Preliminary Risk Screening SEPP 33 (Resilience & Hazard)

Apollo Place Data Centre, 1 Apollo Place & 1 Sirius Road, Lane Cove West, NSW 2066

EMKC^3

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Prepared by:

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SLR Project No.: 610.031515.00001

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
R01-1.5	24 February 2025	Dr Craig Simpson	Dr Peter Georgiou	Dr Peter Georgiou
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Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with EMKC3 (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

Executive Summary

SLR Consulting Australia Pty Ltd (SLR Consulting) has been engaged by EMKC[3] to assess the potential impacts of the proposed Development Application for the Apollo Place Data Centre, at 1 Apollo Place and 1 Sirius Road, Lane Cove West, New South Wales (NSW) 2066.

This report addresses the Project in relation to Hazards & Risk in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 (the SEPP).

Under the SEPP, the Preliminary Risk Screening (PRS) stage assesses the storage and transport of specific dangerous goods classes that have the potential for significant, off-site effects. Specifically, this stage involves the identification of classes and quantities of all dangerous goods to be used, stored or produced on site with respect to storage depot locations as well as transported to and from the site.

If screening thresholds for the identified dangerous goods are exceeded, the SEPP requires a Preliminary Hazard Analysis (PHA) to be undertaken.

The site is located at 1 Apollo Place and includes a southeastern portion of 1 Sirius Road, Lane Cove West, NSW 2066 and comprises the property title SP 80721 and the south easter portion of DP 1271404. The site is within the local government area of Lane Cove Council (Council). The Development Site is zoned E4 General Industry in the Lane Cove Local Environment Plan 2009, as are the Lots surrounding the site.

There are no Dangerous Goods to be used or stored at the facility. Therefore, the facility is not considered potentially hazardous with regards to Dangerous Goods.

Lithium ion batteries are Class 9 Miscellaneous dangerous substances and articles, which are excluded from the SEPP screening process. The hazards associated with these batteries will be covered in the fire safety report.

Diesel fuel to be stored on site, is not classed as a Dangerous Goods, but is classed as a C1 Combustible Liquid, provided no flammable liquids are stored with the diesel.

However, C1 combustible liquids are defined as dangerous goods under NSW workplace legislation. Where dangerous goods are used or stored in volumes greater than the manifest quantities specified in schedule 11 of the Work Health and Safety Regulation 2017, Safework NSW must be notified, which will include manifests and lodgement an emergency plan to Fire and Rescue NSW.

It is noted that one of the adjoining lots (1 Sirius Road), contains an approved data centre with similar processes being undertaken on that site. For the sake of completeness, the combined hazard of both sites, relating to dangerous goods storage at that site and the combined storage across the two sites, was assessed.

If the development of Apollo Place Data Centre (24.7 t diesel) is considered in addition to the existing approved data centre at 1 Sirius Road (1,966.9 t), the combined storage volumes (1,991.6 t) would make a significant increase to the volume of diesel approved to be stored at 1 Sirius Road. The existing Safework NSW notification would need to be updated. However, the combined storage would not exceed the threshold quantity under the POEO Act (2,000 tonnes) and therefore would not require an Environmental Protection Licence under (POEO Act) from NSW EPA.

Overall Conclusion

The SEPP screenings for storage of dangerous goods indicate that the development may not be classified as a hazardous or offensive industry.

It is the conclusion of this report that the proposed development, with suitable engineering and design controls in place, meets all the requirements stipulated by the Department of Planning, Housing and Infrastructure, and hence would not be considered, to be an offensive or hazardous development on site.

Table of Contents

Tables in Text

Figures in Text

Acronyms and Abbreviations

DA	Development Application
DPHI	NSW Department of Planning, Housing and Infrastructure
kg	Kilogram
kL	Kilolitres (= 1,000 litres)
km	Kilometre (= 1,000 metres)
L	Litres
LEP	Local Environment Plan
m	Metres
PHA	Preliminary Hazard Assessment
POEO (Act)	Protection of the Environment Operations (Act)
PRS	Preliminary Screening Study
SEARs	(Planning) Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State significant development
t	Tonne (= 1,000 kg)

1.0 Introduction

SLR Consulting Australia Pty Ltd (SLR Consulting) has been engaged by EMKC[3] to assess the potential impacts of the proposed Development Application for the Apollo Place Data Centre, consisting of 1 Apollo Place and the southeastern portion of 1 Sirius Road, Lane Cove West (the Site) New South Wales (NSW) 2066.

