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16 January 2017

Mr Chris Ritchie
Director, Industry Assessments
Department of Planning & Environment
GPO Box 39
Sydney 2001

Dear Chris ,

SSDA 7663 - TOYOTA SPARE PARTS WAREHOUSE AND DISTRIBUTION CENTRE - SITE 3B, OAKDALE SOUTH ESTATE

An Environmental Impact Statement (EIS) and supporting documentation was submitted on 4 November 2016 to the New South Wales Department of Planning and Environment (DP&E) on behalf of Goodman in support of a state significant development application (SSDA) for the development of Site 3B within the Oakdale South Estate (OSE).

The proposal was for the construction, fit out and use of a warehouse and distribution facility to be used for the storage and distribution of spare parts for motor vehicles operated by Toyota.

The application package was placed on public exhibition from 17 November 2016 until 16 December 2016. Following the close of the public exhibition period, the DPE requested that the proponent, Goodman Property Services (Aust) Pty Ltd (Goodman), provide a formal response to the submissions received during the exhibition period.

This letter provides a formal response to the matters raised in the submissions.

NOTIFICATION AND SUBMISSIONS

The SSDA was formally notified to adjoining landowners and key local and state authorities and agencies who were formally invited to make comment on the SSDA. In total 11 agency submissions and no public submissions were received. We note that all submissions make no objection to SSDA 7663.

The Department of Planning has also provided key issues to be addressed in the response to submissions in its letter dated 22 December 2016.

In response to DP&E comments, a justification of the proposed site layout is discussed in the following section. This justification is accompanied by a detailed options analysis at **Table 1** and illustrated in the plans at **Attachment 1**.

A detailed response to the comments provided by the DP&E and within the various agency submissions are provided in **Table 2**.

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TOYOTA SITE LAYOUT

The design of the Toyota Parts and distribution facility has been developed following extensive operational analysis and design development with the intent of achieving best practice across Toyota's global portfolio with respect to safety and operational efficiency. Toyota have refined the design and layout of the proposed Toyota facility over the last 12 months to reach the optimum solution as shown in the plans lodged with the SSD application.

- This process has been heavily informed by Toyota's well documented 'just in time' or 'lean production systems (TPS) as well as the Toyota company commitment to 'Kaizan' (continuous improvement) following over 50 years of manufacturing cars in Australia.
- The fundamental design criteria for the orientation of the facility, including the location of the proposed loading docks has been informed by this operational analysis and includes:
- Warehouse proportions of 1:1.5 for maximum efficiency of the movement and storage of parts in the warehouse and separation of man / machine for employee safety as well as accommodate an 8,000 sqm mezzanine
- A 30m deep awning to provide all weather loading / unloading for the full range of vehicles up to B-doubles to visit the site and ensure safety and amenity for employees and truck drivers for loading / unloading.
- A generous 63m deep hardstand to enable a safe working environment for passing and manoeuvring trucks with separate entry and exit points for one way flow of vehicles on the hardstand and which accommodates on site queuing.
- Providing clear separation between cars and heavy vehicle access points. The main office faces north and is co-located with car parking areas to eliminate pedestrian / vehicular conflict and to provide legible access from the office for staff and the loading docks facing east.
- The building orientation ensures protection from adverse weather conditions and as such significantly improves overall health and safety and sustainability for Toyota staff. This has been informed by a detailed 'heat burden study' to minimise the amount of time with sub-optimal working environment for employees without resort to mechanically operated cooling and heating equipment. Additional design measures include:
- Minimising the warehouse openings to the north and west to reduce impact of solar gain and high strength winds, and
- Minimising the warehouse openings to the south and west to reduce the impact of cold winds and driving rain.
- Providing a north facing office which optimises natural light for the office staff and improving the overall internal amenity and energy efficiency.
- The office orientation also maximises Toyota's corporate exposure to the north-east corner and provides an attractive and professional building presentation to the street as show in the submitted photomontage. The above criteria are essential to meet the operational needs of Toyota and are a fundamental requirement for selection of this estate to accommodate this facility and has resulted in the proposed orientation and configuration of the facility thus necessitating the loading docks facing Estate Road 1.
- In relation to the proposed vegetative screening the Landscape Architect has confirmed that the species selection will ensure that the loading dock areas will be effectively screened thereby demonstrating consistency with this control. It is noted that several developments in the Erskine Park area have loading docks fronting estate roads this includes Grady Crescent and Lockwood Road in Erskine Park and as such not without precedent within this industrial precinct where operationally required (Refer Attachment 2).

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TOYOTA SITE LAYOUT – OPTIONS ANALYSIS

An options analysis has been undertaken to demonstrate the factors considered in the final orientation of the proposed warehouse. These options are illustrated at **Attachment 1**

Table 1 – Options Analysis

	Preferred Option		**North Hardstand**		**South Hardstand**		**West Hardstand**	
Solar Gain	✓	North facing office to reduce solar gain on office façade. A detailed heat burden study has been undertaken to support the current orientation as preferred in reducing the amount of potential time lost due to climate conditions	✕	Increased solar impact on west facing office façade	✕	Increased solar impact on east facing office façade	✕	Increased solar impact of low western sun on dock face
Prevailing Wind Exposure	✓	Avoids exposure to cold winds and wind driven rain from SW and hot NW winds	✕	Hot north west winds impacting operational areas on dock face	✕	Docks exposed to cold winds and wind driven rain from SW	✕	Docks exposed to cold winds and wind driven rain from SW Docks exposed to hot winds from NS
Hardstand Functionality	✓	Two direct access points to hardstand for one way traffic flow and surveillance of both locations from main office.	✕	Reduced hardstand area resulting in insufficient length of hardstand to	✕	Reduced hardstand area resulting in insufficient length of hardstand to	✕	Only single access point resulting in reduced available use of hardstand and

