Riskcon engineering

SEPP-RH Assessment

Project Mars Data Centre - 12 Mars Road, Lane Cove West

Goodman Property Services (Aust) Pty Ltd
Document No. RCE-24358_GoodmanMarsRd_SEPP_Final_18Feb26_Revision B - Formal Lodgement
Date 18/02/2026

SEPP-RH Assessment

Project Mars Data Centre - 12 Mars Road, Lane Cove West

Goodman Property Services (Aust) Pty Ltd

Prepared by

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Quality Management

Rev	Date	Remarks	Prepared By	Reviewed By
A	16 December 2024	Draft issued for comment	Zachary Cohn	Renton Parker
0	11 April 2025	Issued final		
1	22 April 2025	Incorporated comments		
2	22 July 2025	Incorporated comments		
3	15 September 2025	Updated description and layout		
4	13 October 2025	Updated title		
5	10 December 2025	Updated layouts		
B	18 February 2026	Revision B – Formal Lodgement		

Executive Summary

Background

This (RCE-24358_GoodmanMarsRd_SEPP_Final_18Feb26_Revision B - Formal Lodgement) has been prepared by Riskcon Engineering Pty Ltd to accompany a State Significant Development Application (SSDA) for the construction and ongoing operation of a data centre facility at 12 Mars Road, Lane Cove West in the Lane Cove Government Area (LGA). The site is legally described as Lot 22 in Deposited Plan 732062.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the Project Mars Data Centre Project (SSD-82052708) dated 10th April 2025.

Goodman Property Services (Aust) Pty Ltd (Goodman) has proposed to develop a data centre at their site located at 12 Mars Road, Lane Cove West. The facility will require battery storages and fuel for back-up generators. It is required to perform 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 12 Mars Road, Lane Cove West NSW 2066.

Conclusions

The proposed data centre at 12 Mars Road, Lane Cove West 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 lithium-ion batteries (Class 9) and combustible liquids are not assessable against the SEPP-RH thresholds and therefore 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.) 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
SEPP	State Environmental Planning Policy

1.0 Introduction

1.1 Background

This (RCE-24358_GoodmanMarsRd_SEPP_Final_18Feb26_Revision B - Formal Lodgement) has been prepared by Riskcon Engineering Pty Ltd to accompany a State Significant Development Application (SSDA) for the construction and ongoing operation of a data centre facility at 12 Mars Road, Lane Cove West in the Lane Cove Government Area (LGA). The site is legally described as Lot 22 in Deposited Plan 732062.

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1.2 Objectives

The objectives of the study are to:

- Determine whether SEPP-RH applies to the proposed data centre 12 Mars Road, Lane Cove West based on the quantity of DGs being stored as required by Industry Specific Secretary's Environmental Assessment Requirements (SEARs, **Table 1-1**); and
- Report on the findings of the study in support of the DA.

Table 1-1: SEARs - Hazards & Risks

Item	Requirement	Report Section
Hazards and Risks	• 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.	**Section 4.0**
	• 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.	**Accompanying report**
	• The EIS must demonstrate the relevant aspects of the FM Global Property Loss Prevention Data Sheet 5-32 – Data Centres and Related Facilities have been considered and could be implemented as part of the development. It must also demonstrate the development would comply with the relevant aspects of the following standards: o o AS/NZS 4681 – Storage and handling of Class 9 (miscellaneous) dangerous goods and articles	**Accompanying report**

Item	Requirement	Report Section
	o o AS IEC 62619 – Secondary cells and batteries containing alkaline or other non-acid electrolytes – Safety requirements for secondary lithium cells and batteries, for use in industrial applications o o AS 1940 – Storage and handling of flammable and combustible liquids.	

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 12 Mars Road, Lane Cove West 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 Site Description

3.1 Site Location and Layout

The proposed data centre is located at 12 Mars Road, Lane Cove West NSW 2066 which is approximately 9 km northwest of the Sydney Central Business District (CBD). **Figure 3-1** shows the location of the site in relation to the Sydney CBD. Provided in **Figure 3-2** is the layout of the site.

