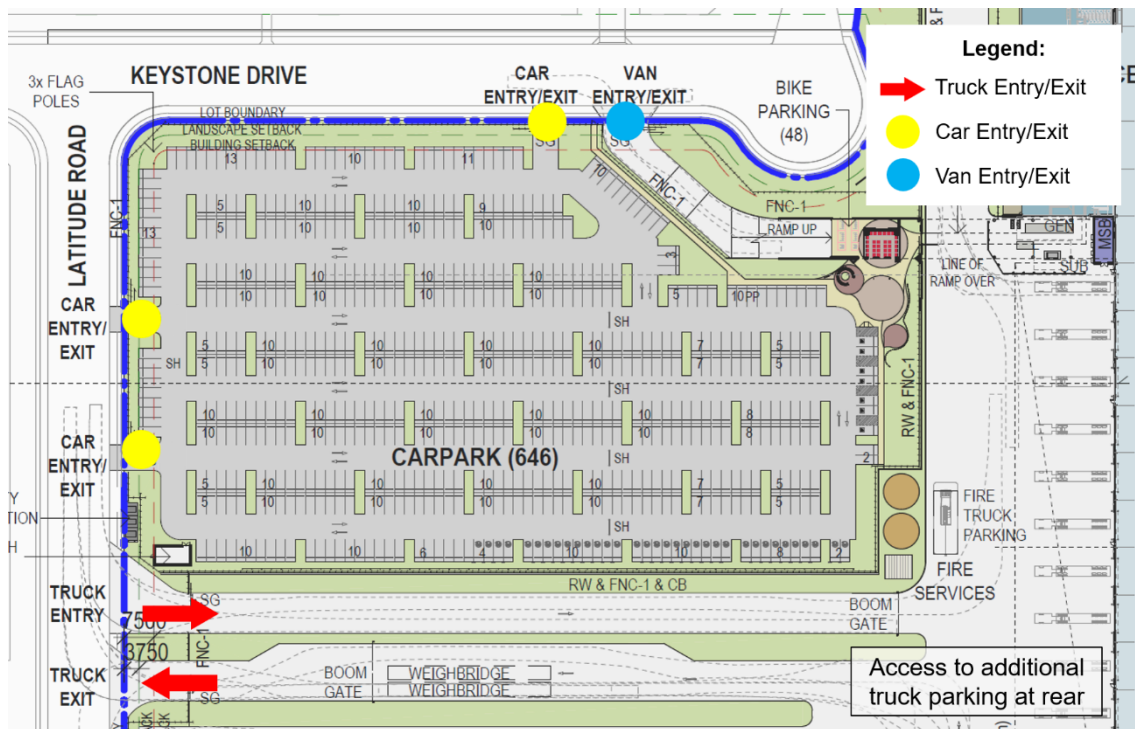


Figure 13: Proposed vehicle access to Lot 2B (Source: SBA Architects)

3.3.7 Uses and activities

The proposal seeks approval for warehouse and distribution uses with ancillary facilities. The warehouse will operate as an 'automated mail and parcel processing and sorting facility'. Ancillary facilities includes parcel storage lockers which are further discussed at Section 3.3.11.

The warehouse will operate 24 hours. 7 days a week.

3.3.8 Sustainability

The proposal incorporates measures to improve sustainability and energy performance in the construction and operation of the development. This includes:

- a minimum of 3,675 kW PV solar system
- AC and lighting control provided to offices
- provision of bicycle parking spaces, end-of-trip facilities and parking spaces with EV charging stations
- passive solar design for external outdoor areas
- use of low VOC materials in accordance with Green Star requirements
- high-performance glazing in all air-conditioned areas as per National Construction Codes (NCC) requirements motion sensors to all LED lights within the warehouse and offices
- roof and external wall insulation as per the NCC requirements
- low flow fixtures and fittings, including taps and shower heads
- 5% of total parking spaces are dedicated to electric cars with charging stations
- target 5 Star Greenstar Rating

3.3.9 Signage

The proposal seeks approval for business identification signs comprising:

- Sign S1 - 5000mm x 1280mm illuminated freestanding doubled side sign with 'tenant' text and logo. The sign will be installed on the north-western corner of the main car park.
- Signs S2, S3, S4 - Five (5) 2500mm x 850mm illuminated freestanding doubled side signs with 'tenant' text and logo. The signs will be installed along the northern and western edges of the car park fronting both Keystone Drive and Latitude Road.
- Sign S6 - 2500mm x 2500mm illuminated wall sign with 'Goodman' logo. The sign will be installed on the western elevation of Building 2B.
- Sign A - 1250mm x 5900mm illuminated sign with 'tenant' text and logo. The sign will be installed on a wall at the skybridge entry adjacent to the carpark.
- Sign B - 6000mm x 17,311mm illuminated wall sign with 'tenant' text and logo. The sign will be installed on the west elevation of Building 2B.
- Sign C - 4000mm x 11,540 illuminated wall sign with 'tenant' text and logo. The sign will be installed on the west elevation of Building 2B.
- Sign D - 4000mm x 11,540 non-illuminated wall sign with 'tenant' text and logo. The sign will be installed on the south elevation of Building 2B.

The proposed sign locations are detailed in the figure below.



Figure 14: Proposed signage locations Building 2B (Source: SBA)

3.3.10 Battery energy storage system

The proposal seeks approval for the installation and operation of six lithium-ion battery energy storage systems (BESS) external to the main warehouse building and fleet workshop. The proposed systems will be based on the EVO Power NEO series and include integrated thermal management and fire suppression. Fire separation between the BESS and warehouse will be provided in accordance with the relevant Australian Standards. The BESS will connect to the Energy Services Switchboard. Electrical infrastructure will be rated for the maximum output of either the solar panels or BESS at one time.

3.3.11 Parcel Storage Lockers

The proposal seeks approval for parcel storage lockers on ground level, including 10 short-term parking spaces within the Building 2B parking area. The proposed location is shown in red within Figure 15 below. A render of the parcel storage locker is also shown in Figure 16 below, accessed via the car park area.

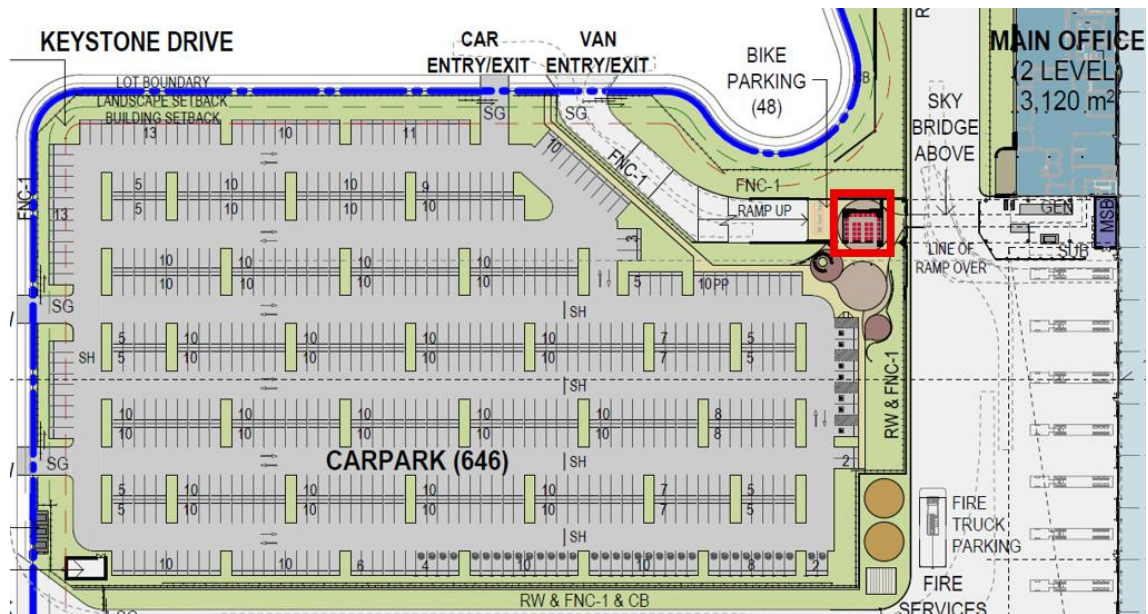


Figure 15: Proposed parcel locker location outlined in red (Base source: SBA)



Figure 16: Render of proposed parcel storage locker and office entry from the Building 2B carpark (Source: SBA)

The parcel storage lockers are intended to operate as a parcel pick-up point 24 hours, 7 days a week and will have the following design features:

- integrated canopy with inbuilt LED lights on a photoelectric (PE) cell
- concrete slab
- powered through hardwire or plugged into standard general-purpose outlet (GPO)

The proposed parcel storage lockers are considered ancillary and not independent to the primary warehouse and distribution use. Planning circular PS 21-008 includes guidance on how to characterise development confirming that a component of a development may have features that are both ancillary and independent. If this is the case, PS 21-008 states that the following should be considered:

Considerations for characterisation	Comment
Is the component going to serve the dominant purpose of the development or is it independent?	The parcel storage lockers are intended to support and enhance the operation of the proposed warehouse and distribution centre and do not operate independently of the primary use. The lockers facilitate the collection and distribution of parcels handled by the warehouse and are therefore ancillary to, and serve the dominant purpose of, the development as a warehouse and distribution centre.
What is the amount of land to be used for a certain component, relative to the amount of land proposed to be used for other purposes? If the amount of land is relatively small, it is more likely to be ancillary.	The proposed parcel storage lockers are 60m ² , which when compared to the 142,157m ² overall GLA of Building 2B and ancillary facilities, is considered relatively minor in size.
Evidence of a purpose that is inconsistent with the dominant purpose is likely to undermine a claim that a component is ancillary.	The proposed parcel storage lockers are largely consistent with the dominant warehouse or distribution purpose, which is defined as: Warehouse or distribution centre <i>means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.</i> The proposed parcel storage lockers align with the warehouse and distribution centre use within Building 2B as it will operate 24/7, will be used mainly for storing or handling items, will not include retail sales, will not result in any additional traffic impacts and is of a size and scale that does not undermine this dominant purpose.

Considerations for characterisation	Comment
If the component is temporary, it is more likely to be ancillary; if it is regular (that is, will constitute an ongoing use for a long period of time), it is likely to be an independent use.	The parcel storage lockers are proposed as a permanent component of the development. However, their ongoing presence does not result in an independent land use. The lockers are intrinsically linked to, and operate as part of, the warehouse and distribution centre, facilitating the collection and distribution of parcels processed through the facility. They cannot operate independently of the warehouse and distribution centre and remain ancillary to, and supportive of, the dominant purpose of the development.
If the component goes beyond what is reasonably required in the circumstances for the development to implement the dominant purpose, it is likely to be an independent use (regardless of whether it has ancillary qualities).	The proposed parcel storage lockers will utilise the proposed car parking arrangement and will not result in any additional traffic impacts, with 10 short term parking spaces provided. The proposal results in 75 surplus car parking spaces and can therefore adequately accommodate the short-term parking for the lockers.
Related components of a development are likely to have an ancillary relationship, although this is not necessarily determinative of such a relationship.	As detailed above, the proposed parcel storage lockers will have several related components to the warehouse or distribution centre purpose, such as traffic arrangements, storage and handling of items and 24/7 operation.
Physical proximity of the component to the rest of the development is likely to be evidence of an ancillary relationship, although again not necessarily determinative.	The proposed parcel storage lockers are both located adjacent to and integrated to the proposed 2B car parking area and is proximate to Building 2B.

Table 6: Parcel locker ancillary development

Based on the above, while parts of the proposed parcel storage lockers will operate independently of the warehouse and distribution use, it will largely operate in a way that is ancillary to this use as:

- will operate 24/7
- is located proximate to Building 2B
- will not result in any additional traffic impacts, relying on the proposed parking spaces and arrangement; and
- is of a size and scale that is small and does not undermine the dominant purpose.

3.4 Lot 2C

The proposed development will also include Lot 2C (former Precinct 5) within the north-east corner of the site. The proposed works within Lot 2C are limited to hardstand for vehicle parking, flood mitigation and road infrastructure. This area is proposed to accommodate a portion of Building 2B parking for heavy rigid and trailer vehicles and a stormwater basin. It will connect to Lot 2B via a new internal private access road. This lot is proposed to be subdivided into a part lot with Precinct 2B. This is to ensure services can remain private between the development, given the proposed future freight corridor.

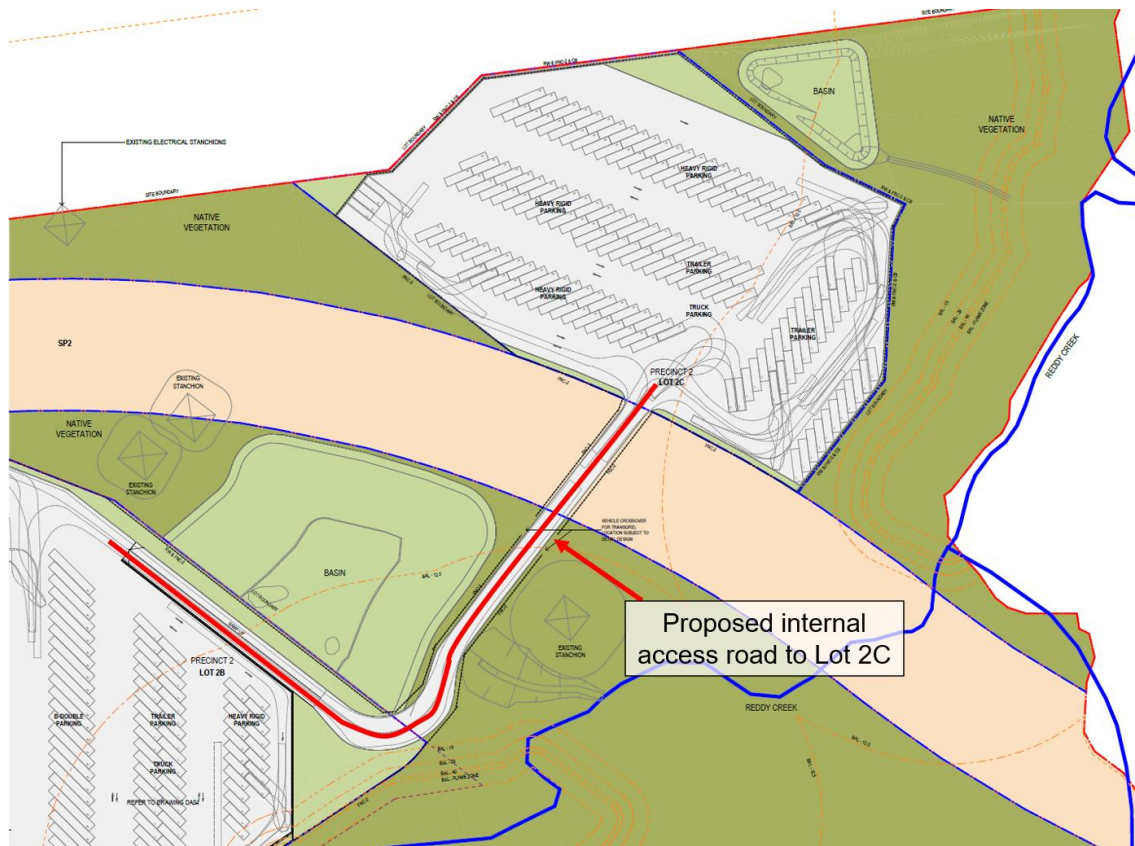


Figure 17: Proposed Lot 2C layout (Source: Goodman)

3.5 Internal estate infrastructure

3.5.1 Remediation and earthworks

Remediation works are enabled under DA 347.1/2021 and will be completed in accordance with the MOP and Rehabilitation Management Plan.

As outlined in Section 1.3, significant rehabilitation works have been undertaken and are ongoing at the site. Notwithstanding, additional rehabilitation works are required as part of this SSDA, including a proposed additional containment cell estimated to hold 40,000m³ of contaminated soil (including previously assessed works under DA 347.1/2021) (refer Figure 16). An updated RAP has been prepared to support this SSDA to address additional contaminated material to be stored at the site beyond that approved under DA 347.1/2021.

A summary of applications and quantum of material approved, stored, and proposed to be stored at the site within the expanded contamination cell is provided in the table below.

Application	Total (m³)
DA 347.1/2021	30,000
BIC-53879	121,472 (including 30,000m³ approved material under DA 347.1/2021), noting this includes: • 66,472 of contaminated material • 55,000 non-contaminated material
SSD-120888992 (subject application)	40,000

Table 7: Summary of approved, stored, and proposed contaminated material to be stored at the site

The current remediation works at the site are detailed within the below table.

Application	Remediation works										
DA 347.1/2021	As detailed in Section 1.3, a Remediation Action Plan (RAP) forming part of DA 347.1/2021 was approved to remediate and store a quantum of 30,000m³ of contaminated soil at the site in the form of containment cells. It is noted that a final RAP has not been submitted to the consent authority, being Council. Notwithstanding this, two containment cells have been constructed. Following detailed investigations post-approval, the quantum of contaminated material at the site exceeds 30,000m³ as originally quantified under the RAP and approved under the consent for DA 347.1/2021. A Building Information Certificate (BIC-53879) has been lodged to regularise the construction of the containment cells and additional material, as detailed below.										
BIC-53879	BIC-53879 has been lodged with Council seeking to regularise the construction of these containment cells and the additional quantum beyond the approved 30,000m³ stored at the site. A summary of the total quantum of contaminated material stored in the existing cells is provided in the table below. <table> <tr> <th>Description</th><th>Total (m³)</th></tr> <tr> <td>Contaminated material (ACM)</td><td>51,986</td></tr> <tr> <td>Contaminated material (TRH)</td><td>14,486</td></tr> <tr> <td>Non Contaminated material</td><td>55,000</td></tr> <tr> <td>Total material stored</td><td>121,472</td></tr> </table> Table 8: Total quantum of contaminated material stored in existing cells	Description	Total (m³)	Contaminated material (ACM)	51,986	Contaminated material (TRH)	14,486	Non Contaminated material	55,000	Total material stored	121,472
Description	Total (m³)										
Contaminated material (ACM)	51,986										
Contaminated material (TRH)	14,486										
Non Contaminated material	55,000										
Total material stored	121,472										
SSD-12088892	The works under SSD-12088892 are proposing a 40,000m³ contaminated material cell on top of the previously stored amounts under DA 347.1/2021 and BIC-53879.										

Table 9: OEE recent remediation works

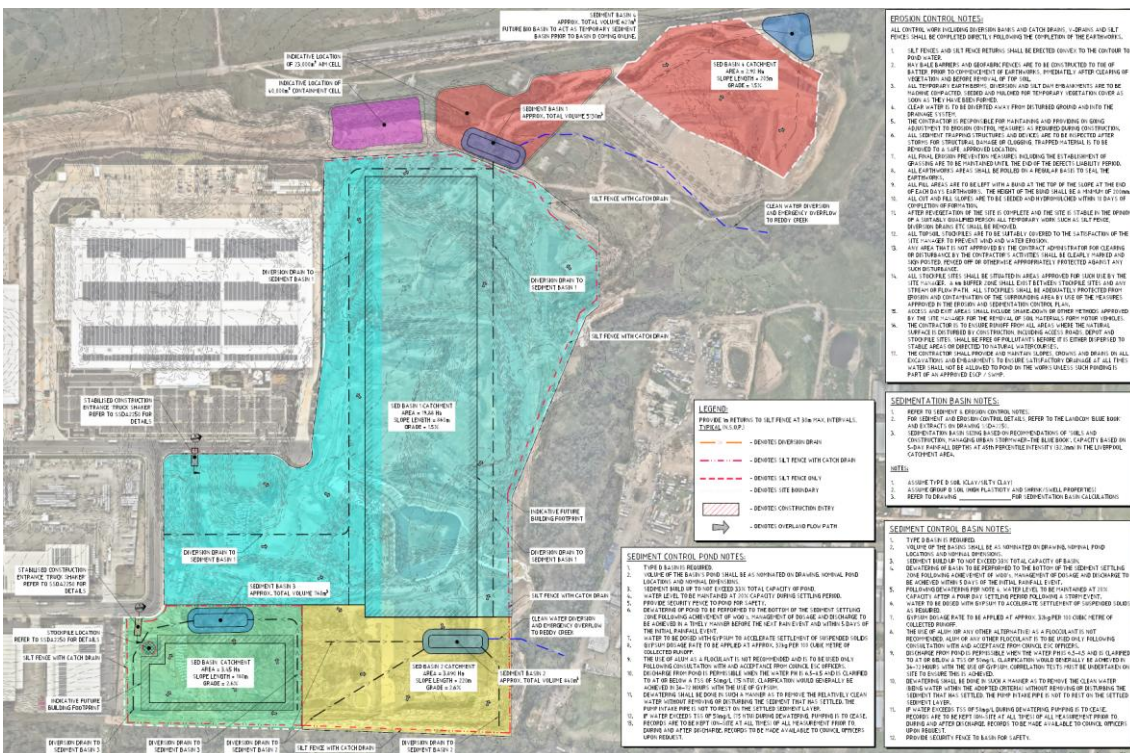


Figure 18: Containment cell detailed in purple (Source: Costin Roe Consulting)

The application seeks consent for bulk earthworks to enable the construction of the proposed development. This will require amendments to the building pad levels approved under SSD 37486043.

The proposed development will build upon the approved and completed levels under DA 347.1/2021 (as modified). 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.

The proposed levels will finish at the following:

- P2 Upper Pad (Warehouse 2A pad) – At DA level (BE 77.5)
- P2 Lower Pad (southern Warehouse 2B pad)– At DA level (BE 71.5)
- P4 Lower Pad (northern Warehouse 2B pad)– At approximately BE 66 (circa 4m below approved BE 70 level)

The proposed bulk earthworks include approximately 550,000m³ fill importation required as either VENM, ENM or Resource Recovery Order under Section 286A of the PoEO Act 1997. 1.1.1 The proposed cut and fill plan is included at Appendix 11c.

3.5.2 Retaining walls

The proposal includes construction of retaining walls including importation of engineered backfill, and modification of existing retaining walls. The external retaining

walls remain consistent with those approved under SSD 37486043. Proposed retaining walls within Precinct 2 include:

- RW1 - 320m long in fill retaining wall with a maximum height of 6.8m. This wall separates Lot 2A and Lot 2B.
- RW2 - 320m long in fill retaining wall with a maximum height of 6.8m. This wall goes around the Lot 2B car parking area.
- RW3 - 75m long in cut retaining wall with a maximum height of 5.2m. This wall is located where Lot 2B adjoins the cul-de-sac.
- RW4 - 165m long in fill retaining wall with a maximum height of 4.2m. This wall is located between the Lot 2B truck parking and the access road leading to Lot 2C.
- RW5 - 145m long in fill retaining wall with a maximum height of 7.5m. This wall is located between Basin C and the access road leading to Lot 2C.

The locations of the proposed and existing retaining walls are shown in the retaining wall setout plans in the Civil Engineering Plans at Appendix 11c.

3.5.3 Noise barriers

There are several noise bunds and barriers proposed across the site. The intent of these walls is to provide a permanent noise barrier between the proposed development and rural residential receivers to the south and east, noting a temporary noise wall was approved under SSD 37486043, detailed in Figure 17 below.



Figure 19: Temporary Noise Barrier Location (Source: SSD 37486043 Consent - Appendix 4)

A summary of the temporary noise bund and permanent noise barriers proposed for Precincts 1 and 3 only and when all Precincts are developed is provided below.

Precincts 1 and 3

- 5m high temporary noise bund to the north of proposed Building 2A (refer Figure 18). This is required as a temporary solution when Precincts 1 and 3 are operational, but buildings 2A and 2B in Precinct 2 are yet to be constructed, meaning that acoustic shielding provided by these two buildings would not be present.