	Preferred Option		North Hardstand		South Hardstand		West Hardstand	
		Toyota has a 6 hour turnaround KPI for delivering spare parts to customers / dealerships resulting in the current design		accommodate storage and access requirements.		accommodate storage and access requirements Only single access point resulting in reduced available use of hardstand and preventing one way flow Right hand down access for trucks backing onto docks not achieved Not preferred to locate working hardstand adjacent to transmission line easement if avoidable		preventing one way flow. Right hand down access for trucks backing onto docks not achieved.
Building Proportions	✓	1:1.5 achieved	✕	1:1 only. Not suitable due to inefficient movement of storage and materials with man / machine separation	✕	1:1 only. Not suitable due to inefficient movement of storage and materials with man / machine separation	✓	1:1.5 achieved
Presentation	✓	Corporate exposure of office to NW corner (most prominent corner of site)	✕	No corporate exposure of office	✕	Corporate exposure for office and car parking however not on the prevailing frontage	✕	Corporate exposure for office and car parking reduced

	Preferred Option		North Hardstand		South Hardstand		West Hardstand	
						Reduced setback between Toyota and Sigma warehouse facades		No variation to building form on main estate road
Car parking functionality	✓	Multiple points of entry / exit to car park	✕	Single entry / exit point to hardstand resulting in compromised staff access during changeover periods and increase potential for queuing	✕	Multiple access points for car parking possible however encouraging more driveways on a higher order road	✕	Results in locating the Fire sprinkler tanks and pump rooms at the NE corner (most prominent location) as they need to be away from main office and adjacent in-rack connections for mezzanine

Table 2 – Response to Submissions

Matters Raised	Applicant consideration of matter/response
Department of Planning	
Urban Design and Layout	
The primary frontage appears to be to Estate Road 4, and the loading dock occupies the secondary frontage to Estate Road 1, the most prominent frontage. Architectural/design control No. 5 of the Penrith Council Development Control Plan 2014 - Erskine Business Park requires loading docks to be located towards the rear of allotments and screened from view through physical and/or vegetation screening. Consideration should be given to relocating the loading dock to the western elevation.	Location of Building and Loading Dock The design of the Toyota Parts and distribution facility has been developed following extensive operational analysis and design development with the intent of achieving best practice across Toyota's global portfolio with respect to safety and operational efficiency. This process has been heavily informed by Toyota's well documented 'just in time' or 'lean' production systems (TPS) as well as the Toyota company commitment to 'Kaizan' (continuous improvement) following over 50 years of manufacturing cars in Australia. The fundamental design criteria for the orientation of the facility, including the location of the proposed loading docks has been informed by this operational analysis and includes: • Warehouse proportions of 1:1.5 for maximum efficiency for movement and storage of parts in the warehouse and separation of man / machine for employee safety.

Matters Raised	Applicant consideration of matter/response
	• A 30m deep awning to provide all weather loading / unloading for the full range of vehicles up to B-doubles and ensures safety and amenity for employees and truck drivers for loading / unloading. • A generous 63m deep hardstand enables a safe working environment for passing and manoeuvring trucks with separate entry and exit points for one way flow of vehicles on the hardstand and which accommodates on site queuing. • Providing clear separation between cars and heavy vehicle access points. The main office faces north and is co-located with car parking areas to eliminate pedestrian / vehicular conflict and to provide legible access from the office for staff and the loading docks facing east. • The building orientation ensures protection from adverse weather conditions and as such significantly improves overall health and safety and sustainability for Toyota staff. Additional design measures include: – Minimising the warehouse openings to the north and west to reduce impact of solar gain and high strength winds, and – Minimising the warehouse openings to the south and west to reduce the impact of cold winds and driving rain. – Providing a north facing office which optimises natural light for the office staff and improving the overall internal amenity and energy efficiency. • The office orientation also maximises Toyota's corporate exposure to the north-east corner and provides an attractive and professional building presentation to the street as show in the submitted photomontage.

Matters Raised	Applicant consideration of matter/response
	The above criteria are essential to meet the operational needs of Toyota and are a fundamental requirement for selection of this estate to accommodate this facility. This has resulted in the proposed orientation and configuration of the facility thus necessitating the loading docks facing Estate Road 1. Vegetative Screening The Landscape Architect has confirmed that the species selection will ensure that the loading dock areas will be effectively screened thereby demonstrating consistency with this control. Site Image Landscape Architects confirms: *"Planting proposed along the Estate Road 1 consist of groups of native tree planting, groups of shrubs with complementing groundcovers. Groups of Corymbia maculata (maure height x width) 15m x 7m trees, are proposed along this entire frontage. Over time, providing a high level screening and softening of the proposed built form. To ensure screening at lower level, i.e 1-3 metres, Large groups of Viburnum ordoratissimum shall be planted across the extent of this boundary. Further to this a combination of Pennisetum 'Nafray', Gazania tomentosa, and Trachelospermum jasminoides are proposed to ensure a green and softened interface."* • We note that several developments in the Erskine Park area have loading docks fronting estate roads this includes Grady Crescent and Lockwood Road in Erskine Park and as such not without precedent within this industrial precinct where operationally required (refer to Attachment 2).