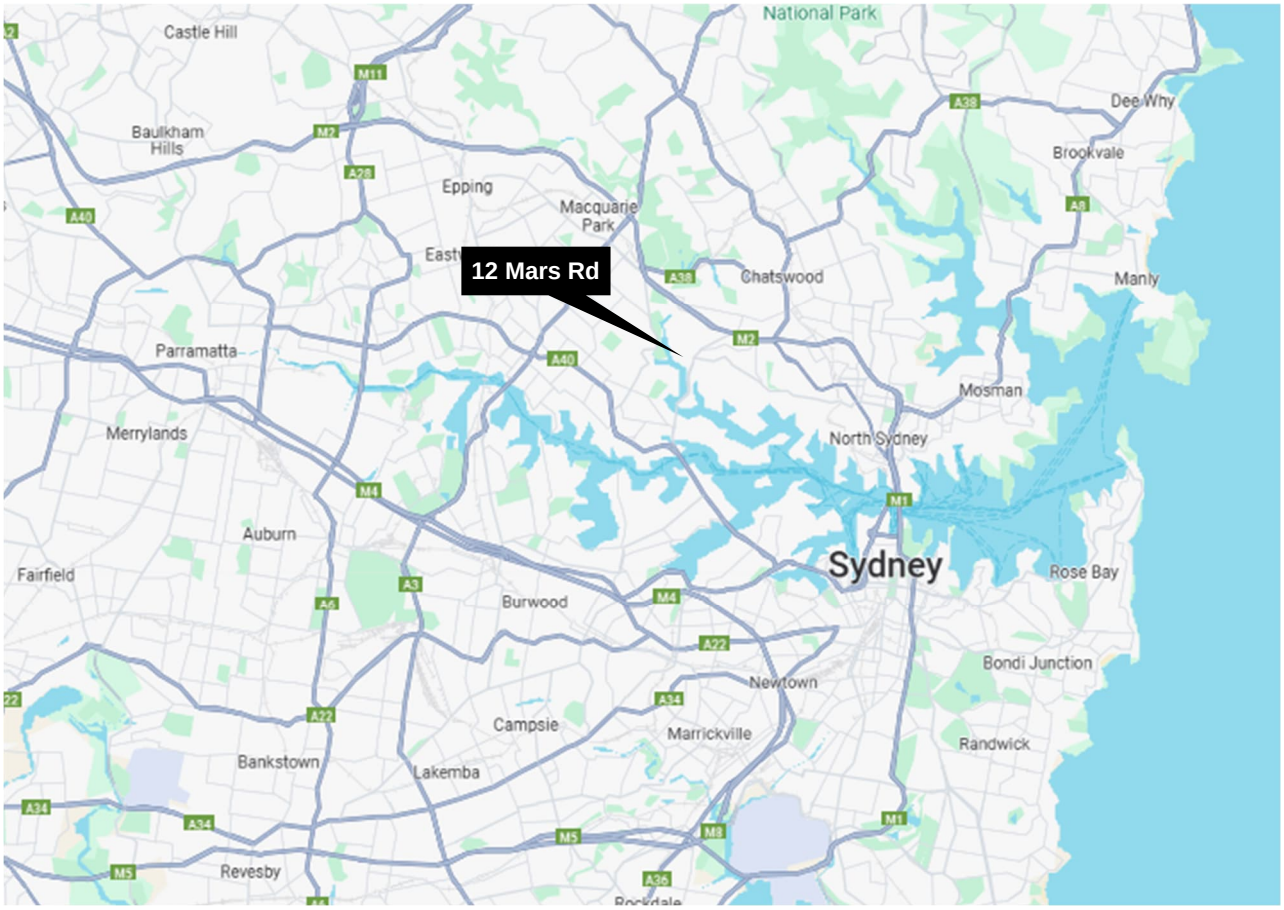


Figure 3-1: Site Location

3.2 Project Description

A State Significant Development Application (SSDA) has been prepared to support a data centre at 12 Mars Road, Lane Cove West. The site area is 33,559m^2 and is zoned E4 General Industrial.

The proposal will include:

- 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 operation of a three-storey data centre building with a total gross floor area of approximately 21,832m^2 comprising:
    - 24 parking spaces
    - 2 loading dock spaces
    - 2 levels of technical data hall floor space

  - 3 level office and amenities building
- Provision of required utilities including:
  - diesel storage tanks
  - water tanks
  - substations on site
- Vehicle and pedestrian access provided via Mars Road
- Associated landscaping and site servicing
- Installation of site services and drainage infrastructure
- A floor space ratio of approximately 0.65:1

