



State Environmental Planning Policy No. 33

Mamre Road, Kemps Creek

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Mamre Road, Kemps Creek

The GPT Group

Prepared by

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Quality Management

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A	24 February 2021	Draft issued for review	Jason Costa	Renton Parker
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Executive Summary

Introduction

The GPT Group (GPT) seeks approval for a concept masterplan for the future development of a warehouse estate comprising (5) warehouse buildings and Stage 1 construction of Warehouse 1 and 3. Currently all the warehouses are speculative developments with no assigned tenants at this stage. However, the Secretary's Environmental Assessment Requirements (SEARs) requires the preparation of a State Environmental Planning Policy No. 33 (SEPP 33) to demonstrate the warehouses do not exceed SEPP 33. Where an exceedance occurs, a Preliminary Hazard Analysis (PHA) is required to demonstrate the risks are compliant with the land zoning.

It is noted that while the approval is only sought for construction of Warehouses 1 and 3, approval for the additional speculative warehouses have been included within the assessment.

As no tenants have been allocated, it has been proposed to prepare a SEPP 33 assessment for each warehouse to provide an allowance of DGs within each warehouse to provide flexibility in leasing options. GPT has engaged Riskcon Engineering Pty Ltd (Riskcon) to prepare the SEPP 33 assessment for the site(s).

Conclusions

A review of the quantities of DGs stored at the site and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

Recommendations

The following recommendations have been made generally for sites storing DGs:

- The DGs shall be stored in a manner which complies with the applicable storage standards (i.e. AS/NZS 3833:2007 or class specific standards such as AS 1940-2017).
- The documentation required by the Work Health and Safety (WHS) Regulation 2017 shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFARP) as required by the WHS Regulations.
- Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2009 shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

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1.0 Introduction

1.1 Background

The GPT Group (GPT) seeks approval for a concept masterplan for the future development of a warehouse estate comprising (5) warehouse buildings and Stage 1 construction of Warehouse 1 and 3. Currently all the warehouses are speculative developments with no assigned tenants at this stage. However, the Secretary's Environmental Assessment Requirements (SEARs) requires the preparation of a State Environmental Planning Policy No. 33 (SEPP 33) to demonstrate the warehouses do not exceed SEPP 33. Where an exceedance occurs, a Preliminary Hazard Analysis (PHA) is required to demonstrate the risks are compliant with the land zoning.

It is noted that while the approval is only sought for construction of Warehouses 1 and 3, approval for the additional speculative warehouses have been included within the assessment.

As no tenants have been allocated, it has been proposed to prepare a SEPP 33 assessment for each warehouse to provide an allowance of DGs within each warehouse to provide flexibility in leasing options. GPT has engaged Riskcon Engineering Pty Ltd (Riskcon) to prepare the SEPP 33 assessment for the site(s).

1.2 Scope of Work

The scope of work is to prepare a SEPP 33 assessment for warehouses 1, 2, 3, 4 and 5 within the proposed estate at Mamre Road, Kemps Creek.. Should any additional studies be required (i.e. PHA) these are not included within the scope of works. No other sites are included within the scope of works.

2.0 Methodology

2.1 General Methodology

The methodology used in this assessment is as follows:

- Review the types and proposed quantities of DGs to be stored at the site.
- Compare the quantities of DGs against the threshold quantities listed in “Applying SEPP 33 – Hazardous and Offensive Development” (Ref. [1]) to identify whether the storage location or quantity triggers SEPP 33.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33.
- Report on the findings of the SEPP 33 assessment.

2.2 Data taken from “Applying SEPP 33”

Figure 2-1, extracted from “Applying SEPP 33” provides details on the application of Figures or Tables from the same document to determine the applied screening threshold for each class of DG and **Figure 2-2** indicates the SEPP 33 general screening thresholds (table 3 from the document).

Class	Method to Use/Minimum Quantity
1.1	Use graph at Figure 5 if greater than 100 kg
1.2-1.3	Table 3
2.1 — pressurised (excluding LPG)	Figure 6 graph if greater than 100 kg
2.1 — liquefied (pressure) (excluding LPG)	Figure 7 graph if greater than 500 kg
LPG (above ground)	table 3
LPG (underground)	table 3
2.3	table 3
3PGI	Figure 8 graph if greater than 2 tonne
3PGII	Figure 9 graph if greater than 5 tonne
3PGIII	Figure 9 graph if greater than 5 tonne
4	table 3
5	table 3
6	table 3
7	table 3
8	table 3