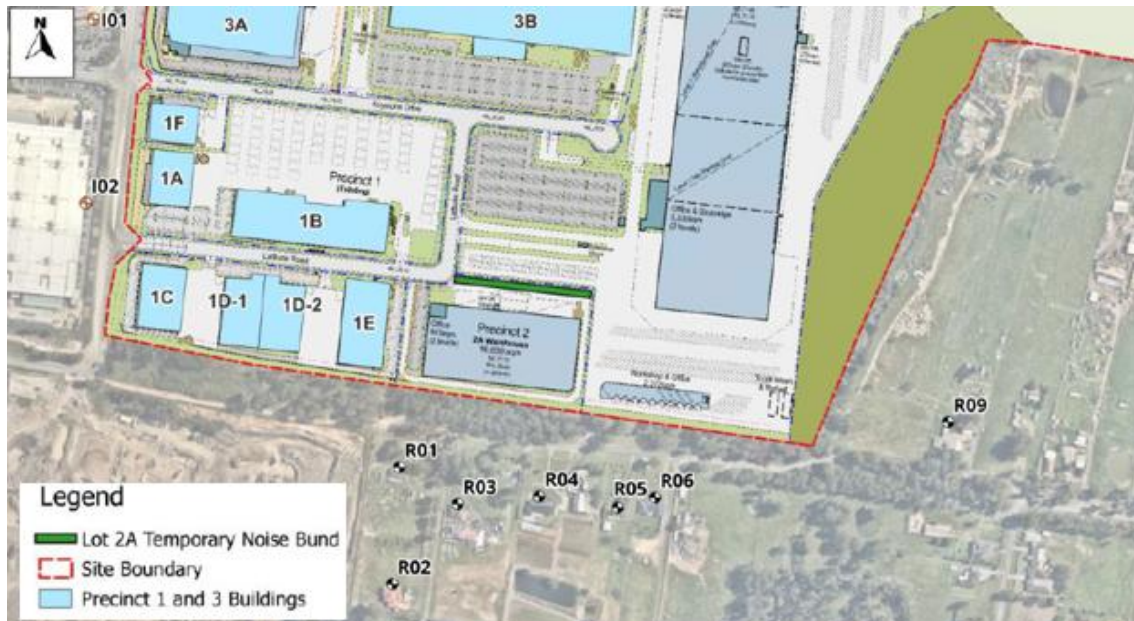


Figure 20: Proposed permanent acoustic wall for Precincts 1 and 3 only (Source: RWDI)

All Precincts

- the southern and eastern boundaries of the site, adjoining the future SLR and riparian corridor, noise barriers ranging in height from 2m to 12m
- 5m high noise barrier between Building 2A and 2B
- 12m high noise barrier adjacent to the truck car wash in the southeastern corner of the site

The proposed noise barriers once all Precincts are completed are detailed in Figure 19.

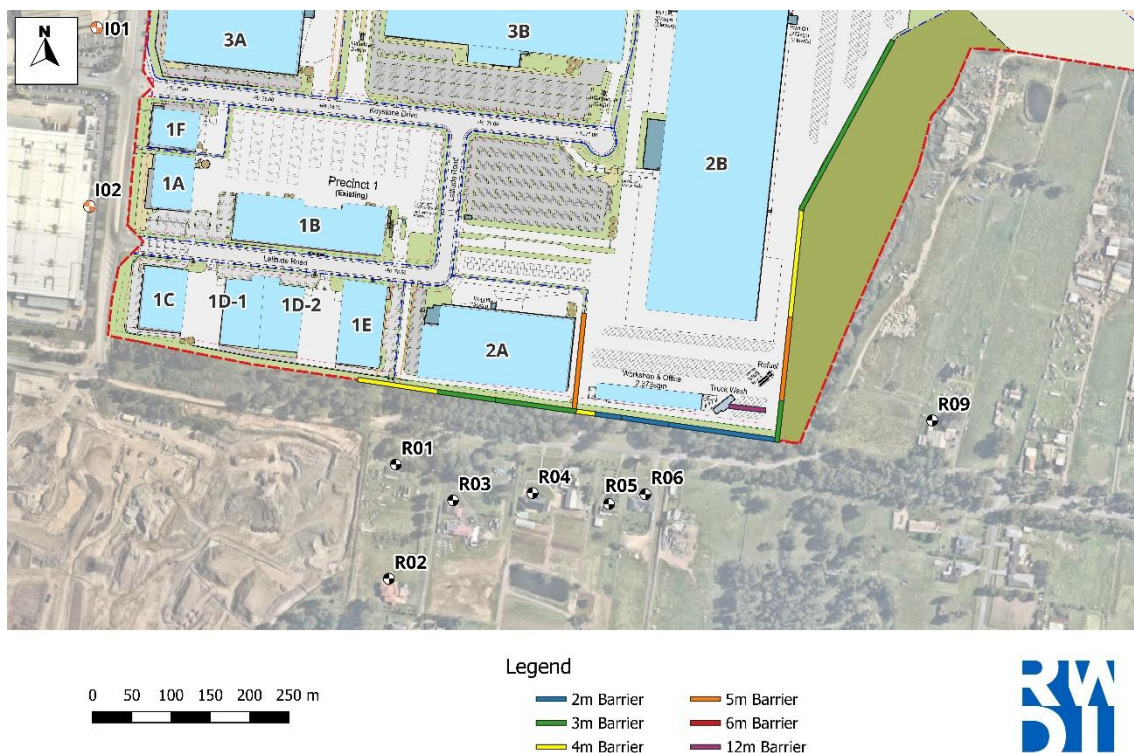


Figure 21: Proposed noise barriers for all Precincts (Source: RWDI)

The proposed noise barriers are estimated to be between 2m - 12m, with all boundary barrier heights relative to the natural terrain level. The noise barrier walls are indicative and subject to a future Design Noise Verification Statement that will confirm design details and suitability, at appropriate construction certificate stage.

3.5.4 Road and servicing amendments

Road and servicing amendments are proposed to Stage 1 to reflect the revised building layout under the proposed masterplan. A feeder is required for the Lot 2B and 2C site.

A feeder route has been installed via existing works completed on behalf of EE to service the estate.

On 11 May 2026, a service application (UIL8298) was lodged with EE for additional 11Kv feeder.

The proposal includes the removal of the spine road and associated services between Precinct 2 and 4. All servicing for Precinct 2 will be undertaken from the existing road reserve, with internal reticulation to Lot 2C done through Lot 2B given the Lots are proposed to be part lots.

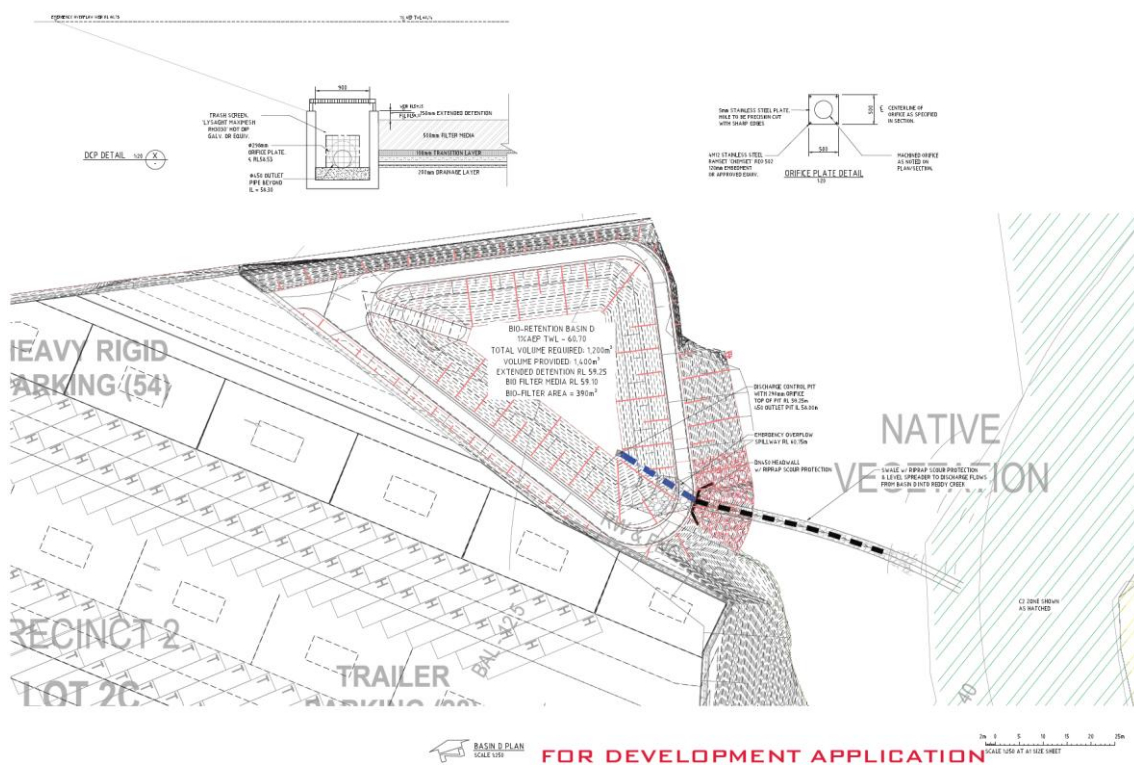
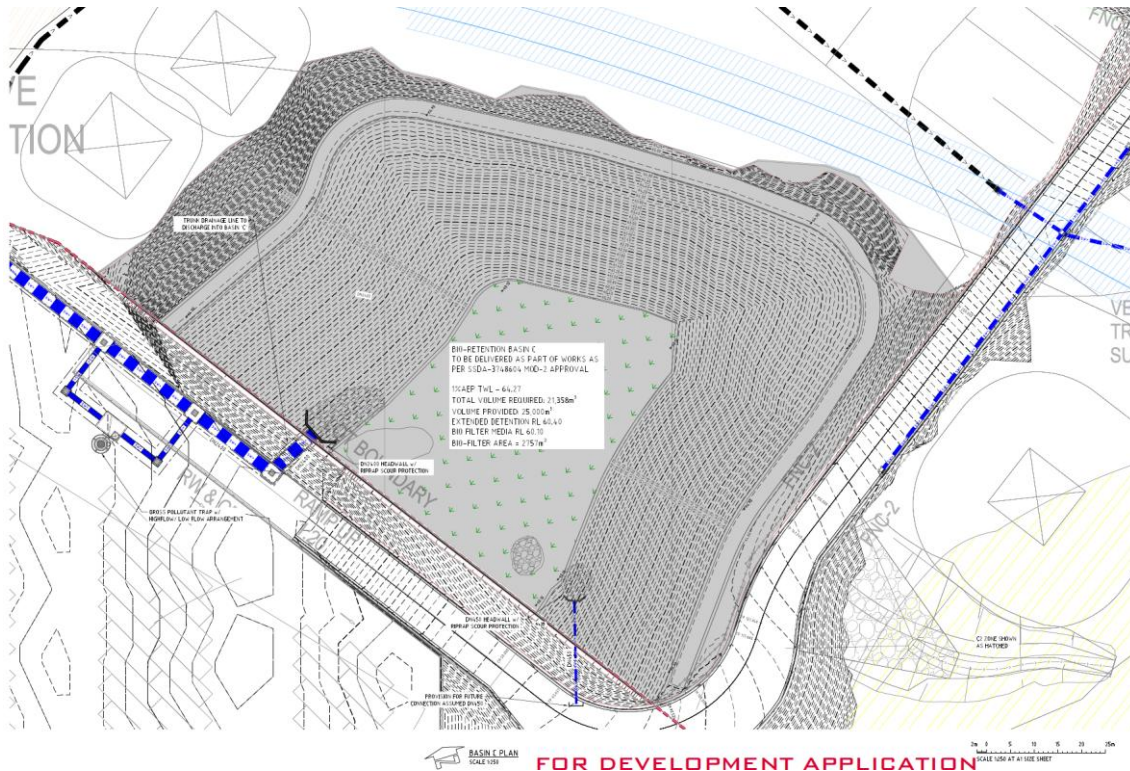
The trunk drainage system approved for OEE requires realignment to facilitate the proposed building layout. Trunk drainage will be diverted around the northern side of Building 2B and placed within an easement designed in accordance with Fairfield City Council's Stormwater Management Policy and Specification for Roadworks and Drainage.

3.5.5 Stormwater management

Proposed stormwater management infrastructure includes the construction and fit-out of Stormwater Basin D in Lot 2C and construction of Stage 1 stormwater discharge line through Building 2B to Basin C, including:

- stage 1 stormwater through Lot 2B and associated easement
- temporary on-site detention (OSD) per Condition D58 of SSD 37486043 being moved to basin C footprint, with Bio basin fit out to be completed prior to demolition. It is intended that Basin C will not take dirty water from Precinct 2 catchment until stabilised, and on lot basins will be completed in the interim

Stormwater management plans are included in the Civil Engineering Plans at Appendix 11c. The proposed stormwater basins are detailed in the figures below.



3.6 Subdivision

The proposed subdivision plan for the site is provided at Appendix 30 and shown at Figure 22 below. Lot 109 DP 1293112 is proposed to be subdivided into:

- Lot 110 DP 1293112
- Lot 111 DP 1293112
- Lot 112 DP 1293112
- Lot 113 DP 1293112

Notably, the proposed subdivision of Lot 110 into part lots is due to the same tenant being proposed, and so services are internally reticulated.

This subdivision pattern reflects the proposed building layout on the site.

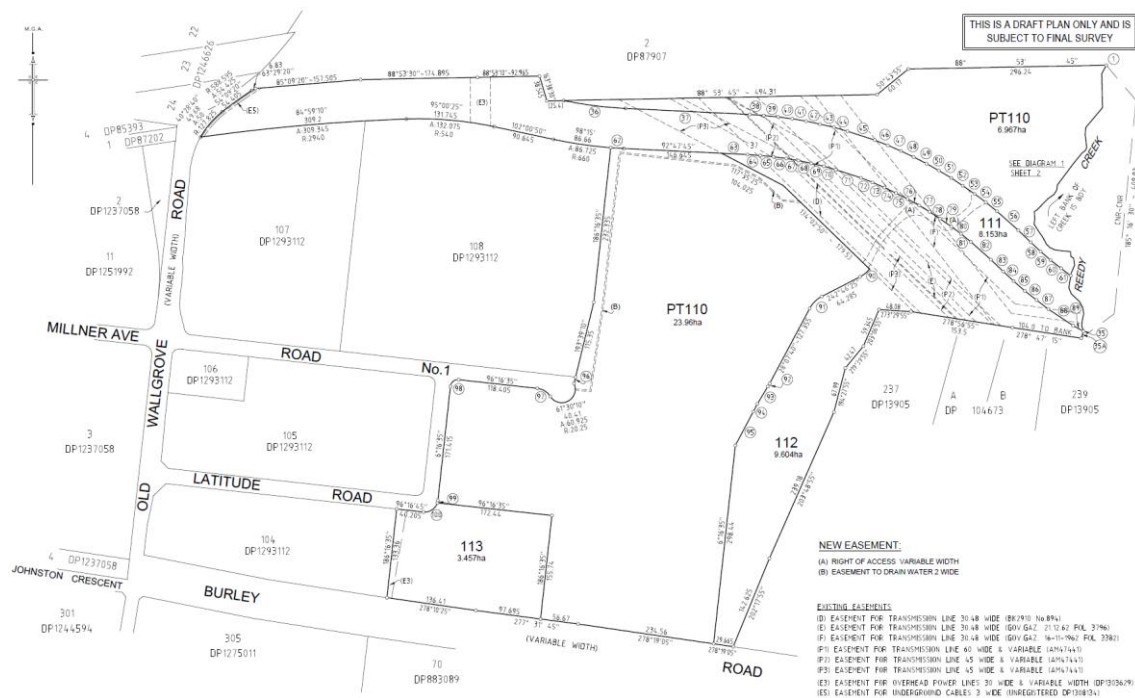


Figure 24: Subdivision plan (Source: Goodman)

3.7 Staging

The proposed development will be constructed and delivered in one stage.

3.8 Modifications to Concept and Stage 2 SSDA (SSD 3476043)

As part of the proposed works under this SSDA, the following modifications are required to the Concept Approval and Stage 2 Infrastructure works previously approved under SSDA 37486043, pursuant to section 4.55(1A) of the EP&A Act by modifying the Concept DA as follows:

- Amendment to approved Masterplan and Subdivision plan to consolidate the existing Precinct 2, 4 and 5 into a single Precinct 2
- Amendment of Stage 2 infrastructure scope to accommodate revised and consolidated Precinct 2, 4 and 5 layouts
- Amendment of Development Controls, including those prescribed under Conditions A8, A9 and A10 of the consent, specifically:
 - Building Height
 - Maximum GLA and GFA
 - Increase maximum permissible vehicle size from a 30 m super B-double to a 36.5m B-triple (Condition D14)

The proposed and existing approved OEE Masterplans are detailed within Figure 23 and Figure 24 below.

The proposed modifications to conditions under the SSD-37486043 development consent are detailed within Appendix 7. An assessment of the proposal against the provisions of Section 4.55(1A) of the EP&A Act is provided at Section 4.4.

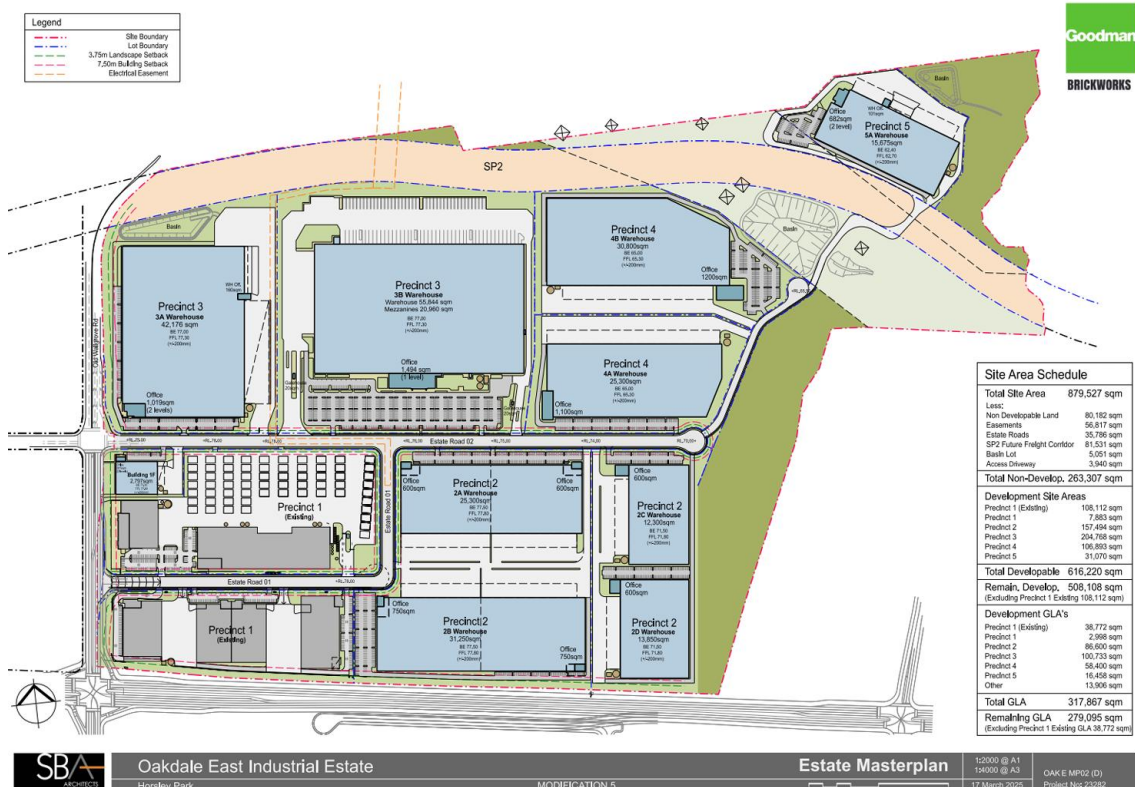


Figure 25: Approved OEE Masterplan from MOD 5 SSD 37486043 (Source: SBA)

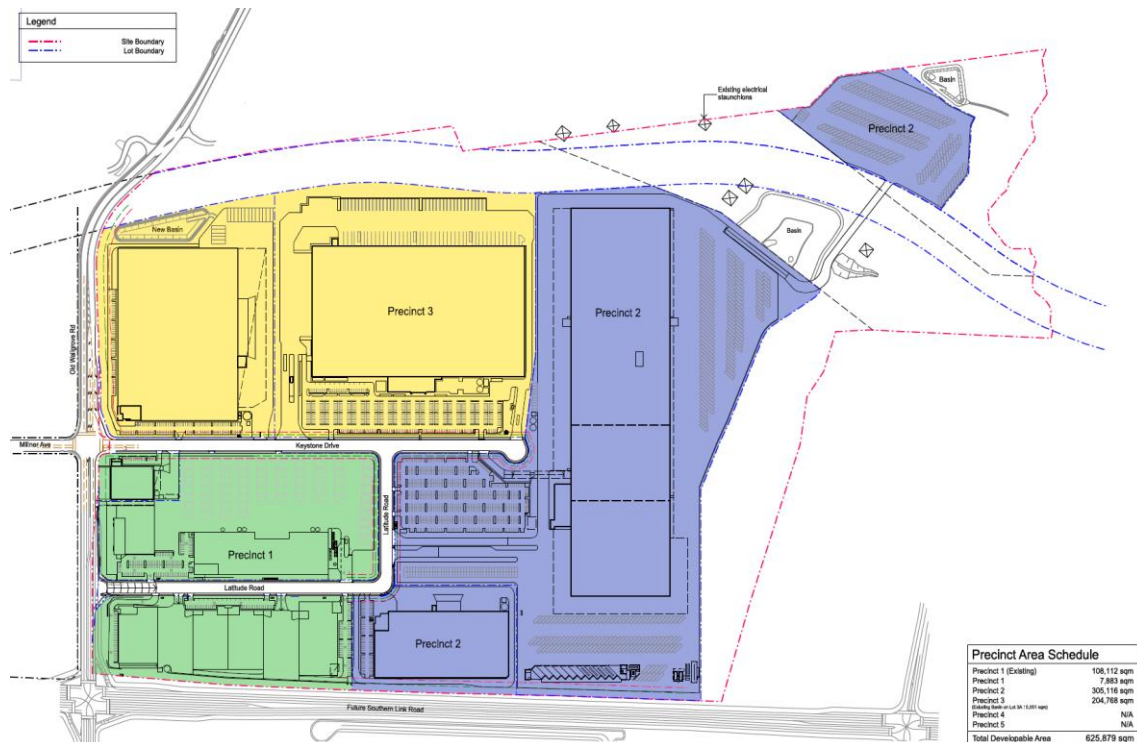


Figure 26: Updated Precinct Plan (Source: SBA)

3.9 Completed OEE

As detailed above, following any future approval of this SSDA the OEE will operate as follows:

- Stage 1 - operational
- Building 3A - under construction
- Building 3B - operational
- Building 1F - construction not yet commenced

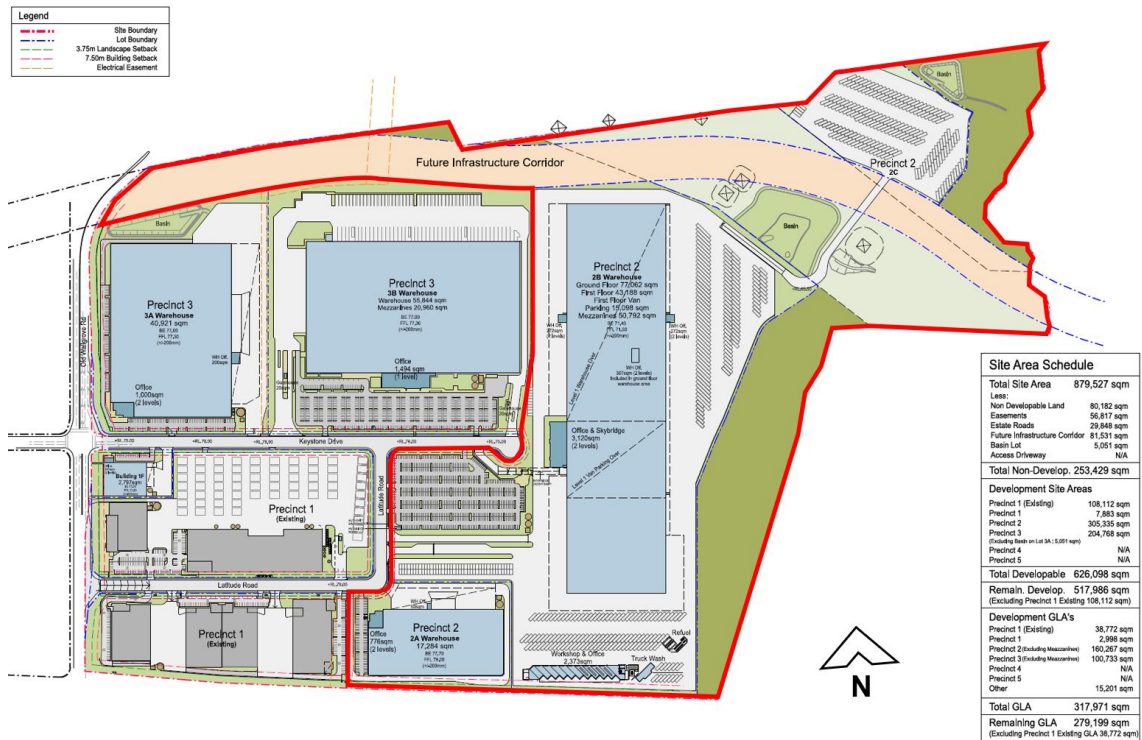


Figure 27: Proposed OEE Masterplan (Source: SBA)

4 Statutory context

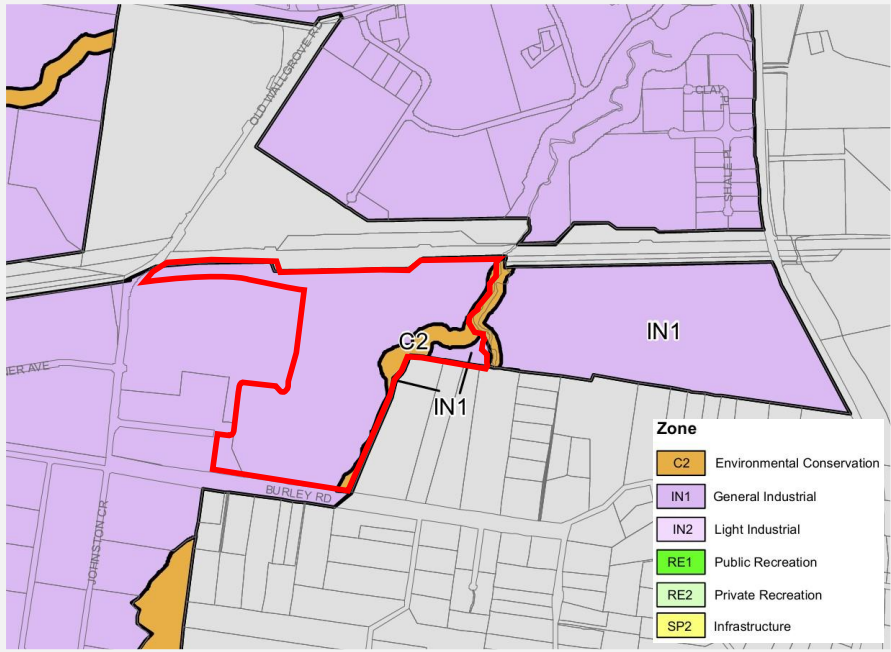
This application has been prepared pursuant to Part 4 of the EP&A Act. Further, this application is an SSD application pursuant to section 4.12(8) of the EP&A Act and requires development consent under section 4.2 of the EP&A Act.

