



State Environmental Planning Policy No. 33

520 Gardeners Road, Alexandria

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520 Gardeners Road, Alexandria

Charter Hall

Prepared by

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Quality Management

Rev	Date	Remarks	Prepared By	Reviewed By
A	1 December 2021	Draft issue for review	Renton Parker	Steve Sylvester
0	2 December 2021	Issued final		
1	2 March 2022	Updated floor area		

Executive Summary

Background

Charter Hall has proposed to develop a new warehouse and distribution centre at 520 Gardeners Road, Alexandria. The project will involve the construction of a two-storey warehouse and distribution centre comprising 21,952 m² of warehouse and distribution GFA with 5,557 m² ancillary office space, landscaping at ground and second floor levels, bicycle and car parking.

The Secretary's Environmental Assessment Requirements (SEARs) require the preparation of a State environmental Planning Policy No. 33 (SEPP 33) assessment to determine the risk profile of the development and potential for offsite impacts of the individual tenancies.

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 520 Gardeners Road, Alexandria.

Conclusions

A review of the quantities of DGs stored at the warehouse 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.

Provided in **Table 5-1** is a summary of the SEARs issued for the development the location they have been addressed within this report.

Table 5-1: SEARs Table

ID	Requirement	Location Addressed within Report
15	Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with SEPP 33.	This report
	Where required by SEPP 33, provide a Preliminary Hazard Analysis prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis	SEPP 33 was not exceeded; hence, a Preliminary Hazard Analysis is not required.

Recommendations

The following recommendations have been made:

- Where DGs are to be stored, the documentation required by the Work Health and Safety Regulation 2017 for the materials and commodities stored shall be prepared prior to occupation of the facility.

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Abbreviations

Abbreviation	Description
ADG	Australian Dangerous Goods Code
DA	Development Application
DGs	Dangerous Goods
SEPP	State Environmental Planning Policy

1.0 Introduction

1.1 Background

Charter Hall has proposed to develop a new warehouse and distribution centre at 520 Gardeners Road, Alexandria. The project will involve the construction of a two-storey warehouse and distribution centre comprising 21,952 m² of warehouse and distribution GFA with 5,557 m² ancillary office space, landscaping at ground and second floor levels, bicycle and car parking.

The Secretary's Environmental Assessment Requirements (SEARs) require the preparation of a State environmental Planning Policy No. 33 (SEPP 33) assessment to determine the risk profile of the development and potential for offsite impacts of the individual tenancies.

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 520 Gardeners Road, Alexandria.

1.2 Scope of Services

The scope of work is to prepare a SEPP 33 assessment for the tenancies within the warehouse to be located at 520 Gardeners Road, Alexandria. The assessment does not include any other sites nor the preparation of any additional planning studies should they be required.

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 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.

2.3 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 (Ref. [1]).

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

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

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 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

Transportation screen thresholds have been provided in **Figure 2-3**.

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 2-3: Transportation Screening Thresholds

3.0 Project Description

3.1 Site Location and Layout

The proposed warehouse is located at 520 Gardeners Road, Alexandria which is approximately 7 km south of the Sydney Central Business District (CBD). **Figure 3-1** shows the regional location of the site in relation to the Sydney CBD. Layouts of the warehouse are provided in figure a

