



State Environmental Planning Policy No. 33

65 Huntingwood Drive, Huntingwood

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65 Huntingwood Drive, Huntingwood

Charter Hall Holdings Pty Ltd

Prepared by

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## Quality Management

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A	27 April 2021	Draft issue for comment	Renton Parker	Steve Sylvester
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## Executive Summary

### Background

Charter Hall Holdings Pty Ltd (Charter Hall) proposes to expand the existing food processing facility (bakery) at 65 Huntingwood Drive. The project is classified as a State Significant Development Application (SSDA); hence, Secretary Environmental Assessment Requirements (SEARs) were issued which required preliminary risk screening in accordance with the State Environmental Planning Policy No. 33 (SEPP 33) to determine whether the risk profile of the site is suitable for the land zoning.

FDC Fitout & Construction Pty Ltd (FDC), on behalf of Charter Hall, has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a SEPP 33 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP 33 assessment for the site at 65 Huntingwood Drive, Huntingwood.

### Conclusions

A review of the quantities of DGs stored at the proposed facility 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 in the event DGs are stored at the site:

- The documentation required by the Work Health and Safety Regulation 2017 applicable to a placard site shall be prepared and stored on file at the site.
- The appropriate placards for storages exceeding placard quantity as defined in the Work Health and Safety Regulation 2017 shall be affixed to the applicable storages.

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## Abbreviations

Abbreviation	Description
ADG	Australian Dangerous Goods Code
DA	Development Application
DGs	Dangerous Goods
DPIE	Department of Planning, Industry & Environment
LPG	Liquefied Petroleum Gas
SEPP	State Environmental Planning Policy

## 1.0 Introduction

### 1.1 Background

Charter Hall Holdings Pty Ltd (Charter Hall) proposes to expand the existing food processing facility (bakery) at 65 Huntingwood Drive. The project is classified as a State Significant Development Application (SSDA); hence, Secretary Environmental Assessment Requirements (SEARs) were issued which required preliminary risk screening in accordance with the State Environmental Planning Policy No. 33 (SEPP 33) to determine whether the risk profile of the site is suitable for the land zoning.

FDC Fitout & Construction Pty Ltd (FDC), on behalf of Charter Hall, has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a SEPP 33 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP 33 assessment for the site at 65 Huntingwood Drive, Huntingwood.

### 1.2 Scope of Services

The site is located within the Huntingwood Industrial Estate, 32 km west of the Sydney CBD and 4 km south of Blacktown Town Centre. The site is situated along the southern boundary of Huntingwood, bordering the Western Motorway (M4) to the south and Huntingwood Drive to the north.

The site is occupied by the existing Arnott's Biscuits food processing facility which operates 24 hours a day, seven days a week. The site currently contains three large freestanding industrial buildings, the main 'L-shaped' processing building to the north and two warehouses to the south. The balance of the site includes small ancillary buildings, car parking, loading areas and privately used open space. The north-west corner of the site currently acts as an on-site detention (OSD) basin.

Vehicular access to the site for light vehicles is via an existing entry and exit driveway (Liberty Road) at the Huntingwood Drive frontage. Separate heavy vehicle access to the site is available from Huntingwood Drive adjacent to the eastern boundary. Heavy vehicle access to the high-bay warehouse is also available from Brabham Drive.

### 1.3 Proposed Development

The proposed development comprises the expansion of the existing food processing operations at 65 Huntingwood Drive, Huntingwood. The Project is summarised as follows:

- Construction of a new processing facility (24,775 m<sup>2</sup>) with first-floor amenities in the northwest corner of the site.
- Construction of a new ingredient silo building (1,000 m<sup>2</sup>) along the Huntingwood Drive frontage.
- Construction of a storage building (270 m<sup>2</sup>) to the east of the existing building.
- Construction of a new processing building (1,200 m<sup>2</sup>) and ingredient silo building (120 m<sup>2</sup>) to the south of the main facility.
- Replacement of the existing on-site detention basin (OSD) with an OSD tank below the basement car park.

