SEPP (RESILIENCE AND HAZARDS) 2021
PRELIMINARY RISK SCREENING REPORT
FOR ICON OCEANIA KEMPS DEVELOPMENT
253-267 ALDINGTON ROAD, KEMPS CREEK

Prepared for: ICON Oceania Kemps Development Pty Ltd
Root Partnerships

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EXECUTIVE SUMMARY

This Preliminary Risk Screening has been prepared by Benbow Environmental to accompany a State Significant Development Application (SSDA) for the staged construction and operation of an industrial estate comprising four warehouse buildings at 253-267 Aldington Road, Kemps Creek, NSW 2178 in the Penrith City Council Local Government Area (LGA). The site is legally described as Lot 9 in Deposited Plan 253503.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-23480429) dated 30 July 2021 and additional SEARs issued on 25 March 2022.

The transport of dangerous goods for the proposed development will not trigger SEPP 33. The storage of dangerous goods does not exceed the SEPP 33 preliminary risk screening thresholds, therefore a Preliminary Hazard Analysis is not required.

This report concludes that the proposed industrial estate is suitable and warrants approval.

Emma Hansma
Senior Engineer

R T Benbow
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1. INTRODUCTION

This report has been prepared to accompany an SSDA for the construction and operation of an industrial estate comprising four warehouse buildings at 253-267 Aldington Road, Kemps Creek, NSW 2178 (SSD-23480429).

The application seeks consent for:

- Site Establishment:
    - Demolition and removal of existing rural residential structures including removal of farm dams.
    - Remediation as required
    - Bulk earthworks (193,100 m^3 of fill) and retaining walls.
- Staged construction and operation of an industrial estate with a total gross floor area of 45,530m^2, maximum FSR of 0.45:1, maximum height of 17.2m, split over four warehouses contained within three buildings with ancillary hardstand and office spaces:
    - Stage 1
        - Warehouse 1A: 8,700 m^2 with 660 m^2 office space (total GFA – 9,360 m^2)
        - Warehouse 1B: 9,130 m^2 with 750 m^2 office space (total GFA - 9,880 m^2)
        - Warehouse 1C: 8,405 m^2 with 655 m^2 office space (total GFA - 9,060 m^2)
    - Stage 2
        - Warehouse 2 (temperature controlled): 16,930 m^2 with 790 m^2 office space (total GFA - 17,230 m^2)
- Use of the buildings for warehouse and distribution purposes 24 hours per day 7 days per week.
- Ancillary development including:
    - Signage (A pylon estate sign approximately 5m high and individual tenant signage adjacent to each office)
    - Car parking (261 vehicular spaces)
        - Warehouse 1A: 65 spaces
        - Warehouse 1B/ 1C: 113 spaces
        - Warehouse 2: 85 spaces
    - Landscaping
    - Retaining walls
    - Utility infrastructure and services connection; and
    - Stormwater management including naturalised open channel drainage as well as below ground on-site detention of stormwater.

- Construction and dedication of new local roads and an interim intersection with Aldington Road.
- Subdivision of the site into two Torrens title allotments along with a road reserve lot for the widening of Aldington Road.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (**SEARs**) issued for the project (SSD-23480429) dated 30 July 2021 and additional SEARs issued on 25 March 2022. It also addresses the Test of Adequacy comments received on 1 October 2021.

The SEARs requirements addressed is as follows:

> ***Hazards and Risk*** *– a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).*

1.1 SCOPE OF WORKS

The scope of this report is limited to the following:

- Description of the site and surroundings including existing site uses;
- Review and description of the details of the proposed development including proposed buildings, proposed uses and site activities, and the locations and facilities for the storage of dangerous goods;
- Assumptions used for the type and quantity of chemicals and fuels that are likely to be stored and transported to the site including expected details of transportation vehicle types and numbers;
- Undertaking and compiling a Preliminary Risk Screening in accordance with SEPP (Resilience and Hazards); and
- Advising on the need for further assessments (i.e. PHA).