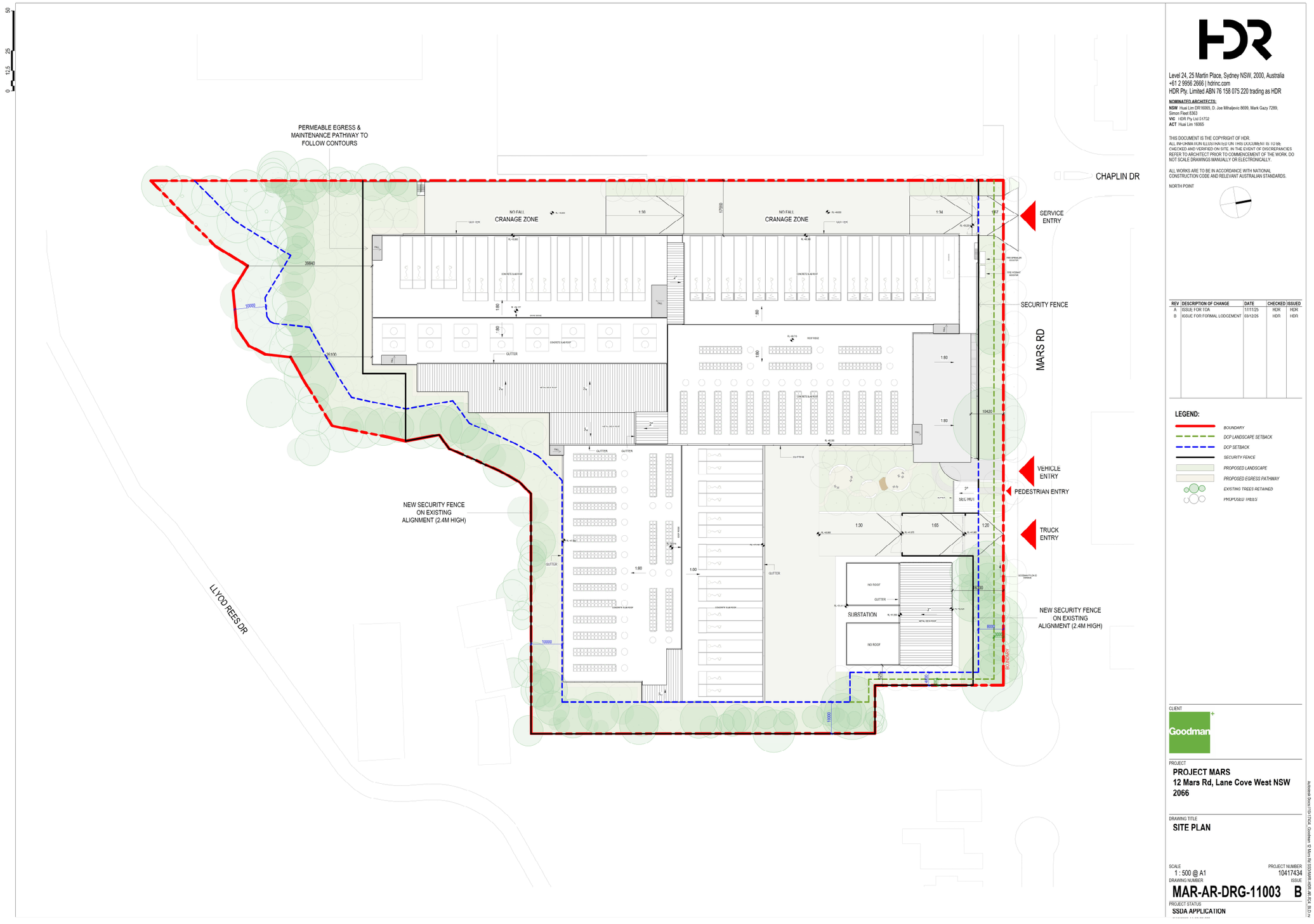
3.3 Quantities of Dangerous Goods Stored and Handled & SEPP-RH Screening

The classes and quantities of DGs to be stored at the facility are summarised in **Table 3-1**, alongside the SEPP-RH assessment.

Table 3-1: Maximum Classes and Quantities of Dangerous Goods Stored & SEPP-RH Screening

Class	Packing Group (PG)	Description	Quantity (L or kg)	SEPP-RH Applicable? (Y/N)
9	n/a	Li-ion batteries	194,000 kg	N
C1	n/a	Diesel	849,000 L	N
C2	n/a	Transformer oils	68,000 L	N

Note that the classes stored (9 and combustible liquids) are not applicable to the SEPP-RH risk screening process (Ref. [3], therefore the site is not potentially hazardous.



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NORTH POINT

REV	DESCRIPTION OF CHANGE	DATE	CHECKED	ISSUED
A	ISSUE FOR TOA	17/11/25	HDR	HDR
B	ISSUE FOR FORMAL LODGEMENT	03/12/25	HDR	HDR

LEGEND:

- BOUNDARY
- DCP LANDSCAPE SETBACK
- DCP SETBACK
- SECURITY FENCE
- PROPOSED LANDSCAPE
- PROPOSED EGRESS PATHWAY
- EXISTING TREES RETAINED
- PROPOSED TREES

CLIENT
Goodman

PROJECT
PROJECT MARS
12 Mars Rd, Lane Cove West NSW 2066

DRAWING TITLE
SITE PLAN

SCALE
1 : 500 @ A1

PROJECT NUMBER
10417434

DRAWING NUMBER
MAR-AR-DRG-11003

ISSUE
B

PROJECT STATUS
SSDA APPLICATION

Archicad Docs\10417434_Goodman 12 Mars Rd SSDA\MAR-AR-RCA_B.PLN

Figure 3-2: Site Layout

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 transformers.

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?
9	Li-ion batteries	No
C1	Combustible Liquid	No
C2	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. As no other dangerous good are proposed to be stored, the site would be below the SEPP-RH thresholds. Therefore, the site is not regarded as being potentially hazardous to adjacent properties and further planning studies would not be required.

4.2 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.

4.3 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 12 Mars Road, Lane Cove West 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 lithium-ion batteries (Class 9) and combustible liquids are not assessable against the SEPP-RH thresholds and therefore 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] Department of Planning, “Applying SEPP 33,” Department of Planning, Sydney, 2011.

[4] Standards Australia, “AS 1940:2017 - Storage and Handling of Flammable and Combustible Liquids,” Standards Australia, Sydney, 2017.