



SEPP-RH Assessment

Project Duke Data Centre

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Goodman Limited

Prepared by

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Goodman Limited

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Quality Management

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A	12 July 2024	Draft issued for comment	Ezra Bagaskara	Renton Parker
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Executive Summary

Background

Goodman has proposed to develop a data centre at their site located at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW. The facility will require battery storages and fuel for back-up generators. The Secretary Environmental Assessment Requirements (SEARs) require the preparation of a preliminary risk screening in accordance with Chapter 3 of the State Environmental Planning Policy – Resilience & Hazards (SEPP-RH, Ref. [1]).

Goodman has commissioned Riskcon Engineering Pty Ltd (Riskcon) to review the proposed storage and to prepare a SEPP-RH assessment for submission with the development application (DA). This document provides Riskcon's assessment of the applicability of SEPP-RH to the proposed site at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW.

Conclusions

The proposed data centre at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW has been assessed for the application of the Chapter 3 of the State Environmental Planning Policy - Resilience and Hazards (SEPP-RH) based on the proposed storage of DGs at the facility. The analysis conducted in this study included an assessment of the proposed DG storage volumes against generic threshold storage quantities, as well as an assessment of transport operations involved in the storage and handling of DGs.

The results of these assessments identified that the site does not exceed any SEPP-RH storage thresholds. Further, the transport of DGs does not exceed the threshold levels, nor do any offensive operations occur at the site which may result in environmental emissions. Therefore, it is concluded that the site would not be regarded as potentially hazardous under the SEPP-RH policy.

Recommendations

The following recommendations have been made:

- Goodman shall re-assess their site against SEPP-RH in the event that storage quantities of DGs increase.
- Documentation required by the Work Health and Safety Regulation 2017 (Ref. [2]) specific to the site classification based upon the quantity of goods stored shall be prepared for the site prior to occupation.

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Abbreviations

Abbreviation	Description
CBD	Central Business District
DGs	Dangerous Goods
EPA	Environmental Protection Agency
NSW	New South Wales
PTU	Power Train Units
SEPP	State Environmental Planning Policy
UPS	Uninterruptable Power Supply

1.0 Introduction

1.1 Background

Goodman has proposed to develop a data centre at their site located at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW. The facility will require battery storages and fuel for back-up generators. The Secretary Environmental Assessment Requirements (SEARs) require the preparation of a preliminary risk screening in accordance with Chapter 3 of the State Environmental Planning Policy – Resilience & Hazards (SEPP-RH, Ref. [1]).

Goodman has commissioned Riskcon Engineering Pty Ltd (Riskcon) to review the proposed storage and to prepare a SEPP-RH assessment for submission with the development application (DA). This document provides Riskcon's assessment of the applicability of SEPP-RH to the proposed site at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW.

1.2 Objectives

The objectives of the study are to:

- Determine whether SEPP-RH applies to the proposed data centre at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW based on the quantity of DGs being stored; and
- Report on the findings of the study in support of the DA.

1.3 Scope of Work

The scope of work is for a SEPP-RH assessment of the quantities of DGs proposed for storage within the site located at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW to determine whether the SEPP-RH policy applies to the site. Additionally, a review of the quantity of vehicle movements as a result of the DGs being stored will be assessed to determine whether additional traffic assessment is required. The scope does not include any other sites, nor the preparation of any other planning studies should they be required.

2.0 Methodology

2.1 General Methodology

The methodology used in this study is that which is recommended in *Applying SEPP-33 – Hazardous and Offensive Developments* (Applying SEPP-33, Ref. [1]). The methodology is summarised below:

- A review of the proposed types and quantities of DGs to be stored at the site was conducted.
- The quantities of DGs were compared to the threshold quantities listed in *Applying SEPP-33* to determine whether the storage triggers the SEPP-RH policy.
- Vehicular movements as a result of DGs being stored were reviewed and compared against the applicable thresholds detailed in *Applying SEPP-33*.
- The findings of the SEPP-RH assessment were documented within this report.