Matters Raised	Applicant consideration of matter/response
Additionally, consideration should be given to providing a consistent setback on the eastern elevation with that of the adjacent Sigma site to the north.	• The site layout and orientation for the adjacent Site 3A (Sigma) has been directly informed by Sigma's specific operational requirements. Given the differences in requirements between the end users and size / configuration of the development sites, it is not feasible nor practical to apply a one size fits all approach to development setbacks, noting that both sites comply with the numerical requirements approved in the site specific DCP. • The site specific DCP provides controls for the development of buildings within the OSE. The DCP requires a 7.5m building setback to Estate Roads and an average of 50% of this building setback to be landscaped along the frontage. This means that an average of 3.75m is required along the Estate Road frontages. • A continuous 3.8m landscape setback has been provided along the eastern boundary to Estate Road 1, with an increased landscape setback to the corner of Estate Road 1 and Estate Road 4, which is greater than 15m. This setback complies with the requirements of the site specific DCP and is consistent across both sites. • Perimeter tree planting has been provided as per the submitted landscape plans by Site Image which will provide adequate screening consistent with the approved landscape screening treatment approved across the estate under the SSD6917.
The Department has some concerns due to these unresolved urban design matters. As the Oakdale South Estate is in its early stages of development it is important to set a positive precedent for future warehousing developments. By encouraging warehouse buildings that address primary frontages, activate streetscapes, provide architectural interest and reduce	• The proposed buildings are operational facilities and while active frontages are sought and achieved where possible within the OSE, the operational requirements of the end-users have necessarily been prioritized to ensure that the facility can function in the manner required. Several alternative master plan options were considered however the

Matters Raised	Applicant consideration of matter/response
the visual impact of loading docks, the overall visual amenity of the estate would improve and the aims and objectives of the broader estate would be realised.	proposed master plan is the only option which can acceptably satisfy both Toyota and Sigma's specific operational requirements. • Whilst it is acknowledged that active frontages would be a desirable urban design outcome and have been achieved to the extent possible, the importance of the OSE as a critical component of a strategically important employment hub, serving the direct and indirect needs of the growing Western Sydney region, including the future proposed airport at Badgerys Creek cannot be understated. • It is emphasised that allowing end users to tailor their designs per their specific operational requirements is critical to attracting long term occupants and therefore securing the economic prosperity of the WSEA. • The proposed elevations are consistent with the façade treatments implemented at Oakdale Central. The elevations reflect a consistent design language and an attractive and holistic presentation across the Oakdale precinct. • Architectural features and landscaping are proposed to break up large expanses of building mass which are consistent with the treatment approved under SSD 6917. Providing varied building and landscape setbacks also contributes to improving the overall visual amenity and building articulation.
<u>Noise</u> The Noise Impact Assessment includes modelling of predicted noise levels based on worst case traffic movements. This assessment should be updated to include all noise generating uses including plant and equipment in	Acoustic Engineers SLR have provided the following response: Similar to the S.96 Masterplan noise impact assessment, plant and equipment have been assessed in the Toyota noise assessment.

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accordance with the Secretary's Environmental Assessment Requirements dated 21 July 2016.	In addition to light and heavy vehicle movements on the estate roads and within the Toyota site, loading activities are modelled in the hardstand area including gas powered forklift operations, heavy vehicle manoeuvring and maximum noise sources such as heavy vehicle air brake releases. The following sound power levels (SWLs) have been modelled for these sources: • Light vehicle movements: 96 dBA • Heavy vehicle movements: 106 dBA • Gas powered forklifts: 93 dBA • Heavy vehicle air brake release: 115 dBA LAMAX The exact models of fixed plant and their locations are not yet known, so a cumulative SWL of 100 dBA for all external plant on the Toyota site and conservative equipment placement (i.e. rooftop locations) have been modelled. These noise sources are included in the predicted results discussed in the noise impact assessment.
Penrith City Council	
<u>Layout and Orientation</u> Council has previously raised concerns regarding the modified building concept for Precincts 3, 4 and 5. These concerns relate to the orientation of the warehouses, the location of parking areas and loading docks as well as a	• We note that these comments are site wide and that concerns relating to Precincts 4 and 5 are not applicable to this SSDA. • The site specific DCP with which the proposal generally complies allows for flexibility in design to account for tenant needs. It is noted that the

Matters Raised	Applicant consideration of matter/response
reduction in land available for landscaping relative to the previously approved application.	proposed development complies with the setbacks provided within this DCP. • Site 3B is the most suitable for Toyota's operational requirements as it has two road frontages. Toyota requires two points of entry / egress directly to the hardstand to enable one way traffic flow and for the safety and operational efficiency of the hardstand area. • The office has a northerly aspect and presents a design of architectural merit to the frontage of Estate Road 4 and at the north east corner of the site. This is illustrated clearly in the submitted photomontage.
Concerns regarding the layout of development under the proposed modified concept plan given the large expanse of blank walls and building mass facing prominent estate roads. The proposed development shows little regard for any presentation to its frontage to Estate Road 01.	• Prominent elevations fronting the street or public reserves are consistent with the façade treatments approved by the Department under the original SSD 6917. The building is setback significantly (65m) from the street frontage. The setback reduces the appearance of bulk from this frontage. • Landscaping, including trees and shrubs, along this frontage further reduce any unacceptable impact to the Estate Road 1 frontage (refer to Estate Road 01 planting / screening description above). • The ancillary office is also located along the main frontage, contributing to its articulation.
The Erskine Business Park Section of Council's Development Control Plan (DCP) 2014 does not allow loading docks within the defined setback to any road frontage.	• A site specific DCP was approved under SSD 6917. This DCP is required to be adopted into Penrith DCP 2014 as per Condition B12 of the Concept and Stage 1 approval for SSD 6917. • The requirements of this control are that loading areas *should* be located towards the rear of the allotments and *where possible* screened. The proposed layout is justifiable for the following reasons.

