

## Consultants Advice Notice

<b>Project:</b>	Building 4E, Oakdale West Industrial Estate	<b>Ref No.:</b>	RCE-21076
<b>From:</b>	Renton Parker	<b>Date:</b>	10 <sup>th</sup> of February, 2022
		<b>Revision:</b>	1
<b>Attention</b>	<b>Company</b>	<b>Email</b>	
<b>To:</b>	Luke Ridley	Goodman Group	<a href="mailto:Luke.ridley@goodman.com">Luke.ridley@goodman.com</a>
<b>Re: SSD 22191322, Condition B28</b>			

### 1.0 Introduction

#### 1.1 Introduction

Goodman is developing a warehouse within their Oakdale West Industrial Estate which includes the storage and handling of spirits that have an alcohol content exceeding 24% which results in these products being classified as a flammable liquid. As part of the Development Application (DA) submission for the building, a State Environmental Planning Policy No. 33 (SEPP 33) assessment was prepared to determine whether the storage would be below the acceptable thresholds or if additional risk assessment would be required in the form of a Preliminary Hazard Analysis (PHA). The results of the assessment indicated the site would not exceed SEPP 33 and would therefore not require any additional risk assessment as part of the DA submission, including the completion of a Fire Safety Study (FSS).

Following the DA submission, Condition B28 was imposed on the development which requires the following:

*"B28 – The Applicant must update the Fire Safety Study for the development in accordance with the Department's Hazardous Industry Planning Advisory Paper (HIPAP) No. 2 – Fire Safety Study Guidelines, January 2011, and detail the fire prevention and mitigation measures for all credible fire hazards, including grass and bushfires".*

To the project team, this Condition seems out of place; hence, Goodman has engaged Riskcon Engineering Pty Ltd to prepare a response to request that the Condition is removed.

### 2.0 Condition Review

#### 2.1 Planning Pathway

It is understood that the planning approval pathway where Dangerous Goods (DGs) are stored commences with a SEPP 33 assessment. Where SEPP 33 is exceeded a PHA is required as part of the submission which then dovetails into the pathway shown in **Figure 2-1**. It is noted that submission of a SEPP 33 does not preclude other studies being required as other agencies may request these studies as part of the approval pathway; however, in general, for a simple development such as a warehouse, additional studies would not typically be required.

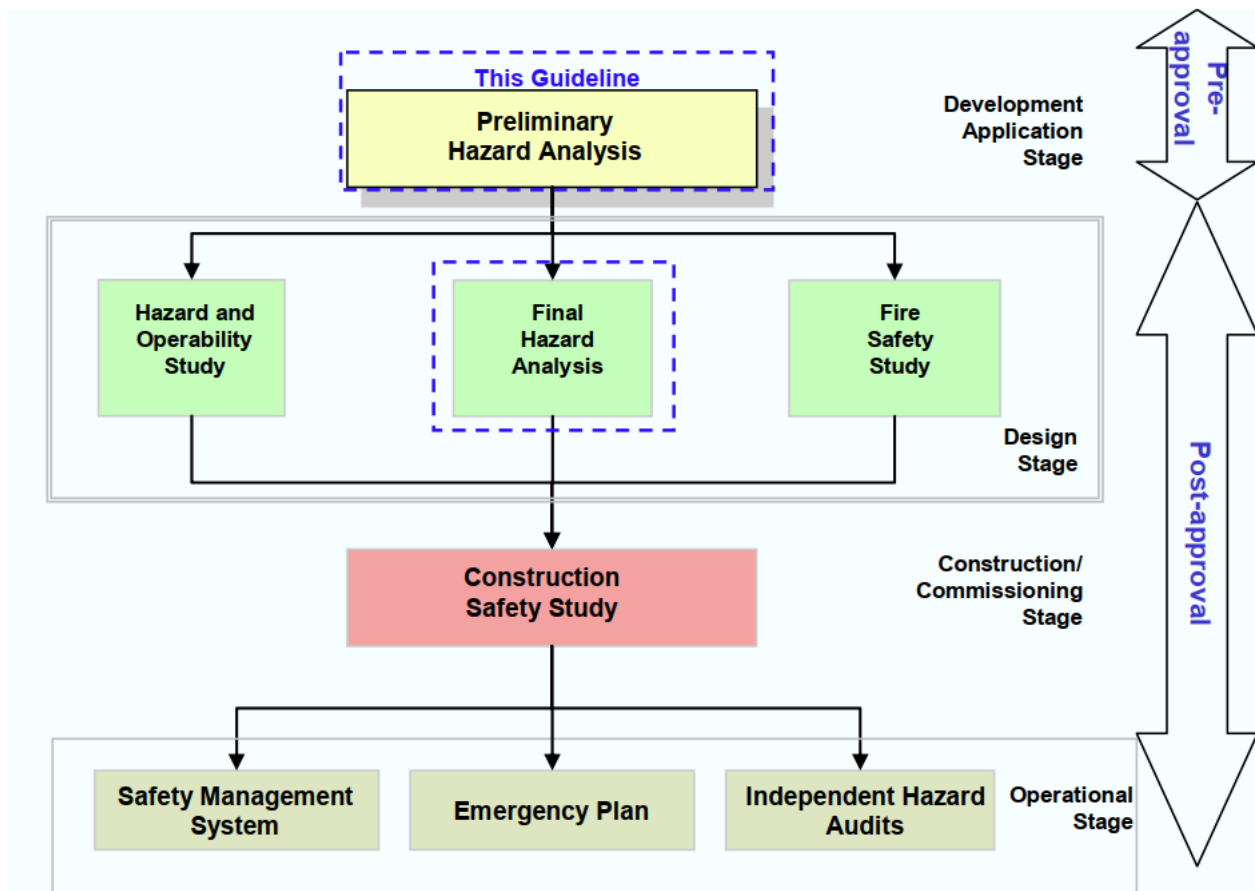


Figure 2-1: Hazard Related Approval Pathway

## 2.2 Condition B28

As noted, a SEPP 33 was prepared confirming that the site would not exceed the SEPP33 and thus a Fire Safety Study (FSS) is not typically required. It is noted that where large volumes of flammable liquids are stored (typically >1,000,000 L) the design standards will require a FSS; however, this facility only stores 87,000 kg of flammable liquids so this requirement would not be triggered.

Further review of the condition indicates the wording is odd as it requests that the FSS for the development be updated which implies there was already a FSS developed. No other condition exists requiring the initial preparation of the FSS; hence, it is strange to request that it be updated.

## 3.0 Response

Given that the development does not exceed SEPP 33, it would be unusual to require a Fire Safety Study as it would not normally be required under the normal process, it is concluded that the inclusion of this Condition is an error; hence, it is requested that this condition be removed from the approval.

Yours faithfully,

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