3.0 Project and Site Description

3.1 Project Description

The proposed development (SSD-71368959) will seek approval for the construction of an 120MVA Data Centre. The proposal seeks to demolish existing structures on the site, construct, fit out and the 24/7 operation of a Data Centre, with associated works.

The works subject to SSD-71368959 include the following:

- Site preparation works including demolition, bulk excavation, and removal of existing structures on the site, tree and vegetation clearing, and bulk earthworks,
Construction, fit out and 24/7 operation of a 120 MVA data centre with a maximum building height of 40m (from natural ground level) and total gross floor area of approximately 26,052m² comprising:
 - At-grade parking for thirty-four (34) car parking spaces and one (1) accessible car parking spaces,
 - Two (2) 12.5m loading dock spaces,
 - Four (4) levels of technical data hall floor space with one data hall on ground level, three (3) data halls on levels one and two (2) data halls on level three.
 - Secure entrance lobby on ground level and ancillary office space on each level and mezzanine level,
- Provision of required plant and utilities, including:
 - Six (6) 33kV switch rooms on ground level
 - 1,172,000L above ground diesel storage tanks,
 - 5,125kL above ground water storage tanks,
 - 72 diesel generators
- Acoustic screen parapet,
- Vehicle access provided via Gardeners Road and Ricketty Street,

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) and accompanying cover letter issued for the Kent Road Data Centre project (SSD-71368959) dated 31 May 2024.

Specifically, this report has been prepared to respond to the SEARs requirement issued and summarised in **Table 3-1** below.

Table 3-1: SEARs Addressed

Item	Requirement	Report Section
Preliminary Hazard Analysis (PHA)	<ul style="list-style-type: none"> • Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021. • Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis and Multi-Level Risk Assessment. • If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis. 	Section 4.0

3.2 Site Description

The project is located on land known as 2 and 10-22 Kent Road, and 685 Gardeners Road, Mascot, legally referred to as Lot 1 DP529177, Lot 1 DP1009083 and Lot 2 DP529177. The site is located on Country of the Gadigal people within the local government area of Bayside Council.

It has a land area of approximately 23,470m² with frontages to Ricketty Street, Kent Road and Gardeners Road, all of which are classified roads.

The site forms part of the Mascot West Employment lands which comprises a mix of land zoned for industrial, commercial and business park uses. To the east of the site is Mascot Station Town Centre which comprises a mix of retail, commercial, residential and recreational open space land uses.

Surrounding land uses in the immediate vicinity of the include:

- **North:** Gardeners Road, which is the LGA boundary with the City of Sydney. Further to the north is existing industrial development with Alexandra Canal beyond.
- **South:** Ricketty Street is immediately south, with predominantly one (1) to four (4) storey commercial and industrial development beyond.
- **East:** Kent Road is immediately to the east, with four (4) to 14 storey high density residential development beyond.
- **West:** To the west is light industrial development typically one (1) to two (2) storey in height.

The site is zoned E3 Productivity Support under the Bayside Local Environmental Plan 2012 (**BLEP 2021**). The proposal is permissible with development consent in the E3 zone and meets the zone objectives.

In its existing state, the site itself contains two large warehouse buildings which are currently leased out to multiple tenants. Large extents of the site consist of hardstand for vehicle circulation and parking with a number of mature trees are located along the site's boundaries.

A summary of the site is provided in **Table 3-2** below.

Table 3-2: Site Description Summary

Item	Description
Site Area	23,470m ²
Ownership	Goodman
Legal Description	Lot 1 in DP529177, Lot 1 in DP1009083 and Lot 2 DP529177

3.3 Quantities of Dangerous Goods Stored and Handled

The classes and quantities of DGs to be stored at the facility are summarised **Table 3-3**.

