



4 November, 2015
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Reference: SEPP33(Prestons)-LETFinal(Rev0)-4Nov15

Logos Property
c/- DBL Property Pty Ltd
6/432 Kent St
Sydney NSW 2000

Attn: Jeffrey Lord

Re: SEPP33 Assessment – Proposed Property Development, Prestons, NSW

Dear Jeff,

Thank you for your query regarding the application of State Environmental Planning Policy No.33, Hazardous and Offensive Developments (SEPP33), to the proposed property development at Prestons NSW. I have conducted the assessment in the attached document, in summary, the analysis concluded that SEPP33 does not apply to the proposed development as the quantity of Dangerous goods proposed for storage at the site does not exceed the threshold levels listed in Applying SEPP33, published by the NSW Department of Planning and Environment (DPE).

Should you have any queries regarding the assessment, please do not hesitate to contact me on my mobile (0411 659 309).

Yours faithfully,

CORE Engineering

Steve Sylvester

**Associate Director
BEng., MAIDGC, FS Engineer (TUV 2203/10),
EEHA CT0598a&b/CR16285)**

Logos Property

PROPOSED STATE SIGNIFICANT DEVELOPMENT, PRESTONS, NSW

APPLICATION OF STATE ENVIRONMENTAL PLANNING POLICY NO.33

1. INTRODUCTION

Logos Property (Logos) proposes to develop a parcel of land in Prestons, NSW for light industrial storage (warehousing and distribution). As part of the State Significant Development Application (No.7155), the Department of Planning and Environment (DPE) has issued SEAR's for the Environmental Impact Statement (EIS). The SEARs require the following in respect of Hazards and Risks:

Hazards and Risks - the assessment must include: - a preliminary risk screening carried out 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, package size, and location of all dangerous goods and hazardous materials associated with the project;

- should the preliminary risk 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). The PHA must:

- identify the hazards associated with the proposed development to determine the potential for off-site impacts;
- estimate the combined risks from the existing site and the proposed development (overall site); and
- demonstrate that the risks from the overall site (as modified by this project) comply with the criteria set out in Hazardous Industry Planning Advisory Paper No 4 - Risk Criteria for Land Use Safety Planning.

Logos has requested CORE Engineering Pty Ltd (CORE) to prepare a SEPP33 analysis for the proposed development and to advise in relation to the SEARs requirements for Hazard and Risk. This document provides CORE's review and assessment of the proposed Prestons development and the requirements of the SEARs.

2. OBJECTIVES

The objectives of this study is to complete the required SEPP33 assessment of the proposed development at Prestons, NSW and to determine whether the policy applies to the site and whether additional studies are required for the facility (per the SEARs).

Figures 3-1 shows the proposed facility location and development area. This figure may be used to assist in understanding discussions prepared in this study.



Figure 3-1: Aerial Photograph Showing the Proposed Development – Prestons, NSW

3. METHODOLOGY

The methodology used for the SEPP33 assessment of the proposed development at Prestons, NSW, is that recommended in the document 'Applying SEPP33 – Hazardous and Offensive Developments', published by the Department of Planning and Environment.

The study approach is as follows:

- Identify the materials proposed for storage at the site;
- Determine whether the materials are listed in the Australian Dangerous Goods Code (ADG, Ref.1) and are there for classified as Dangerous Goods (DGs);
- Where DGs are not listed in the ADG, SEPP33 does not apply;
- Where DGs are listed in the ADG; review the quantities stored and determine whether the quantities exceed the threshold levels listed in Applying SEPP33;
- Where quantities of DGs stored do not exceed SEPP33 thresholds, SEPP33 does not apply; and
- Where quantities of materials stored exceed the threshold levels, it is necessary to conduct a PHA study, which (if required) would be conducted in a separate assessment.

On completion of the assessment prepare a report for submission with the SSD Application.

4. SEPP33 STUDY ASSESSMENT AND RESULTS

Figure 3-1 shows the proposed site location in the Prestons area of NSW. The property is generally bounded by Kurrajong Road, Bernera Road and Yarrunga Street, Prestons and is adjacent to currently vacant land to the West (that is zoned for industrial development).

The development as proposed in the Application seeks approval for five (5) warehouse buildings as shown on the site plan at **Figure 3-2**.