Figure 2-1: Screening Method to be Used

Class	Screening Threshold	Description
1.2	5 tonne	or are located within 100 m of a residential area
1.3	10 tonne	or are located within 100 m of a residential area
2.1	(LPG only — not including automotive retail outlets ¹)	
	10 tonne or 16 m ³	if stored above ground
	40 tonne or 64 m ³	if stored underground or mounded
2.3	5 tonne	anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale
	1 tonne	chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg
	2.5 tonne	chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg
	100 kg	liquefied gas kept in or on premises
	100 kg	other poisonous gases
4.1	5 tonne	
4.2	1 tonne	
4.3	1 tonne	
5.1	25 tonne	ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary
	5 tonne	ammonium nitrate — elsewhere
	2.5 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers <30 kg
	1 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg
	5 tonne	any other class 5.1
5.2	10 tonne	
6.1	0.5 tonne	packing group I
	2.5 tonne	packing groups II and III
6.2	0.5 tonne	includes clinical waste
7	all	should demonstrate compliance with Australian codes
8	5 tonne	packing group I
	25 tonne	packing group II
	50 tonne	packing group III

Figure 2-2: General Screening Threshold Quantities

Class	Vehicle Movements		Minimum quantity*	
	Cumulative Annual	Peak or Weekly	per load (tonne)	
			Bulk	Packages
1	see note	see note	see note	
2.1	>500	>30	2	5
2.3	>100	>6	1	2
3PGI	>500	>30	1	1
3PGII	>750	>45	3	10
3PGIII	>1000	>60	10	no limit
4.1	>200	>12	1	2
4.2	>100	>3	2	5
4.3	>200	>12	5	10
5	>500	>30	2	5
6.1	all	all	1	3
6.2	see note	see note	see note	
7	see note	see note	see note	
8	>500	>30	2	5
9	>1000	>60	no limit	

Figure 2-3: Transportation Screening Thresholds

3.0 SEPP 33 Review

3.1 Introduction

State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33) has been developed under the Environmental Planning and Assessment Act 1979 to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a facility to ensure the risks to surrounding land uses is minimised.

The policy includes a guideline that assists government and industry alike in determining whether SEPP 33 applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [1]) provides a list of threshold levels, for the storage of DGs, above which the regulator considers the DG storage to be potentially hazardous. In the event the threshold levels are exceeded, SEPP 33 applies and a Preliminary Hazard Analysis (PHA) is required, followed by a series of hazard analysis studies stipulated by the Department of Planning, Industry, and Environment in the conditions of consent.

3.2 Warehouse 1

3.2.1 Description

Warehouse 1 is proposed to be a standalone warehouse in the south east corner of the estate. The closest site boundary is to the north at a distance of 9 m.

3.2.2 Proposed Storage Details

Warehouse 1 has not been allocated to a tenant yet; hence, it would be a speculative development and so the storage commodities are unknown at this stage. Therefore, to provide some flexibility in terms of potential tenants, a SEPP 33 has been conducted to provide an allowance for storage of DG commodities as part of the initial Development Application (DA).

Provided in **Table 3-1** is a summary of the DGs and materials proposed to be stored at the facility as part of the site operations.

Table 3-1: DG Classes or Materials Stored and Maximum Quantities at Warehouse 1

Class	Description	Maximum Quantity (kg)
2.1	Flammable gases (i.e. aerosols)	20,000 kg / 5,000*
2.1	Flammable gas (LPG Tank, cylinders, etc.)	7,500 L / 4,125^
3	Flammable liquids (i.e. hand sanitisers, perfumes, alcohol)	60,000
8	Corrosive Substances (i.e. cleaning chemicals)	10,000

*Based upon 25% of the aerosol product weight being LPG

^Density of LPG at 550 kg/m³

3.2.3 Storage Assessment

Threshold limits for the application of SEPP 33 are presented in **Table 3-2** indicating the maximum quantity that can be stored on site for each class.

Table 3-2: Quantities Stored and SEPP 33 Threshold for Warehouse 1

Class	Description	Maximum Quantity (kg)	SEPP 33 Threshold (kg)	Does SEPP 33 Apply?
2.1	Flammable gases (aerosols)	9,125	10,000	N
3	Flammable liquids	60,000	8.5 m (see Figure 3-1)	N

The flammable liquids threshold is based upon a distance to the site boundary based upon the quantity. The quantity of flammable liquid stored at the site is 60,000 kg which requires a distance of 8.5 m from the storage to the site boundary. The closest site boundary is 9 m from the warehouse on the southern side of the warehouse which is greater than the threshold distance. Therefore, the flammable liquid storage would not exceed the SEPP 33 threshold distance.