Table 3-3: Maximum Classes and Quantities of Dangerous Goods Stored

Class	Packing Group (PG)	Description	Quantity (L or kg)	SEPP-RH Applicable? (Y/N)
8	III	Valve Regulated Lead Acid Battery (VLRAs)	17,400 kg	Y
9	n/a	Li-ion batteries	667,200 kg	N

Class	Packing Group (PG)	Description	Quantity (L or kg)	SEPP-RH Applicable? (Y/N)
C1	n/a	Combustible liquids	1,172,000 L	N

Provided in **Figure 3-2 to Figure 3-7** is the location of DGs on site. Note, the site layout for levels not containing DGs has been omitted from this report.

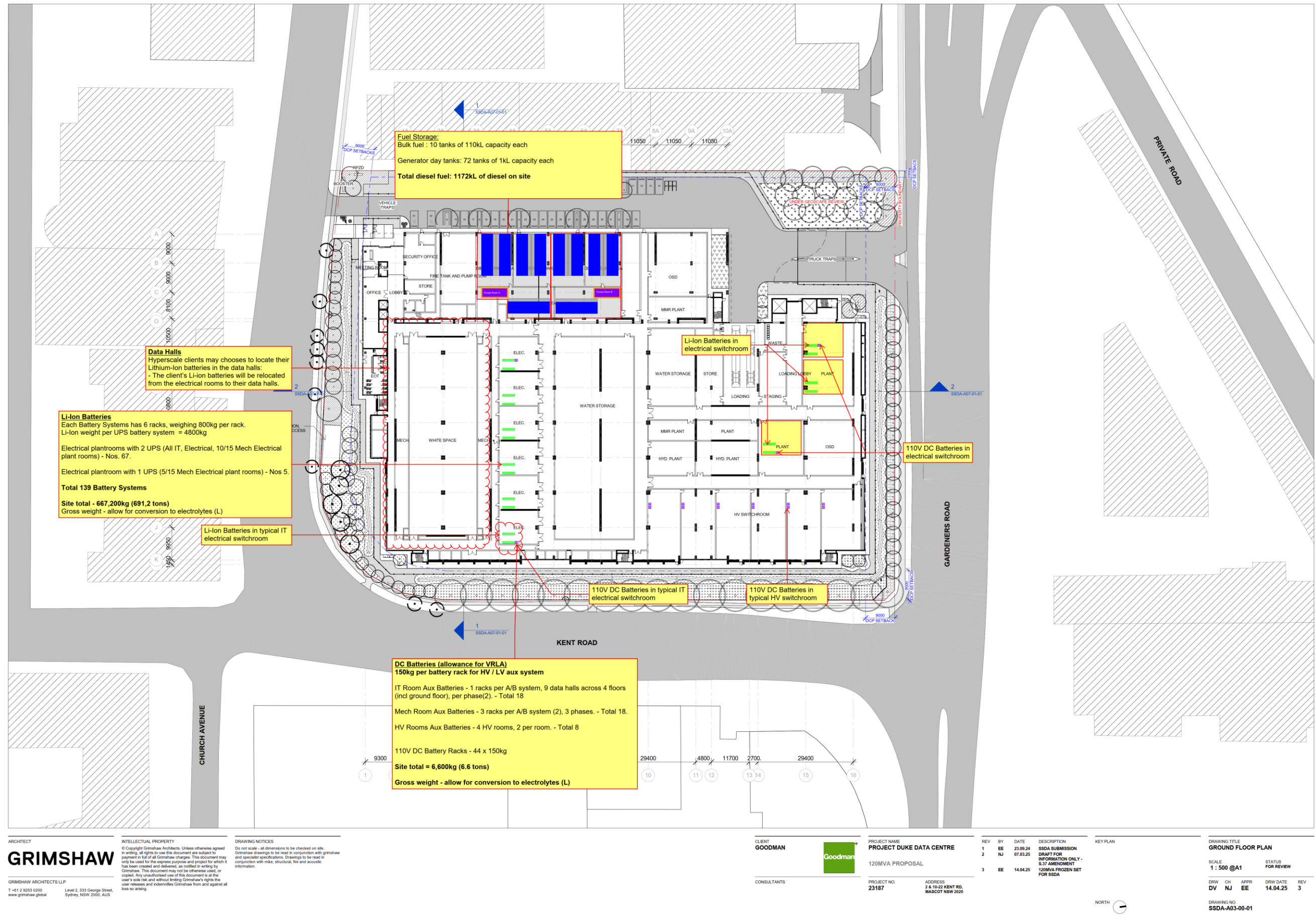


Figure 3-1: Site Layout - Ground Floor

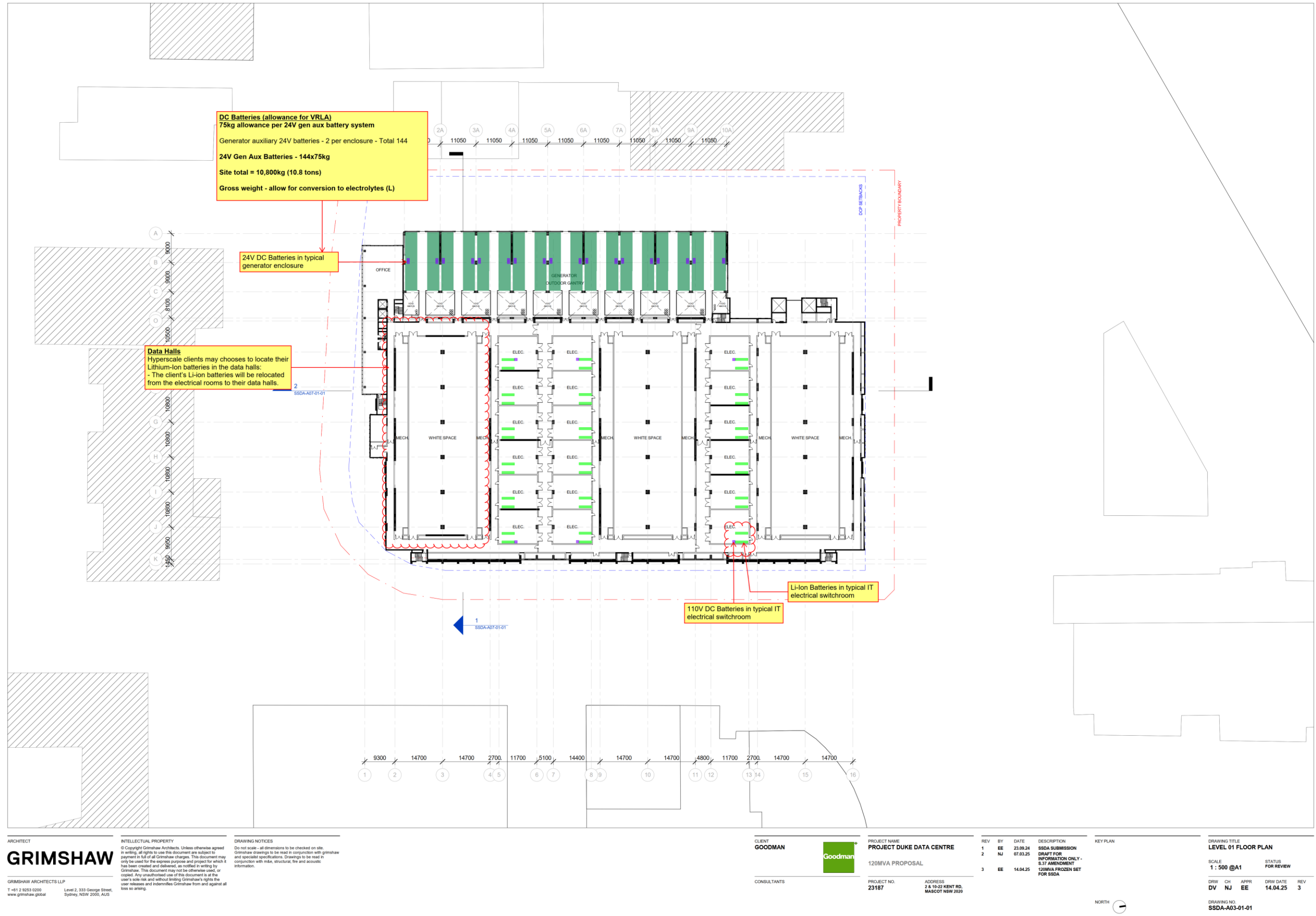


Figure 3-2: Site Layout – Level 1