Matters Raised	Applicant consideration of matter/response
At a minimum the extent of landscaping should be increased along the eastern boundary to match the 15m setback to any road required by the Erskine Business Park Section of the DCP.	– The operational requirements of Toyota require the loading area in the proposed location in order to provide two points of entry / egress to the hardstand to ensure one way traffic flow for safety and operational efficiency. – Landscaped screening will be provided along Estate Road 1 as per the landscape plans submitted with the SSDA. Site Image has confirmed that the proposed landscaping will provide adequate screening of the loading areas when viewed from Estate Road 1 (refer to landscape commentary above). – We note that there are several locations within Erskine Park area where the loading docks have frontages to the estate roads so this design response is not without precedence where operationally necessary (refer to Attachment 2). It is also noted that there is no through traffic to the south for the OSE and visitation is limited to staff and visitors. • The proposed setbacks have been addressed earlier in the response to DP&E comments. A landscaped setback of 14m is considered to be excessive as it exceeds the building setback requirements of the site specific DCP.
The Swept Path Analysis prepared by Ason Group appears to show that a large expanse of the hardstand area facing Estate Road 1 will be utilised for external storage. This is not supported by Council on the basis of resulting in worsened visual prominence	• The swept path analysis being referred to in this comment was based on an earlier revision of the site plan. The area is shown on the submitted architectural plans will accommodate overflow car parking if required.
<u>Signage</u>	

Matters Raised	Applicant consideration of matter/response
The amount of business identification signage proposed is considered to be excessive. Development should comply with Council's DCP controls for signage, particularly the control which outlines that industrial and business park uses are only "permitted one pole or pylon signs with the maximum height not in excess of 7m."	• A site specific DCP for the OSE has been approved as part of SSD 6917. This SSDA also included a Signage Strategy that was specifically amended to address Penrith Council's concerns. • The proposed signage scheme is consistent with Goodman's estate wide signage strategy approved for both the Oakdale Central and South Estates. The estate wide signage strategy is necessary to provide adequate wayfinding, precinct, building and tenancy identification. • The signage is consistent with the adopted signage strategy which is similar to other developed industrial precincts. Appropriate signage is essential to the safety and operation of the estate roads within OSE given the size and 24 hour operations of the warehouses buildings being developed. • The proposed business and building identification signage has been developed according to the requirements of Toyota. This facility not only accommodates the spare parts distribution but also a significant commercial office component and will represent Toyota's primary distribution facility in NSW. • Signage will comprise a combination of building identification signage, way-finding signage and pylon signage. The Toyota signage provides visual identification of the brand and provides visual interest to the building. We note that other approved pylon signs within the Oakdale Estate have heights of 12m. • Given the size of the site (64,290 sqm) and the building proposed, the 7 business/building identification signs are not considered an excessive amount of signage.

Matters Raised	Applicant consideration of matter/response
Built Form Servicing requirements for the building such as sprinkler tanks and the like, should not be located within the front setback or be visible from public places. These requirements shall be integrated with the building and landscaping design.	• The tanks and pump rooms etc. are in the north-western corner of the site, well away from the most visually prominent area of the site being the intersection of Estate Road 1 and Estate Road 4. Nevertheless, it is noted that NSW Fire Brigades require these services to be located at an accessible location near the water supply point in the street. • The proposal has been architecturally designed to ensure that all portions of the building, including infrastructure such as water tanks and pump rooms, are integrated into the facility. • Water tanks and plant rooms will be finished appropriately to form modern and attractive elements of the building rather than designed to be hidden or screened.
Fencing and Retaining Walls All front fencing shall be located behind the landscape setback and not along the road frontage boundary. Fencing is to be a maximum height of 2.1 m and of an 'open' nature.	• The Stage 1 SSDA proposed palisade fencing along the internal estate roads and between each warehouse building proposed in that DA. • The Department's assessment of the Stage 1 SSDA concluded that the fencing proposed is compatible with the proposed landscape treatments and streetscape controls • The location of the proposed fencing is consistent with this approach and as such considered to be acceptable in the context of the Stage 1 approval and site specific DCP controls.
Any retaining walls visible from public places shall be stepped and contain suitable landscaping to soften their visual impact.	AT&L engineers have confirmed that: • There are no retaining walls proposed which would be visible from the public domain.