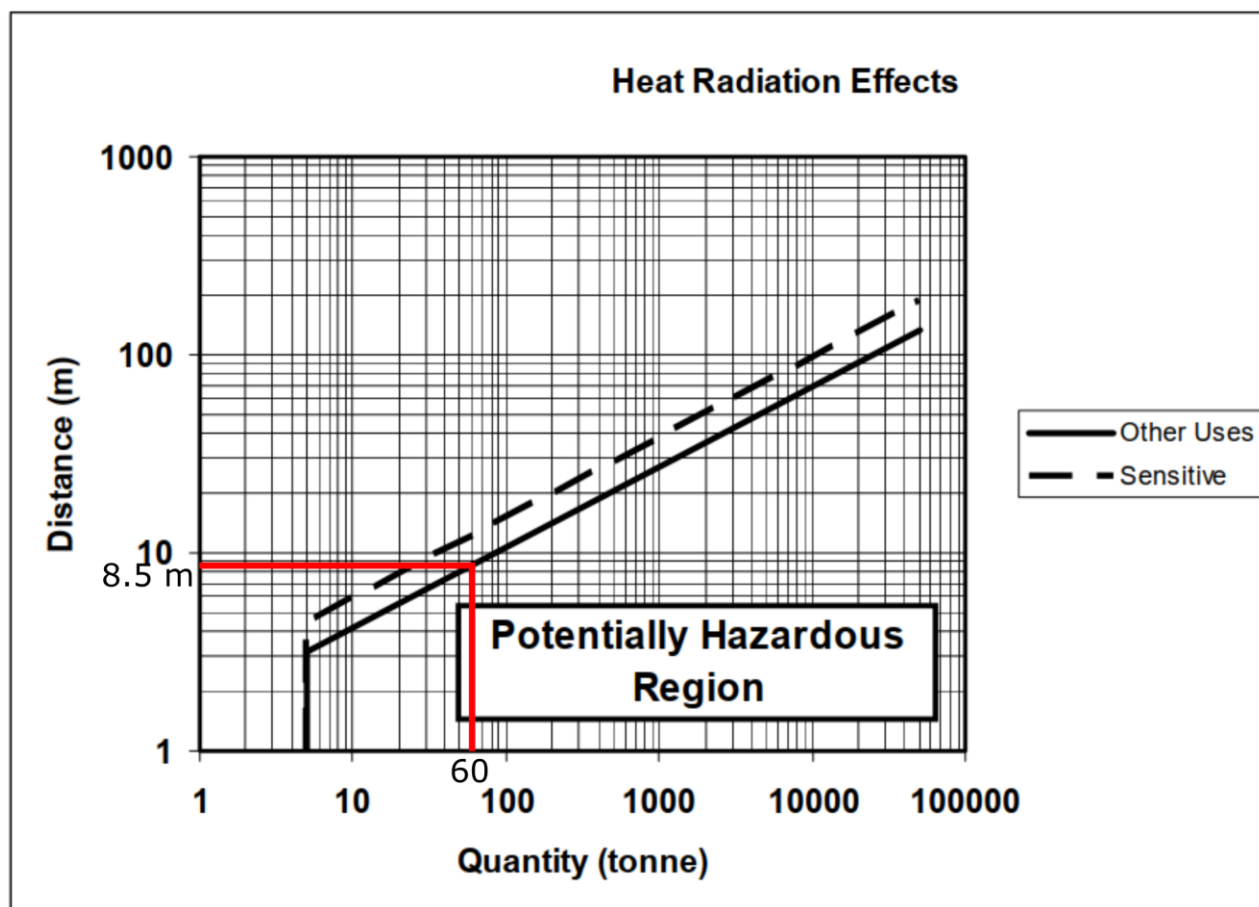


Figure 3-1: Class 3 SEPP 33 Distance – Warehouse 1 (Speculative)

3.2.4 Transport

The quantities to be stored are less than SEPP 33 shown in **Figure 2-3** or not applicable; hence, a high turnover of stored product would be required to exceed the transport movements associated with the corresponding storage. This rate of turnover isn't credible; hence, it is considered that the transport screening thresholds of SEPP 33 would not be exceeded; hence, SEPP 33 would not apply.

3.3 Warehouse 2 - Speculative

3.3.1 Description

Warehouse 2 is proposed to be a standalone warehouse centrally located on the eastern side of the estate. The closest site boundary is to the north at a distance of 12.5 m which backs onto the proposed riparian zone.

3.3.2 Proposed Storage Details

Warehouse 2 has not been allocated to a tenant yet; hence, it would be a speculative development and so the storage commodities are unknown at this stage. Therefore, to provide some flexibility in terms of potential tenants, a SEPP 33 has been conducted to provide an allowance for storage of DG commodities as part of the initial Development Application (DA).

Provided in **Table 3-3** is a summary of the speculative quantities to be approved for Warehouse 2.