2. SITE & PROJECT INFORMATION

The site is known as 253 - 267 Aldington Road, Kemps Creek and is legally described as Lot 9 in Deposited Plan 253503. The site is rectangular in shape with an area of approximately 10 hectares.

The site has a primary frontage along its eastern boundary to Aldington Road of 160 m and a depth of 630 m. The site is currently occupied by a dwelling house, sheds and agricultural land as shown in the aerial photograph at Figure 7 below.

The site is undulating in parts but longitudinally falls slightly from Aldington Road at an RL 54.00 to the western boundary with an RL 44.00 which equates to an average grade of 1.5% or 1V in 65H. The site also falls across the site from north to south at 4.3% or 1V in 23H.

The site is burdened by a 60.96 m wide Transgrid easement which runs north-south through the site. The easement is known as 'Dapto – Sydney West 330kV Easement' and there is presently no high voltage transmission line infrastructure present.

The site is approximately 5 kilometres (km) north-east of the future Western Sydney International (Nancy-Bird Walton) Airport, 14 km south-east of Penrith CBD and 38 km west of the Sydney CBD.

The site is located within the suburb of Kemps Creek, which falls within the Penrith Local Government Area (LGA). It is in the Mamre Road Precinct within the broader WSEA and is currently surrounded by rural residential land uses.

Multiple SSDs and Local DAs are currently being progressed for industrial and warehouse development within the Mamre Road Precinct which will substantially change the nature of the surrounding area. The regional context is shown below in Figure 2-1 below.

Figure 2-1: Site Context

↑N Not to scale	LEGEND: Subject Site Aldington Road Abbotts Road	Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152

The surrounding land uses include:

North: Pastoral/ farmland extends towards the elevated Bakers Lane. Several properties have been purchased by developers for industrial development these include Frasers and Fife Stockland.

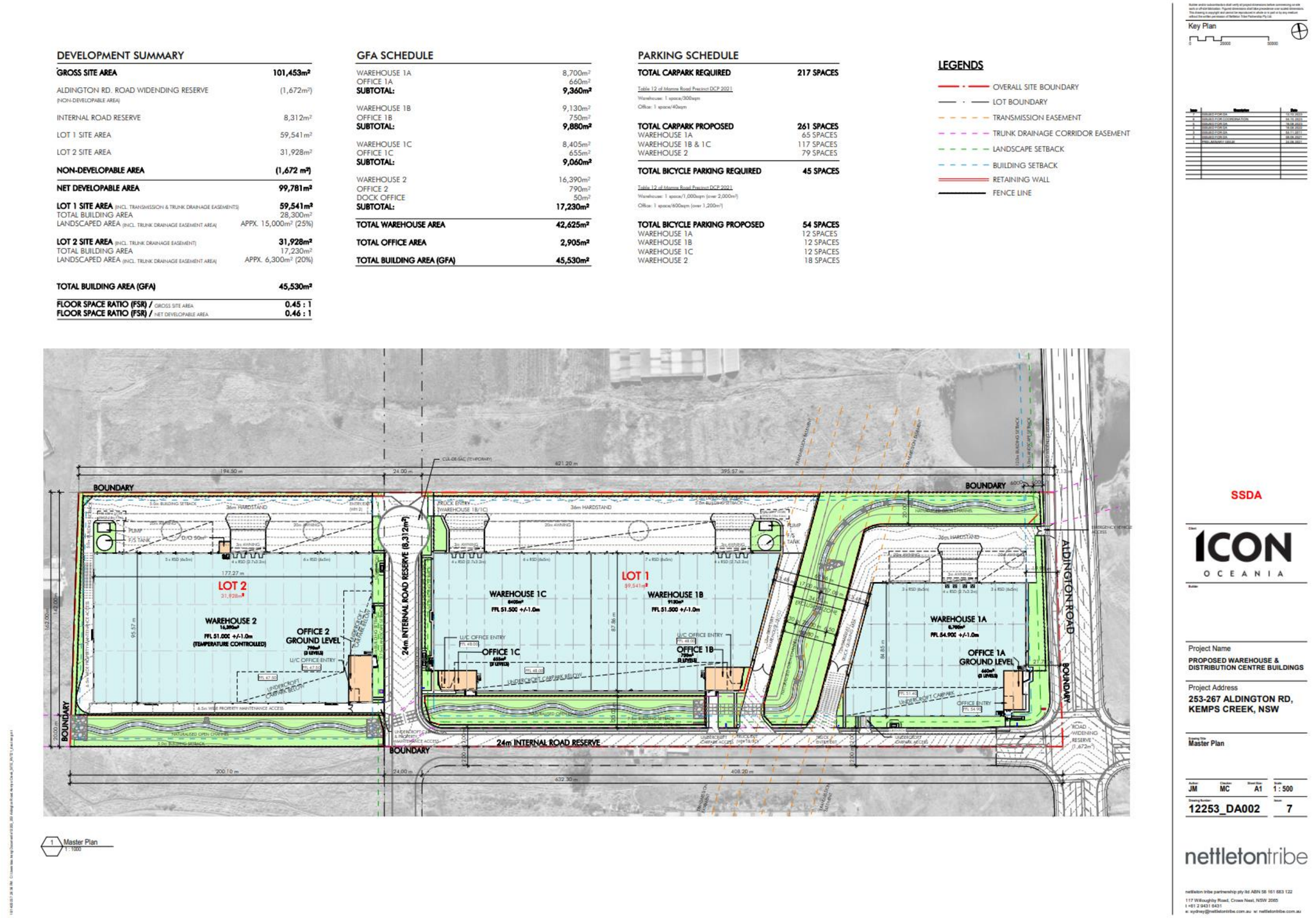
South: Farm and pastoral lands with rural residential properties scattered within the landscape. The Mamre Road precinct extends further beyond Abbotts Road. A locally listed heritage item is located at 282 Aldington Road to the south east.