The following legislation and environmental planning instruments (EPIs) are relevant to the proposal:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Protection of the Environment Operations Act 1997*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resources and Energy) 2021*
- *Fairfield Local Environmental Plan 2013*
- *Oakdale East Development Control Plan*

The legislation and EPIs above have been addressed in detail at Appendix 6 and specific key considerations are addressed within the sections below.

Category	Comment
Power to grant approval	The proposal is for a warehouse and distribution development (and associated works described previously in this letter). The proposal is SSD pursuant to Section 12 of Schedule 1 of the Planning Systems SEPP as Building 2B and Lot 2C of the development has an estimated cost of \$633,697,216 (excl. GST) (see Appendix 1a) which meets the \$50 million threshold and is a 'single operation' (interpreted as a single warehouse). Additionally, Building 2A is required to be included within this SSDA to provide the necessary infrastructure works (i.e. earthworks and retaining walls) to deliver the Building 2B and Lot 2C development works. Furthermore, it is required to model and achieve the overall noise management strategy for the site. The Minister for Planning and Public Spaces (or Independent Planning Commission) is the consent authority pursuant to Section 4.5(a) of the EP&A Act.

Category	Comment
	Additionally, the site is land identified as “affected land” on the State Environmental Planning Policy (Infrastructure) 2007 Water Supply Infrastructure Map under the Transport and Infrastructure SEPP. The proposed development will be consistent with the Guideline for Development Adjacent to the Upper Canal and Warragamba Pipelines, published by Water NSW in September 2021.
Permissibility	The site is predominantly zoned IN1 General Industrial, with a small portion of the site along the eastern boundary zoned E2 Environmental Conservation, under the Industry and Employment SEPP. Development for the purposes of a warehouse and distribution centre is permissible with consent in the IN1 General Industrial Zone. As detailed in Section 3.3.11, the proposed parcel storage lockers have been assessed to be ancillary to the overall use of the site for warehouse and distribution centre purposes.  Figure 28: Zoning map identifying the OEE outlined red (Source: Industry and Employment SEPP) A further portion of the site is mapped for a Future Infrastructure Corridor under the Transport and Infrastructure SEPP. The only works proposed within the Future Infrastructure Corridor are earthworks and rehabilitation work for the expanded containment cell, flood mitigation works and roads providing connection to Lot 2C (former Precinct 5). Both works within the Future Infrastructure Corridor are permissible with consent under the Transport and Infrastructure SEPP.

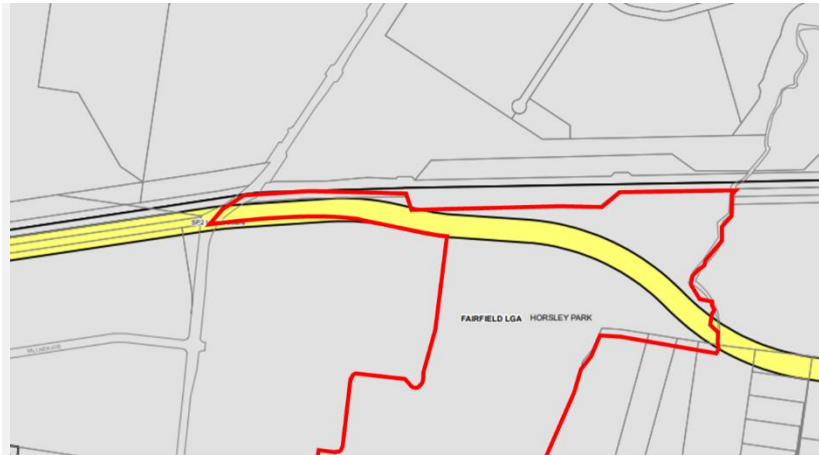


Figure 29: Major corridors map (site outlined dashed red) (Source: Transport and Infrastructure SEPP)

The proposed expansion to the approved containment cell (DA 347.1/2021), is proposed under this SSDA. The expansion cell is required to fulfill the rehabilitation obligations under DA 347.1/2021 (as modified) as the EIS assumed up to 40,000m³ of material stored on-site.

The containment cell is permissible on the site as it is ancillary to the remediation works required to enable warehouse and distribution centre uses which are permissible with consent in the IN1 zone. Despite the containment cell exceeding the 30,000m³ threshold for storage of contaminated land under Clause 20, Schedule 3 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), it is not considered designated development as it is ancillary to the warehouse and distribution centre, pursuant to Clause 49, Schedule 3 of the EP&A Regulation.



Figure 30: Aerial view of the broader site (outlined in yellow) and the three containment cells (Source: Nearmap)

Category	Comment
Key development standards	• Height: ○ Oakdale East DCP: Maximum building height of 15m. Building 2A has a height of 14.6 m (excluding solar) and will comply with this control, while Building 2B will exceed this control with a height of 25m (excluding plant. roof access points and solar), requiring proposed amendment to the Concept approval. An updated Visual Impact Assessment (VIA) has been prepared to assess the impacts from this proposed height exceedance to surrounding sensitive receivers. • FSR: ○ IN1 zone: No numeric control ○ E2 zone: N/A - no building / GFA proposed in this zone.
Development Control Plan	• Section 2.17 of the I&E SEPP outlines that consent must not be granted unless a development control plan has been prepared for the land. • The Oakdale East Estate Development Control Plan (DCP) applies to the site. • However, as the proposal is SSD, the DCP does not apply in accordance with Section 2.10 of the Planning Systems SEPP. • The SSDA will modify the Concept plan approved under SSDA 37486043 to amend the DCP controls in relation to the building height and GLA.
Other approvals	• <i>Biodiversity Conservation Act 2016</i> (BC Act 2016): All relevant biodiversity matters, including clearing and offsets, were addressed in the Biodiversity Development Assessment Report (BDAR) for the OEE under SSD 37486043 (refer Appendix 8a). A Biodiversity Impact Assessment Report (BIAR) has been prepared and submitted as part of this SSDA (refer Appendix 8b). • <i>National Parks and Wildlife Act 1974</i>: Although an Aboriginal heritage impact permit (AHIP) under section 90 of the NPW Act is not required for SSD (per section 4.41(d) of the EP&A Act), an Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared and submitted as part of SSD 37486043. Given this, a new ACHAR is not required and submission of a consistency letter as part of this SSDA suitably addresses any impacts in relation to Aboriginal Cultural Heritage (refer Appendix 12b). • <i>Water Management Act 2000</i>: No controlled activities are proposed under this application. • <i>Contaminated Land Management Act 1997</i>: Contamination for the broader OEE was addressed under the DA 347.1/2021. The site was assessed to be suitable for proposed industrial uses. Notwithstanding, a RAP has been prepared and submitted as part of this SSDA for: ○ the expanded containment cell and up to 162,000m³ of total contaminated material stored on site (or circa 2.5% of the total 5,000,000m³ remediated under DA 347.1/2021)

Category	Comment
	- import of 550,000m³ ENM, VENM, RRO - Precinct 5 (i.e. Lot 2C) data gap (not assessed under RAP for SSD 37486043 or DA 347.1/2021)
Pre-condition to exercising the power to gain approval	Pre-conditions to exercising the power to gain approval are discussed at Section 4.14.1 and addressed in detail at Appendix 6.
Mandatory matters for consideration	Mandatory matters for consideration are discussed at Section 4.2 and addressed in detail at Appendix 6.

Table 10: Statutory requirements relevant to the project

4.1 Pre-conditions

The table below outlines the pre-conditions to exercising the power to grant approval that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Pre-condition	Comment	EIS ref.
Environmental Planning & Assessment Regulation 2021		
Section 66 of the EP&A Regulation requires that a contributions plan must be approved for land prior to any development application being determined. Alternatively, if there is no contributions plan in place, the developer may enter into a planning agreement for the matters that may be the subject of a contributions plan.	The provisions of the <i>Fairfield City Local Infrastructure Contribution Plan 2023 (Section 7.11 & s.7.12) (2023-2041)</i> apply to the land. The relevant Section 7.12 contributions will be imposed on any consent granted. Accordingly, the requirements of this section of the Regulation are satisfied.	-
Protection of the Environment Operations Act 1997 (POEO Act)		
Pursuant to Chapter 3 of the POEO Act, an Environment Protection Licence (EPL) is required for certain scheduled activities listed under Schedule 1 of the Act	The proposed remediation works will be undertaken in accordance with the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) and the requirements of the NSW Environment Protection Authority (EPA).	-

Pre-condition	Comment	EIS ref.
	Where required under Schedule 1 of the POEO Act, an Environment Protection Licence (EPL) will be obtained for the remediation works prior to the commencement of any licensed activities. The EPL process will address the detailed operational and environmental management measures for the remediation works, including matters such as waste handling, dust suppression, noise management and contamination controls. Accordingly, the detailed regulation of the remediation activities will occur through the EPA licensing framework following development consent, including obtaining an EPL for associated remediation works.	
Biodiversity Conservation Act 2016		
Section 6.12 of the BC Act requires that a biodiversity development assessment report is prepared by an accredited person in relation to proposed development or activity that would be authorised by a planning approval or proposed clearing that would be authorised by a vegetation clearing approval.	A BIAR has been prepared by Ecologique and is provided at Appendix 8b. All relevant biodiversity matters were addressed and offsets made under SSD 37486043. Notwithstanding, the original BDAR for SSD 37486043 has been provided at Appendix 8a for reference.	Appendix 8a
State Environmental Planning Policy (Industry and Employment) 2021		
A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.	The proposal seeks approval to display business identification signage associated with Building 2A and 2B. The proposed signage is consistent with the objectives of Chapter 3 of the Industry and Employment SEPP.	Appendix 6
State Environmental Planning Policy (Resilience and Hazards) 2021		

Pre-condition	Comment	EIS ref.
In determining whether a development is potentially hazardous industry consideration must be given to current circulars of guidelines published by DPHI relating to hazardous or offensive development (Section 3.7)	The proposal involves storage of dangerous goods (DGs) within both Building 2A and Building 2B. The quantity of DGs to be stored within both buildings will be below the quantitative thresholds prescribed under the <i>Hazardous and Offensive Development Application Guidelines - Applying SEPP 33</i> . The Risk Assessment Report prepared by Riskcon Engineering confirms that no further hazard assessment is required.	Appendix 18
A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is proposed to be carried out. (Section 4.6)	Remediation works are enabled under the Mining Lease (M(MO)L7) and will be completed in accordance with the MOP and Rehabilitation Management Plan. A containment cell estimated to hold 40,000m ³ metres of contaminated soil is proposed as part of this SSDA. An updated RAP has been prepared to support the SSDA to address additional contaminated material to be stored at the site beyond that approved under DA 347.1/2021 (refer Appendix 13). Goodman have received feedback from TfNSW on the containment cell expansion included within the SSDA which is generally supportive, subject to conditions requiring the containment cell receive Level 1 sign off and SAS. A Site Remediation and Validation Report will be prepared following completion of these works to confirm that the site is suitable for the proposed development	Section 6 Appendix 13a - 13c
State Environmental Planning Policy (Transport and Infrastructure) 2021		
The consent authority must give written notice to the electricity supply authority for the area in which the development is to be carried out, inviting comments about potential safety risks, and take into consideration any response to the notice that is received within 21 days after the notice is given. (Section 2.48)	The proposal is considered development likely to affect an electricity transmission or distribution network as it involves the works within proximity to electricity networks, such as Ausgrid and telecommunication underground assets. DPHI must notify the electricity supply authority of the application.	Section 6

Pre-condition	Comment	EIS ref.
The consent authority must notify TfNSW within 7 days of the application being made as the proposal is traffic generating development. (Section 2.122)	The proposal is considered traffic generating development under Schedule 3 of the Transport and Infrastructure SEPP. DPHI must notify TfNSW of the application. An updated Transport Accessibility and Impact Assessment (TAIA) has been prepared which assesses the proposal's parking, vehicle movements, unsuitable material export (i.e. excess topsoil), B-triple truck access, swept paths and construction traffic management.	Section 6 Appendix 14

Table 11: Pre-conditions table

4.2 Mandatory considerations

The table below outlines the relevant mandatory considerations to exercising the power to grant approval, that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Mandatory consideration	Comment	EIS ref.
Environmental Planning and Assessment Act 1979		
Relevant objects of the Act (Section 1.3)	The proposal addresses the objectives of the Act as it: • promotes social and economic welfare of the community by contributing to employment generating uses within the WSEA and providing essential distribution services across the surrounding regional area whilst ensuring protection of the surrounding conservation land and natural environment. • is consistent with the zoning of the site. • promotes productivity by creating job opportunities in the construction and operation of the development. • promotes amenity and proper construction, including protection of occupant health and safety, through high-quality design; and • incorporates measures to facilitate ecologically sustainable development.	Appendix 6
Relevant environmental planning instruments (Section 4.15)	The proposal seeks development consent under Part 4 of the Act. The relevant EPIs are addressed at Appendix 6.	Appendix 6

Mandatory consideration	Comment	EIS ref.
Relevant planning agreements or draft planning agreements (Section 4.15)	A VPA between Goodman and the Minister for Planning was entered under Section 7.4 of the EP&A Act in 2023 in relation to the OEE. In accordance with the VPA, the application of s7.11 and 7.12 of the Act is not excluded in respect of the development.	Section 2.4
Relevant Development control plans (Section 4.15)	The OEE Development Control Plan 2024 is relevant to this proposal. While development control plans do not apply to SSDs under Section 2.10 of the Planning Systems SEPP, the relevant controls have been considered and amended as part of this SSDA.	Appendix 6
Section 4.55(1A)	This SSDA also seeks to modify SSD 37486043 pursuant to section 4.55(1A) of the Act. The proposed changes include the following modifications: • amendment to approved Masterplan and Subdivision plan to accommodate revised Precinct 2, 4 and 5 layout which will be consolidated into a single Precinct 2, resulting in a total of three precincts (Precinct 1, 2 & 3). • amendment of Stage 2 infrastructure scope to accommodate revised and consolidated Precinct 2, 4 and 5 layouts • amendment of Development Controls, including those prescribed under Conditions A9 and A10 of the consent, specifically: ○ <i>Building Height</i> ○ <i>Maximum GLA</i> • increase maximum permissible vehicle size from a 30 m super B-double to a 36.5m b-triple (Condition D14) This application, inclusive of the modifications to the Concept Approval under SSD 37486043, seeks to facilitate the development of Building 2A and 2B along with associated internal infrastructure changes. An assessment of the proposed modifications against Section 4.55(1A) of the EP&A Act is provided at Section 4.4.	Section 4.4 Appendix 7

Mandatory consideration	Comment	EIS ref.
	The Mining Lease and consent for SSD 77020757 will be surrendered once a satisfactory DA is received.	
State Environment Planning Policy (Resilience and Hazards) 2021		
Under section 4.6, in determining a development application, consideration must be given to whether land is contaminated.	Remediation works are enabled under the Mining Lease (M(MO)L7) and will be completed in accordance with the MOP and Rehabilitation Management Plan. A Site Remediation and Validation Report will be prepared following completion of these works to confirm that the site is suitable for the proposed development.	-
State Environment Planning Policy (Transport and Infrastructure) 2021		
For traffic-generating development, the consent authority must take into consideration any submission from Transport for NSW and the accessibility of the site (Section 2.121)	The proposal is considered traffic generating development under Schedule 3 of the Transport and Infrastructure SEPP. The EIS considers traffic and access at Section 6.	-
State Environment Planning Policy (Resources and Energy) 2021		
The consent authority must consider impacts on water, agricultural and biodiversity resources; land use compatibility; amenity, transport and infrastructure impacts; heritage; greenhouse gas emissions; rehabilitation and closure outcomes; cumulative impacts; and whether the development is in the public interest (Section 2.20)	The proposal does not seek consent for ongoing mining or extractive industry operations and instead relates to the relinquishment of Mining Lease ML M(MO)L7. Accordingly, this section is of limited relevance. Notwithstanding, relevant environmental considerations associated with closure and rehabilitation have been addressed in this EIS.	-

Table 12: Mandatory considerations

4.3 OEE Concept Approval - SSD 37486043

The subject site is located within the OEE which was granted Concept and Stage 2 consent under SSD 37486043 (as modified).

Part A of SSD 37486043 includes conditions for the Concept Approval and Part B includes conditions for future DAs which need to be considered as part of future DAs. Part D includes conditions for Stage 2 works. An assessment against the key numerical requirements of Part A, B and D is provided in the tables below.

Condition	Control	Keylan Comments
Part A - Conditions for Concept Proposal		
A9	The maximum GLA for development on the site must not exceed the following limits. Warehouses and distribution centres and ancillary offices: 317,867m ²	Does not comply The total GLA of Precinct 2 across the proposed warehouses is 160,267m² . This will result in a total GLA of 317,971m ² across the OEE including existing development in Precincts 1 and 3, which exceeds the requirements by 104m ² . The relevant amendment to this condition is shown in Appendix 7.
A10	The Concept Proposal must be consistent with the development controls in Table 2.	An assessment of the Concept Proposal is provided in Table 13 below.
Part B - Conditions for Future Development Applications		
Development Controls		
B2	<i>Future DAs must demonstrate how the development complies with the development controls in Table 2.</i>	Complies An assessment of the development against the development controls in Table 2 is provided above. Where there are non-compliances as a result of this proposal, amendments to the conditions are proposed and provided at Appendix 7.
Noise and Vibration		
B3	<i>Future DAs must be accompanied by a Noise and Vibration Impact Assessment.</i>	Complies A Noise and Vibration Impact Assessment has been prepared by RWDI and is attached at Appendix 15.
Transport, Access and Parking		
<i>Transport</i> B4	<i>Future DAs shall be accompanied by a transport, access and parking assessment.</i>	Complies A Traffic and Accessibility Impact Assessment has been prepared by Ason Group and is attached at Appendix 14.

Condition	Control	Keylan Comments
Access B5 -	<i>Future DAs that propose an access road between Precincts 4 and 5 that traverses the WSFL corridor must include detailed plans showing levels of the access road and demonstrate the access road would not impact the ability to deliver and operate the future WSFL.</i>	Complies Detailed plans showing the internal access road between Lot 2B and 2C (former Precincts 2, 4 and 5) prepared in consultation with TfNSW are attached at Appendix 3b. A Traffic and Accessibility Impact Assessment has been prepared by Ason Group and is attached at Appendix 14. Impacts on the road network and mitigation measures are discussed at Section 6.7.
Access B6	<i>Future DAs must be accompanied by detailed plans and demonstrate measures to minimise road safety risks and congestion.</i>	
Visual Amenity		
Landscaping B7	<i>Future DAs must be accompanied by a landscape plan.</i>	Complies Landscape plans have been prepared by Scape and are attached at Appendix 9.
Outdoor Lighting B8	<i>Future DAs must ensure compliance with relevant Australian Standards.</i>	Complies As detailed within the Architectural Plans prepared by SBA (Appendices 3a - 3c) and BCA Report (Appendices 22a - 22c), the proposed outdoor lighting will comply with the relevant Australian Standards.
Signage B9	<i>Future DAs must include a signage strategy.</i>	Complies Signage plan is included within the Architectural Plans provided at Appendices 3a and 3b.
Building Materials B10	<i>Finished facades and roofs must use neutral, recessive colours, non-reflective materials and be designed to present an attractive façade to residential areas.</i>	Complies The proposed building materials use neutral, recessive and non-reflective materials. A material and finishes schedule is provided within the Architectural Plans at Appendices 3a and 3b.
Stormwater Management		

Condition	Control	Keylan Comments
B11	<i>Future development must comply with Fairfield City Council's Stormwater Management Policy</i>	Complies A stormwater management plan has been prepared by Costin Roe Consulting and is provided within the Civil Engineering Plans at Appendix 11a, 11b and 11c.
B12	<i>Future development must include an update to the Stormwater Management System Design.</i>	
Air Quality		
B13	<i>Future DAs must be accompanied by an Air Quality and Outdoor Impact Assessment.</i>	Complies An Air Quality Impact Assessment has been prepared by SLR Consulting and is attached at Appendix 17.
Hazards and Risk		
B14	<i>Future DAs must be accompanied by a Preliminary Risk Screening.</i>	Complies A Preliminary Risk Screening has been prepared by Riskcon and is attached at Appendix 18.
B15	<i>If the Preliminary Risk Screening indicates the development is 'potentially hazardous' a Preliminary Hazard Analysis must be prepared.</i>	Complies The Preliminary Risk Screening confirms that the quantities of DGs proposed for storage and transport does not exceed the threshold for 'potentially hazardous' development. Therefore, a Preliminary Hazard Analysis is not warranted.
Bushfire Protection		
B16	<i>Future DAs must comply with the provisions of NSW RFS' Planning for Bushfire Protection, the Bushfire Hazard Assessment for OEE and the relevant Australian Standard.</i>	Complies A Bushfire Hazard Assessment has been prepared by Blackash and is attached at Appendix 19.
Water NSW		
B17	<i>The applicant must consult Water NSW prior to lodgement of a DA for works on Precinct 5 adjoining the water pipelines corridor.</i>	Complies

Condition	Control	Keylan Comments
		As discussed in Section 5.1, WaterNSW have been contacted prior to lodgement of this application. They will continue to be consulted throughout the assessment process and will be provided the opportunity to make comment or submission during the exhibition period.
Sydney Water		
B18	<i>Future DAs must include a Compliance Certificate under section 73 of the Sydney Water Act 1994.</i>	Complies A Section 73 Compliance Certificate is provided at Appendix 21.
External Walls and Cladding		
B19	<i>External walls must comply with the relevant requirements of the BCA.</i>	Complies A BCA Report has been prepared by BM+G and is provided at Appendices 22a - 22b.
B20	<i>The products and systems proposed for use or used in the construction of external walls must comply with the requirements of the BCA.</i>	Complies A BCA Report has been prepared by BM+G and is provided at Appendices 22a - 22b.
Contamination		
B21	<i>Future DAs for Precinct 5 works must be accompanied by a site contamination assessment.</i>	Complies A RAP has been prepared by JBS&G and is provided at Appendix 13b.
Part D - Stage 2 Development Specific Environmental Conditions		
Permanent Noise Mitigation		
D10	<i>Within 12 months of the commencement of operation of warehouse 3B, or as part of a future DA in Precinct 2, the Applicant must prepare a Design Noise Verification Report detailing permanent noise mitigation measures, to the satisfaction of the Planning Secretary.</i>	Complies A Design Noise Verification Report has been prepared and submitted to DPHI.