Table 3-3: DG Classes or Materials Stored and Maximum Quantities for Warehouse 2

Class	Description	Maximum Quantity (kg)
2.1	Flammable gases (aerosols)	36,000 / 9,000*
2.2	Non-flammable, non-toxic gases	25,000
3	Flammable liquids (i.e. hand sanitisers)	70,000
4.1	Flammable solids (i.e. ethanol wipes)	4,000
5.1	Oxidising substances (i.e. hair dye)	2,500
8	Corrosive substances (i.e. cleaning chemicals)	15,000

*Based upon 25% of the aerosol product weight being LPG

3.3.3 Storage Assessment

Threshold limits for the application of SEPP 33 are presented in **Table 3-4** indicating the maximum quantity that can be stored on site for each class.

Table 3-4: Quantities Stored and SEPP 33 Threshold for Warehouse 2 (Speculative)

Class	Description	Maximum Quantity (kg)	SEPP 33 Threshold (kg)	Does SEPP 33 Apply?
2.1	Flammable gases (aerosols)	9,000	10,000	N
2.2	Non-flammable, non-toxic gases	25,000	n/a	N
3	Flammable liquids (i.e. hand sanitisers)	70,000	9.5 m (see Figure 3-2)	N
4.1	Flammable solids (i.e. ethanol wipes)	4,000	5,000	N
5.1	Oxidising substances	2,500	5,000	N
8	Corrosive substances	15,000	25,000	N

The flammable liquid threshold is based upon the separation distance from the storage to the site boundary. Based upon a storage of 70,000 kg, the separation required is 9.5 m as shown in **Figure 3-2**. The closest site boundary is 12.5 m; hence, the separation distance threshold is not exceeded.