- Landscaped setbacks along both street frontages to screen the new processing facility and loading area.



## 2.0 Methodology

### 2.1 General Methodology

The methodology used in this assessment is as follows:

- Review the types and proposed quantities of Dangerous Goods (DGs) to be stored at the site.
- Compare the quantities of DGs 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 (Ref. [1]).
- Report on the findings of the SEPP 33 assessment.

### 2.2 Application of State Environmental Planning Policy No.33 – Hazardous and Offensive Developments

State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33) has been developed under the 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 and Environment in the conditions of consent.

## 3.0 SEPP 33 Review

### 3.1 Proposed Storage Details

Discussion with Arnott's indicates that DGs are unlikely to be stored at the facility; however, a notification to SafeWork NSW for a previous site occupied by Arnott's was provided for a similar site which has been used as an input for the assessment. The indicative DG listing has been summarised in **Table 3-1** with an assessment of whether the class is subject to SEPP 33.

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

Class	Description	PG	Quantity	Class Subject to SEPP 33 (Y/N)
2.1	Liquefied Petroleum Gas	n/a	660 kg	Y
8	Sodium hydroxide solution	II	3,000	Y

\*Based upon a density of 550 kg/m<sup>3</sup>

### 3.2 Data taken from "Applying SEPP 33"

**Figure 3-1** extracted from "Applying SEPP 33" provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold.

- LPG is classified as a Class 2.1 gas; hence, Table 3 shall be used.
- Sodium hydroxide is a Class 8; hence, Table 3 shall be used.

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 3-1: Screening Method to be Used**

Table 3 from "Applying SEPP 33" has been extracted and is shown in **Figure 3-2**.

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 <sup>1</sup> )	
	10 tonne or 16 m <sup>3</sup>	if stored above ground
	40 tonne or 64 m <sup>3</sup>	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 3-2: General Screening Threshold Quantities**

### 3.2.1 DG Storage Assessment

Threshold limits for the application of SEPP 33 are presented in **Table 3-2** along with maximum DG quantities that will be stored. The results summarised in the table indicates the SEPP 33 criteria is not exceeded; hence, no further assessment would be required.

**Table 3-2: Quantities Stored and SEPP 33 Threshold**

Class	Description	PG	Quantity	SEPP Threshold (kg)	Does SEPP 33 (Y/N)
2.1	LPG	n/a	660 kg	10,000	N

Class	Description	PG	Quantity	SEPP Threshold (kg)	Does SEPP 33 (Y/N)
8	Sodium Hydroxide Solution	II	3,000 kg	25,000	N

### 3.2.2 DG Transport Assessment

Table 2 from Applying SEPP 33 has been extracted and reproduced in **Figure 3-3**. As DGs are not anticipated to be stored at the site and the quantities provided based upon another site are limited, transport limits would not be expected to be exceeded; hence, SEPP 33 would not apply.

Class	Vehicle Movements		Minimum quantity*	
	Cumulative	Peak	per load (tonne)	
	Annual	or Weekly	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 3-3: Transportation Screening Thresholds**

## 4.0 Conclusion and Recommendations

### 4.1 Conclusions

A review of the quantities of DGs stored at the proposed facility 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 in the event DGs are stored at the site:

- The documentation required by the Work Health and Safety Regulation 2017 applicable to a placard site shall be prepared and stored on file at the site.
- The appropriate placards for storages exceeding placard quantity as defined in the Work Health and Safety Regulation 2017 shall be affixed to the applicable storages.

## 5.0 References

- [1] Department of Planning, "Applying SEPP 33," Department of Planning, Sydney, 2011.
- [2] NSW Department of Planning and Environment, "Applying SEPP33 – Hazardous and Offensive Developments," NSW Department of Planning and Environment, Sydney, 2011.