Table 13: Assessment against conditions under SSD 37486043

Development Aspect	Control	Keylan Comments
Minimum building setbacks		
<i>Old Wallgrove Road</i>	<i>15m</i>	N/A The proposed buildings do not front Old Wallgrove Road.
<i>Estate Road</i>	<i>7.5m</i>	Complies The proposed buildings are setback at least 7.5m from Keystone Drive and Latitude Road.
<i>Southern Link Road</i>	<i>15m</i>	Complies The proposed buildings are setback at least 15m from the future Southern Link Road corridor.
<i>Corner Lots - secondary street frontage</i>	<i>5m</i>	N/A There are no proposed buildings on corner lots.
<i>Rear and side setbacks within the estate</i>	<i>5m</i>	Complies All proposed buildings are setback at least 5m from lot boundaries within the estate.
<i>WNSW water pipeline corridor</i>	<i>5m</i>	Complies The proposed buildings are located away from the water pipeline corridor.
Heights		
<i>Buildings in Precinct 1,2,4 and 5</i>	<i>15m</i>	Does not comply There are no buildings proposed in Precinct 1. Notwithstanding and as detailed in Appendix 7 and Section 4.4, this control is proposed to be modified under this SSDA. The modifications to this control will facilitate the proposed height of Building 2B and reflect the consolidated precinct layout. Building 2A has a maximum ridge height of 14.6m (excluding solar). Building 2B is located across former Precincts 2 and 4 and has a maximum ridge height of 24.6m (excluding plant, roof access points and solar).
<i>Buildings in Precinct 3</i>	<i>16.8m</i>	Not applicable

Development Aspect	Control	Keylan Comments
		There are no buildings proposed within Precinct 3.
Subdivision		
Minimum lot size	5,000m ²	Complies Proposed subdivision of Lot 109 will result in the following lot sizes. Lot 110: 30.927ha Lot 111: 8.153ha Lot 112: 9.604ha Lot 113: 3.457ha
Minimum street frontage	40m (excluding cul-de-sac)	Complies Proposed subdivision of Lot 109 will result in the following street frontages at Latitude Road and Keystone Drive. Lot 110: 289.8m Lot 113: 40.2m
Minimum width at building line	35m	Complies
Minimum depth	30m	Complies
Site Coverage		
Site coverage	Maximum 65% on each lot (excluding awnings)	Complies The site coverage across Precinct 2 is 52%.
Minimum landscaping setbacks from:		
Old Wallgrove Road and Southern Link Road	10m	Complies The landscaping setbacks are marked on the plans provided at Appendices 3a and 3b.
Collector Road	7.5m	
Local Estate Roads	3.75m	
Side boundary (internal)	No minimum requirement	
Rear boundary	2.5m	
Minimum Tree Canopy		

Development Aspect	Control	Keylan Comments
<i>Minimum tree canopy cover on lot (once mature)</i>	10%	Complies The proposed tree canopy cover is as follows. Lot 2A: 10.49% Lot 2B & C: 10.97% Precinct 2 total area: 10.92%
Parking Rates		
<i>Parking Rates</i>	• 1 space per 300 m2 of warehouse GFA; • 1 space per 40 m2 of office GFA; and • 1 space for accessibility parking for every 100 car parking spaces • A minimum 5% of car parking spaces to be electric vehicle charging stations	Complies Building 2A requires 79 car parking spaces and provides 79 car parking spaces including 2 accessible spaces. Building 2B requires 572 car parking spaces and provides 646 car parking spaces including 7 accessible spaces. Both buildings provide the minimum 5% electric vehicle charging stations.

Table 14: Consistency with SSD 37486043 Part A conditions

4.4 Section 4.55(1A) of the EP&A Act

The provisions under Section 4.55(1A) of the EP&A Act are required to be considered by the consent authority in determining a modification application. Section 4.55(1A) of the EP&A Act states:

A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:

Section 4.55(1A) Provision	Response
<i>(a) it is satisfied that the proposed modification has minimal environmental impact, and</i>	The proposed modification is considered to be of minimal environmental impact for the following reasons: • the total GLA increase within the OEE is nominal with respect to the proposed floor area to facilitate Buildings 2A and 2B • the proposed increase in building height to facilitate Building 2B has been carefully designed to respond to operational requirements and does not materially alter the environmental impacts of the approved development, including in relation to visual amenity, overshadowing or the broader built form outcomes

Section 4.55(1A) Provision	Response
	- the BIAR accompanying this application at Appendix 8b confirms no adverse environmental impacts beyond those originally assessed under SSD-37486043, noting all offsets have been made and the OEE is subject to a VMP which is already in place - the ACHAR consistency memorandum at Appendix 12b confirms no adverse impacts to identified Aboriginal heritage items within the site as a result of the proposed changes - Traffic modelling confirms both major intersections will perform at the same levels as assessed under the original SSD. The minor increase to GLA does not impact on predicted traffic generation. A Traffic Impact Assessment has been provided at Appendix 14 in support of these findings. - The full operation of the OEE is predicted to fully comply with operational noise criteria during all time periods with the inclusion of proposed noise barriers as discussed in the Noise and Vibration Impact Assessment at Appendix 15. - No additional visual impacts will result from the modification, noting any increases in height are appropriately sited and the site will still be subject to extensive landscaping. A Visual Impact Assessment and Landscape Plans have been provided in support of these findings. - There are no additional bushfire risks associated with the modifications. - There are no anticipated changes to potential air pollutants as a result of the modification and mitigation measures as proposed under the original SSD can ameliorate potential air quality impacts. - The Estate will continue to implement the same sustainability management principles and effectively employ ecologically sustainable development.

Section 4.55(1A) Provision	Response
<i>(b) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and</i>	The proposed changes are limited to amendments to the approved development and do not alter the essential character, nature or purpose of the development approved by the Minister. The proposal will continue to facilitate the approved industrial development including warehouse and distribution centres uses, with the modifications relating to refinements to the approved design and associated works. No new land use is proposed, and the development will continue to operate in accordance with the objectives and intent of the original development consent.
<i>(c) it has notified the application in accordance with:</i> <i>i. the regulations, if the regulations so require, or</i> <i>ii. the community participation plan, if the community participation plan requires the notification or advertising of applications for modification of a development consent, and</i>	The modification application may require notification under the regulations. Notwithstanding, this SSD application will be exhibited and reflects the intended outcomes under the modification to SSD-37486043.
<i>(d) it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the community participation plan, as the case may be.</i>	The consent authority will consider any submissions received during the exhibition period as part of its assessment of the modification application. Should submissions be received, a Response to Submissions (RtS) will be prepared by the applicant to address the issues raised.

Table 15: Section 4.55(1A) assessment

4.4.1 Section 4.55(3) of the EP&A Act

Section 4.55(3) of the EP&A Act states:

In determining an application for a modification of a consent under this section, the consent authority must take the following into consideration.

- (a) the matters referred to in section 4.15(1), but only so far as the matters are of relevance to the application,*
- (b) the reasons given by the consent authority for the grant of the consent sought to be modified, but only so far as the reasons are of relevance to the application.*

The following section of the report provides an assessment against the environmental planning instruments relevant to the development. The section also includes discussion and evaluation of the key issues and matters for consideration under section 4.15(1) of the EP&A Act.

4.4.2 Section 4.15(1)(a) Planning Instruments

This section provides an assessment against section 4.15(1) of the EP&A Act.

Relevant Provision	Comment
(a) the provisions of:	
(i) any environmental planning instrument, and	The original EIS Report for SSD 37486045 provided an assessment of the development against the relevant planning instruments. The proposed modification will not alter the approved development's compliance with the relevant EPIs. The relevant environmental planning instruments are addressed at Section 4.1 and 4.2 and at Appendix 6.
(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	There are no relevant proposed environmental planning instruments.
(iii) any development control plan, and	The OEE DCP is addressed in Appendix 6.
(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	The relevant planning agreement is discussed at Section 4.5.
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	There are no known matters prescribed by the regulations that would hinder the proposed modification.
(v) (Repealed)	N/A
(b) the significant likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	The request to modify the conditions of consent will not result in any adverse environmental impacts as discussed in Section 6.
(c) the suitability of the site for the development,	The site has been deemed suitable for the development under the consent for SSD 37486043. The modification application involves changes to the proposed layout and size of the buildings within Precinct 2. These changes do not impact on site suitability.
(d) any submissions made in accordance with this Act or the regulations,	Any submissions made will be considered accordingly.

Relevant Provision	Comment
(e) the public interest.	The original SSD application addressed the public interest. Given the nature of the amendments of the modification, the proposal continues to remain in the public interest. Notwithstanding, further community engagement and consultation has been undertaken and will continue as part of the proposed development under SSD-120888992.

Table 16: Section 4.15(1) Assessment

4.5 Contributions

A VPA between Goodman and the Minister for Planning was entered under Section 7.4 of the EP&A Act in 2023 in relation to the OEE. In accordance with the adopted VPA, the application of Sections 7.11 and 7.12 of the Act is not excluded in respect of the development.

The Housing and Productivity Contribution (HPC) came into effect in October 2023 to apply a State-wide contribution for new developments. Under the HPC, a rate of \$16.22 per square metre of new GFA as per 1 January 2026 is required for Industrial development. Any consent issued will impose the required contributions under the HPC.

Goodman currently has existing SIC/HPC credits sufficient to offset HPC contributions payable under this SSD application. A discharge certificate will be provided to confirm credits have been offset prior to obtaining a Construction Certificate.

The contributions payable under this application in accordance with Fairfield City Council's *Local Infrastructure Contribution Plan 2023 (Section 7.11 & 7.12)* are assumed to be 1% of the development cost at \$6,336,972.16. Given a contributions plan is in place for the land, the matters under Section 66 of the EP&A Regulation have been satisfied.

5 Engagement

A chapter on engagement is included within the Social and Economic Report prepared by SLR Consulting (Appendix 20a).

The engagement program will be conducted in line with DPHI's *Undertaking Engagement Guide: Guidance for State Significant Projects* and will comply with the community engagement requirements in the SEARs.

5.1 Engagement carried out

Notification letters were distributed to key stakeholders alongside supporting email communication.

The Oakdale East Agency Consultation Meeting and Oakdale East Community Consultation Meeting were both held on Friday 8 May 2026.

These activities established stakeholder awareness of the project including the proposed planning and approvals pathway, the nature and scale of the proposed development and a progress update.

5.1.1 Targeted consultation

Correspondence has been sent out to notify stakeholders of the intention to lodge an SSD for the proposed works. The table below confirms stakeholders contacted and subsequent engagement undertaken.

Stakeholder	Form of engagement	Comment
Transport for New South Wales	- Email with project description and draft plans - Meeting on 20 May 2026	On 11 May 2026, an email was sent with project description providing notice of intent for this SSDA. A subsequent meeting was held on 20 May 2026 to discuss the proposal. No formal comments have been received. On 27 May 2026, feedback was received confirming: - No further modelling required for Silverback scope - TfNSW crossing at Precinct 5 to be consistent with previous advice for FCC DA - No comments on containment cell location within the future infrastructure corridor which is to be subject to

Stakeholder	Form of engagement	Comment
		Level 1 sign off and SAS A2
Environmental Protection Authority	- Email with project description and draft plans - Meeting on 19 May 2026	On 13 May 2026, an email was sent with project description providing notice of intent for this SSDA. No comments have been received. On 19 May, a meeting was held to discuss the location of containment cells within the Future Infrastructure Corridor and the site.
Endeavour Energy	Email with project description and draft plans	On 12 May 2026, an email was sent with project description providing notice of intent for this SSDA. No comments have been received.
Water NSW	Email with project description and draft plans	On 12 May 2026, an email was sent with the project description and plans providing notice of intent for this SSDA. No comments have been received.
Transgrid	Email with project description and draft plans	On 12 May 2026, an email was sent with the project description and plans providing notice of intent for this SSDA. A response was received on 29 June 2026 confirming that the proposed works are acceptable, subject to meeting conditions relating to access, servicing and design requirements to the transmission line easement and Structure 12. It is considered that these items can inform appropriate conditions of consent which will be imposed on any consent granted.

Stakeholder	Form of engagement	Comment
Fairfield City Council	- Request for meeting with General Manager - Email with project description and draft plans	On 13 May 2026, an email was sent with the project description and plans providing notice of intent for this SSDA. No comments have been received.
DPIRD	Email with project description and draft plans	On 17 May 2026, an email was sent with project description providing notice of intent for this SSDA. A response was received on 29 May 2026 confirming that DPIRD had no concerns with the transfer and subsequent surrender of M(MO)L7 following approval of this SSD.
Community	- Community consultation meeting - Email with project description and draft plans	On 8 May 2026, a community consultation meeting was held for the proposal. On 13 May 2026, an email was sent with the project description and plans providing notice of intent for this SSDA. No comments have been received.

Table 17: Stakeholder engagement summary

5.2 Consideration of Community views

A Community Consultation and Complaints Handling Strategy (CCCHS) has been prepared and is provided at Appendix 20b. The CCCHS details all previous engagement and consultation strategies undertaken for the broader OEE including:

- Consultation Meetings – facilitated with the wider community and key stakeholders.
- Complaints Register – to track any complaints made by wider community and key stakeholders.
- Agency Consultation – with any relevant State or Local Government agencies to identify areas of concern and satisfactory resolutions.
- Letterbox Drop – letter notification to landowners and occupiers of the immediate area.
- Email and Phone Communication – contact details of wider community and key stakeholders obtained with consent so that further notification or contact can be made to respond to queries or complaints.

- Site Signage – signage on site provided visitors to site and immediate residents with contact numbers and relevant project and safety information.
- Website – website developed for the wider community and key stakeholders which provides all project information material.
- Toolbox and Prestart Meetings – all site visitors and staff provided with task specific safety information, emergency procedures and relevant project updates.

As noted above, a website was established during initial consultation for the Concept Approval of the OEE. The website remains active and will continue to be accessible during the delivery of all stages of the Estate. This will enable the public to view project information and submit any queries or concerns during the construction of the OEE.

DPHI will formally exhibit the application as part of their assessment. The Applicant will respond to all relevant issues and queries made during the assessment process as requires.

5.3 Engagement to be carried out

Goodman will continue to keep stakeholders and the community informed of the project approval process during the exhibition and determination phases and through to construction and operation. Engagement will be carried out using the established OEE communication framework to ensure the provision of timely, accurate and accessible information.

The Social and Economic Report details a recommended future engagement approach with proposed activities and engagement material including:

- Targeted follow-up meetings or calls where stakeholders raise specific concerns or where potential impacts require further explanation.
- Plain English summaries or key messages for technical issues likely to be of interest.
- Support statutory exhibition by making clear information available about the Project, assessment findings and how submissions can be made.
- Review and categorise issues raised during exhibition and prepare clear responses to social and economic matters.
- Provide advance notification of construction commencement, expected activities, working hours, traffic arrangements and complaint pathways.
- Maintain ongoing communication throughout construction, particularly during bulk earthworks, fill importation and other potentially disruptive activities.
- Provide information before commencement of operations, including expected operational characteristics and contact channels.
- Maintain an accessible enquiry and complaints pathway during operation.

6 Assessment and mitigation of impacts

This section provides an assessment of the environmental impacts associated with the proposed development. The environmental assessment is based on several specialist studies undertaken for the key issues identified by the SEARs.

Proposed mitigation measures are provided at Appendix 4.

6.1 Built form

The proposed architectural design for the development is included at Appendices 3a and 3b. The Design Report provided at Appendix 31 details how the built form outcomes respond to the site conditions and existing and future character of the locality. The design objectives of the development are summarised below:

- *Better Fit* - the proposal is appropriately located in an industrially zoned area and established industrial estate within the WSEA.
- *Better Performance* - sustainability is at the core of the building design whereby solar panels are provided to reduce energy consumption alongside other ESD initiatives such as water recycling, EV chargers and densely landscaped break out spaces.
- *Better for Community* - the proposal provides the opportunity for businesses to occupy a facility that will support local jobs as well as future growth and community diversification.
- *Better for People* - the proposal has been designed to prioritise safety and efficient movement of vehicles through clear separation of accessways and pedestrian footpaths and bicycle areas.
- *Better Working* - the proposal has been designed in accordance with the requirements of an industrial estate, whereby the facilities are located centrally to major transport routes making the site highly accessible.
- *Better Value* - the site's strategic location and contemporary design offer significant opportunity for industrial tenants.
- *Better Look and Feel* - the proposed design of the warehouse and office maximises the site through large floor plates that are offset by the incorporation of light and neutral colours as well as an engaging entrance and landscaped break out areas.

Renders of the proposed development are shown in the figures below.



Figure 31: Render of proposed development looking east (Source: SBA Architects)



Figure 32: Render of proposed building 2A viewed from north-west (Source: SBA Architects)



Figure 33: Render of proposed storage locker and office entry from Building 2B carpark (Source: SBA Architects)



Figure 34: Render of proposed building 2A office (Source: SBA Architects)

6.1.1 Height and scale

Building 2A has a proposed maximum ridge height of 14.6m (excluding rooftop plant, roof access points and solar) which is similar to existing warehouse developments in the Estate and complies with height controls under the Concept Approval.



Figure 35: Building 2A elevation and section (Source: SBA Architects)

Building 2B has a proposed maximum ridge height of 25m (excluding rooftop plant, roof access points and solar). This does not comply with controls under the Concept Approval and is therefore subject to the proposed amendments to the Concept Approval, as outlined in Section 4.3.3 and Appendix 7.

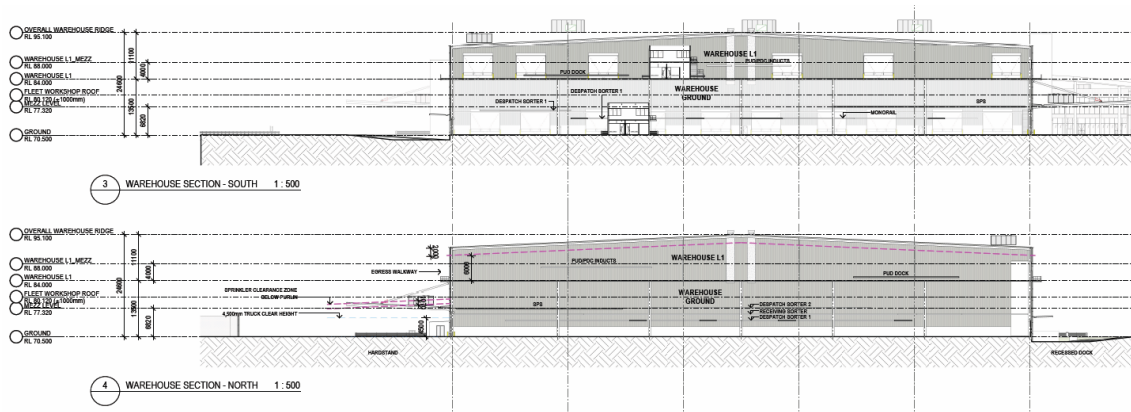


Figure 36: Building 2B sections (Source: SBA Architects)

Notwithstanding the proposed height of Building 2B, the development is designed to mitigate potential visual impacts associated with bulk and scale when viewed from surrounding roads and sensitive receivers. The proposed design incorporates adequate landscaped setbacks, articulation of built form, variation in façade materials and stepped building pad levels. These features aim to reduce the perception of visual bulk.

As outlined in Section 6.2, there will be minimal visual impact from the proposed height when viewed from roads and private properties within the surrounding locality. Building 2B will largely be screened by existing vegetation and proposed landscaping. Views toward the development from within the OEE and rural residential areas are limited and experienced at long distances, reducing the prominence of any perceived building height within the wider view.

6.1.2 Material and finishes

The materials and external finishes proposed to be used across Buildings 2A and 2B include:

- prefinished metal wall cladding and metal roof - white, grey
- precast concrete panels
- translucent roof sheeting
- glazing
- aluminium window frames and weather protection louvres
- powder coated metal mesh
- block work

These materials are consistent with those used for existing warehouse developments in the OEE to ensure visual cohesion. The materials and finishes are applied to building facades in a manner that prevents continuous blank elevations and contributes to visual interest.

Building 2B also incorporates a red metal wall cladding that complements the branding of the tenants and support business identification. This is limited to the western elevation facing OEE and will not be visible from surrounding residential areas. The proposed materials and finishes are detailed below.



Figure 37: Building 2A office render (Source: SBA)



Figure 38: Render of proposed building 2B office and entry from carpark looking south-east (Source: SBA Architects)

6.1.3 Signage

Signage locations are shown in the architectural plans at Appendices 3a and 3b.

The proposed signs are visually compatible with the industrial character of the OEE and appropriately designed to support efficient wayfinding within the precinct. The scale, materials, position and orientation of the proposed signs ensure that there are no adverse visual or accessibility impacts.

A detailed assessment of signage against Chapter 3 of the Industry and Employment SEPP as well as the OEE DCP is provided at Appendix 6. The proposed signage is consistent with the relevant provisions.

6.2 Visual impacts

A Visual Impact Assessment (VIA) prepared by Urbis is provided at Appendix 29. The VIA considers the surrounding visual context and analyses five public domain views which may be impacted by the proposed development as shown in Figure 37.

The VIA notes that the site has been heavily modified through vegetation clearing and earthworks. While the broader setting includes areas of native vegetation, the visual character of the immediate context is dominated by large-scale industrial buildings and infrastructure.



Figure 39: Location of viewpoints (Source: Urbis)

A summary of the viewpoints and potential impacts is provided in the table below.

View	Description	Receptor	Visual Impact Rating
VP01	View northwest from 198 Burley Road	Rural residential	Low
VP02	View southeast from Old Wallgrove Road	Road	Nil
VP03	View southwest from Roberts Road	Industrial	Low
VP04	View northwest from Walworth Road	Rural residential	Low
VP05	View northwest along Burley Road	Rural residential	Low-medium

Table 18: Visual impact summary

The VIA uses the following factors to determine the overall visual impacts:

- View place sensitivity
- Physical absorption capacity
- Compatibility with urban and visual context
- Viewing period
- Viewing distance

Detailed explanation of the visual effect ratings and weighting factors are contained in the VIA.