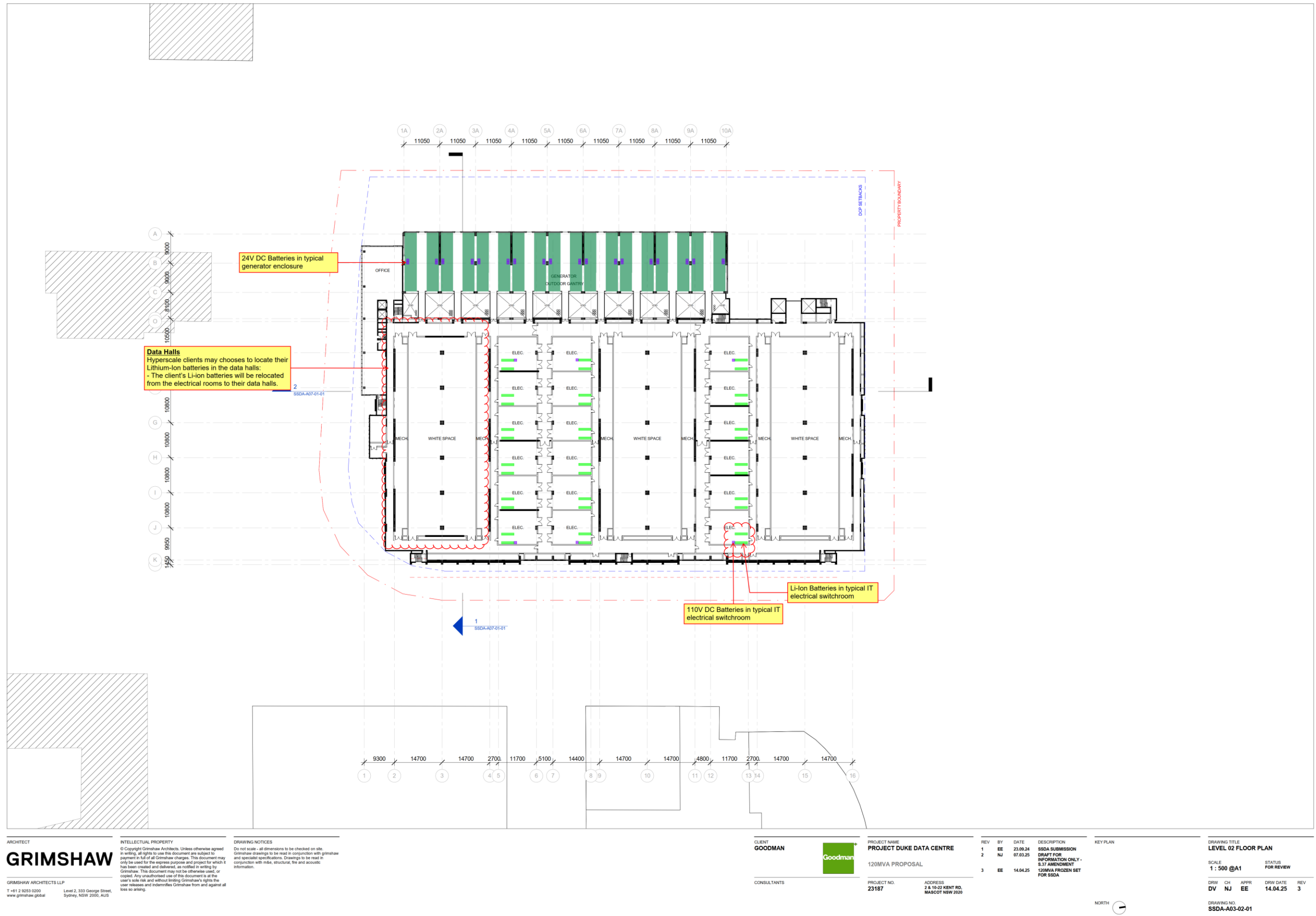


Figure 3-3: Site Layout – Level 2

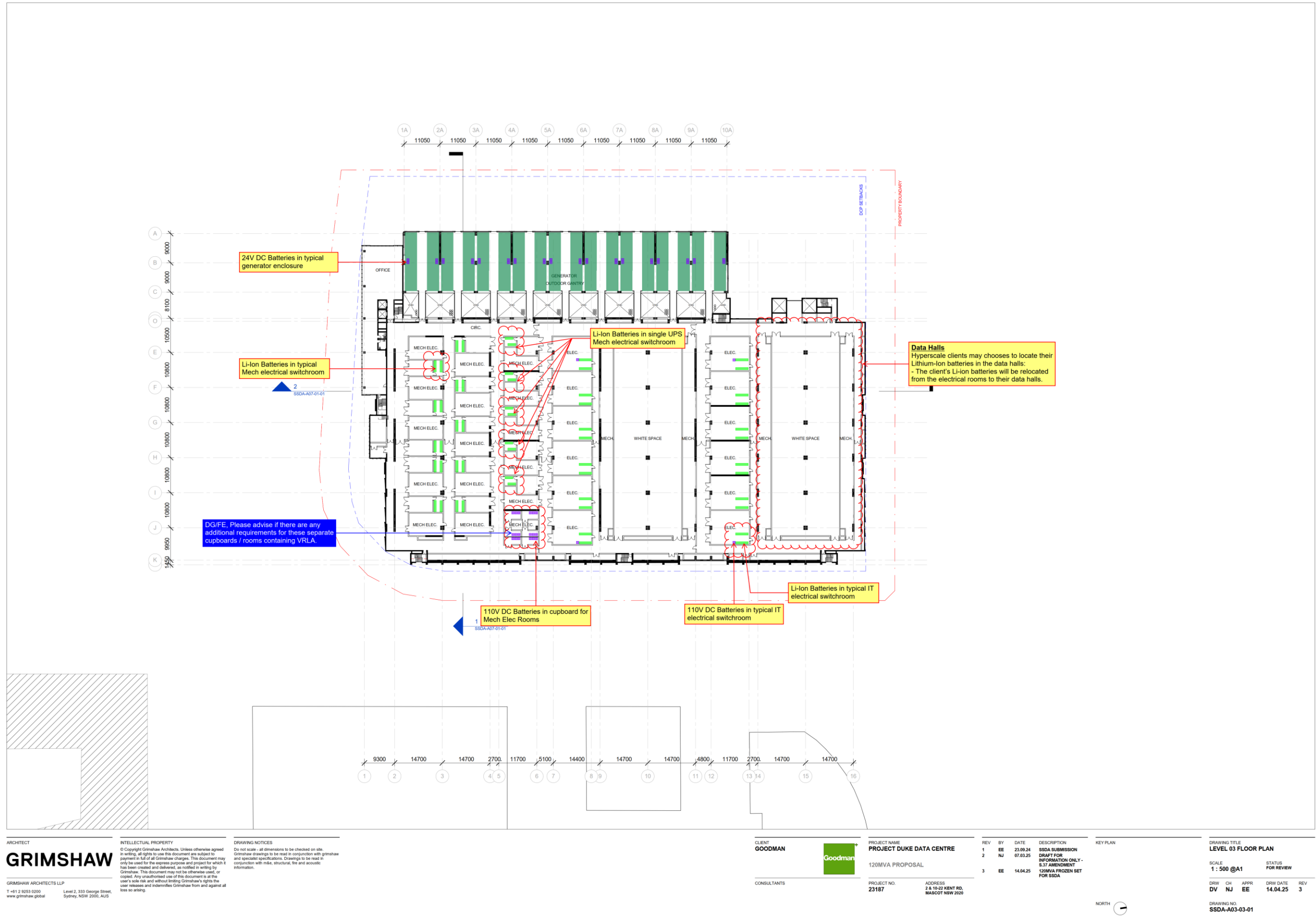


Figure 3-4: Site Layout – Level 3

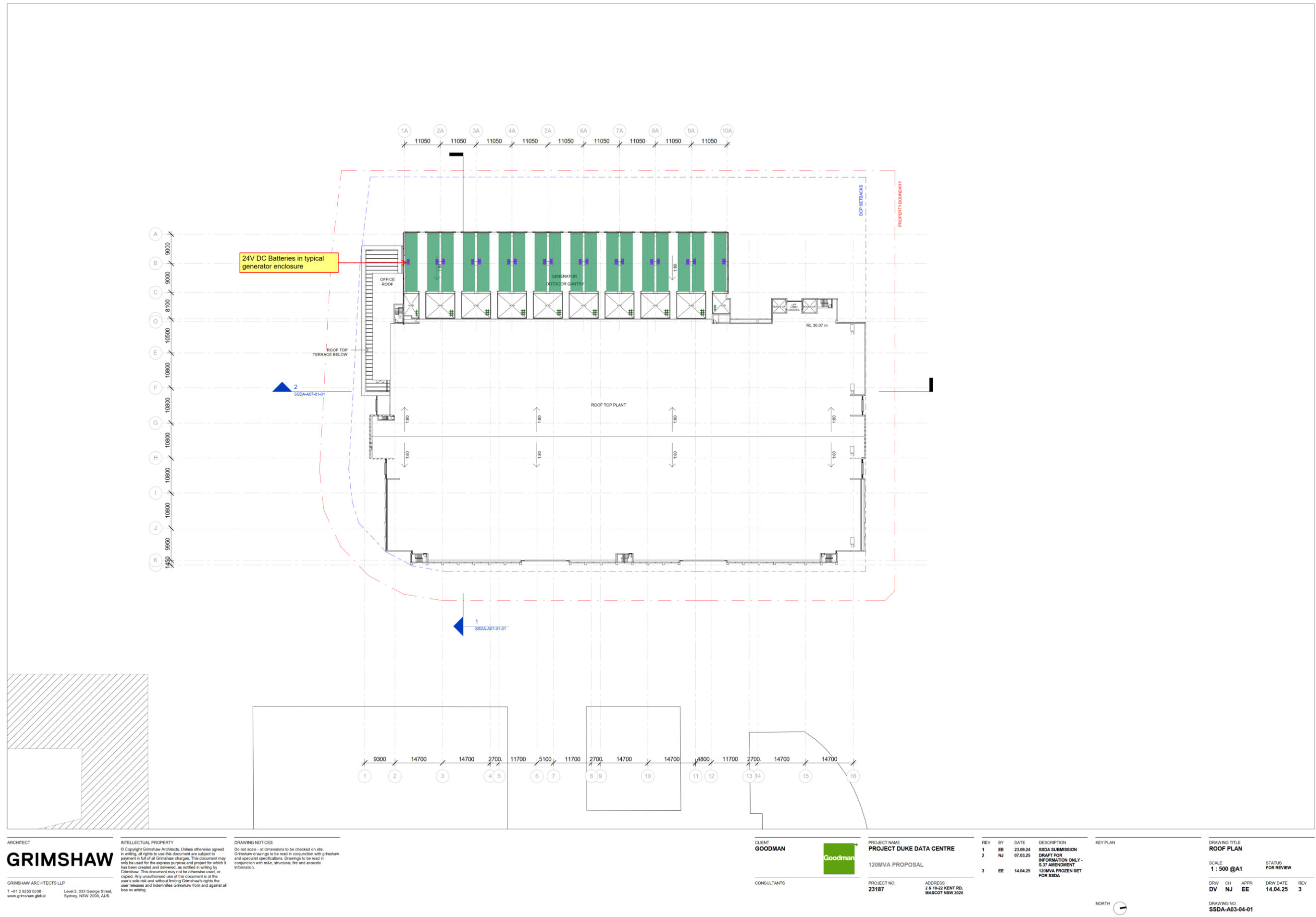


Figure 3-5: Site Layout – Level 4 Roof

4.0 SEPP-RH Assessment

4.1 SEPP RH Application and Assessment

The proposed data centre will store class 9 substance (Li-ion batteries) and combustible liquids for use in generators and tanks.