East: The site is bound to the east by Aldington Road. On the opposite side of Aldington Road several properties have been purchased in seeking approval for industrial development. Land rises to the east which provides a natural screen to the residential E4 Environmental Living zone beyond.

West: Farm and pastoral lands to Mamre Road and beyond. Sites on Mamre Road have been purchased for industrial uses.

All land in the immediate surrounding context to the north, east and south has now been zoned for industrial uses.

Figure 2-2: Concept Master Plan



3. CHEMICAL STORAGE

The proposed development is for a new warehouse and distribution centre that includes details as described in Section 2.2. This SEPP (Resilience and Hazards) Screening has been prepared to assess the ongoing use of the site for this purpose of warehouse and distribution operations. Information provided at the writing of this report was limited and therefore assumptions have been made to identify the types and quantities of chemicals that would typically be stored at the site.

Chemicals kept of site are expected to be typical of those required for the operation and maintenance of a warehouse and distribution facilities.

The following table provides the details for the hazardous chemicals expected to be stored at the site. This list includes assumptions only based on chemicals typically stored at warehouse and distribution facilities used for forklifts, machinery maintenance, landscaping maintenance, and air conditioning systems for office and amenities and warehouse 2. The assessment is limited to dangerous goods as classified under the Australian Dangerous Goods Code and C1 and C2 combustible liquids, other non-dangerous goods have not been included.