Matters Raised	Applicant consideration of matter/response
	• All retaining walls will incorporate appropriate pedestrian and vehicular safety barriers in accordance with the either Austroads or the relevant BCA requirement. • Slopes which have a gradient of 1:5 or less will be turfed. Slopes which have gradients steeper than 1:5 will be planted out with vegetation which does not require mowing.
<u>Side/Rear Boundary Interface</u>	
The batter slopes at the western and southern boundaries straddle the proposed lot boundaries. Additionally, given that they are proposed at a slope of 1:3 they should be fully vegetated given that mowing this gradient will be difficult.	• Noted – the landscape plans show these batter slopes and boundaries to be treated with proposed shrubs, massed grasses and groundcovers.
The perimeter road should also be setback 2.5 m for its entire length as per the site-specific controls included in the Oakdale South SSD approval. The perimeter road should not encroach on the landscape setback at any point including the south-western corner of the site.	• The Site specific DCP controls requires the following side and rear setbacks: - 0m – side boundary - 2.5m – rear boundary • Both the south and the western boundaries (along the perimeter road) may be considered side boundaries, requiring 0m built form setbacks. As the proposal seeks 1.5m setback both boundaries to the internal road, this is considered acceptable. • Assuming full compliance with a DCP control of 2.5m setback to the rear (south boundary) and zero setback to sides, a landscape area of 587sqm would be achieved. The proposed 1.5m setback to each boundary results in a landscape area of 761 sqm which provides 174 sqm of additional

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	landscape area. Given that more landscape area is achieved by the proposed setbacks, a departure from the site specific DCP requirements is considered acceptable in this instance. • The EIS identified that the proposed setback balances the need for amenity and functionality on the estate with the needs of the proposed end user. The landscaping will communicate a consistent brand and identity with the adjoining sites provides appropriate transitions between public and private domain and between developable and non-developable lands on the site. • As the neighbouring premises to the south and west are Goodman owned, there is a vested interest to maintain adequate landscaping treatment for separation between its tenancies, to satisfy end user requirements.
<u>Engineering</u> All subdivision and engineering works shall be designed and constructed in accordance with Council's 'Design Guidelines for Engineering Works for • Subdivisions and Developments' and Council's 'Engineering Construction Specification for Civil Works' • All retaining walls shall be located within private property and not within the road reserve areas. • All retaining walls shall have pedestrian and vehicular safety barriers in accordance with Austroads Guidelines.	AT&L have provided the following responses: • Generally, all works have been designed in consultation with Penrith City Council (PCC) and their design specification and will be constructed in accordance with PCC Subdivisions and Developments' and Council's 'Engineering Construction Specification for Civil Works' • All retaining walls are located on private property • All retaining walls will incorporate appropriate pedestrian and vehicular safety barriers in accordance with the either Austroads or the relevant Australian Standard. • Slopes which have a gradient of 1:5 or less will be turfed. Slopes that have gradients steeper than 1:5 will be planted with vegetation which does not require mowing.

Matters Raised	Applicant consideration of matter/response
• All batter slopes shall be a maximum of 1 in 5 (horizontal to vertical) to permit mowing. Any batter slope steeper than 1 in 5 shall be vegetated.	
<u>Water Sensitive Urban Design</u> A CDS or similar vortex type GPT must therefore be installed as per the MUSIC modelling relied upon. It is recommended that the Department impose a condition of consent accordingly. It is also recommended that the Department includes a condition to ensure that there is ongoing cleaning and maintenance of the devices.	• The Music modelling undertaken in developing the overall stormwater scheme for the development included GPT's to be located on most downstream point of the stormwater network. The aim of the unit is to capture Gross Pollutants. Modelling was also undertaken using Enviropods within each inlet pit. The resultant Music model demonstrated either option meets the targeted guideline reductions. At detailed design and prior to CC, a final Music model will be prepared and submitted to the PCA for final signoff.
A condition of consent should be imposed which requires that the WSUD measures be operated and maintained in perpetuity to the satisfaction of Council in accordance with the final Operation and Maintenance Management Plan.	• It would usual for OEMP be prepared for each of the basins and devices installed across the development site. The OEMP will be completed prior to OC.
Water NSW	
It is noted that on-site stormwater infrastructure will be connected to estate-wide infrastructure delivered under the approved Concept Proposal Stage 1 SSDA, and that post-development flows will remain the same, or less than existing pre-development flows, and peak stormwater flows downstream of	• Noted no formal response required.

Matters Raised	Applicant consideration of matter/response
the site will not be increased as a result of the proposal. This is supported by WaterNSW with no further comment on the application.	
WaterNSW requests that the Department continues to consult with us regarding any future developments for the greater Oakdale Estate.	• Noted.
TransGrid	
TransGrid has reviewed this development application and determined that the proposed development is conditionally acceptable subject to the provisions within the letter however noting that the development is entirely within (Precinct 3, Site 3B) outside the easement corridor.	• Noted.
Transgrid has requests the development comply with conditions relating to the protection of its assets within the easement	• Noted. The proposal ensures that the development will not impact upon the Transmission easement and will comply with the relevant requirements relating to this application.
Roads and Maritime	
Roads and Maritime has reviewed the submitted documentation and raises no objection to the proposed application.	• Noted – no formal response required
Office of Environment and Heritage	
After reviewing the relevant documents, OEH's Greater Sydney Planning Team has concluded that both matters do not contain biodiversity, natural hazards or Aboriginal cultural heritage issues that require a formal OEH	• Noted – no formal response required.