This report addresses the Project in relation to Hazards & Risk in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 (the SEPP).

This involves a two-stage process:

Stage 1 – Preliminary Risk Screening (PRS)

Under the SEPP, the Preliminary Risk Screening (PRS) stage assesses the storage and transport of specific dangerous goods classes that have the potential for significant, off-site effects. Specifically, this stage involves the identification of classes and quantities of all dangerous goods to be used, stored or produced on site with respect to storage depot locations as well as transported to and from the site.

Stage 2 – Preliminary Hazard Analysis (PHA)

If screening thresholds for the identified dangerous goods are exceeded, the SEPP requires a Preliminary Hazard Analysis (PHA) to be undertaken.

The PHA determines the level of risk to people, property, the environment and surrounds, taking into account the implementation of controls.

If the risk levels exceed the criteria of acceptability and/or if the controls are assessed as inadequate, or unable to be readily controlled, then the development is classified as “hazardous industry”.

Where it is unable to prevent offensive impacts on the surrounding land users, the development is classified as “offensive industry”.

PHAs are prepared in accordance with Hazardous Industry Planning Advisory Paper No.6 – “Guidelines for Hazard Analysis (DoP,2011)” and “Multi-Level Risk Assessment (DoP,2011)”.

2.0 Methodology of this Study

The present Hazard and Risk Study forms part of the supporting documentation for the Development Application (DA) for the Proposal, undertaken as a State Significant Development (SSD) Application in accordance with the NSW Department of Planning, Housing and Infrastructure (DPHI) Planning Secretary's Environmental Assessment Requirements (SEARs), application number SSD-67407231. Part 16 Hazards and Risks, states that:

- *Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021.*
- *Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis and Multi-Level Risk Assessment.*
- *If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis*.

It should be noted that the development is not adjacent to or on land in a pipeline corridor. Accordingly, a hazard analysis relating to a pipeline is not required.

The purpose of this report is to provide a preliminary risk screening of the hazards associated with the storage of dangerous goods on the site in accordance with the SEPP. The purpose of the SEPP preliminary risk screening is to exclude from more detailed studies those developments which do not pose significant risk.

Where the SEPP Preliminary Risk Screening identifies a development as potentially hazardous and/or offensive, developments are required to undertake a Preliminary Hazard Analysis (PHA) to determine the level of risk to people, property and the environment at the proposed location and in the presence of controls.

If the risk levels exceed the criteria of acceptability and/or if the controls are assessed as inadequate, or unable to be readily controlled, then the development is classified as 'hazardous industry'. Where it is unable to prevent offensive impacts on the surrounding land users, the development is classified as 'offensive industry'.

A development may also be considered potentially hazardous with respect to the transport of dangerous goods. A proposed development may be potentially hazardous if the number of generated traffic movements (for significant quantities of hazardous materials entering or leaving the site) is above the cumulative annual or peak weekly vehicle movements. Table 4 in the document Applying SEPP 33: Hazardous and Offensive Development Application Guidelines (NSW Department of Planning, 2011), outlines the screening thresholds for transportation.

This report presents information pertaining to the presence of any hazardous materials, flammable substances, and compressed or liquefied gases proposed to be stored or handled in relation to the Development Site, including on site storage, or transported to or from the site. This report also covers an assessment of the potential hazard posed by the presence of lithium batteries on the site.

2.1 Proposed Development

The site is located at 1 Apollo Place and includes a southeastern portion of 1 Sirius Road, Lane Cove West, NSW 2066 and comprises the following property titles as set out in **Table 1**.