Table 3-1: Typical Chemical Storage – 4 Warehouses Combined

Chemical Name	Area/Use	DG Class	Storage Type	Estimated Onsite Maximum Quantity (tonnes or Litres)
Liquid Petroleum Gas (LPG)	Used for operation of forklifts	2.1	Stored cylinders	800 L
Acetylene gas	Welding purposes	2.1	8 Cylinders	400 L
Oxygen gas		2.2 sub-class 5.1	8 Cylinders	400 L
Refrigerant	AC system	2.2	Within refrigerant System	3.6 Tonnes
			Total Class 2.1	**800 L**
			Total Class 2.2	**4,000 L**
Various Cleaning products	General	3	Various small containers	< 100 L
			Total Class 3	**100 L**
Ammonium nitrate fertiliser	Garden maintenance	5.1	Containers	<1 tonne
			Total Class 5.1	**1,400 L**
Various Corrosives for Cleaning	General	8	Various small containers	<100 L
			Total Class 8*	**100 L**

Table 3-1: Typical Chemical Storage – 4 Warehouses Combined

Chemical Name	Area/Use	DG Class	Storage Type	Estimated Onsite Maximum Quantity (tonnes or Litres)
Diesel	Within trucks and for lawn mower	Non-Dangerous Good (C1 Combustible)	Small container/Within trucks	2 tonne
			Total C1 Combustible Liquid	**2,000 L**
Hydraulic/Lubricant oils	Used for vehicle maintenance	Non-Dangerous Good (C2 Combustible)	Containers	<1 tonne
			Total C2 Combustible Liquid	**1,000 L**

Note: *The exact type and quantity of Class 8 substances to be stored is not known. Those listed are typical for are of Packing Groups II and III. For the purposes of this assessment it is assumed all Class 8 Corrosive substances to be stored on site are Packing Group II.

4. PRELIMINARY RISK SCREENING

4.1 ONSITE STORAGE

A preliminary risk screening of the chemicals stored at the site in accordance with State Environment Planning Policy (Resilience and Hazards) 2021 (SEPP (Resilience and Hazards)) has been undertaken, with results provided below.

Table 4-1: SEPP (Resilience and Hazards) Preliminary Risk Screening

Class	Screening Threshold	Description	Site Specific Description	Quantity to be stored	Triggers SEPP (Resilience and Hazards)
Class 1.1	Assessed by reference to figure 5 of applying SEPP (Resilience and Hazards)	Explosives	None	None	No
Class 1.2	5 tonne or are located within 100 m of a residential area	Explosives	None	None	No
Class 1.3	10 tonne or are located within 100 m of a residential area	Explosives	None	None	No
Class 2.1	(LPG only — not including automotive retail outlets[1]) 10 tonne or 16 m^3 if stored above ground 40 tonnes or 64 m^3 if stored underground or mounded	Flammable Gases	LPG Cylinders for forklifts	800L	No
	(Excluding LPG) Assessed by reference to figure 6 of applying SEPP (Resilience and Hazards)	Flammable Gases Pressurised	Welding purposes (acetylene gas)	<100 L	No
	(Excluding LPG) Assessed by reference to figure 7 of applying SEPP (Resilience and Hazards)	Flammable Gases liquified under pressure	None	None	No

Table 4-1: SEPP (Resilience and Hazards) Preliminary Risk Screening

Class	Screening Threshold	Description	Site Specific Description	Quantity to be stored	Triggers SEPP (Resilience and Hazards)
Class 2.2	Not relevant	Non-flammable, non-toxic gases	Refrigerant & welding purposes (oxygen gas, argon gas, liquid nitrogen)	4,000 L	Not relevant
Combustible Liquid C1	Not relevant	Combustible liquid with flashpoint of 150°C or less	Diesel within trucks and for lawn maintenance	2,000 L	Not relevant
Combustible Liquid C2	Not relevant	Combustible liquid with flashpoint exceeding 150°C	Oils for maintenance	1,000 L	Not Applicable
Class 2.3	5 tonne	Anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale	None	None	No
	1 tonne	Chlorine and sulphur dioxide stored as liquefied gas in contains <100 kg	None	None	No
	2.5 tonne	Chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg	None	None	No
	100 kg	Liquefied gas kept in or on premises	None	None	No
	100 kg	Other toxic gases	None	None	No