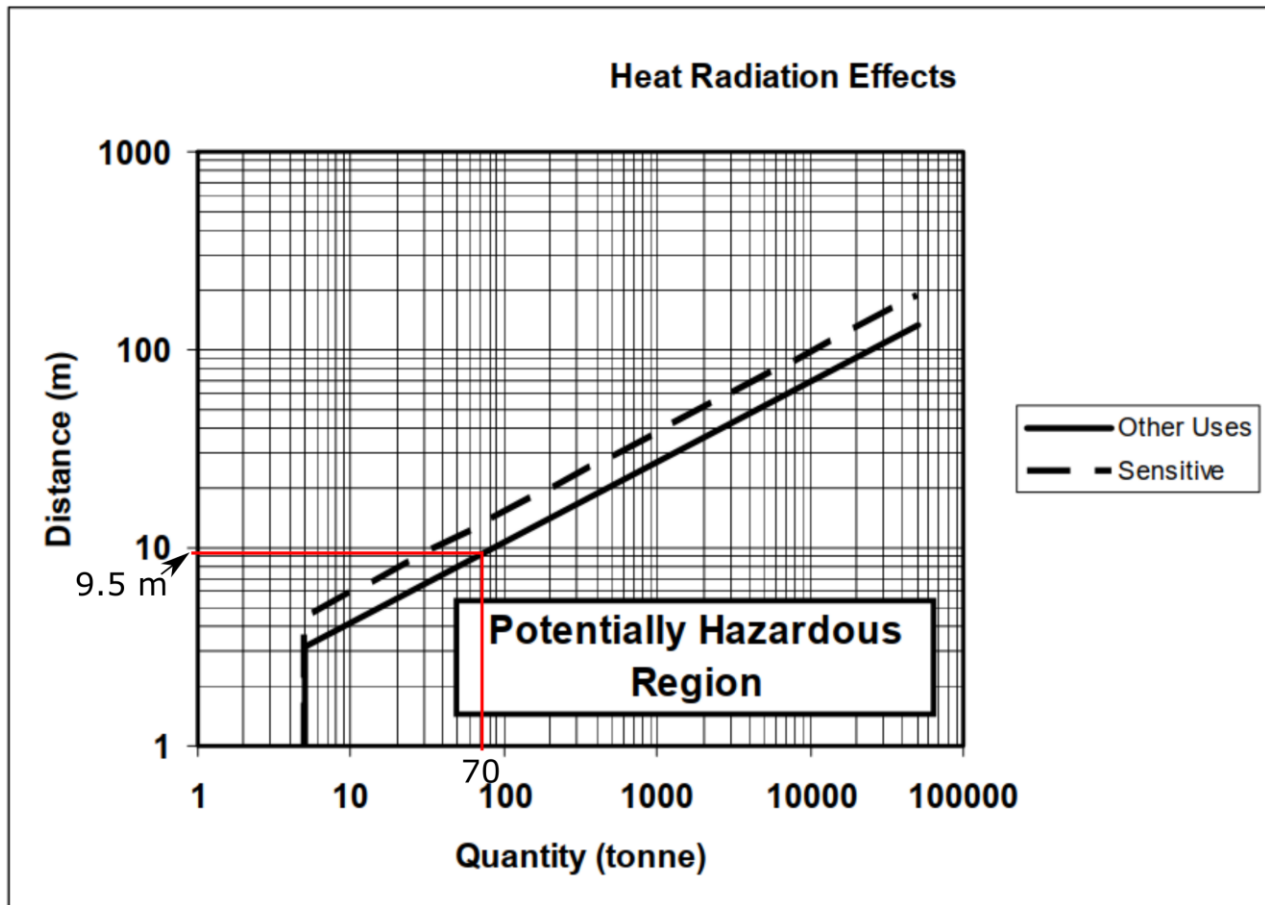


Figure 3-2: Class 3 SEPP 33 Distance – Warehouse 2 (Speculative)

3.3.4 Transport

The quantities to be stored are less than SEPP 33 shown in **Figure 2-3** or not applicable; hence, a high turnover of stored product would be required to exceed the transport movements associated with the corresponding storage. This rate of turnover isn't credible; hence, it is considered that the transport screening thresholds of SEPP 33 would not be exceeded; hence, SEPP 33 would not apply.

3.4 Warehouse 3 - Speculative

3.4.1 Description

Warehouse 3 is proposed to be a standalone warehouse located in the north eastern corner of the estate. The closest site boundary is to the north at a distance of 24.5 m.

3.4.2 Proposed Storage Details

Warehouse 3 has not been allocated to a tenant yet; hence, it would be a speculative development and so the storage commodities are unknown at this stage. Therefore, to provide some flexibility in terms of potential tenants, a SEPP 33 has been conducted to provide an allowance for storage of DG commodities as part of the initial DA.

Provided in **Table 3-5** is a summary of the speculative quantities to be approved for Warehouse 3.

Table 3-5: DG Classes or Materials Stored and Maximum Quantities for Warehouse 3

Class	Description	Maximum Quantity (kg)
2.1	Flammable gases (i.e. aerosols)	20,000 kg / 5,000*
2.1	Flammable gas (LPG Tank, cylinders, etc.)	7,500 L / 4,125^
2.2	Non-flammable, non-toxic gases	25,000
3	Flammable liquids (i.e. hand sanitisers)	500,000
4.1	Flammable solids (i.e. ethanol wipes)	4,000
5.1	Oxidising substances (i.e. hair dye)	4,000
8(II)	Corrosive substances (i.e. cleaning chemicals)	20,000
8(III)	Corrosive substances (i.e. cleaning chemicals)	45,000

*Based upon 25% of the aerosol product weight being LPG

^Density of LPG at 550 kg/m³

3.4.3 Storage Assessment

Threshold limits for the application of SEPP 33 are presented in **Table 3-6** indicating the maximum quantity that can be stored on site for each class.

Table 3-6: Quantities Stored and SEPP 33 Threshold for Warehouse 3 (Speculative)

Class	Description	Maximum Quantity (kg)	SEPP 33 Threshold (kg)	Does SEPP 33 Apply?
2.1	Flammable gases (aerosols)	9,000	10,000	N
2.2	Non-flammable, non-toxic gases	25,000	n/a	N
3	Flammable liquids (i.e. hand sanitisers)	50,000	20 m (see Figure 3-2)	N
4.1	Flammable solids (i.e. ethanol wipes)	4,000	5,000	N
5.1	Oxidising substances	4,000	5,000	N
8(II)	Corrosive substances	20,000	25,000	N
8(III)	Corrosive substances	45,000	50,000	N

*Limit before assessment becomes distance based

The flammable liquid threshold is based upon the separation distance from the storage to the site boundary. Based upon a storage of 500,000 kg, the separation required is 20 m as shown in **Figure 3-3**. The closest site boundary is 24.5 m; hence, the separation distance threshold is not exceeded.