The initial screening of Dangerous Goods (DGs) was conducted using Table 1 in *Applying SEPP-33* (Ref. [1]) to determine if the classes are assessable against SEPP-RH thresholds. The results of the assessment are summarised in **Table 4-1**.

Table 4-1: DG Classes and SEPP-RH Applicability

Class	Description	Assessable against SEPP-RH?
8	VLRA	Yes
9	Li-ion batteries	No
C1	Combustible Liquid	No

As shown in **Table 4-1**, Table 1 of *Applying SEPP-33* indicates that combustible liquids and class 9 substances are not assessable against the SEPP-RH thresholds.

4.2 Assessment of Hazards

4.2.1 Storage

Threshold limits for the application of SEPP 33 are presented in **Table 4-2**, along with maximum DG quantities that will be stored at the site. The results summarised in the table indicates the SEPP 33 criteria is not exceeded; hence, will not require further assessment in the form of a PHA study.

Table 4-2: Quantities Stored and SEPP 33 Threshold

Class	Description	PG	Quantity (kg)	SEPP Threshold (kg)
8	VLRA	III	17,400	50,000

4.3 Transport Assessment

In addition to the storage of DGs, SEPP-RH also requires a review of the transport of DGs to the site. Similarly, to **Section 4.1**, combustible liquids and class 9 substances are not subject to SEPP-RH transport assessment. Hence, the traffic movements and quantities transported to and from the site do not exceed the thresholds listed in *Applying SEPP 33* (Ref. [1]) and the site is considered to be low risk.

4.4 Offensive Operations Assessment

Applying SEPP 33 (Ref. [1]) also contains a requirement for review of operations that may cause offense in the form of emissions, odour or other environmental impact. An indication of whether “offensiveness” may occur at the facility is whether an Environmental Protection Authority (EPA) license is required for specific operations at the site.

A review of the site operations relevant to the diesel tank storage indicates that there are no processes that would result in the manufacture, production or transfer of materials in a form that may result in the release of bulk materials at the site. Hence, an EPA license would not be required for this site.

Further, there would be no unusual operations that would cause potential emissions, odours, or noise outside of normal warehouse type operations. Therefore, there is no potential for offensive operations at the site and SEPP 33 does not apply.

5.0 Conclusions and Recommendations

5.1 Conclusions

The proposed data centre at 2 & 10-22 Kent Road and 685 Gardeners Road, Mascot NSW has been assessed for the application of the Chapter 3 of the State Environmental Planning Policy - Resilience and Hazards (SEPP-RH) based on the proposed storage of DGs at the facility. The analysis conducted in this study included an assessment of the proposed DG storage volumes against generic threshold storage quantities, as well as an assessment of transport operations involved in the storage and handling of DGs.

The results of these assessments identified that the site does not exceed any SEPP-RH storage thresholds. Further, the transport of DGs does not exceed the threshold levels, nor do any offensive operations occur at the site which may result in environmental emissions. Therefore, it is concluded that the site would not be regarded as potentially hazardous under the SEPP-RH policy.

5.2 Recommendations

The following recommendations have been made:

- Goodman shall re-assess their site against SEPP-RH in the event that storage quantities of DGs increase.
- Documentation required by the Work Health and Safety Regulation 2017 (Ref. [2]) specific to the site classification based upon the quantity of goods stored shall be prepared for the site prior to occupation.

6.0 References

- [1] NSW Department of Planning and Environment, "Applying SEPP33 – Hazardous and Offensive Developments," NSW Department of Planning and Environment, Sydney, 2011.
- [2] SafeWork NSW, "Work Health and Safety Regulation," SafeWork NSW, Lisarow, 2017.
- [3] Standards Australia, "AS 1940:2017 - Storage and Handling of Flammable and Combustible Liquids," Standards Australia, Sydney, 2017.