Table 1 Site Identification

Site Adress	Legal Descriptions	Land Area (approx..)
1 Apollo Place, Lane Cove West	SP 80721	2,684 m^2
South-eastern portion of 1 Sirius Road, Lane Cove West (previous 2 Apollo Place)	South-eastern Portion of Lot 1 DP 1271404	2,598 m^2

The total area of the Site is 5,301sqm. It is noted that the Site comprises 2,598sqm of the south-eastern portion of 1 Sirius Road which spans across 42,053sqm. The Site is identified in **Figure 1** and **Figure 2** below.

Figure 1 Cadastral Map (Source: SIX Maps, 2022)

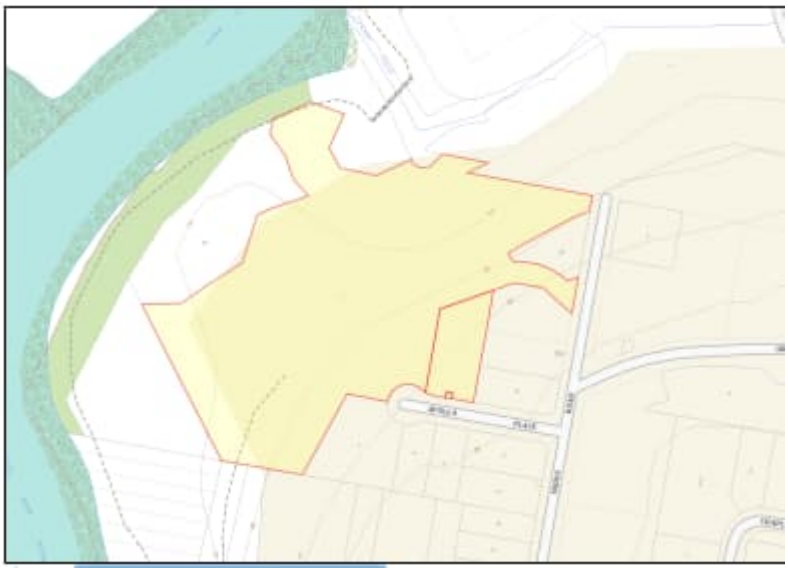


Figure 2 Aerial Map (Source: Sixmaps, 2022)

The Site currently comprises a four (4) storey building (1 Sirius Road), which we understand is currently used as offices ancillary to the approved data centre being constructed on the Site and a one storey building (1 Apollo Place) which we understand is used as a light industry. The Site has four existing vehicle driveway crossovers to Apollo Place. The neighbouring lot to the south is currently an office building. The neighbouring lots to the east are a plastic tool manufacturer and orthopaedics manufacturer.

The Site is located approximately 9.1 km northwest of the Sydney CBD and 12.4 km east of Parramatta. The Site is approximately 500 m north of the Lane Cove Business Park and approximately 2.5 km from the Lane Cove town centre. The Lane Cove River and Stringybark Creek are located approximately 200 m to 250 m north and west of the Site.

The site is within the local government area of Lane Cove Council (Council). The Development Site is zoned E4 General Industrial in the Lane Cove Local Environment Plan 2009, as are the Lots surrounding the site (see

Figure 3).