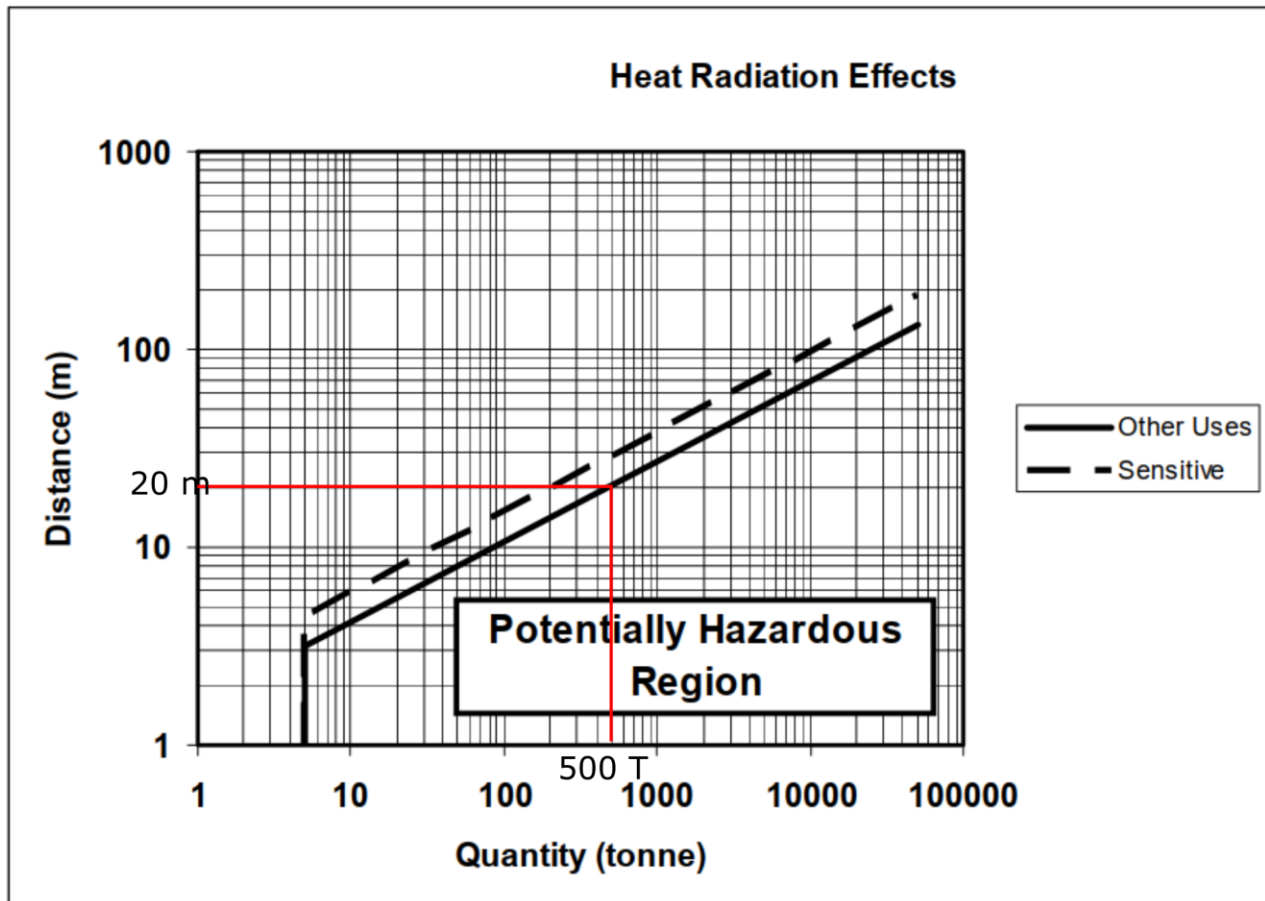


Figure 3-3: Class 3 SEPP 33 Distance – Warehouse 3 (Speculative)

3.4.4 Transport

The quantities to be stored are less than SEPP 33 shown in **Figure 2-3** or not applicable; hence, a high turnover of stored product would be required to exceed the transport movements associated with the corresponding storage. This rate of turnover isn't credible; hence, it is considered that the transport screening thresholds of SEPP 33 would not be exceeded; hence, SEPP 33 would not apply.

3.5 Warehouse 4 - Speculative

3.5.1 Description

Warehouse 4 is proposed to be split in half to provide two tenancies within the warehouse. The warehouse is located centrally on the northern side of the estate. The closest side boundary is the intertenancy wall.

3.5.2 Proposed Storage Details

Warehouse 4 has not been allocated to a tenant(s) yet; hence, it would be a speculative development and so the storage commodities are unknown at this stage. Therefore, to provide some flexibility in terms of potential tenants, a SEPP 33 has been conducted to provide an allowance for storage of DG commodities as part of the initial Development Application (DA).

Provided in **Table 3-7** and are a summary of the DGs and materials proposed to be stored in each tenancy at the facility as part of the site operations.