Matters Raised	Applicant consideration of matter/response
response. We have no further need to be involved in the assessment of these projects.	
Heritage Council of NSW	
Toyota Spare Parts Warehouse and Distribution Centre is located within the same Lot as the proposed Sigma Pharmaceutical Facility Distribution and Warehouse and Distribution Facility (SSD 7719) to the south of the remains associated with the Lochwood Estate identified during archaeological testing (Artefact Heritage 2015) and there will be no additional impacts than have been assessed already.	• Noted – no formal response required.
Environment Protection Authority On the basis of the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (P0E0 Act). The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the POE0 Act. Accordingly, the EPA has no comments regarding the proposal and has no further interest in this proposal.	• Noted – no formal response required.
Department of Primary Industries DPI has reviewed the application and Environmental Impact Statement and advises as the EIS states on page 46 “that generally there will be no further impacts on areas of environment or cultural sensitivity than those identified	• Noted – no formal response required.

Matters Raised	Applicant consideration of matter/response
within the EIS for the approved Concept and Stage 1 SSDA 6917", NSW DPI has no further comment.	
Transport for NSW Transport for NSW has reviewed the documentation presented in support of the Development Application and has no further comment.	• Noted – no formal response required.
Endeavour Energy	
From an electricity distribution networks perspective, Endeavour Energy's recommendations and comments in relation to the supply of electricity to the individual developments / sites are as follows:	
- The applicant for the future proposed development of the sites will need to submit an application for connection of load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be determined.	• Noted, the applicant will submit for connection when required.
- Any future proposed buildings, structures, etc. must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132kV) as specified in AS/NZS 7000:2010 'Overhead line design - Detailed procedures' and the 'Service and Installation Rules of NSW'.	• Noted the proposed buildings will comply with the minimum safe distances.
- The construction of any building or structure (including fencing) that is connected to or in close proximity to Endeavour Energy's electrical	• Noted the proposed development will comply with the relevant Australian Standards.

Matters Raised	Applicant consideration of matter/response
network is required to comply with AS/NZS 3000:2007 'Electrical installations' to ensure that there is adequate connection to the earth.	
- Before commencing any underground activity the applicant is required to obtain advice from the Dial before You Dig 1100 service in accordance with the requirements of the Electricity Supply Act 1995 (NSW) and associated Regulations.	• Noted.
- Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why they may be at risk and what you can do to work safely should be understood.	• Noted
In case of an emergency relating to Endeavour Energy's electrical network, the applicant should note Emergencies Telephone is 131 003 which can be contact 24 hours/7 days.	• Noted.
NSW Fire and Rescue	
The development site appears to have adequate measures in place to mitigate the risk of significant fire spar throughout the site through vegetation management in a manner compliant with the requirements stated in *Planning for Bushfire Protection 2000*. Additionally, the site is described as having a water supply for firefighting operations which is compliant with Australian	• Noted – no formal response required

Matters Raised	Applicant consideration of matter/response
Standards. Access into and around the property for the purposes of firefighting appears to meet the requirements of *Planning for Bushfire Protection 2000*.	
Owing to the potential for a significant fuel load within the building and the bushfire prone land on which it is built FRNSW recommends that. 1. All fire safety measures appropriate to the proposed development and its associated risk meet all relevant Legislative, National Construction Code and Other Department of Planning instrument requirements. 2. The potential fuel load contained within the proposed building be appropriately assessed to ensure that the fire sprinkler system installed within the proposed building is appropriate to the hazard classification as defined in Australian Standard AS 2118.1-1999.	• Noted – no formal response required at this stage.
NSW Rural Fire Service The Service has reviewed the plans and documents received for the proposal and subsequently raise no concerns or issues in relation to bush fire.	• Noted – no formal response required.

CONCLUSION

We have considered the comments and issues raised by the DP&E in relation to the subject SSDA. All comments and issues provided in relation to this SSDA have been considered on their merit with respect to the specific operational requirements of Toyota. Based on the comments received and noting that there are no 'objections' to the proposed development Goodman does not consider it necessary at this stage to provide any amended consultant reports or significant design revisions in response.

The proposed built form is consistent with other warehouse developments within the Oakdale Estate and other similar industrial estates. We note that there are significant limitations on providing a varied approach to built form due to the specific warehouse typologies required for the operations of the end users. The proposal is consistent with the approved Concept and Stage 1 SSD approval 6917 and the proposed Section 96 modification currently being assessed by DPE which establishes the overall use of the precinct for warehouse and distribution purposes.

As noted above, Toyota's intent is to ensure this Parts & Distribution Warehouse is Toyota's 'Global Best' in employee safety & Operational efficiency. To meet this aspirational target, Toyota is investing heavily into many new state of the art safety systems (man/machine & machine/machine separation) and prototype operational efficiency systems.

These systems have been developed through Toyota's well documented 'Just in time' or 'Lean' production systems (TPS) & along with the learnings, & 'Kaizan' (continuous improvement) from the 50+ years of Manufacturing cars in Australia.

Utilising the experience & knowledge of Toyota's Engineers in their Melbourne facility, these systems have been specifically designed to meet the exact needs of Toyota's distribution network. This has driven the very specific warehouse design and site layout. Key learnings from these new safety & operational efficiency systems will be implemented into Toyota's Global network of Parts Distribution Facilities and used as a benchmark for all future Toyota developments.

The proposed development of Site 3B for Toyota's Spare Parts Warehouse and Distribution Centre will result in a productive and appropriate development which integrates into the surrounding WSEA with acceptable impacts on surrounding lands. Any potential impacts can be reasonably mitigated, thus avoiding any unreasonable impact on amenity of surrounding residential areas, useability of surrounding sites, and environment.

The proposal will generate:

- 38,456m2 of warehouse, distribution and office floorspace to meet specific operational demands of Toyota.
- 1,200 construction jobs and 138 operational jobs;
- $57.5 million of direct investment by Toyota in undertaking the proposed development.