2.2 Hours of Operation

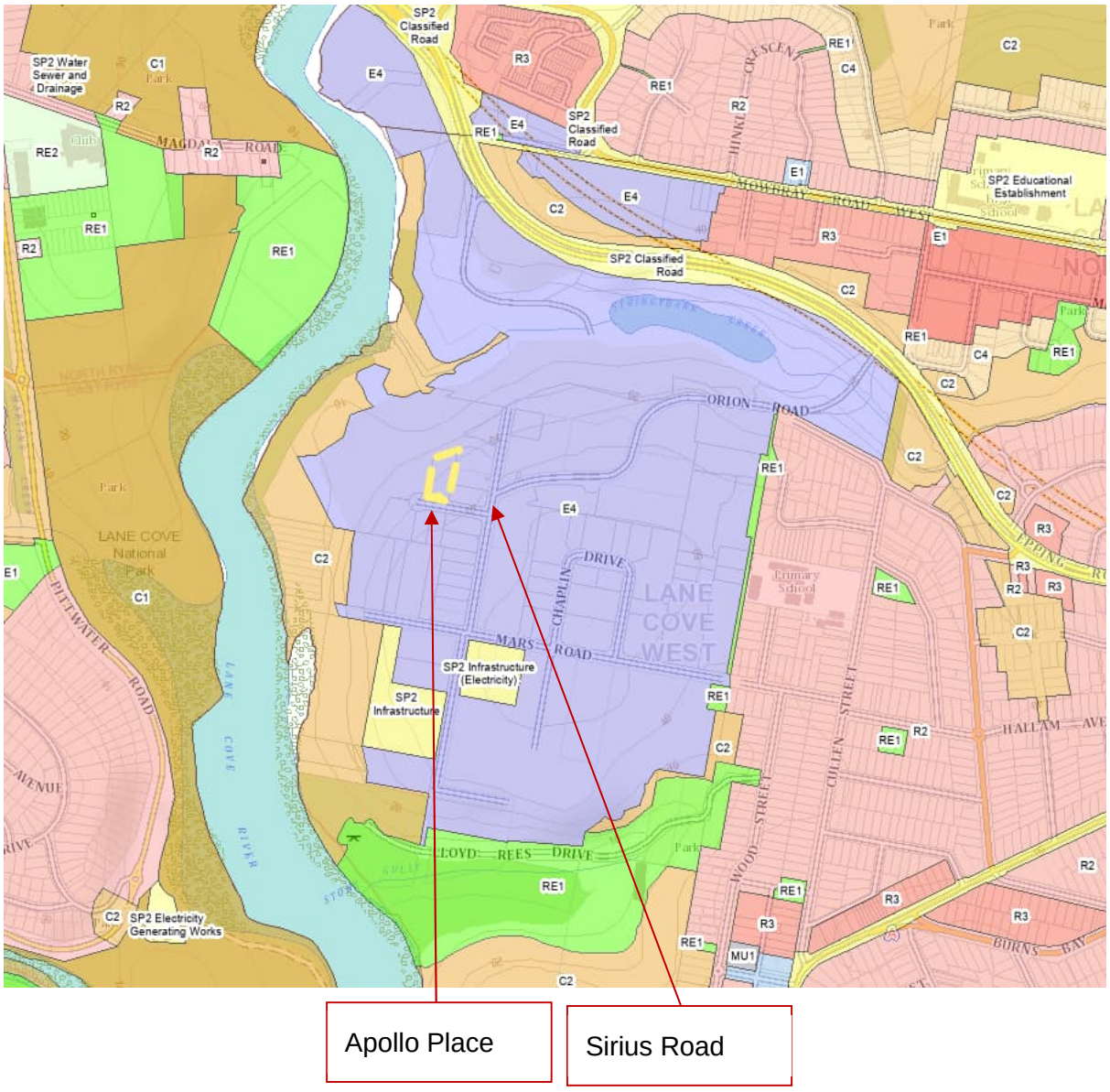
The proposed development will operate 24 hours a day, seven days a week.

2.3 Vehicular Access and Parking

Access to the Development Site will be via Apollo Place (refer to

Figure 3).

Figure 3 Land Zoning Map



3.0 Surrounding Land Uses and Zoning

Under the provision of the Lane Cove Local Environmental Plan (LEP) 2009, the Development Site is zoned E4 General Industrial as is the land surrounding the site.

The proposed use as a data centre is permitted with consent in the E4 General Industrial zone, being a prescribed zone pursuant to Chapter 2, Part 2.3, Division 3 of State Environmental Planning Policy (Transport and Infrastructure) 2021 (the Transport and Infrastructure SEPP),

Details of neighbouring properties and distance to residential properties have been set out in **Table 2**.