The proposal is assessed as having Nil to Low-medium visual impact on the selected views. Intervening elements including topography and dense vegetation screen substantial portions of the development from the surrounding visual catchment. Where the proposed development is visible from elevated locations, it occupies a smaller component of the wider view and does not diminish the character of the view.

Views to the site from Latitude Road and Roberts Road are typically gained from freight and logistics vehicles. Views to the site from Burley Road are from vehicles accessing residential properties at the western end of the street. All views are anticipated to be brief in nature. The proposed development will not be visible from any surrounding public recreation space.

For private properties, close views of the sites from dwellings to the south are filtered by topography and vegetation. The visual impact on long distance views from dwellings along Walworth Road is determined to be low given the wide composition and similar developments in the area.

Furthermore, the VIA concludes that the proposal will not obstruct views to scenic or highly valued features. The development demonstrates medium to high visual compatibility with existing warehouse and logistics uses within the OEE.

Viewpoint 1, shown in Figure 38 below, demonstrates how existing vegetation blocks most of the proposed development when viewed from 198 Burley Road.



Figure 40: Viewpoint 01 - View to proposed development from 198 Burley Road (Source: Urbis)

Remaining photomontages from the VIA are provided below for reference.



Figure 41: Viewpoint 02 - View to proposed development from Old Wallgrove Road (Source: Urbis)



Figure 42: Viewpoint 03 - View to proposed development from Roberts Road (Source: Urbis)



Figure 43: Viewpoint 04 - View to proposed development from Walworth Road (Source: Urbis)



Figure 44: Viewpoint 05 - View to proposed development from along Burley Road (Source: Urbis)

6.3 Landscaping

Landscaping plans prepared by Scape are provided at Appendix 9.

The Landscape Design Statement in Appendix 9 outlines how the proposed landscaping across Precinct 2 conforms to the existing design language of constructed portions of Precinct 1 and is consistent with the aims of relevant State and local guidelines for tree canopy cover. Canopy cover is provided as per the table below.

	Lot 2A	Lot 2B & C	Precinct 2	Requirement
Proposed mature canopy area (m ²)	3,524	33,972	37,496	34,383
Canopy cover (%)	10.20	10.98	10.90	10

Table 19: Canopy cover summary (Source: Scape)

Under the proposal, Precinct 2 has a total landscaped area of 62,130m² comprising 18.06% of the precinct area, and areas of existing native vegetation are retained. Notably, the proposal is consistent with both the approved Concept Plan and site-specific DCP landscaping requirements.

The proposed landscaping contributes to mitigation of visual impacts by providing additional screening to public domain within the OEE and surrounding rural residential receivers to the south and east. The landscaping treatment uses a clustering approach to increase tree densities, creating potential for small bird habitats throughout the site.

Detailed landscape treatment is proposed for the entrance to Building 2A. Feature trees are proposed at access points for pedestrians and vehicles to support wayfinding. The communal space will comprise feature paving, curved bench seating and feature shrubs. Screening trees are proposed along the lot boundaries and between the carpark and truck exit.

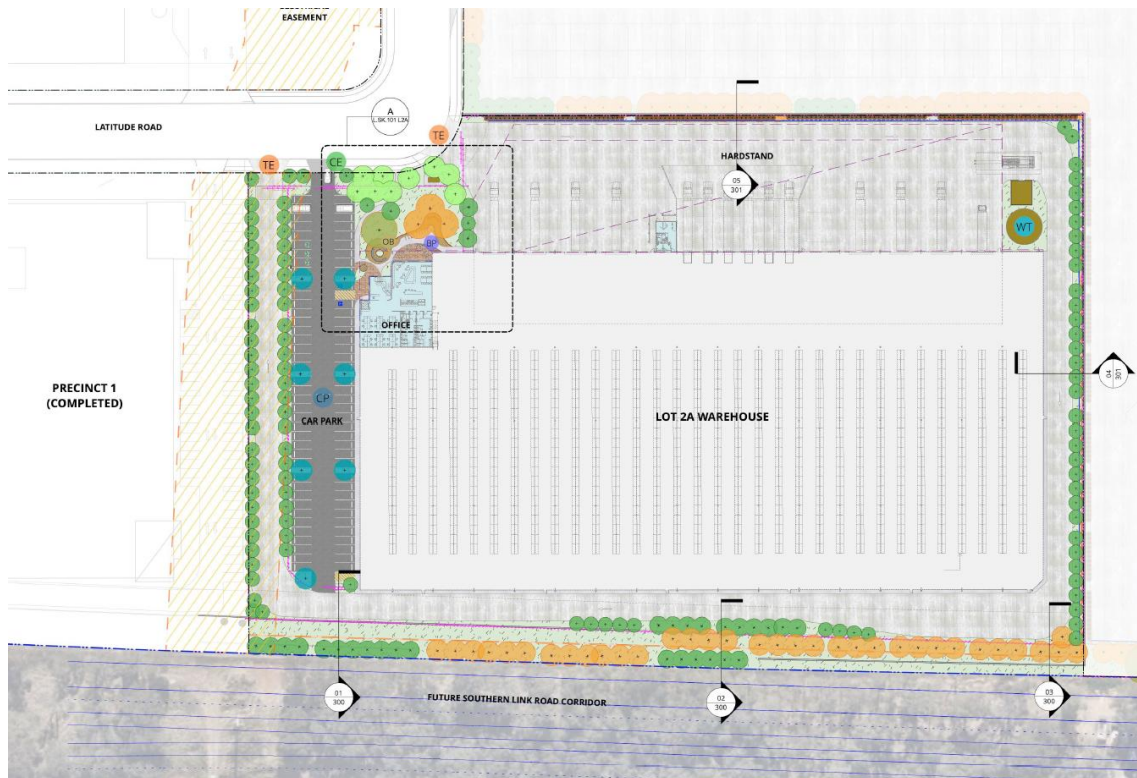


Figure 45: Landscape concept plan - Lot 2A (Source: Scape)

Lots 2B and 2C have combined landscaped area of 57,415m² covering 18.6% of the site area. Proposed landscaping within Lots 2B and 2C includes extensive tree planting is provided within the landscaped setbacks to adjacent OEE properties, internal estate roads, the WaterNSW pipeline and future freight corridor. There is also additional tree planting proposed within grassed areas of conservation zoned land which will support ecological connectivity on the site.

Trees and understorey planting incorporate native and exotic species.

The Landscape Plans propose canopy trees around the perimeters of Precinct 2 to the south of Buildings 2A and 2B to screen the bulk and scale of the buildings when viewed from rural receivers to the east and south. The below figures illustrate an example of the bulk planting proposed to provide effective screening between buildings and estate roads. Further, landscaping is also provided throughout the car parking areas for Precinct 2 to screen expansive areas of car parking and to mitigate urban heat island effects.

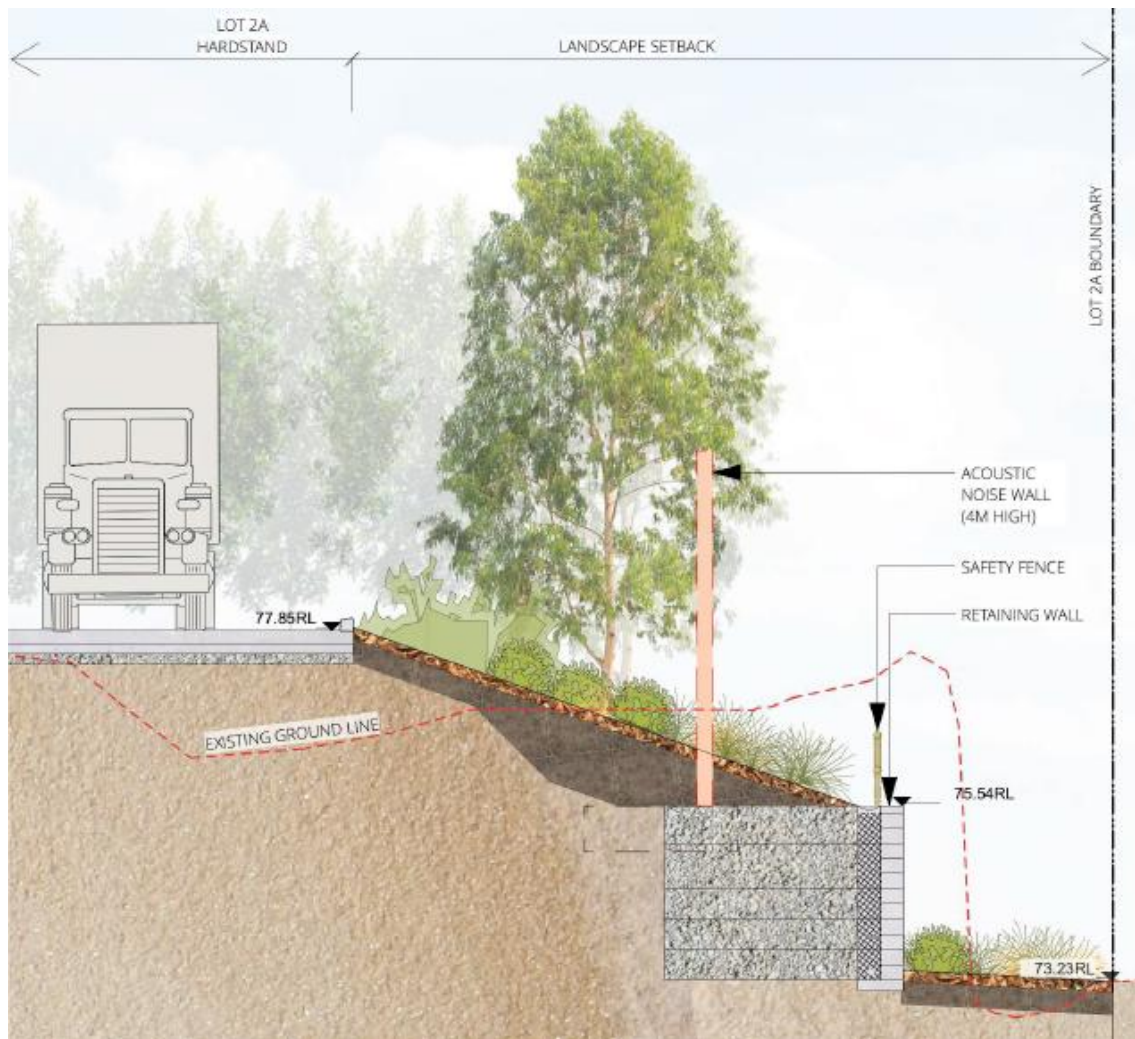


Figure 46: Proposed landscape section south of Lot 2A (Source: Scape)



Figure 47: Proposed landscape section south of Lot 2B (Source: Scape)

Tree planting and planter beds are distributed across the car parking area of Building 2B as shown in Figure 47, softening the visual impact of expansive hardstand area and supporting the mitigation of urban heat island effect.

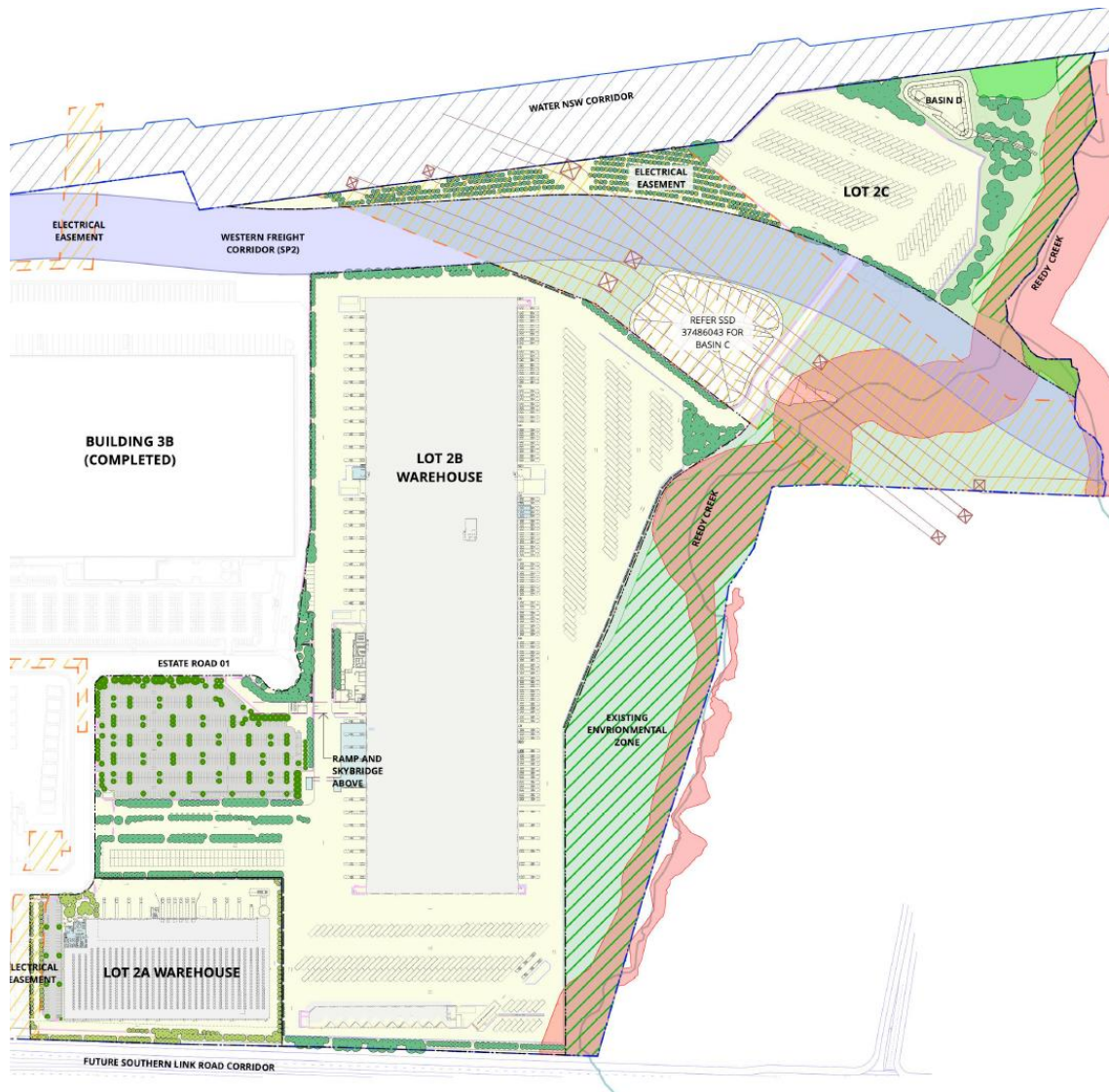


Figure 48: Landscape concept plan - Lot 2B & 2C (Source: Scape)

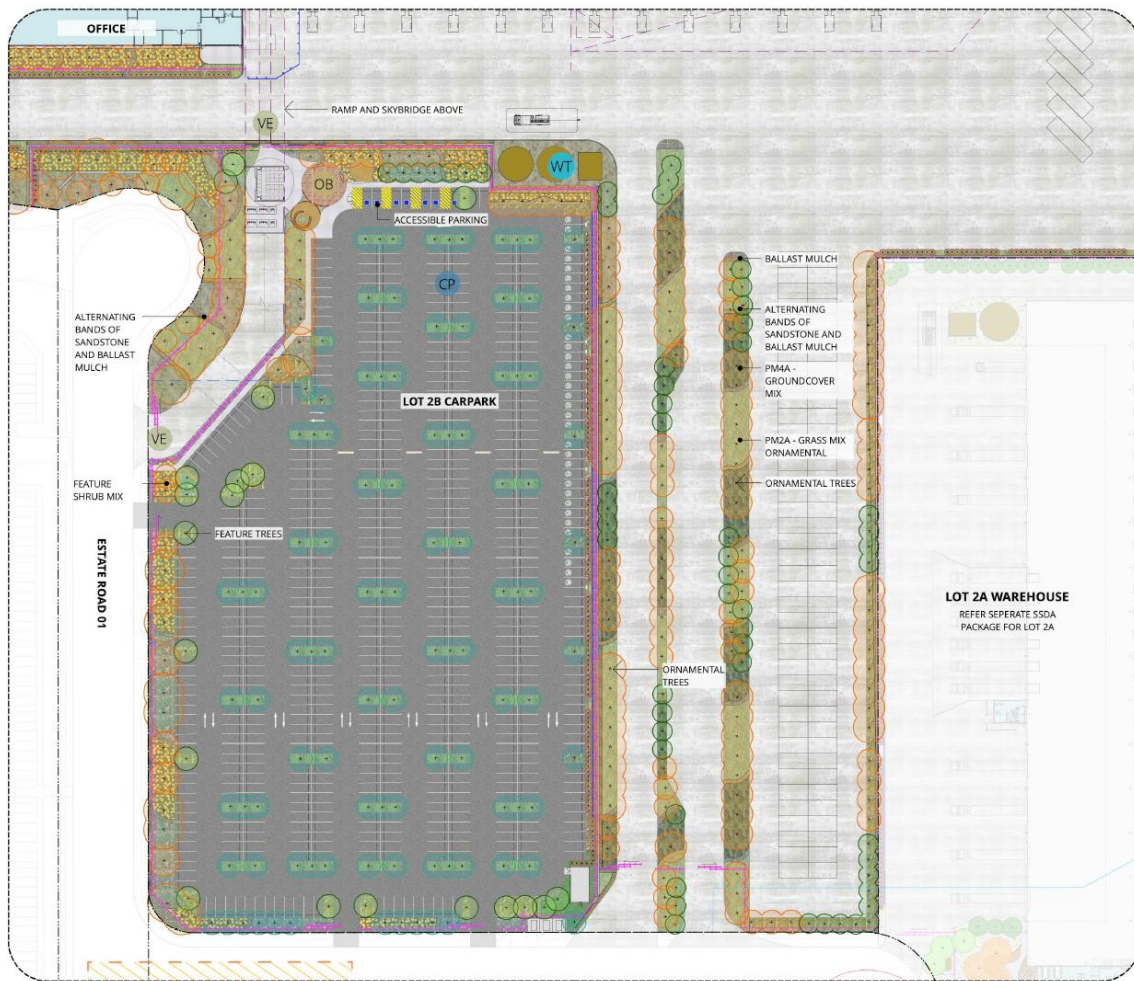


Figure 49: Landscape detail plan showing Lot 2B car parking area (Source: Scape)

As per the Landscape Design Statement, Goodman will be responsible for the landscape implementation of healthy and functional planting in the establishment period and on-going maintenance of high quality and robust landscape outcome.

6.4 Soil and water

The EIS is supported by a Civil Engineering Report (Appendix 10) and Civil Engineering Plans (Appendix 11a, 11b and 11c) prepared by Costin Roe Consulting. The Civil Engineering Report addresses key issues including:

- Bulk earthworks and retaining walls
- Embankment stability
- Groundwater
- Acid sulphate soils and salinity
- Water cycle management strategy and drainage methodology
- Construction soil and water management

This is supported by a Geotechnical Report prepared by Douglas Partners (Appendix 32).

6.4.1 Earthworks and retaining walls

The proposed earthworks are required to provide building pad levels, facilitate site access, support stormwater drainage and fill existing pits associated with historical quarry works on the land. The table below compares the reduced levels approved under DA.347.1/2021 against the proposed levels. It is noted that the levels are subject to a +/- 200mm variation to account for uncertainties in the geotechnical conditions and detailed design considerations.

Precinct (based on approved site layout)	Approved levels (RL)	Proposed levels (RL)
Precinct 2 (west)	77.50	No change
Precinct 2 (east)	71.50	70.50 – 75.00
Precinct 4	70.00	70.20

Table 20: Summary of changes to building pad levels

Proposed SSD 120888992 assumes these previously approved levels and works in respect of assessment of environmental impacts previously assessed in accordance with Clause 4.63 (a) of the EP&A Act. Further re-assessment up to these levels is therefore not required.

Additional fill importation of approximately 550,000m³ is required to satisfy the previously approved levels and achieve proposed pad levels.

The proposed locations and heights of retaining walls are shown on the Civil Engineering Plans at Appendix 11c. As part of this SSDA, existing retaining walls and walls that have been approved but not constructed will be modified to align with the proposed development layout.

All geotechnical testing and inspections performed during fill inspections will be undertaken to Level 1 geotechnical control in accordance with relevant Australian Standards.

6.4.2 Groundwater

Groundwater matters are addressed in the RAP prepared by JBS&G within Appendix 13b. The RAP notes the following:

The nearest registered bores were located approximately 700 m north of the site and were reported to be used for monitoring purposes – the reported geology at the well location comprised shallow fill (0.15 m) underlain by dry silty clay to a depth of 2.9 m below ground surface (bgs). The silty clay was in turn underlain by dry shale to a depth of 18 m bgs from which the materials were reported to be wet from 9.50-13.50 m bgs.

Based on available information and observations made during groundwater investigation works across the adjacent Plant 3 Factory, site groundwater is anticipated to exist within a confined system in shale bedrock, albeit in one heavily modified by the completion of quarrying activities within the site and quarry void to the west. A review of the previous topography (as detailed in the survey plans in Appendix I) identifies that localised groundwater is likely to

generally flow to the north-east towards Reedy Creek (to the east and south of the site). The freshwater body of Reedy Creek flows in a north to north-easterly direction, meeting Eastern Creek approximately 4.1 km to the north-east of the site.

Review of regional conditions indicates that regionally the site is situated between the Eastern Creek and Ropes Creek systems, which both ultimately discharge into the Hawkesbury River a significant distance from the site. Whilst it is likely that groundwater movement would occur to the east, given the proximity of the Reedy Creek system and tertiary alluvial formation, there is the possibility that overall regional groundwater movement in the west of the site may occur towards Ropes Creek approximately 1.5 km to the west of the site.

Furthermore, the Douglas Partners earthworks specification report (Appendix 32) states the following:

Excavation work for quarrying on the site has resulted in deep excavations to well below the in-situ rock surface. Excavations extend to RL36 resulting in cuts of up to 25 m depth. At all times during the quarrying period (some 7-8 years) the quarry has remained a dry site, with all water experienced in the quarry being direct rainfall and runoff from surrounding catchment areas. Excavations and reinstatement of the quarry is not experiencing any adverse effects of subsurface.

Notably, the earthworks proposed as part of this SSDA remain consistent with the scope approved under DA 347.1/2021 and SSD 3486043 in terms of levels. As such, any interference with groundwater is not expected to exceed what has previously been assessed.

Additional surface water management measures, including surface runoff conveyance, on-site detention, WSUD and best practice pollution reduction, have been proposed within the design and are anticipated to mitigate the potential impacts of groundwater.

6.4.3 Acid sulphate soils and salinity

The Civil Report (Appendix 10) states:

An assessment of the potential for acid sulphate soils has been requested as part of the SEAR's requirements.

Review of accessible data using the SEED tool, hosted by NSW OEH (201810) indicates the area occupied by the site has not been required to be assessed for the presence of ASS based on the outcomes of a preliminary evaluation. Such sites are by default characterised as "no known occurrence", being defined as areas where land management activities are not likely to be affected by ASS materials.

Review of the geographical and topographical location of the assessment area, there is no appreciable risk of ASS occurrence in natural soils and/or rock at the site. On this basis, there is no further requirement for consideration of ASS conditions and/or management of such during potential future ground disturbance activities.

Based on the above assessment, it is concluded there is no risk of ASS occurrence and further investigations are not required.

The ESCP will implement the following management measures:

- sediment basins that are designed in accordance with the Blue Book.
- sediment fences located around the perimeter of the site to ensure no untreated runoff leaves the site.
- stabilised site access proposed at one location at the works area.

Notably, the ESCP within the Future Infrastructure Corridor (detailed in red and purple above) is to be filled in post construction works.

Rainwater will be collected in OSD basins for reuse for non-potable uses such as toilet flushing and irrigation.

Overall, the proposed drainage system comprises the following components:

- Road drainage system designed to the 5% AEP
- Trunk drainage (easements) system designed to the 1% AEP
- Stub connections for all development lots connecting to road drainage designed to the 5% AEP
- Lots and roads are to be treated by end of line combined bioretention and on-site detention (OSD) basins. Basin C, which was approved under the Concept Approval, and Basin D, proposed under this SSDA.