The proposal is consistent with the strategic objectives of the Western Sydney Employment Area and a *A Plan for Growing Sydney*. The delivery of Badgerys Creek Airport will permanently alter the land use pattern of the Broader WSEA, through changes to the surrounding environment in terms of noise, traffic and air quality. The changing context of the OSE reinforces its role as a critical component of a

strategically important employment hub, serving the direct and indirect needs of the growing Western Sydney region, including the future proposed airport at Badgerys Creek.

The proposed development for a Toyota Warehouse and Distribution centre is wholly consistent with the broader strategic framework for the locality and broader WSEA area and as such should be supported by the Department of Planning and Environment.

Yours sincerely,

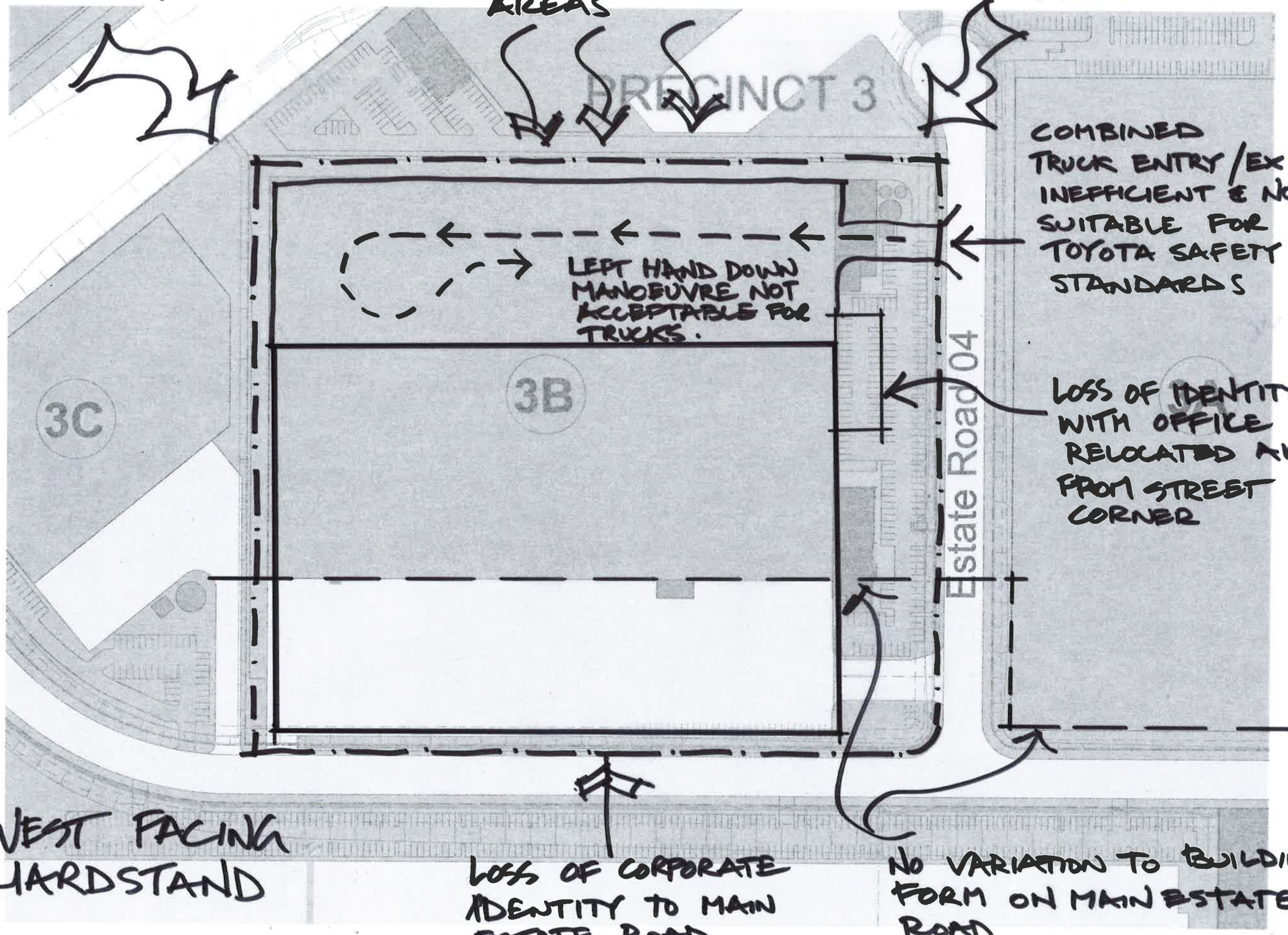
Christophe Charkos
Senior Consultant

ATTACHMENT 1 ALTERNATE LAYOUT OPTIONS

STRONG WINDS IMPACTING DOCK FACE.

INCREASED SOLAR GAIN TO WESTERN OPERATIONAL AREAS

WARM NORTH WEST WINDS IMPACTING DOCK FACE.