Table 2 Neighbouring properties and distance to residential properties

Direction	Approximate Distance from Boundary of Development Site	Company / Operations	Use of Premises
East	Adjacent	Ukulele Mate	Musical Instruments store
South	23 m	5 Apollo Place	Curvy - Lingerie supplier DKM Blue - Promotional material supplier No 1 Draft Pick - Basketball Club
Southwest	33 m	3 Apollo Place	Western Power Services - electrical installation services
Southeast	39 m	11 Sirius Road	Class Occasion Hire - party equipment rentals
East	Adjacent	7 Sirius Road	Signature Orthopaedics - medical supplies
Northeast	280 m	Residential property	Residences

4.0 Proposed Development

The proposal involves the construction and operation of a data centre and associated infrastructure and amenities, (identified as the Apollo Place Data Centre, comprising the following scope of works:

- Minor earthworks involving cut and fill works
- Infrastructure comprising civil works and utilities servicing
- Construction of a four (4) storey data centre building comprising:
  - A power consumption of 45 megawatts (MW)
  - 9,328sqm of gross floor area (GFA)
  - 4 data halls
  - 29 back-up generators
- Diesel storage capacity of 29.1 kilo litres (kL)
- The diesel storage will consist of 315kL of new tanks will be required to serve 1 Apollo Place, but located within 1 Sirius Road, while 30.5kL of return tank will also be required within 1 Apollo Place.
- 27 car parking spaces
- 392sqm of associated landscaping
- Ancillary offices and amenities
- Hours of operation being on a 24 hours per day, 7 days per week basis
- Torrens title lot consolidation

4.1 Diesel Storage

As stated above the total diesel storage will be 345.5 kilolitres (kL). The breakdown of diesel storage has been set out below in **Table 3**.

Table 3 Diesel Storage Requirements – Apollo Place

Tanks / Location	Quantity	Diesel Storage Requirements
Generators with Day Tank Safe fill level per Day Tank is 950L	29 generators	27.6 kL
Return Tank 1.5 kL	1	1.5 kL
Site Total Diesel Storage		**29.1 kL** **(24.7 t)** [1]

Note 1 conversion based on an average density of 1.18 l/kg for automotive diesel

4.1.1 Diesel Storage Adjacent Property Lane Cove West Data Centre – 1 Sirius Road (approved)

It is noted that one of the adjoining lots (1 Sirius Road), contains an approved data centre with similar processes being undertaken on that site. For the sake of completeness, the combined hazard of both sites has been assessed, in relation to the dangerous goods involved in the combined storage across the two sites.

Table 4 Diesel Storage Requirements - 1 Sirius Road (approved)

Tanks	Quantity	Diesel Storage Requirements
Generators with Day Tank Safe fill level per Day Tank is 950 L	121 generators	115 kL
Bulk Tanks		2,199 kL
Site Total Diesel Storage		**2,307.3 kL** **(1,966.9 t)** [1]

Note 1 conversion based on an average density of 1.18 l/kg for automotive diesel

5.0 Preliminary Risk Screening

Preliminary risk screening of the proposed development is required under the SEPP to determine the need for a Preliminary Hazard Analysis (PHA). The preliminary risk screening assesses the storage of specific Dangerous Goods classes that have the potential for significant, off-site effects. Specifically, the assessment involves the identification of classes and quantities of all dangerous goods to be used, stored or produced on site with respect to storage depot locations as well as transported to and from the site.

5.1 Dangerous Goods Storage

There are no Dangerous Goods to be used or stored at the facility. Therefore, the facility is not considered potentially hazardous with regards to Dangerous Goods.

Lithium ion batteries are Class 9 Miscellaneous dangerous substances and articles, which are excluded from the SEPP screening process. The hazards associated with these batteries will be covered separately in the Fire Safety Report commissioned for the project.

Diesel fuel to be stored on site, is not classed as a Dangerous Goods, but is classed as a C1 Combustible Liquid, provided no flammable liquids are stored with the diesel.

SLR has been advised by the client that no flammable liquids will be stored with the diesel. Therefore, in the proposed development diesel will be classed as a C1 Combustible Liquid.