The trunk drainage system approved for OEE requires realignment to facilitate the proposed building layout. Trunk drainage will be diverted around the northern side of Building 2B and placed within an easement designed in accordance with Fairfield City Council's Stormwater Management Policy and Specification for Roadworks and Drainage.

MUSIC modelling has been undertaken to confirm compliance with the reduction targets for pollutants required under the OEE DCP as shown in the table below.

	Total Source Load (kg/yr)	Total Residual Load (kg/yr)	Reduction Achieved (%)	Target Reduction (%)
Total Suspended Solids (kg/yr)	63,570	8,970	85.89	85.00
Total Phosphorus (kg/yr)	115.8	39.18	66.17	55.00
Total Nitrogen (kg/yr)	961	428.4	55.42	40.00
Gross Pollutants (kg/yr)	11,590	33.84	99.71	90.00

Table 21: MUSIC analysis results for allowable load reduction (Source: Costin Roe)

Overall, the proposal is consistent with the requirements of the Fairfield City Council DCP and *Fairfield City Council Stormwater Management Policy – September 2017*, noting however, that DCPs do not apply to SSD. The Civil Report at Appendix 10 concludes that stormwater quantity and quality, as well as erosion and sediment risks, can be effectively managed on-site, and there will be no adverse runoff impacts within the Reedy Creek catchment.

6.5 Flooding

A Flood Impact and Risk Assessment (FIRA) prepared by Colliers is provided at Appendix 32.

The FIRA draws upon previous flood studies undertaken for the OEE under SSD 37486043, DA 347.1/2021 and DA 118.1/2025, with consideration to Council's adopted flood study being 'Fairfield Rural Area Flood Study (Ropes, Reedy & Eastern Creeks)'. This Flood Study was updated through many iterations by BMT WBM to support the approval of the existing SSD 37486043 (as modified). The updated model, as detailed in the 2023 Stage 2 Flood Assessment, has been used to inform the baseline scenario for the current flood assessment and subsequent mitigation works proposed.

The FIRA compares the baseline and developed scenarios to determine the extent of changes in flood level. Due to the detailed assessment undertaken to date, the FIRA scope and category is to be based on the 'FIRA based on existing assessment requirements' rather than the 'detailed FIRA' category. Additionally, for this FIRA:

"...the baseline scenario being assessed within this has also adopted the post-development scenario of the approved Oakdale East Industrial Estate SSD (SSD-37486043), including Modifications 1 to 5 which have also been approved. This is in accordance with Section 4.63(a) of the Environmental Planning and Assessment (EPA) Act 1979, which states that if a development consent is to be surrendered as a condition of a new development consent and the development to be authorised by that new development consent includes the continuation of any of the development authorised by the consent to be surrendered, that the consent authority is not required to re-assess the likely impact of the continued development to the extent that it could have been carried out but for the surrender of consent."

The proposed flood assessment will therefore be based on the approved baseline, despite any future surrendering of the development consent.

The site's flood behaviour during the 5% AEP, 1% AEP 1% AEP with climate change, and PMF design storm events under pre and post developed conditions have been modelled and determined that the proposed development is consistent with SSD-37486043 from both a flood risk and emergency management strategy perspective.

The FIRA key findings and recommendations are:

- the proposed layout and civil design is supportable from a flooding perspective.
- the proposed development does not adversely affect flood behaviour within the site or surrounding area, including Reedy Creek.
- the proposal is outside of the mainstream PMF, which enables safe occupation of the site during floods.
- the proposal will not result in any adverse impacts to floodplain environments including riverbanks or watercourses.
- the proposed development will be filled in a way that does not detrimentally affect existing drainage patterns on the site and surrounds.

- the flood planning level (FPL) for the site is the 1% AEP level + 500mm freeboard, which is equivalent to 65.2m AHD. The proposed warehouse pads at 70.5 m AHD and 78 m AHD for Warehouse 2A and 2B sit above the FPLs and are therefore compliant.
- the site remains unaffected by increases in flood levels due to a higher rainfall intensity from climate change.
- evacuation can be achieved from the site via internal roads as they are only inundated by low hazard flood waters and will remain trafficable in all storm events.
- if inhabitants are unable to evacuate, occupants can shelter-in-place until evacuation is possible, as the proposed development is above the mainstream PMF extents.

In summary, the proposed development can be undertaken without any adverse impacts within the overall Reedy Creek catchment, and the proposed design and layout is supportable from a flooding perspective.

6.6 Contamination and remediation

A Detailed Site Investigation (DSI) prepared by JBS&G is provided at Appendix 13a and a Remediation Action Plan (RAP) is provided at Appendix 13b.

The findings of the DSI indicate that the site can be made suitable for the proposed land uses provided that measures outlined in the RAP are undertaken to manage contamination risks. Contaminants on the site are primarily ground surface asbestos and asbestos impacted soils. It is anticipated that further unexpected impacts will be relatively isolated and able to be managed through controlled excavation and off-site disposal.

A summary of the preferred remediation strategy is provided below.

Scope of work	Summary
Site establishment	Implementation of safety and environment controls: • locating and isolating all required utilities in the proximity of the works, including above ground water pump lines; • assessing need for traffic controls and specific traffic management plans for heavy vehicles working in the vicinity; • work area security fencing if required; • site signage and contact numbers; and • sediment fencing (attached to security fencing) if required.
Establishment of asbestos work areas	Temporary exclusion areas are to be established for asbestos removal works and fenced off with appropriate marked signage. An Asbestos Management Plan will be prepared by the appointed asbestos removalist or Licenced Asbestos Assessor.

Scope of work	Summary
Asbestos excavation activities	Excavation works for asbestos impacted soil may include moving the impacted material via temporary stockpiling or loading directly into transport vehicles with suitable covers for movement to containment cells. Further procedures apply as detailed in the RAP.
On-site containment	There are two containment cells present on the site with an additional cell proposed under this application. Asbestos containment measures will be consistent with previously approved RAPs prepared for the OEE.
Long term on-site containment of asbestos impacted material	Final containment area The containment cell area will be excavated to the required volumes prior to asbestos material movement activities in accordance with the placement procedures. The final surface will be covered with an easily identifiable marker layer and capping layer. Temporary stockpile management Temporary stockpiling may be required due to accessibility, construction of the proposed containment cell and earthworks schedules. Monitoring and management measures are detailed in the RAP.
Material tracking requirements	The movement of all earth/aggregate based materials will be subject to a Material Tracking Plan.
Waste management/off-site disposal	Appropriate waste management to be ensured through waste classification reporting requirements, a material handling and tracking plan and documentation of waste disposal.
Site disestablishment	All equipment used during remediation works shall be removed, decontaminated or disposed of as waste from the site on completion of remediation works.

Table 22: Remediation strategy summary

As detailed in Section 3.5.1, the volumes of contaminated material stored at the site under previously approved and proposed application is detailed below:

levels required by TfNSW. As discussed in Section 4.1, the application will be subject to obtaining an EPL post-approval.

The site can be made suitable for the proposed uses, subject to the finalisation of all remediation works detailed in the RAP.

6.7 Traffic and transport

A Transport Accessibility and Impact Assessment (TAIA) prepared by Ason Group is provided at Appendix 14. The TAIA concludes that the proposed development will not result in any adverse impacts on the surrounding road network. Further assessment and details are provided in the subsections below.

6.7.1 Traffic generation

Anticipated traffic generation has been calculated utilising the adopted trip generation rates for large format-warehousing from the TfNSW Guide to Transport Impact Assessment 2024. The rates adopted are as follows:

- AM Peak Hour: 0.14 vehicle trips / 100m² GFA
- PM Peak Hour: 0.14 vehicle trips / 100m² GFA
- Daily: 0.28 vehicle trips / 100m² GFA

Given the total proposed GLA for Precinct 2, totalling 160,267m² of warehouse and office GLA, the proposal results in the following total trip generation:

- AM Peak Hour: 307 veh/hr
- PM Peak Hour: 405 veh/hr
- Daily: 712 veh/day

Given the discrepancy between the total GLA for Precinct 2 assessed under SSD 37486043 and that proposed, there is a net reduction of 274 vehicular trips in the AM period and net reduction of 222 vehicular trips in the PM period. The assessment suggests that the proposed development will have no additional impacts to the external road network compared to previous modelling.

6.7.2 Existing and future road network

The proposal involves amendments to the OEE road layout. Keystone Drive is proposed to be shortened to accommodate the amalgamation of form Precincts 2 and 4 and facilitate the proposed building footprint for Building 2B. The proposed amendments to the OEE road layout are detailed in the figures below.

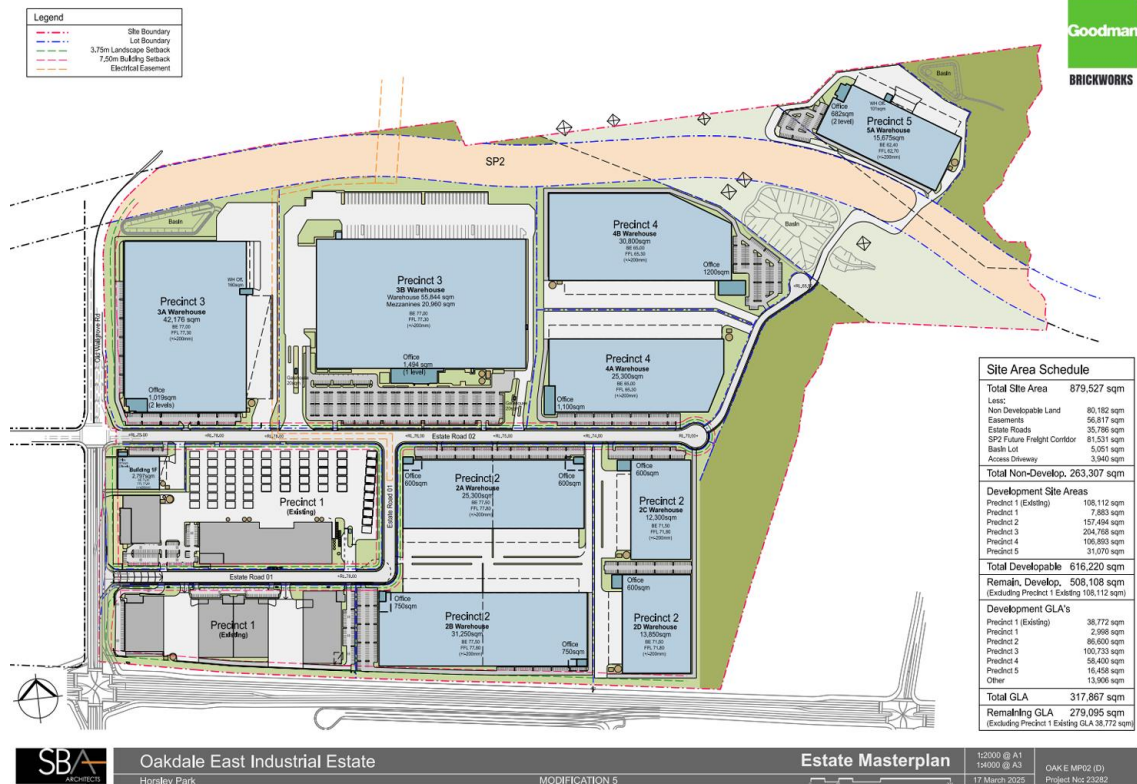


Figure 52: Approved OEE Masterplan from MOD 5 SSD 37486043 (Source: SBA)

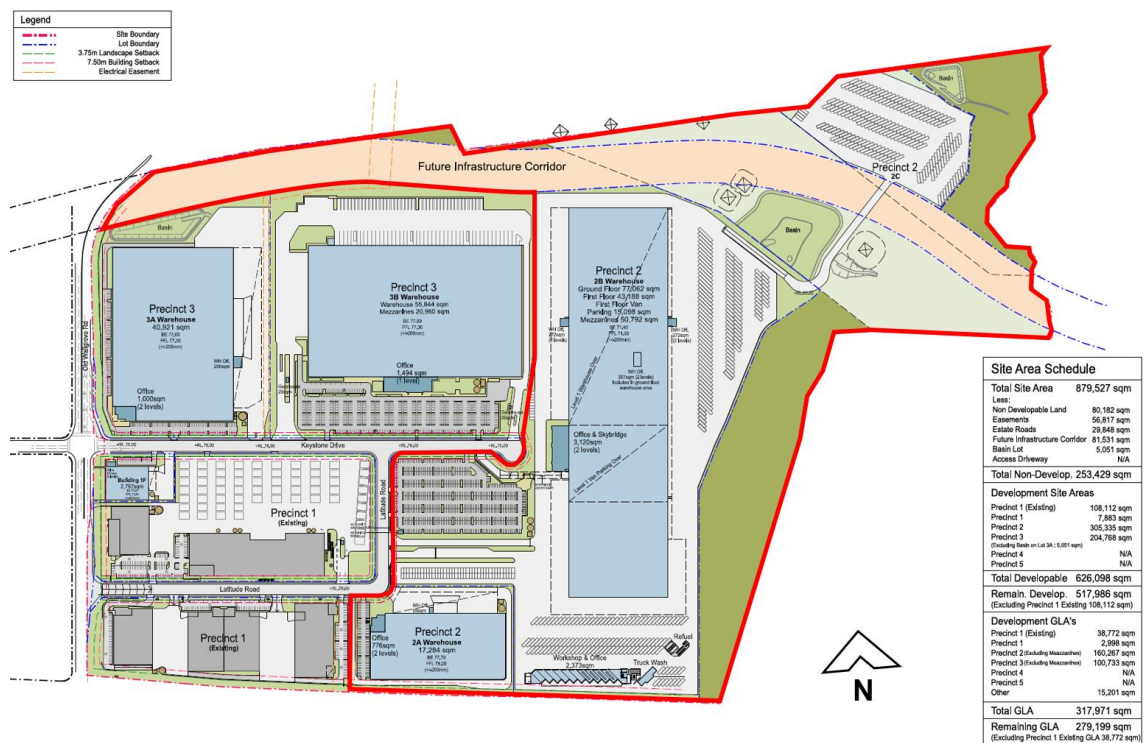


Figure 53: Proposed OEE Masterplans (Source: SBA)

The internal road design for the OEE was approved under SSD 37486043, expanding upon the existing internal road provided to access Precinct 1 as approved under DA 93.1/2019. As detailed within section 3.8 of this EIS, the approved internal road network will be amended with access to the warehouses provided as follows:

Warehouse	Access arrangements
2A	Car and truck ingress and egress will be provided via Latitude Road to the north and northwest of the warehouse.
2B	- Van ingress and egress off Keystone Drive. - Car parking entry off Keystone Drive. - Car parking egress off Latitude Road. - Truck ingress and egress off Latitude Road.
Lot 2C	Vehicle ingress and egress from proposed internal access road.

Table 24: Summary of access arrangements for each warehouse and lot

As detailed below and in the swept paths within Appendix 14, the swept path analysis confirms that B Triple access is achievable through the intersections upgraded by Goodman under SSD 37486043.

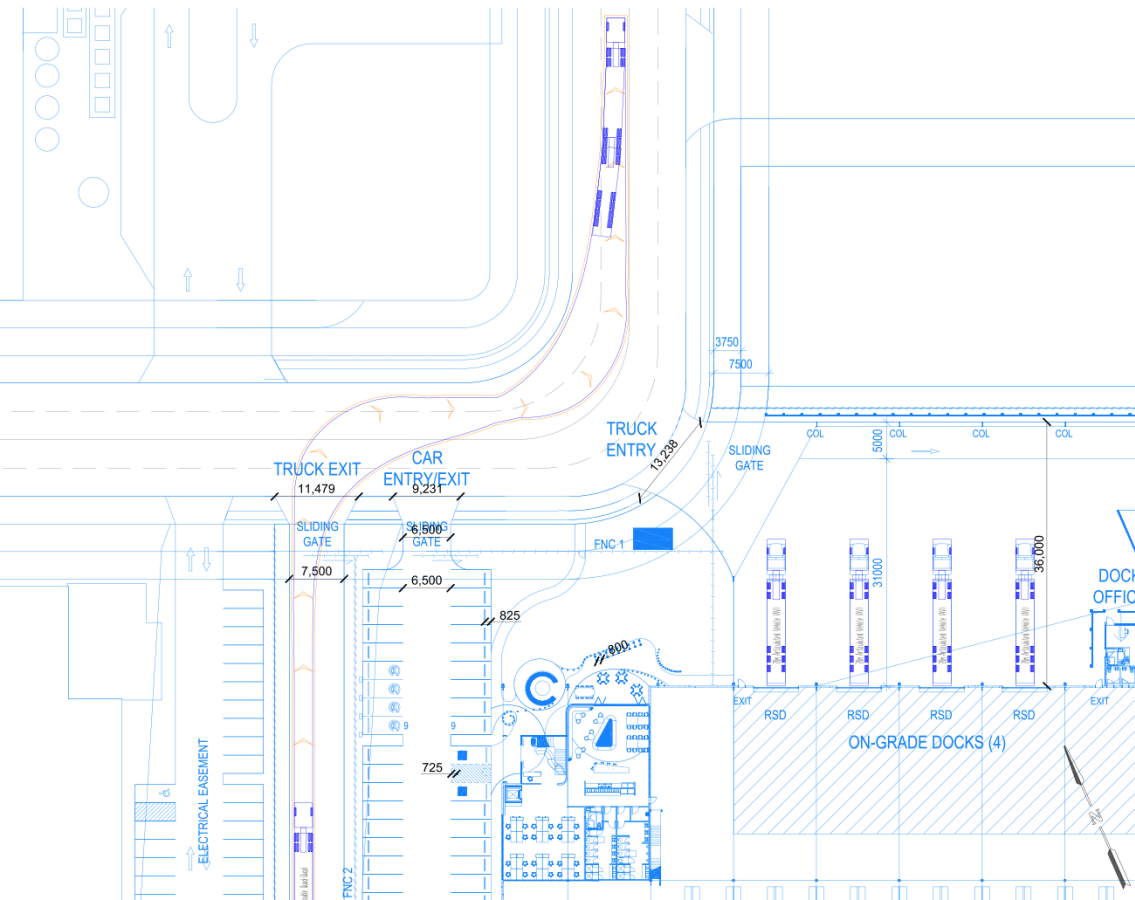


Figure 54: Access points to Building 2A (Source: Ason Group)

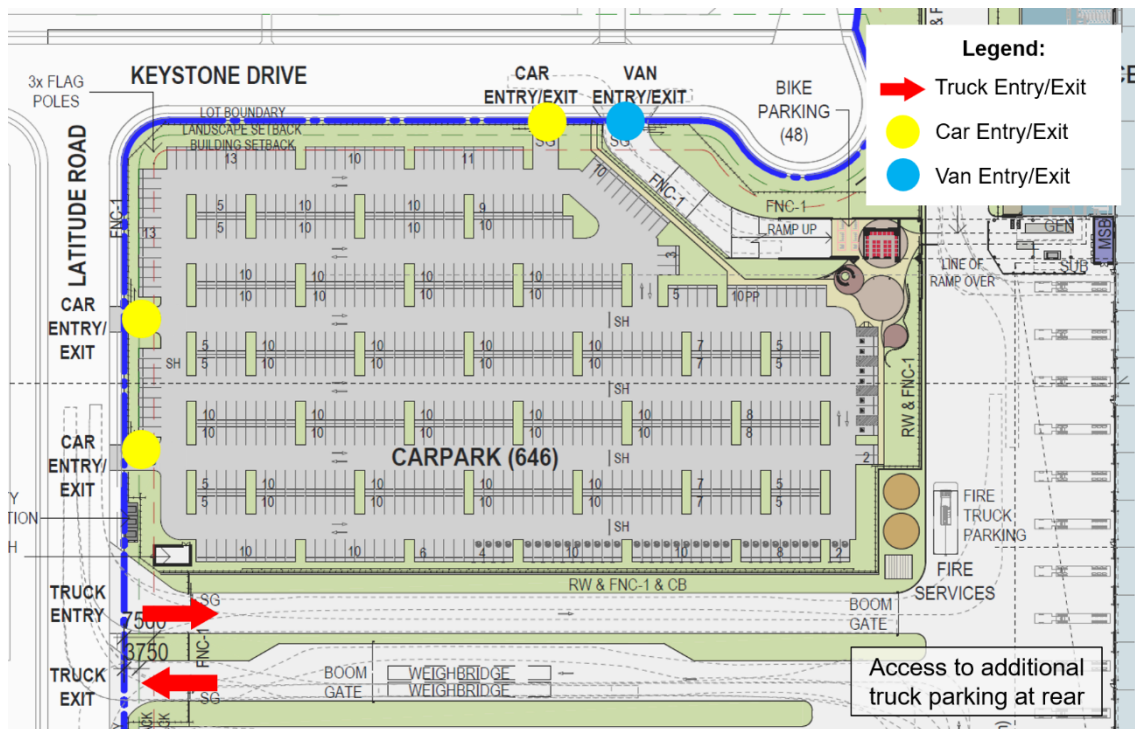


Figure 55: Access points for Building 2B (Base source: SBA Architects)

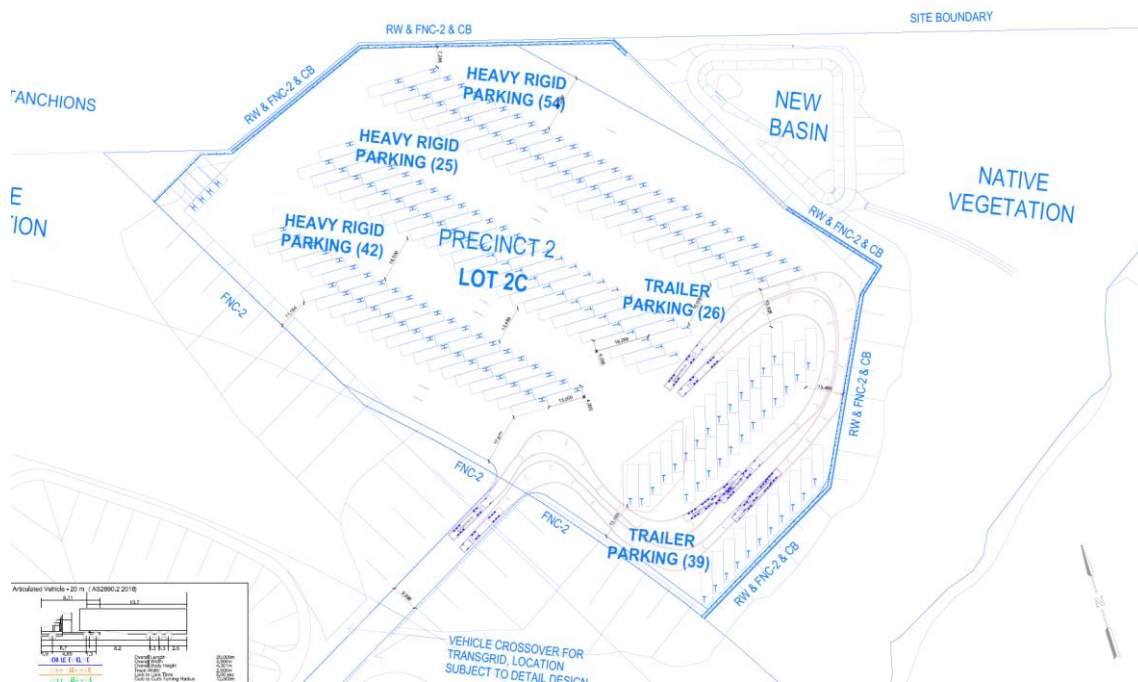


Figure 56: Access point to Lot C (Source: Ason Group)

6.7.3 Parking

Rates of car parking are generally provided under the OEE DCP. For the proposed workshop, the relevant rates have been taken from the Fairfield City Wide Development Control Plan 2024 (FDCP 2024) given there is no prescribed rate under the OEE DCP. The prescribed rates are as follows:

Land Use	Parking rate
Warehouse or distribution centre	1 space per 300m ² GFA
Office	1 space per 40m ² GFA
Workshop	6 spaces per work bay plus 1 space per 40m ² gross leasable area for any spare parts shop

Table 25: Applicable parking rates under OEE DCP

Required car parking provisions has been calculated utilising the proposed GLA rather than GFA as this is consistent with the previous approach taken for other applications within the OEE. The proposal proposes car parking in accordance with the above rates for each warehouse and tenancy as follows:

Warehouse	Land Use	Proposed GFA (m ²)	Requirement	Total required	Proposed
2A	Warehouse	17,284	58	79	79
	Office (including dock office)	826	21		
2B	Warehouse	120,250	401	572	646
	Office (including dock office)	4,436	111		
	Workshop	2,373	60		

Table 26: Required and proposed car parking for Precinct 2

A further 10 spaces within the proposed car parking area of Building 2B have been allocated for short-term parking associated with the parcel storage lockers. Given the surplus provision of parking (75 spaces), this is considered to have a negligible impact on the overall parking supply for the development and can be readily accommodated within the existing parking allocation. The dedicated spaces are intended to facilitate convenient, short-duration parcel collection and are not expected to generate additional parking demand or traffic movements beyond those already associated with the warehouse and distribution centre use.