Table 3-7: DG Classes or Materials Stored and Maximum Quantities at Warehouse 4(a)

Class	Description	Maximum Quantity (kg)
2.1	Flammable gases (i.e. aerosols)	17,500 kg / 4,375*
3	Flammable liquids (i.e. hand sanitisers, perfumes, alcohol)	2,250
4.1	Flammable solids (i.e. sanitising wipes)	2,000
8(III)	Corrosive Substances (i.e. cleaning chemicals)	15,000

*Based upon 25% of the aerosol product weight being LPG

Table 3-8: DG Classes or Materials Stored and Maximum Quantities at Warehouse 4(b)

Class	Description	Maximum Quantity (kg)
2.1	Flammable gases (i.e. aerosols)	17,500 kg / 4,375*
3	Flammable liquids (i.e. hand sanitisers, perfumes, alcohol)	2,250
4.1	Flammable solids (i.e. sanitising wipes)	2,000
8(III)	Corrosive Substances (i.e. cleaning chemicals)	15,000

*Based upon 25% of the aerosol product weight being LPG

3.5.3 Storage Assessment

Threshold limits for the application of SEPP 33 are presented in **Table 3-9** indicating the maximum quantity that can be stored on site for each class.

Table 3-9: Quantities Stored and SEPP 33 Threshold for Warehouse 4

Class	Description	Maximum Quantity (kg)	SEPP 33 Threshold (kg)	Does SEPP 33 Apply?
2.1	Flammable gases (aerosols)	8,750	10,000	N
3	Flammable liquids (i.e. hand sanitisers)	4,500	5,000	N
4.1	Flammable solids (i.e. ethanol wipes)	4,000	5,000	N
8(III)	Corrosive substances	30,000	50,000	N

3.5.4 Transport

The quantities to be stored are less than SEPP 33 shown in **Figure 2-3** or not applicable; hence, a high turnover of stored product would be required to exceed the transport movements associated with the corresponding storage. This rate of turnover isn't credible; hence, it is considered that the transport screening thresholds of SEPP 33 would not be exceeded; hence, SEPP 33 would not apply.

3.6 Warehouse 5 - Speculative

3.6.1 Description

Warehouse 5 is proposed to be a standalone warehouse located in the north western corner of the estate. The closest site boundary is to the north at a distance of 10 m.

3.6.2 Proposed Storage Details

Warehouse 5 has not been allocated to a tenant yet; hence, it would be a speculative development and so the storage commodities are unknown at this stage. Therefore, to provide some flexibility in terms of potential tenants, a SEPP 33 has been conducted to provide an allowance for storage of DG commodities as part of the initial DA.

Provided in **Table 3-10** is a summary of the speculative quantities to be approved for Warehouse 5.

Table 3-10: DG Classes or Materials Stored and Maximum Quantities for Warehouse 5

Class	Description	Maximum Quantity (kg)
2.1	Flammable gases (i.e. aerosols)	20,000 kg / 5,000*
2.1	Flammable gas (LPG Tank, cylinders, etc.)	7,500 L / 4,125^
3	Flammable liquids (i.e. hand sanitisers, perfumes, alcohol)	60,000
4.1	Flammable solids (i.e. sanitising wipes)	4,000
8(II)	Corrosive Substances (i.e. cleaning chemicals)	20,000
8(III)	Corrosive Substances (i.e. cleaning chemicals)	35,000

*Based upon 25% of the aerosol product weight being LPG

^Density of LPG at 550 kg/m³

3.6.3 Storage Assessment

Threshold limits for the application of SEPP 33 are presented in **Table 3-6** indicating the maximum quantity that can be stored on site for each class.

Table 3-11: Quantities Stored and SEPP 33 Threshold for Warehouse 3 (Speculative)

Class	Description	Maximum Quantity (kg)	SEPP 33 Threshold (kg)	Does SEPP 33 Apply?
2.1	Flammable gases (aerosols)	9,125	10,000	N
3	Flammable liquids (i.e. hand sanitisers)	60,000	8.5 m (see Figure 3-2)	N
4.1	Flammable solids (i.e. ethanol wipes)	4,000	5,000	N
8(II)	Corrosive substances	20,000	25,000	N
8(III)	Corrosive substances	30,000	50,000	N

*Limit before assessment becomes distance based

The flammable liquid threshold is based upon the separation distance from the storage to the site boundary. Based upon a storage of 60,000 kg, the separation required is 8.5 m as shown in **Figure 3-3**. The closest site boundary is 10 m; hence, the separation distance threshold is not exceeded.