Table 4-1: SEPP (Resilience and Hazards) Preliminary Risk Screening

Class	Screening Threshold	Description	Site Specific Description	Quantity to be stored	Triggers SEPP (Resilience and Hazards)
Class 3	Assessed by reference to figures 8 & 9 of applying SEPP (Resilience and Hazards)	Flammable liquids PG I, II and III	Cleaning chemicals (PGII or PG III only)	100 L	No
Class 4.1	5 tonne	Flammable Solids	None	None	No
Class 4.2	1 tonne	Substances liable to spontaneous combustion	None	None	No
Class 4.3	1 tonne	Substances which, in contact with water, emit flammable gases	None	None	No
Class 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	None	None	No
	5 tonne	Oxidising substances, and ammonium nitrate elsewhere	Ammonium nitrate fertiliser for garden maintenance	<1 tonne	No
	2.5 tonne	Dry pool chlorine — if at a dedicated pool supply shop, in containers	None	None	No

Table 4-1: SEPP (Resilience and Hazards) Preliminary Risk Screening

Class	Screening Threshold	Description	Site Specific Description	Quantity to be stored	Triggers SEPP (Resilience and Hazards)
	1 tonne	Dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg	None	None	No
	5 tonne	Any other Class 5.1	Oxygen for welding purposes has sub risk 5.1	400 L	No
Class 5.2	10 tonne	Organic peroxides	None	None	No
Class 6.1 PGI	0.5 tonne	Toxic substances	None	None	No
Class 6.1 PGII & III	2.5 tonne	Toxic substances	None	None	No
Class 6.2	0.5 tonne	Infectious substances, includes clinical waste	None	None	No
Class 7	All	Radioactive Material, should demonstrate compliance with Australian codes	None	None	No
Class 8 PGI	5 tonne	Corrosive substance	None	None	No
Class 8 PGII	25 tonne	Corrosive substance	Various cleaning chemicals	100L	No
Class 8 PGIII	50 tonne	Corrosive substance	Various cleaning chemicals	100L	No

The dangerous goods expected to be stored on-site do not exceed the SEPP (Resilience and Hazards) preliminary risk screening thresholds.

4.2 TRANSPORT QUANTITIES

"Transportation Screening Thresholds" from *Hazardous and Offensive Development Application Guidelines: Applying SEPP (Resilience and Hazards), NSW Government Department of Planning (2011)* are shown below. In consideration to the quantities expected onsite (describes in Section 4.2, these amounts would not require vehicle movements or loads that trigger the SEPP (Resilience and Hazards).

Table 4-2: Transportation Screening Thresholds

	Vehicle Movements		Minimum quantity*	
	Cumulative	Peak	per load (tonne)	
Class	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	

Note: Where proposals include materials of class 1, 6.2 or 7, the Department of Planning should be contacted for advice. Classes used are those referred to in the Dangerous Goods Code and are explained in Appendix 7.

* If quantities are below this level, the potential risk is unlikely to be significant unless the number of traffic movements is high.

5. CONCLUDING REMARKS

Benbow Environmental was engaged by Root Partnerships on behalf of ICON Oceania Kemps Development Pty Ltd to undertake a Preliminary Risk Screening for a proposed warehouse and distribution centre to be located at 253-267 Aldington Road, Kemps Creek 2178.

The preliminary risk screening was undertaken in accordance with *State Environment Planning Policy (Resilience and Hazards) 2021* (SEPP (Resilience and Hazards)) for the proposed development.

The transport of dangerous goods for the proposed development will not trigger SEPP (Resilience and Hazards).

The storage of dangerous goods does not exceed the SEPP (Resilience and Hazards) preliminary risk screening thresholds, therefore a Preliminary Hazard Analysis is not required.

The proposed development is not considered a Hazardous and Offensive Development.

This concludes the report.

Emma Hansma
Senior Engineer

R T Benbow
Principal Consultant

6. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of ICON Oceania Kemps Development Pty Ltd, as per our agreement for providing environmental services. Only ICON Oceania Kemps Development Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

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