The proposal also provides for at least 1 disability space for every 100 car parking spaces for each warehouse tenancy. Electric vehicle (EV) charging station requirements are also met whereby a minimum 5% of car parking spaces for each warehouse tenancy are to be EV charging stations.

In addition to car parking, bicycle parking has also been provided in accordance with the OEE DCP. Bicycle parking is calculated based on a percentage of estimated staff numbers which has been undertaken as follows:

Warehouse	Estimated staff	Bicycle parking requirement	Proposed bicycle parking
2A	121	11-20	18
2B	600	48-90	48

Table 27: Bicycle parking requirements and proposed parking with Precinct 2

In accordance with the above bicycle parking provisions, End of Trip (EoT) facilities have also been integrated into the office component of each tenancy. This includes separate male and female change rooms, showers, and associated lockers.

6.7.4 Preliminary Construction Traffic Management Plan

A Preliminary Construction Traffic Management Plan (CTMP) and Green Travel Plan (GTP) have been prepared by Ason Group and are provided within the Traffic Impact Assessment at Appendix 14.

The CTMP shows indicative construction vehicle routes and access arrangements during construction. The primary construction vehicle route to and from the site is via the M7 Motorway, Old Wallgrove Road, Mini Link Road and Keystone Drive as shown in Figure 53 and Figure 54 below.

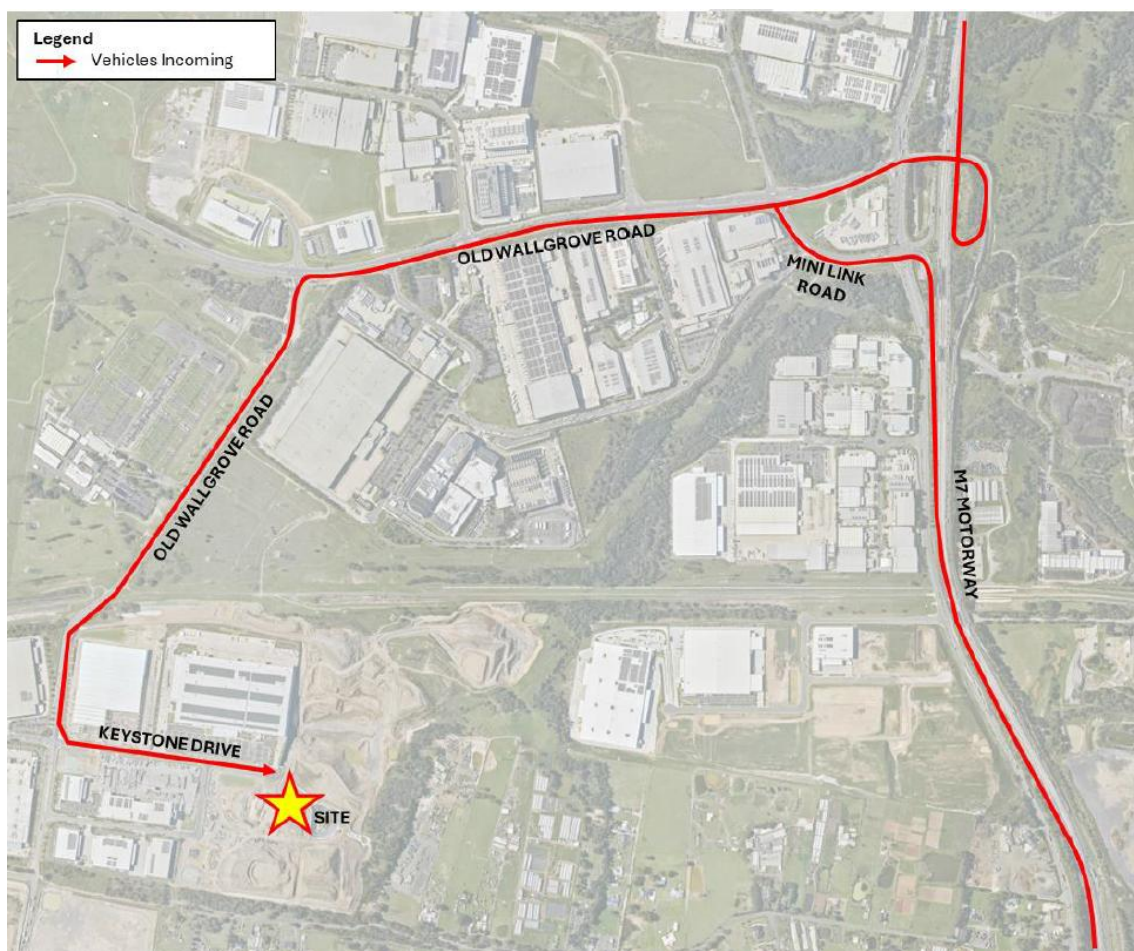


Figure 57: Potential construction travel routes - incoming (Source: Ason Group)

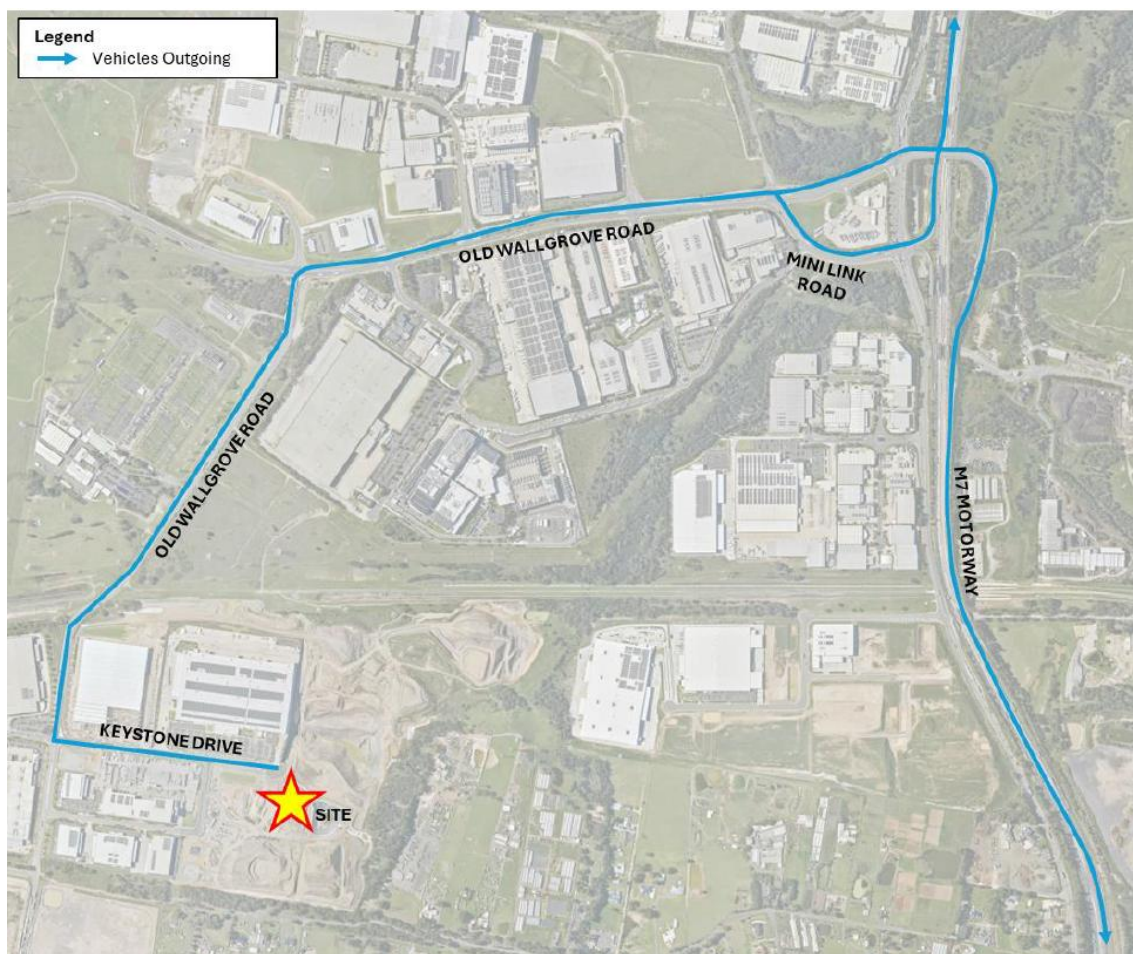


Figure 58: Potential construction travel routes - outgoing (Source: Ason Group)

Estimated peak construction vehicle movements have been developed based on recently proposed developments of similar scale and land use. The CTMP concludes that anticipated daily vehicle trips will not have a material impact on the external road network.

Stage	Preliminary Daily Vehicle Trips
Infrastructure and earthworks Anticipated duration: approximately 15 months	398
Other stages Anticipated duration: approximately 31 months	700

Table 28: Estimated peak construction vehicle movements per stage (Source: Ason Group)

The CTMP further identifies how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.

Standard construction hours, which align with Council's standards, are proposed to be restricted to:

- 7:00am to 6:00pm inclusive Monday to Friday,
- 8:00am to 1:00pm inclusive on Saturday, and

- No work on Sundays and Public Holidays
- 24/7 for fill import only

The implementation of the CTMP has been included as part of the proposal's Mitigation Measures at Appendix 4.

6.7.5 Preliminary Green Travel Plan

A preliminary GTP has been provided which outlines the requirements for a future GTP. Preparation of the GTP will maximise the use of sustainable travel modes, including walking, cycling, public transport and car sharing. It will demonstrate how future staff may travel to and from the site in a sustainable manner.

The GTP will provide detail on transport options for future employees in relation to accessing the site. Current 'journey to work' data indicates that use of private vehicles is the dominant travel mode for those travelling to the locality. This is likely to be similar for the proposed development given the future parking options at the site and limited public transport options.

Notwithstanding, the preliminary GTP provides targets for mode sharing to encourage ride sharing and utilisation of public transport. This includes measures to meet the mode sharing targets such as:

- *An introduction to the GTP for all staff, setting out its purpose and objectives.*
- *Provision of public transport travel information for staff, customers and visitors.*
- *Encouragement of car sharing, both amongst staff on site and in the wider context.*
- *Provision of car share spaces (future potential measure) and / or provision of a business "pool car" while public car share operators are limited in the area.*
- *Assisted cycle purchase schemes.*
- *Interest-free loans to assist with cycle purchase, cycle equipment purchase, etc.*
- *A transport section on the company website with links to local bus operator sites to ensure that travel information is always up to date.*
- *The provision of transport information for visitors to the site.*

The implementation of the final GTP prior to occupation of the development has been included as part of the proposal's Mitigation Measures at Appendix 4.

6.8 Noise and vibration

A Noise and Vibration Impact Assessment prepared by RWDI is provided at Appendix 15. The assessment assesses the potential construction and operational noise, as well as vibration impacts, associated with the proposal.

6.8.1 Operational noise

Anticipated sources of operational noise within the proposed development include light and heavy vehicle movements, loading activities, emergency generators and fixed mechanical service equipment. The cumulative effect of noise from all industrial

sources within the locality have also been considered. The closest sensitive residential (R01-R12) and industrial (I01-I04) receivers to the OEE are detailed in Figure 55 below. These receivers remain consistent with what was approved under SSD 37486043.



Figure 59: Sensitive receivers in relation to OEE (Source: RWDI)

The results of noise modelling and assessment are as follows:

- *The principal OEE operational noise sources comprise of light and heavy vehicle movements, loading activities and fixed mechanical service plant. Noise modelling of these sources has been undertaken to determine potential noise impacts associated with the proposed operation of the OEE.*
- *The cumulative effect of noise from all industrial sources has been considered in assessing potential noise impacts. Negligible 1dB exceedances are expected at receivers R01, R04, and R09. We do not believe that further mitigation of these exceedances is warranted.*

Temporary and permanent noise bunds and barriers are proposed to be constructed at the locations shown in Figure 56 below. These will ensure that operational noise criteria are generally achieved at all identified receivers, despite a negligible 1dB exceedance at R01, R04 and R09.

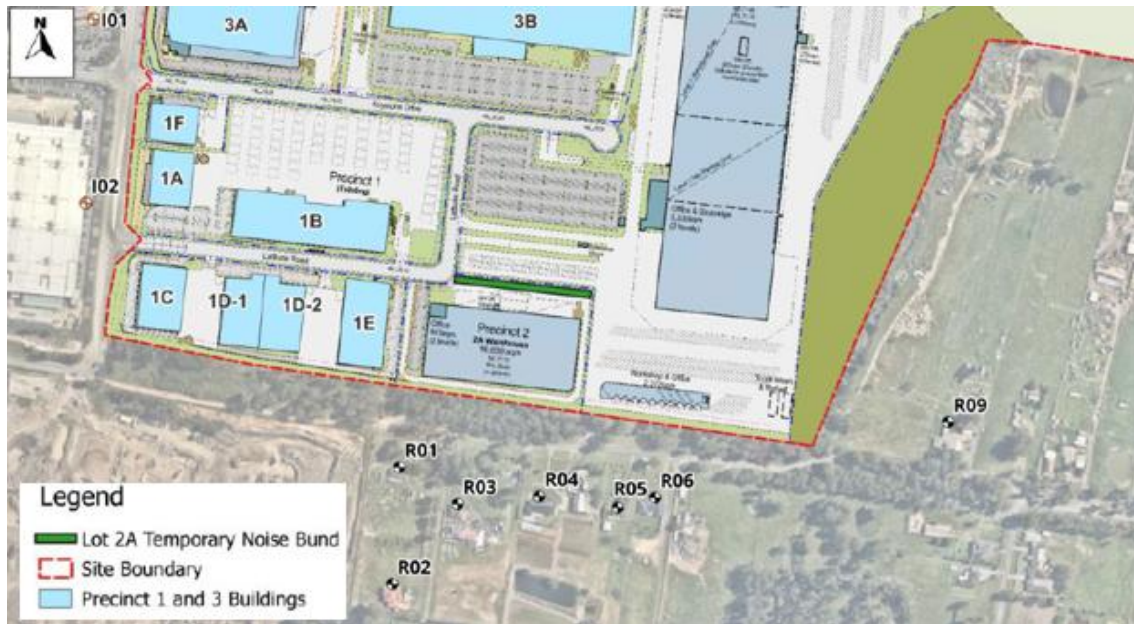


Figure 60: Proposed temporary noise bund (Source: RWDI)



Figure 61: Proposed permanent noise barriers for all Precincts (Source: RWDI)

It is intended that all noise bunds barriers have a minimum transmission loss performance of R_w 18 or greater. This may comprise typical noise barrier materials, including laminated EPS systems, aerated concrete panels that will meet this performance. A future Design Noise Verification Report will be prepared confirming the final design details and suitability.

6.8.2 Construction noise

Construction noise and vibration impacts may arise adopting Construction Noise Management Levels (CNMLs) in accordance with the NSW Interim Construction Noise Guideline (ICNG). The assessment predicts that daytime CNML may be exceeded during earthworks and hardstand works. No vibration impacts at sensitive receivers are

anticipated. Noise mitigation as recommended within the Noise Assessment will therefore be implemented to reduce any impacts to adjoining sensitive receivers. These mitigation measures include:

- Minimize simultaneous use of noisy equipment.
- Shut down equipment intermittently when not in use.
- Orient equipment with directional noise away from sensitive areas.
- Conduct regular compliance checks on plant and machinery to ensure noise levels align with predictions and identify any issues with silencing equipment.
- Use non-tonal reversing alarms on construction equipment and vehicles.
- Goodman will engage in pre-construction consultation with affected communities to explain the works and potential noise impacts, providing ongoing updates to address concerns throughout the construction process.

Construction works are proposed to be undertaken during standard construction hours (7.00am-6.00pm Monday to Friday and 8.00am-1.00pm Saturdays). Additionally, fill importation is proposed to be 24/7 throughout the construction period. Importantly, construction noise arising from out of hours fill importation meets the required CNMLs and no further mitigation for this activity is required.

Our assessment concludes that the proposal is not anticipated to result in any adverse noise impacts to sensitive receivers during both operation and construction, subject to the implementation of the above mitigation measures recommended and as detailed within Appendix 15.

6.9 Biodiversity

Historically, most of the land on site has been quarried, therefore there is limited vegetation present. Native vegetation associated with the Reedy Creek riparian corridor has been retained and protected as part of the Concept Approval for OEE under SSD 37486043. This is intended to remain unchanged under this SSDA.

A BDAR and Vegetation Management Plan (VMP) were submitted as part of the OEE Concept application. These reports outline the vegetation clearing and associated offset requirements, as well as procedures for managing the riparian corridor. The original BDAR prepared by Ecologique assessed and approved under SSD 37486043 is provided at Appendix 8a for reference.

A new BIAR subject to Project Silverback has been prepared by Ecologique and is attached at Appendix 8b. This BIAR details that the OEE has been subject to several development applications that have previously assessed the impacts on biodiversity values. These are detailed in the table below along with the approved clearing that has been progressively undertaken across the OEE.

Application	Vegetation cleared (ha)
DA 85.1/2019	0.35
DA 93.1/2019	0.74

Application	Vegetation cleared (ha)
DA 347.1/2021	3.26
SSD-37486043	2.77
Total	7.12

Table 29: Approved vegetation clearing across OEE (Base source: Ecologique)

Noting the above, the proposal does not involve any additional direct impacts on biodiversity values beyond those previously approved under the earlier DAs. Due to no direct clearing of vegetation, any potential for impacts to incur an offset obligation is not assessed through application of the Biodiversity Assessment Method (BAM).

The BIAR finds:

Due to the potential for additional indirect impacts above those previously offset under earlier DA approvals, it is unclear whether the current approval will be eligible to apply for a BDAR waiver.

A request was submitted to the BOS Help Desk enquiry management system (JIRA) on 28 April 2026 to confirm the appropriate method of assessment. At the time of preparing this report a response had not yet been received.

Several VMPs have been prepared across the OEE to effectively manage surrounding vegetation and the riparian corridor along the eastern boundary of the site. The extent of the riparian corridor and VMP areas are shown below and will remain unchanged under Project Silverback.



Figure 62: VMP extent (Source: Ecologique)

The proposal is contained wholly within the existing approved SSD 37486043 footprint. Therefore, no further impact upon biodiversity values will occur. The proposal will also not result in any residual direct impacts on native vegetation.

The proposal is expected to result in the following additional indirect impacts:

- an increase in the maximum building heights to 15m and 25m for both warehouse buildings may impact the flight paths of migratory species including birds or microbats; and
- increased noise and light spill from day and night operation to the adjacent riparian corridor.

The following mitigation measures are proposed to manage these indirect impacts:

- *implement sensitive lighting design (low glare, downward directed)*
- *minimise illumination intensity*
- *minimise acoustic disturbance to fauna in the riparian corridor*

The proposal is wholly located within areas previously assessed, offset and conditioned under previous approvals. Our assessment concludes that the proposal is not anticipated to result in any prescribed impacts and there is a low and acceptable risk of any indirect impacts to biodiversity, subject to the implementation of the above mitigation measures recommended and as detailed within Appendix 8b.

6.10 Bushfire

A Bushfire Hazard Assessment (BHA) prepared by Blackash is provided at Appendix 19. The site will be managed in accordance with the requirements of *Planning for Bush Fire Protection 2019*. The eastern and southern boundaries of the site are identified as bushfire prone (refer Figure 61 below). This includes land identified as Vegetation Buffer and Vegetation Category 3. Bushfire Attack Levels are (BAL) reach up to 12.5 on the site, including for part of Building 2B and surrounding hardstand areas. The proposed development in relation the BALs is detailed within Figure 62 below.

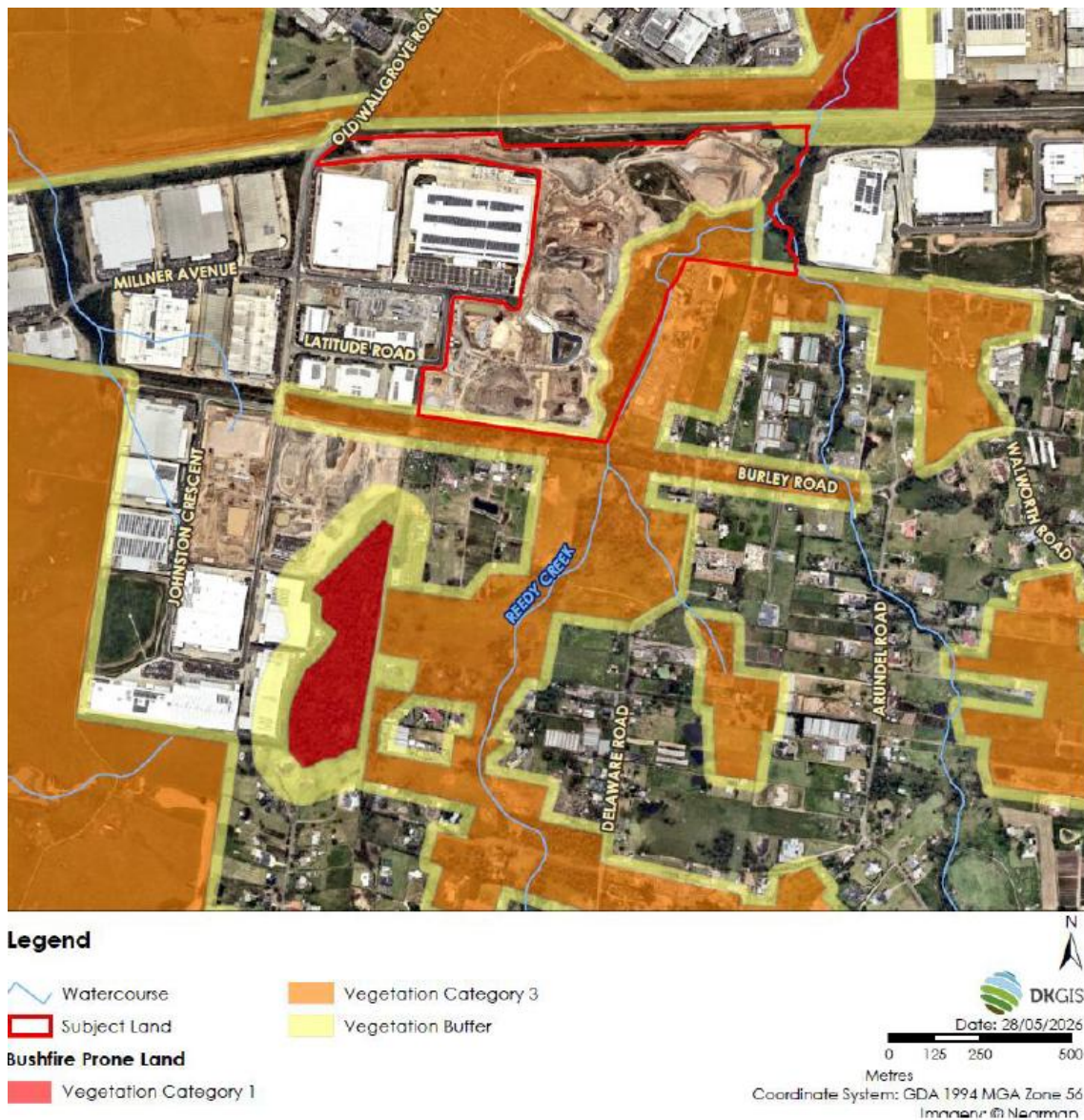


Figure 63: Bushfire prone land map (Source: Blackash)



Figure 64: Bushfire attack levels (Source: Blackash)

The proposed development sits within an established industrial estate context, where there is substantial managed separation and defensible space located around proposed buildings in the form of hardstand areas, internal roads and maintained landscaped areas. The Asset Protection Zone (APZ) strategy for the proposal is to provide and maintain the defensible space between the proposed warehouse buildings and any classified bushfire hazard.