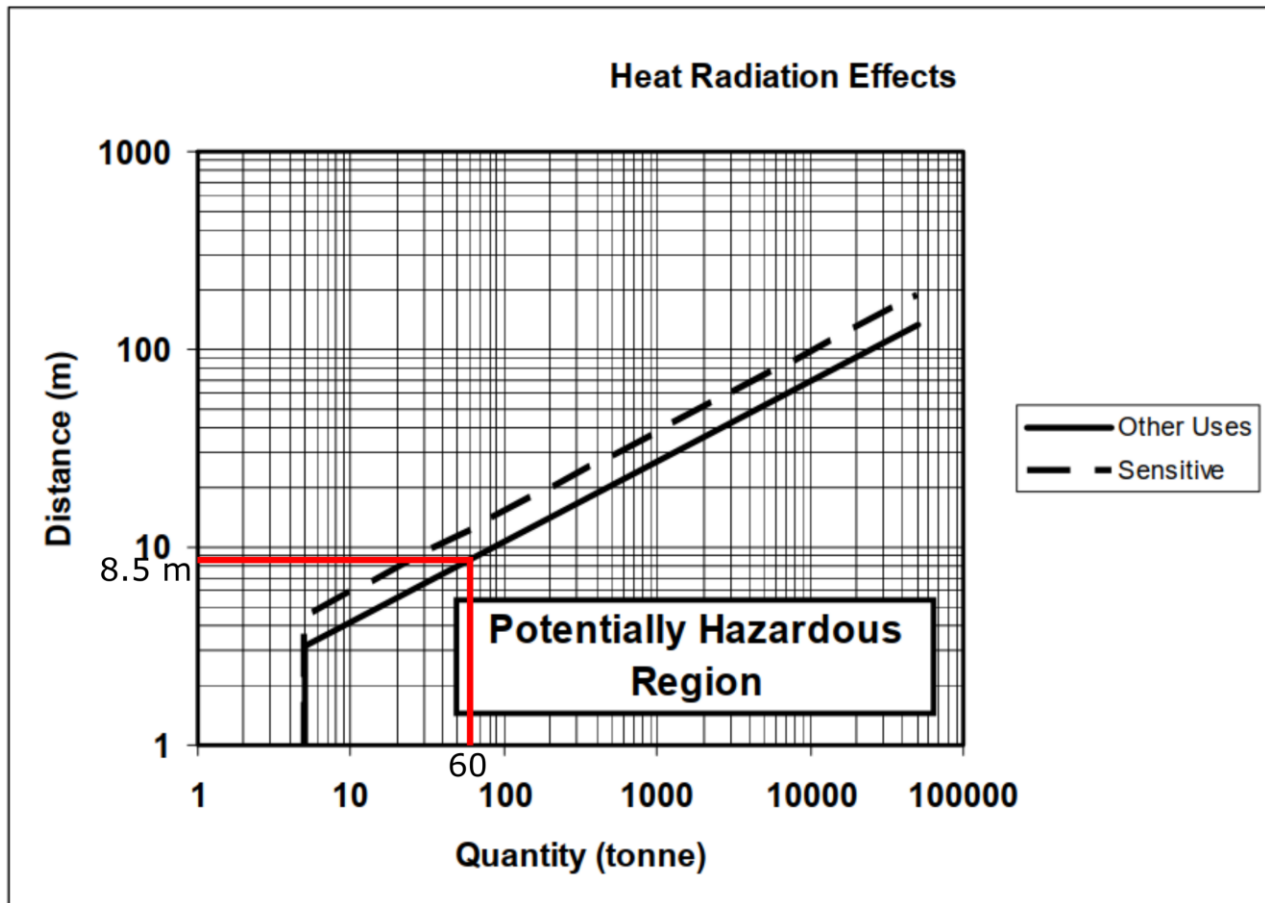


Figure 3-4: Class 3 SEPP 33 Distance – Warehouse 3 (Speculative)

3.6.4 Transport

The quantities to be stored are less than SEPP 33 shown in **Figure 2-3** or not applicable; hence, a high turnover of stored product would be required to exceed the transport movements associated with the corresponding storage. This rate of turnover isn't credible; hence, it is considered that the transport screening thresholds of SEPP 33 would not be exceeded; hence, SEPP 33 would not apply.

3.7 Cumulative Transport Assessment

A review of the three sites indicates that even if the sites were all operating with the expected limits of DG storage proposed for each site the potential to exceed the transport movements of DGs would require a substantial turnover of product which is not considered credible. Therefore, the cumulative assessment of all sites operating would not be considered to exceed the transport thresholds.

4.0 Conclusion and Recommendations

4.1 Conclusions

A review of the quantities of DGs stored at the site and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

4.2 Recommendations

The following recommendations have been made generally for sites storing DGs:

- The DGs shall be stored in a manner which complies with the applicable storage standards (i.e. AS/NZS 3833:2007 or class specific standards such as AS 1940-2017).
- The documentation required by the Work Health and Safety (WHS) Regulation 2017 shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFARP) as required by the WHS Regulations.
- Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2009 shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

5.0 References

- [1] Department of Planning, "Applying SEPP 33," Department of Planning, Sydney, 2011.
- [2] National Transport Commission (NTC), "Australian Code for the Transport of Dangerous Goods by Road & Rail, 7th Edition," 2011.