COMBINED TRUCK ENTRY / EXIT INEFFICIENT & NOT SUITABLE FOR TOYOTA SAFETY STANDARDS

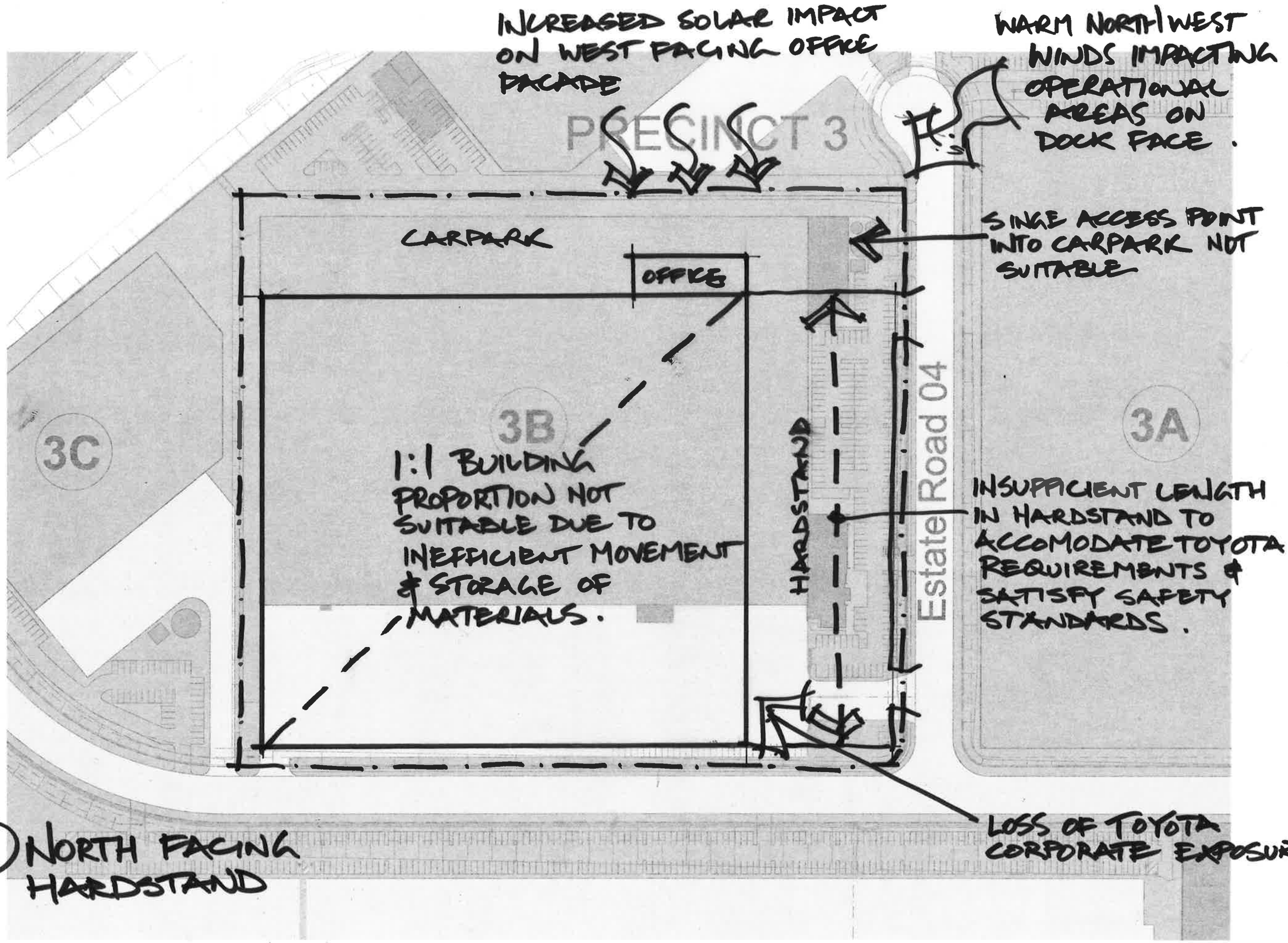
LEFT HAND DOWN MANOEUVRE NOT ACCEPTABLE FOR TRUCKS.

LOSS OF IDENTITY WITH OFFICE RELOCATED AWAY FROM STREET CORNER

(1) WEST FACING HARDSTAND

LOSS OF CORPORATE IDENTITY TO MAIN ESTATE ROAD

NO VARIATION TO BUILDING FORM ON MAIN ESTATE ROAD



(2) NORTH FACING HARDSTAND

PRECINCT 3

IMPACT TO DOCK FACE FROM COLD SOUTHERLY WINDS

INSUFFICIENT LENGTH IN HARDSTAND TO ACCOMODATE TOYOTA REQUIREMENTS & SATISFY SAFETY STANDARDS

HARDSTAND

1:1 BUILDING PROPORTION NOT SUITABLE DUE TO INEFFICIENT MOVEMENT & STORAGE OF MATERIALS

OFFICE

CARPARK.

Road 04

REDUCED SETBACK BETWEEN BUILDING FACADES.

COMBINED TRUCK ENTRY/EXIT INEFFICIENT & NOT SUITABLE FOR TOYOTA SAFETY STANDARDS

(3) SOUTH FACING HARDSTAND

ATTACHMENT 2 EXAMPLES OF LOADING AREAS – ERSKINE PARK

Figure 1 – Grady Crescent – Erskine Park, showing loading areas fronting the Estate Roads

Source: www.maps.google.com.au

Figure 2 – Grady Crescent Erskine Park – showing how loading areas fronting Estate Roads can be effectively screened by landscaping.

Source: www.maps.google.com.au

Figure 3 – Lockwood Road – Erskine Park – illustrating loading areas fronting Estate Roads

Source: www.maps.google.com.au