The BHA proposes an APZ separating Building 2B and Lot 2C hardstand area from the Reedy Creek riparian corridor to protect future development from bushfire risks associated with the forested wetland. The proposed APZ covers the hardstand area in

Lot 2B, proposed Basin D and areas of native vegetation as shown in Figure 63 . This will provide a 40 metre buffer. The proposed APZ will be maintained in accordance with PBP 2019 and *Standards for Asset Protection Zones*, with appropriate ongoing management and maintenance mechanisms implemented to ensure the APZ remains effective for the life of the development.



Figure 65: Proposed Asset Protection Zones (Source: Blackash)

The proposed internal road network enables safe operational access to structures, bushfire prone vegetation and water supply for emergency services. Details of firefighting water supply and hydrants will be confirmed through detailed design of services and fire engineering.

The proposed warehouses are to comply with the NCC, relevant Australian Standard and Section 7.5 of PBP 2019 for additional construction requirements.

The BHA demonstrates that the proposed development can comply with PBP 2019 and be safe in the event of a bushfire with implementation of the recommendations contained in the report.

6.11 Air quality

An Air Quality Impact Assessment (AQIA) is provided at Appendix 17. The AQIA addresses potential air quality impacts during both the construction and operational phases of Precinct 2 in accordance with the NSW EPA Approved Methods and relevant criteria.

Construction

During construction, potential air quality impacts are primarily associated with dust generation, earthworks and trackout. Emissions produced during construction are expected to be temporary in nature and vary in response to prevailing meteorological conditions, as well as the intensity, scale of construction activities.

The AQIA states that proactive implementation of a site-specific Construction Air Quality Management Plan (CAQMP) and Trigger Action Response Plan (TARP) supported by real-time monitoring can maintain cumulative particulate matter concentrations and dust deposition rates under the applicable NSW EPA criteria within this locality. With the adoption of recommended mitigation measures and the TARP outlined in the AQIA, emissions can be effectively managed and minimised, ensuring that potential impacts at surrounding sensitive receivers are maintained at acceptable levels.

Operational

The AQIA uses RAQST modelling to predict concentrations of traffic-related pollutants at 30 m from the kerbside of Old Wallgrove Road where the nearest sensitive receivers are located. As shown in Table 27, the pollutant quantities do not exceed the criteria for maximum or annual pollutant concentrations aside from maximum 24-hour PM_{2.5} concentrations. However, this exceedance is primarily attributed to background concentrations, and the 24-time period used to inform modelling are conservative and unlikely to occur during operation.

Pollutant and averaging period	Background concentration (µg/m³)	Incremental impact (µg/m³)	Cumulative impact (µg/m³)	Criteria (µg/m³)
Maximum 1-hour NO ₂ concentrations	Not applicable	Not applicable	143.4	164
Annual NO ₂ concentrations	16.3	1.6	17.9	31
Maximum 24-hour PM ₁₀ concentrations	44.6	0.7	45.3	50

Pollutant and averaging period	Background concentration (µg/m³)	Incremental impact (µg/m³)	Cumulative impact (µg/m³)	Criteria (µg/m³)
Annual PM ₁₀ concentrations	17.2	0.3	17.5	25
Maximum 24-hour PM _{2.5} concentrations	24.9	0.5	25.4	25
Annual PM _{2.5} concentrations	6.9	0.2	7.1	8

Table 30: RAQST model results (Source: SLR Consulting)

Overall, the AQIA demonstrates that operational air quality impacts are minimal and not anticipated to constrain ongoing use of the site.

6.12 Waste

A Waste Management Plan (WMP) prepared by SLR Consulting is provided at Appendix 28. The WMP has been prepared to assess waste generation for both Building 2A and Building 2B.

The WMP confirms that the proposed development is capable of compliance with the SEARs and is guided by Fairfield City Council's waste requirements as outlined in the *Fairfield Citywide Development Control Plan 2013* and Council's Waste Management Plan.

Construction of the development is expected to result in the following waste streams:

- construction waste
- plant maintenance waste
- packaging waste
- work compound waste from on-site employees

The WMP estimates the following types and quantities of waste will be produced during the construction stage.

Lot	Waste types and quantities (m3)								
	Timber	Asphalt	Timber	Granular Base	Timber	Gyprock	Timber	Metal	Other
2A	76	7.6	645.7	32	301	131	1,195	162	156
2B	574	48	7,149	199	2779	1,011	14,882	1,927	1,715
Total	650	55	7,794	231	3,081	1,142	16,077	2,089	1,871

Table 31: Estimated types and quantities of construction waste

The WMP outlines mitigation measures to ensure effective waste management during construction which are included as part of the measures included at Appendix 4.

Operation of the development is expected to result in the following waste streams:

- domestic wastes generated by employees, including food wastes
- office waste
- garden organic waste from landscaped areas
- bulky waste items such as furniture and e-waste

The WMP estimates the following quantities of operational general waste and recycling will be produced.

Building	Total per Day (L)		Total per Week (L)			
	Garbage	Recycling	Garbage	Paper and Cardboard	Plastic Film	Recyclable Containers
Building 2A	1,489	1,474	10,425	6,528	3,056	732
Building 2B	13,555	13,174	94,883	59,897	26,023	6,298
Total	15,044	14,648	105,308	66,425	29,079	7,030

Table 32: Estimated types and quantities of operational waste

The WMP outlines the process for minimisation, recycling, storage and collection of operational waste. It ensures that waste management will occur in a safe and orderly manner.

6.13 Sustainability

The proposal considers sustainability impacts in accordance with the requirements for non-residential development under Chapter 3 of the *State Environmental Planning Policy (Sustainable Buildings) 2022* (Sustainable Buildings SEPP).

A Sustainability Management Plan (SMP) prepared by SLR Consulting is provided at Appendix 24. The SMP identifies how ecologically sustainable development (ESD) principles are incorporated in the design and ongoing operation of the proposed development to meet relevant building sustainability and environmental performance standards, and minimise greenhouse gas emissions, and energy and resource consumption. This is further reflected in the materials selected for the proposed buildings as demonstrated in the embodied emissions form provided at Appendix 25. The proposed measures are consistent with that already implemented for existing buildings within the OEE. The recommended initiatives are listed in the mitigation measures table at Appendix 4.

The project is targeting a 5-Star Green Star using the Green Building Council of Australia (GBCA) Building V1.0 Rating Tool. NABERS Agreement to Rate for post-occupation verification has been obtained and is provided at Appendix 26.

6.14 BCA compliance

Building Code of Australia and Access Assessment Reports (BCA Report) have been prepared by Blackett Maguire + Goldsmith Pty Ltd (BM+G) for both Buildings 2A and

2B and are provided at Appendix 22a and 22b. The BCA Reports provide an assessment of the proposed development against the relevant provisions of the *Building Code of Australia 2022 Amendment 2* (BCA).

The reports detail that the proposed warehouses are generally compliant with the BCA, subject to the following Performance Solutions:

Building 2A

- *a Performance Solution is required to address the Perimeter Vehicular Access non-compliances to the building, being less than 6m on the northern side of the building along the hardstand and greater than 18m from the building along the western elevation.*
- *the current plans indicate that exit travel distances, and distances between alternative exits within the building will not comply with D2D5 & D2D6.*
- *design of fire hydrant systems per AS 2419.1-2021 Appendix C as the volume of the building is >108,000m³.*
- *further design development is required with respect to the location of the hydrant and sprinkler booster assemblies in order to determine whether a Fire Engineered Performance Solution is required.*
- *the proposed building is required to be accessible throughout in accordance with AS1428.1-2009 and as detailed within the Access Consultant Report*
- *a Performance Solution report is to be provided by the Architect / Façade Engineer to demonstrate how the external walls are designed to prevent the penetration of water into the building.*

Building 2B

- *any proposal to reduce the fire resistance levels (FRLs) of building elements that are required to be fire rated must be addressed as a Performance Solution from the Fire Engineer.*
- *a performance solution is required to address the Perimeter Vehicular Access where the path travels under the skybridge and carpark ramp on the eastern elevation of the building.*
- *services penetrations through elements with a 240/240/240 FRL may require a Performance Solution.*
- *the current plans indicate that exit travel distances and distances between alternative exits within the building will not comply with D2D5 & D2D6— respectively.*
- *the fire isolated stairs will be required to be the subject of the following performance solutions:*
 - *the fire-isolated stairs on the western elevation discharge under an awning rather directly to open space.*
 - *the western fire stairs discharge within 6m of the external wall of the dock office.*
- *the following non-compliances relating to the non-fire isolated stairs are to be addressed as a Performance Solution from the Fire Engineer:*

- *the stairs serving Satellite Office B and PUD office on Level 1 do not provide a continuous means of travel to the level of a road or open space.*
- *the stairs from Satellite Offices A & B discharges at a point greater than 40m (65m and 70m respectively) to a doorway that provides egress to a road or open space.*
- *the stairs from the mezzanine levels on Ground and Level 1 discharge on the warehouse level at a point greater than 40m to a doorway that provides egress to a road or open space.*
- *the PUD office stairs discharges at a point greater than 40m (approx. 75m) to a doorway that provides egress to a road or open space.*
- *the total travel distance from the Satellite Offices and PUD offices via the non-fire isolated exits exceeds 80m.*
- *the total travel distance from the mezzanine levels on Ground Floor and Level 1 exceeds 80m.*
- *the Level 1 warehouse exit doors discharge open space via an external walkway which does not connect directly to the public road. The path of travel to the road requires the use of the enclosed fire stairs which requires re-entry into the building rather than providing a continuous discharge via open space.*
- *a Performance Solution is required from the Fire Engineer to permit egress via roller shutter in lieu of a swinging door in the Fleet workshop.*
- *design of fire hydrant systems per AS 2419.1-2021 Appendix C as the volume of the building is >108,000m³.*
- *further design development is required with respect to the location of the sprinkler booster assembly to determine whether a Fire Engineered Performance Solution is required.*
- *confirmation is to be provided if 50m fire hose reels are proposed to be utilised in the Class 7b areas of the buildings to determine if a Performance Solution is required from the Fire Engineer.*
- *confirmation is to be provided as to the standard of performance for the sprinkler system to determine whether a Performance Solution is required for the use of alternative design standards.*
- *a Performance Solution report is to be provided by the Architect / Façade Engineer to demonstrate how the external walls are designed to prevent the penetration of water into the building.*
- *a Performance Solution may be considered to Rationalised Smoke Exhaust Design.*
- *an accessible sanitary facility is not provided to the PUD Office and Satellite Offices where sanitary facilities have been provided. A Performance Solution by the Access Consultant is required to address this non-compliance.*
- *a Performance Solution is required to address the compliant accessway not provided from the allotment boundary to the main points of pedestrian entry at the main office.*
- *a Performance Solution is required to address the accessibility requirements of D4D4.*

It is considered that with the implementation of the above strategies as specified within the BCA Reports, the proposed development of both Buildings 2A and 2B can readily achieve compliance with the BCA subject to the resolution of matters identified within the reports.

6.15 Fire Safety

Fire Safety Engineering Statements have been developed by Innova Services and are included at Appendix 27a and 27b for both Buildings 2A, 2B and Lot 2C. The Statements confirm that the design of the proposed buildings meets requirements for an acceptable level of fire safety.

The Statements identify elements of the design which cannot comply with Deemed-to-Satisfy (DtS) provisions of the NCC and proposes Performance Solutions to ensure that the Performance Requirements are addressed. The following preventative and protective measures are recommended as Performance Solutions throughout Precinct 2:

Building 2A

- perimeter access with pathways and access points generally in accordance with FRNSW Fire Safety Guideline 'Access for fire brigade vehicles and firefighters
- Automatic Fail-Safe in accordance with Part D3 of the NCC
- hydrants, fire hose reels, sprinklers, portable fire extinguishers, smoke detection and occupant warning, smoke exhausts, and emergency lighting and exit signage to be provided in accordance with the relevant Australian Standard
- emergency management and procedures

Building 2B and Lot 2C

- provision of fire-resistant construction
- fire separation, means of egress, fire-fighting equipment, smoke management, emergency lighting, signage and management provided in accordance with the NCC
- perimeter access with pathways and access points generally in accordance with FRNSW Fire Safety Guideline 'Access for fire brigade vehicles and firefighters
- fire detection, alarm and occupant warning in accordance with Australian Standards

The final specification of all fire safety measures will be addressed at the detailed design stage and established through a Fire Engineering Report. Overall, the Statements conclude that the proposed design can ensure fire safety and protect occupants in accordance with BCA and International Fire Engineering Guidelines.

6.16 Hazards and risk

Materials classified as dangerous goods (DGs) are proposed to be stored at both Building 2A and Building 2B. A Preliminary Risk Screening prepared by Riskcon Engineering is provided at Appendix 18. Table 30 below provides a summary of the DGs proposed to be stored and transported to and from the site.

Class	Description	Quantity
2.1	Flammable gases	Unknown; however, less than 10,000 kg
3	Flammable liquids	1000L
4.1	Flammable solids	1000L or kg
5.1	Oxidising substance	1000L or kg
8	Corrosive substances	1000L or kg
9	Miscellaneous and environmentally hazardous	1000L or kg

Table 33: Summary of dangerous goods to be stored at the site (Source: Riskcon Engineering)

The report confirms that the quantities of DGs proposed for storage and transportation within both buildings does not exceed the thresholds under the Resilience and Hazards SEPP. Accordingly, the proposed development is not classified as potentially hazardous or offensive and preparation of a detailed Hazard Analysis is not required.

The proposed quantities are expected to be contained in retail packages and pose an acceptably reduced risk offsite if stored and handled in accordance with the requirements of the relevant Australian Standards. Safe storage of the proposed DGs at the site is possible subject to the recommended mitigation measures as detailed in Appendix 18 and included in the project's mitigation measures at Appendix 4.

6.17 Heritage

6.17.1 Aboriginal Heritage

The Aboriginal Cultural Heritage Assessment Report (ACHAR) at Appendix 12a draws upon previous studies undertaken by Artefact for the OEE under SSD 37486043, including Precinct 2. An Aboriginal Heritage Memorandum has been prepared by Artefact and is provided at Appendix 12b. The memorandum supports the findings of the original report and confirms that the site remains within a comparable contextual setting. The current proposal does not alter or materially affect the conclusions reached in the original assessment.

Historically, the site was used as a quarry and subsequently the ground at this site has been significantly disturbed.

The ACHAR recommended no further archaeological assessment for SSD 37486043 as there was no plan to impact identified archaeological sites.

An Aboriginal Heritage Memorandum at Appendix 12b has been prepared by Artefact for this proposal. The Memorandum includes a review of the current AHIMS database and confirms that there has been no change to the site context in relation to Aboriginal heritage since the preparation of the ACHAR.

There are two sites listed on the Aboriginal Heritage Information Management System (AHIMS) located within the boundary of Precinct 2 - OE AS1 and WR1.

The area in which Artefact OE AS1 is located, along the southeastern boundary of the site, will not be impacted by the proposed development and has been fenced off by the developer. A second site, WR1 (Prospect), was an artefact scatter identified in 2008 along the northeast boundary of the study area. This site was registered as 'destroyed' in 2020 and, therefore, will not be impacted by the proposed works.

The ACHAR recommends that if changes were to be made to the proposed development that may impact the area assessed by the ACHAR, further investigation in the form of test excavation may be required to be undertaken. This is further reinforced by the accompanying memorandum.

The report also recommends that if unexpected Aboriginal objects or potential objects are uncovered during works, all works in the vicinity should cease immediately and relevant qualified professionals should be contacted and Heritage NSW and Deerubbin Local Aboriginal Land Council (LALC) must be notified, with further mitigation measures potentially required. This is included as part of the Mitigation Measures at Appendix 4.

6.17.2 Environmental heritage

Environmental heritage was addressed under SSD 37486043. There are no identified heritage items within the site or in the locality. No further assessment is required.

7 Project justification

The section provides a justification for the proposed development based on the potential social, economic and environmental benefits, taking into consideration the findings in the detailed assessments, community views and compliance with the statutory planning framework.

7.1 Design justification

The proposed development has been designed to balance feasibility and operational requirements with environmental constraints and considerations of access, amenity, sustainability and safety.

- The design is visually compatible with constructed and under construction development in the OEE, i.e. large format warehouse buildings, and generally complies with the standards prescribed under the OEE DCP.
- The potential amenity and environmental impacts to surrounding uses identified in this assessment can be avoided, minimised or mitigated.
- The design ensures that there are no additional visual impacts despite the proposed building height increase.
- The proposal incorporates ecologically sustainable development principles to optimise energy efficiency and minimise consumption of natural resources.
- The proposal generally maintains the existing road layout with minor changes to accommodate a new building configuration.
- The proposed development is sited to avoid impacts to the identified Aboriginal artefacts on the site.
- The site adjoins land zoned for environmental conservation. The amended design does not give rise to any additional impacts to biodiversity and appropriately mitigates any impacts to the riparian corridor.

7.2 Strategic justification

As demonstrated in Appendix 5, the proposed development meets the objectives and directions outlined in the relevant strategic policies for the site, locality and broader region. In particular, the proposal meets the objectives of the:

- Greater Sydney Region Plan – The proposal satisfies the 4 key themes of the region plan, including Infrastructure and Collaboration, Liveability, Productivity and Sustainability
- Western City District Plan – The proposal plans and manages urban services land through the provision of employment uses.
- Fairfield Local Strategic Planning Statement 2020 – The proposal is consistent with the objectives of the LSPS as it promotes the local economy and plans for urban services land.

- Fairfield Community Strategic Plan – The proposal is consistent with the long term social, environmental and economic goals of the community as described in the Community Strategic Plan.
- Draft Sydney Plan – The proposal is consistent with the 'Prosperous' planning priority.
- Draft Statewide Policy for Industrial Lands – The proposal retains regionally significant industrial land and is therefore consistent with this draft policy.

7.3 Statutory justification

The relevant State and local legislation and environmental planning instruments are listed in Section 4 and assessed against in Appendix 6. The assessment concludes that the proposal complies with the relevant provisions as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 of the Act.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulation and addressed in Appendix 2.
- The SSD pathway has been undertaken in accordance with Chapter 2, Planning Systems SEPP as the proposed development is classified as SSD.
- Referral to TfNSW will be required as per Chapter 2 of the Transport and Infrastructure SEPP for 'traffic generating development'.
- The proposal complies with relevant provisions under Chapter 4 of the Transport and Infrastructure SEPP in relation to the future major infrastructure corridor at the site.
- The proposal complies with all of the relevant provisions under the Industry and Employment SEPP as detailed in Appendix 6.
- The proposed development is consistent with the objectives of the IN1 zone in which all works are contained to.
- The proposed development has been assessed in accordance with Chapter 3 and 4 of the Resilience and Hazards SEPP and is not classified as hazardous or offensive development. Anticipated quantities of dangerous goods to be transported and stored in Building 2B do not exceed thresholds under the SEPP.
- The proposal generally accords with the relevant provisions of the OEE DCP as outlined in Appendix 6.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BIAR prepared by Ecologique provided at Appendix 8a.

7.4 Community views

Extensive community consultation was undertaken during the preparation and determination of the Concept Approval under SSD 3746043 with community feedback informing the development of controls for the OEE. The proposed development has been designed with consideration of the approved controls and where variations occur,

appropriate mitigation measures are incorporated to mitigate potential impacts to the surrounding land uses and the wider community.

The engagement plan provided at Appendix 20 outlines the engagement activities undertaken to date and proposed strategies to ensure the community is informed and has ongoing opportunities to provide feedback. Community engagement is discussed in Section 5 of this EIS.

7.5 Social, economic and environmental justification

7.5.1 Social

Based on the findings of the social impact assessment, the proposed development is expected to have a positive social impact on the local community as it would provide construction and related contractor employment, and warehousing and logistics employment.

7.5.2 Economic

The proposed development involves a significant estimated development cost of approximately \$633,697,216 (excl. GST) in construction and associated costs.

The financial investment will facilitate the future development of warehouse and distribution uses, providing approximately 160,267m² of operational industrial floor space within the WSEA.

The proposed development would also support up to 1,203 jobs during construction and 1,421 during operation.

7.5.3 Environmental

Under the National Strategy for Ecologically Sustainable Development (1992), ESD is defined as, 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.'

The EP&A Act utilises the definition of ESD from Part 3, section 6(2) of the PoEO Act, wherein ESD can be achieved through the implementation of a set of principles and programs.

The proposal has been assessed under these principles in the below sections and additionally, under the accompanying Sustainability Management Plan at Appendix 24.

The precautionary principle

The precautionary principle states that if there are threats of serious or irreversible environmental damage, the lack of full scientific certainty should not be used as a reason for postponing measures to prevent said damage.

Detailed investigations relating to the geological, environmental, engineering, ecological and social aspects of the proposal have been undertaken with the aim to produce an optimal project design and layout. The development of the site as outlined in this EIS and supporting technical assessments, provides the current optimised

proposal, which takes into consideration all physical, environmental, social, cultural heritage and economic aspects which are required to be addressed.

The information supporting this proposal demonstrates that there is sufficient certainty of the environmental impacts associated with the proposal and that these impacts are acceptable and can be mitigated.

Inter-generational equity

Inter-generational equity refers to the principle that the current generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

The proposed development ensures inter-generation equity as demonstrated in the SMP (Appendix 24) and by ongoing employment opportunities resulting from the development. The development will utilise renewable energy generation to ensure future proofing of the buildings for future generations.

The development represents a sustainable development, making best use of a currently vacant site within a precinct zoned for industrial use. The development will not have any unacceptable impacts on the environment and appropriate mitigation measures are proposed.

Conservation of biological diversity and maintenance of ecological values

The third principle of ESD states that the conservation of biological diversity and ecological integrity should be a fundamental consideration in development applications.

The potential environmental impacts of the proposal have been detailed throughout this EIS, with mitigation measures and proposed offsets described.

The proposal has been the subject of a thorough ecological assessment as detailed in Section 6.9 and as informed by the BIAR contained at Appendix 8b.

8 Summary

In summary, the assessment in this EIS concludes that the proposal warrants development approval for the following reasons:

- the proposal, as modified, is generally consistent with the site-specific DCP.
- the proposed modifications to the Concept approval under SSD-37486043 are demonstrated to be of minimal environmental impact, result in substantially the same development and are wholly in the public interest.
- the proposal will deliver 1,203 jobs during construction and 1,421 jobs during operation close to major road networks such as the M4 and M7 Motorways.
- the proposal will transform the remaining part of unutilised site and surrounds resulting in a better planning outcome that delivers significant public benefits to the community.
- the site is strategically identified and well-suited to accommodate the proposed warehouse and distribution centres.
- the proposal is consistent with the strategic industrial and logistics role of OEE and the broader WSEA.
- the proposal is consistent with State and local strategic policies that recognise the importance of employment lands, freight access, major industries, industrial activity and economic development.
- the range of specialist reports accompanying this EIS demonstrate that the development can be carried out on the site without any significant environmental impacts, in relation to matters including construction traffic and haulage, fill importation, dust and air quality, operational freight activity, 24-hour operations, lighting, operational noise, visual scale, cumulative industrial development and ecology design, landscape, contamination, traffic and ecology.
- all potential impacts are suitably mitigated through appropriate measures.