Note that C1 combustible liquids are not a dangerous good under UN (United Nations) classification. However, they are defined as dangerous goods under NSW workplace legislation. Where dangerous goods are used or stored in volumes greater than the manifest quantities specified in Schedule 11 of the Work Health and Safety Regulation 2017, Safework NSW must be notified, which will include manifests and lodgement an emergency plan to Fire and Rescue NSW. Further advice on these requirements should be sort from Safework NSW.

It should be noted that the Protection of the Environment Operations Act 1997, Schedule 1, Clause 9(1) indicates that ‘petroleum products storage’, which would include diesel fuel storage, is a Scheduled Activity. Capacity to store greater than 2,000 tonnes requires an environment protection licence under the Protection of the Environment Operations Act 1997 (POEO Act), from the NSW Environmental Protection Authority (EPA).

The proposed inventory of diesel, and classification is provided in **Table 5** below.

Table 5 Dangerous Goods in Storage*

Substance	Hazardous Class	Total Storage on Site	SEPP Threshold Quantity	SEPP 33 Threshold Level Findings
Diesel	C 1	24.7 t Equivalent to 29.1 kL[1]	Manifest Quantity Safework NSW: 100 t or kL POEO Act 2,000 t	Safework NSW notification required Environmental Protection Licence under (POEO Act) not required from NSW EPA

Note: * Information supplied by EMKC[3]
1 Based on density of 1.18 L/kg for automotive diesel

It is noted that one of the adjoining lots (1 Sirius Road), contains an approved data centre with similar processes being undertaken on that site. For completeness to assess the combined hazard of both sites, SLR has listed below the dangerous goods storage at that site and the combined storage across the two sites.

If the development of Apollo Place Data Centre is considered in addition to the already existing data centre at 1 Sirius Road, the combined storage volumes would be a significant increase to the volume of diesel currently stored. The Safework NSW notification would need to be updated. However, the combined storage would not exceed the threshold quantity under the POEO Act and therefore would not require an Environmental Protection Licence under (POEO Act) from NSW EPA.

The combined storages of the two sites have been set out below in **Table 6**.

Table 6 Combined Dangerous Goods Storage 1 Apollo Place (proposed) and Lane Cove West Data Centre – 1 Sirius Road (approved)

Substance	Hazardous Class	Total Storage on Site	SEPP Threshold Quantity	SEPP Threshold Level Findings
1 Sirius Road – Approved Data Centre				
Diesel	C 1	1,966.9 t Equivalent to 2,307 kL[1]	Manifest Quantity Safework NSW 100 t or kL POEO Act 2,000 t	Safework NSW notification required Environmental Protection Licence under (POEO Act) not required from NSW EPA
Combined Storage: 1 Sirius Road (approved) and 1 Apollo Place (proposed)				
Diesel	C 1	1,991.6 tonnes Equivalent to 2,336.4 kL[1]	Manifest Quantity Safework NSW 100 t or kL POEO Act 2,000 t	Safework NSW notification required Environmental Protection Licence under (POEO Act) not required from NSW EPA

Note: * Information supplied by EMKC[3]
1 Based on density of 1.18 L/kg for automotive diesel

5.2 Dangerous Goods Transport

In applying the SEPP preliminary risk screening, a proposed development may be deemed potentially hazardous if the numbers of generated traffic movements for significant quantities of dangerous goods entering and leaving the site, are above the cumulative vehicle movements shown in the SEPP guideline (**Table 2**).

Dangerous Goods are not transported for the operation of the site. Therefore, the facility is not considered potentially hazardous with regards to transport of Dangerous Goods.

5.3 Lithium Ion Batteries

The hazards associated with lithium ion batteries in the facility are overheating and fire.

There are control measures for lithium ion batteries that are designed to maintain and contain the risks within the site boundary and reduce the risk to areas outside the site boundary. The technical and management safeguards required for lithium ion batteries are self-evident and readily implemented as part of plant safety engineering.