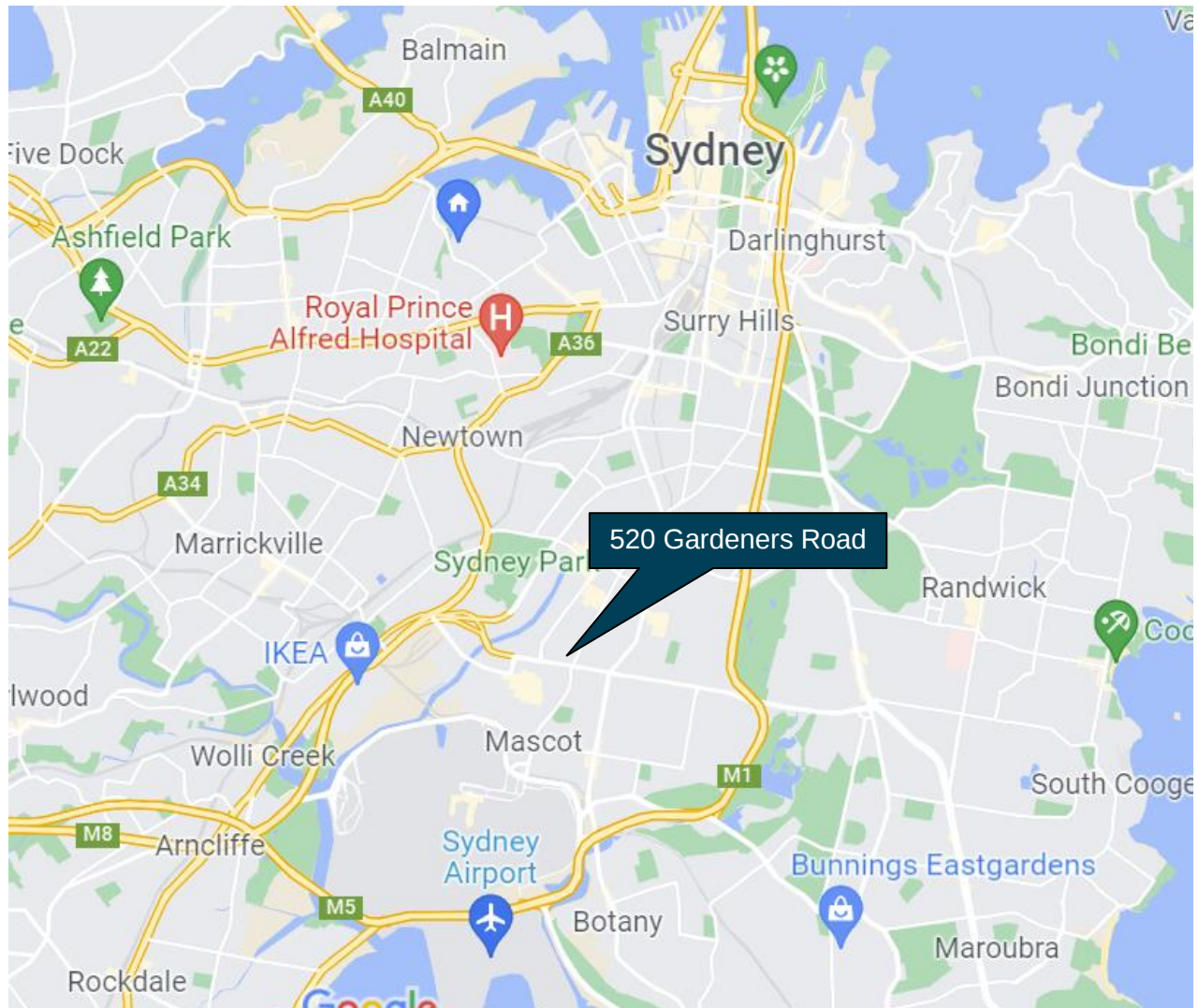


Figure 3-1: Site Location (source Google Maps)

3.2 Description of the Facility

The proposal comprises the redevelopment of the site as summarised below:

- Construction, fit out and operation of a two-storey warehouse and distribution centre comprising approximately 27,509 m² GFA including:
 - 21,952 m² of warehouse and distribution GFA; and
 - 5,557 m² GFA ancillary office space.
- Provision of 64 bicycle parking spaces at ground floor level and 144 car parking spaces at second floor level.

- A total of 4,511m² of hard and soft landscaping at ground level and an additional 1,634 m² of soft landscaping on the level two rooftop.
- Replacement of the existing vehicular access from Bourke Road with two new access driveways from Bourke Road.
- Earthworks and upgrades to existing on-site infrastructure.
- Provision of internal vehicle access route and loading docks.
- Building identification signage.
- Operation 24 hours per day seven days per week.

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4.0 SEPP 33 Review

4.1 Warehouse 1A

4.1.1 Proposed Storage Details for Warehouse 1A

No DGs are proposed to be stored in Warehouse 1A

4.2 Warehouse 1B

4.2.1 Proposed Storage Details for Warehouse 1B

No DGs are proposed to be stored in Warehouse 1B

4.3 Warehouse 2A

4.3.1 Proposed Storage Details for Warehouse 2A

No DGs are proposed to be stored in Warehouse 2A

4.4 Warehouse 2B

4.4.1 Proposed Storage Details for Warehouse 2B

No DGs are proposed to be stored in Warehouse 2B

4.5 Warehouse 3 (Schindler Lifts)

4.5.1 Proposed Storage Details for Warehouse 3

The maximum quantities of products and DGs that are to be stored at the facility, are shown in **Table 4-1**. The data has been taken from existing site operations provided by the client. Provided in **Table 4-1** is an assessment of whether the Class is subject to SEPP 33.

Table 4-1: DG Classes or Materials Stored and Maximum Quantities

Class	PG	Description	Quantity (kg)	Class Subject to SEPP 33 (Y/N)
2.1	n/a	LPG	500	Y
3	II	Flammable liquids	1,000	Y

4.5.2 Storage

Threshold limits have been taken from **Section 2.3** which were extracted from Applying 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 as part of the site approval with respect to DGs.

Table 4-2: Quantities Stored and SEPP 33 Threshold

Class	PG	Description	Quantity (kg)	SEPP Threshold (kg)	Does SEPP 33 (Y/N)
2.1	n/a	LPG	500	10,000	N

Class	PG	Description	Quantity (kg)	SEPP Threshold (kg)	Does SEPP 33 (Y/N)
3	II	Flammable liquids	1,000	5,000	N

4.5.3 Transport

The site only stores DGs for use whether that be onsite or shipped to a site where they are used. The quantities stored are all below SEPP 33 thresholds and are minimal in quantity and would therefore it would be infeasible to exceed the SEPP 33 transport limits. Therefore, SEPP 33 would not be exceeded with respect to transport.

4.6 Warehouse 4A

4.6.1 Proposed Storage Details for Warehouse 4A

No DGs are proposed to be stored in Warehouse 4A

4.7 Warehouse 4B

4.7.1 Proposed Storage Details for Warehouse 4B

No DGs are proposed to be stored in Warehouse 4B

5.0 Conclusion and Recommendations

5.1 Conclusions

A review of the quantities of DGs stored at the warehouse 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.

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5.2 Recommendations

The following recommendations have been made:

- Where DGs are to be stored, the documentation required by the Work Health and Safety Regulation 2017 for the materials and commodities stored shall be prepared prior to occupation of the facility.

6.0 References

[1] Department of Planning, "Applying SEPP 33," Department of Planning, Sydney, 2011.