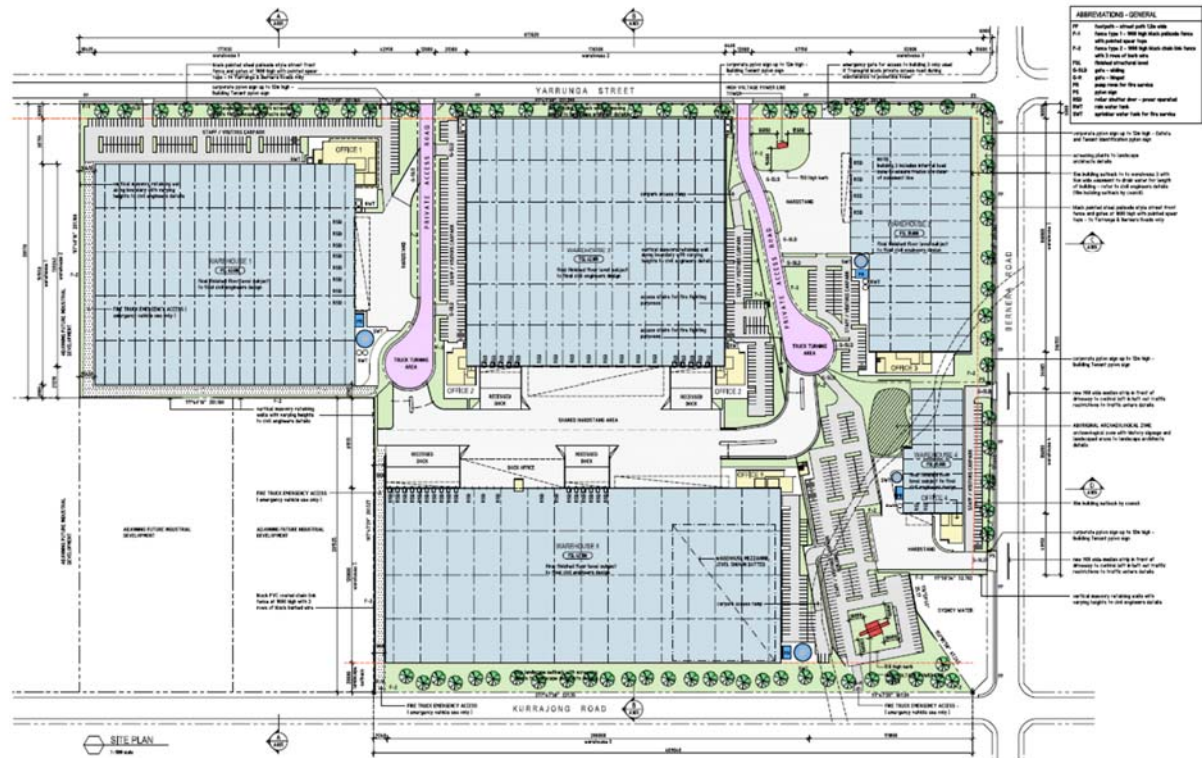


Figure 3-2: Proposed Development Plan – Prestons, NSW

Logos indicates that the property will be occupied by a range of tenants likely including furniture storage, general goods and potentially white goods. The proposed tenants do not plan to store and handle Dangerous Goods (DG) as a prime product storage line, however, many of the sites would store Dangerous Goods in minor quantities as listed in the relevant standard for the DG stored (Ref.2). A list of DG storage quantities for the range of DGs that may be stored at the site is provided in **Table 5-1**. This table also includes the maximum permissible threshold quantity that may be stored before SEPP33 is applied (Ref.1).

Table 5-1: List of Maximum Quantity of DGs that may be stored at the Prestons Site and SEPP33 Maximum Threshold Quantities

DG Class	DG Type	Maximum Qty Stored	SEPP33 Threshold
2	Liquefied Petroleum gas (LPG)	5 tonnes	10 tonnes
3	Flammable Liquids	1 tonne	5 tonnes
4.1	Flammable Solids	1 tonne	5 tonnes
5.1	Oxidising Agents (e.g. pool chlorine)	2 tonne	2.5 tonnes
6.1	Toxic Substances (PGII & PGIII)	2 tonnes	2.5 tonnes

8	Corrosive Substance (PGII) Corrosive Substance (PGIII)	5 tonne 10 tonne	25 tonne 50 tonne
9	Miscellaneous DGs	10 tonne	Not subject to SEPP33

(see Attachment 1 for threshold screening table extracted from Applying SEPP33 – Ref.1)

5. CONCLUSIONS AND RECOMMENDATIONS

5.1. Conclusions

Based on the analysis conducted in **Section 5** and **Table 5-1**, it can be seen that the proposed quantities of DGs to be stored at the warehouse development do not exceed the threshold quantities listed in Applying SEPP33 (Ref.1). Hence, it is concluded that SEPP33 does not apply to the proposed development at Prestons, NSW and therefore a Preliminary Hazard analysis is not required for the site.

Should a user propose to store large amounts of DG, an additional use Application would need to be lodged for that particular user and building. The SEPP33 analysis would therefore need to be updated to deal with that particular user and the location on the site.

5.2. Recommendations

Notwithstanding the fact that SEPP33 does not apply to the site, the storage of DGs may trigger other requirements as part of the Work Health and Safety Regulation (2011). Hence, it is recommended that as part of the development approvals, the site is assessed for compliance with Section 7 of the Work Health and Safety Regulation.

6. REFERENCES

1. Applying SEPP33 – Hazardous and Offensive Developments, NSW Department of Planning and Environment, 2011.
2. “The Australian Code for the Transport of Dangerous Goods by Road and Rail”, known as The Australian Dangerous Goods Code or ADG, ed. 7.3, 2015, Federal Office of Road Safety, Canberra, ACT.

ATTACHMENT 1

Table 3: General Screening Threshold Quantities

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')	
	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

Note: The classes used are those referred to in the Australian Dangerous Goods Code and are explained in Appendix 7.