Table 7 Lithium Storage – Apollo Place

Substance	Hazardous Class	Total Storage on Site	Manifest Quantity	Findings
Lithium batteries	DG 9 Packing Group II	115,000 kg	10,000 kg	Safework NSW notification required

Table 8 Lithium Combined Storage

Substance	Hazardous Class	Total Storage on Site	Manifest Quantity	Findings
1 Sirius Road – Approved Data Centre				
Lithium batteries	DG 9 Packing Group II	308,000 kg	10,000 kg	Safework NSW notification required
Combined Storage: 1 Sirius Road (approved) and 1 Apollo Place (proposed)				
Lithium batteries	DG 9 Packing Group II	423,000 kg	10,000 kg	Safework NSW notification required

The hazards associated with lithium ion batteries and the control measures to be put in place are to be set out separately in the Fire Safety Study - please refer to the Fire Safety Study for details.

6.0 Preliminary Risk Screening Conclusions

This report has reviewed and applied the requirements of Hazards & Risk in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 (the SEPP) in order to determine whether the policy applies to the Project.

The SEPP preliminary risk screening for storage of dangerous goods indicate that the development may not be classified as a hazardous or offensive industry.

The volume of diesel fuel storage to be stored at 1 Apollo Place and 1 Sirius Road does exceed the manifest quantities for C1 combustible liquids specified in schedule 11 of the Work Health and Safety Regulation 2017. Therefore, the Safework NSW notification will need to be notified, which will include manifests and lodgement an emergency plan to Fire and Rescue NSW.

The combined storages of 1 Apollo Place and 1 Sirius Rd (already approved data centre) of 1,985.9 tonnes exceed the manifest quantities for C1 combustible liquids specified in schedule 11 of the Work Health and Safety Regulation 2017. Therefore, the Safework NSW notification may need to be updated, which will include manifests and lodgement an emergency plan to Fire and Rescue NSW.

Under the Protection of the Environment Operations Act 1997, Schedule 1, Clause 9(1) ‘petroleum products storage’, which would include diesel fuel storage, is a Scheduled Activity. Capacity to store greater than 2,000 t requires an environment protection licence from the NSW Environmental Protection Authority (EPA). Under the current design the storage capacity of 24.7 t proposed for 1 Apollo Place and the combined storages of 1 Apollo Place and 1 Sirius Road (already approved data centre) of 1,991.6 t (equivalent to 2,336.4 kL) is expected to not require an environment protection licence.

The hazards associated with lithium ion batteries and the control measures to be put in place are set out in the Fire Safety Study - please refer to the Fire Safety Study for details.

It is the conclusion of this report that the proposed development, with suitable engineering and design controls in place, meets all the requirements stipulated by the NSW Department of Planning, Housing and Infrastructure, and hence would not be considered, to be an offensive or hazardous development on site.

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7.0 References

Commonwealth Government, *Australian Code for the Transport of Dangerous Goods by Road and Rail* (ADG Number 7.9, October 2024).

Department of the Environment and Energy (2017), *Guide to the Australian Energy Statistics August 2017*, Canberra.

NSW Government *Code of Practice Managing Risks of Hazardous Chemicals in the Workplace,* August 2019

NSW Government *Notifications of Schedule 11 Hazardous Chemicals and Abandoned Tanks – Guidance Material*. Safework NSW

Planning NSW, 2011a *Risk Criteria for Land Use Safety Planning – Hazardous Industry Planning Advisory Paper No 4*, New South Wales Government

Planning NSW, 2011b *Hazard Analysis – Hazardous Industry Planning Advisory Paper No 6*, New South Wales Government

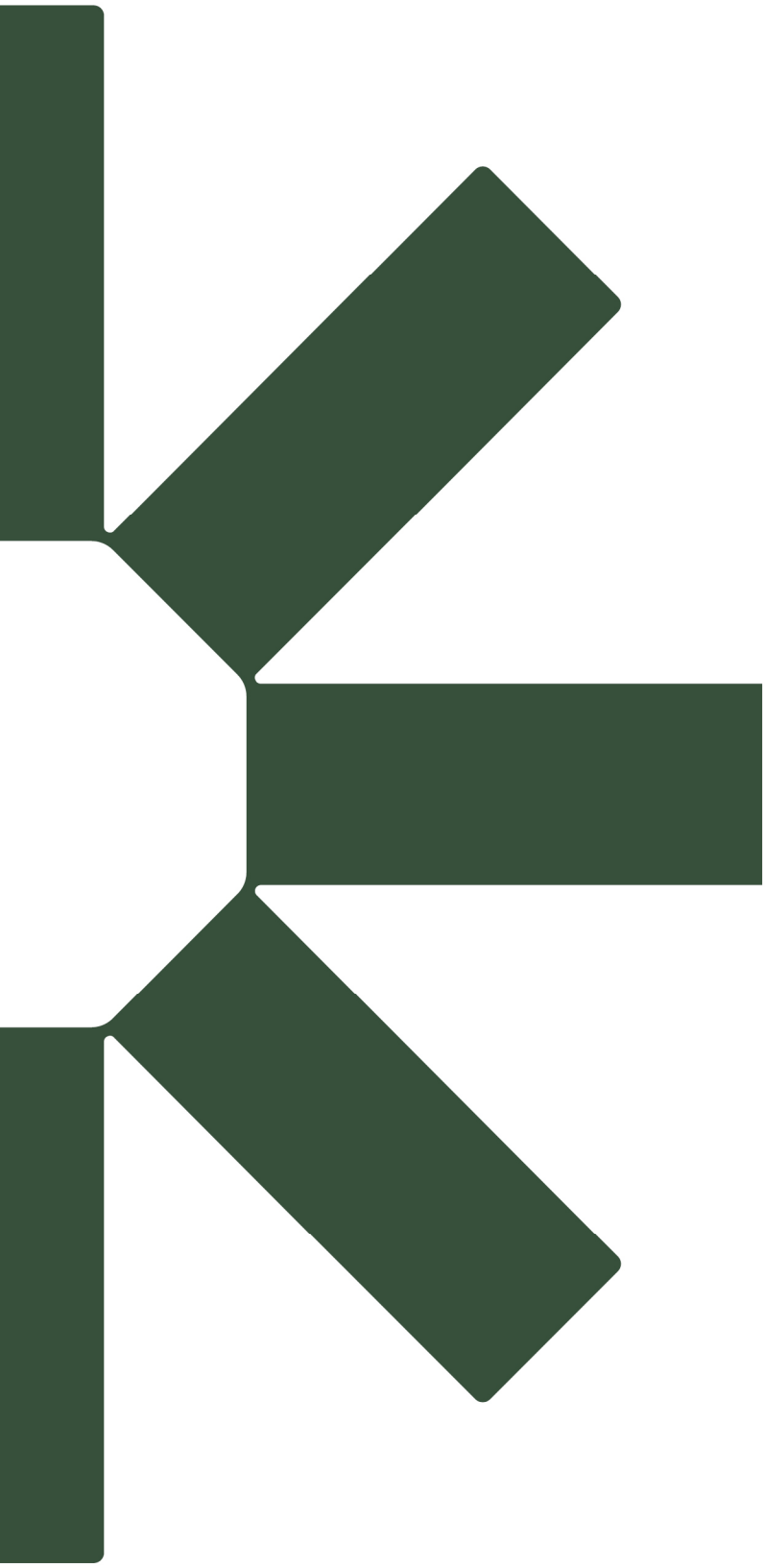
Planning NSW, 2011c, *Applying SEPP 33 - Hazardous and Offensive Development Application Guidelines*.

State Environmental Planning Policy (Resilience and Hazards) 2021.

8.0 Feedback

At SLR, we are committed to delivering professional quality service to our clients. We are constantly looking for ways to improve the quality of our deliverables and our service to our clients. Client feedback is a valuable tool in helping us prioritise services and resources according to our client needs.

To achieve this, your feedback on the team's performance, deliverables and service are valuable and SLR welcome all feedback via https://www.slrconsulting.com/en/feedback. We recognise the value of your time and we will make a $10 donation to our Charity Partner - Lifeline, for every completed form.



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