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SEPP Resilience and Hazards Risk Screening

78 Lockwood Road Data Centre

Prepared for: Stack Infrastructure Pty Ltd

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Abbreviations

Table 1 Abbreviations

Acronym	Description
ACOR	ACOR Consultants Pty Ltd
ADG Code	Australian Code for the Transport of Dangerous Goods by Road & Rail
AS	Australian Standard
AS/NZS	Australian/ New Zealand Standard
DG	Dangerous Goods
N/A	Not Applicable
NSW	New South Wales
PHA	Preliminary Hazard Analysis
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SFL	Safe Fill Level
SSD	State Significant Development
SSDA	State Significant Development Application
WHS	Workplace Health and Safety

1 Executive Summary

This report addresses the requirements for a Preliminary Hazard Analysis (PHA) under Item 16 (Hazards and Risks) of the Industry Specific SEARs (Secretary's Environmental Assessment Requirements) for Data Storage Centres. The objective is to carry out a risk screening assessment to determine if the proposed development would be classified as a potentially hazardous industry under the conditions of State Environmental Planning Policy (SEPP) (Resilience and Hazards) 2021¹ – Potentially Hazardous and Offensive Development.

As part of the proposed development, it has been identified that 78 Lockwood Road Data Centre will include storage and handling of the following dangerous goods²:

- Diesel (C1 Combustible Liquid); and
- Electrolytes in Lithium-ion Batteries (Class 9 Miscellaneous).

The risk screening provides a broad estimate of possible off-site consequences arising from the hazardous materials stored and handled on site. The risk screening is based on the quantity of hazardous materials stored (quantity screening) and the number of transport movements in and out of the site (transport screening).

Based on the class, quantity, location, and movements of the proposed dangerous goods, the risk screening reveals that the proposed development is not considered a potentially hazardous industry and therefore will not require a PHA to be completed.

2 Introduction

This State Environmental Planning Policy (SEPP) (Resilience and Hazards) 2021– Potentially Hazardous and Offensive Development Risk Screening has been prepared by ACOR Consultants (ACOR) on behalf of STACK Infrastructure to accompany a State Significant Development Application (SSDA) for a proposed data centre development at 78 Lockwood Road, Erskine Park (the site).

The site is located in the Penrith Local Government Area (LGA) and is approximately 40km west of the Sydney Central Business District (CBD), 20km west of the Parramatta CBD, and 10km north-east of the future Western Sydney International Airport.

The site is an irregular shaped 7.7-hectare lot bounded to the north by Lenore Drive and to the east by an E2 Environmental Conservation corridor that follows Ropes Creek. The site relies upon access from a cul-de-sac at the eastern end of Lockwood Road at the site's southern boundary. An aerial photograph is provided in Figure 1.

¹ The policy applicable to potentially hazardous developments was previously covered by SEPP 33 – Hazardous and Offensive Development. SEPP 33 has been consolidated into this new policy (SEPP Resilience and Hazards) as Chapter 3 as an administrative function with no policy changes made. All current circulars and guidelines relating to SEPP 33 as referenced in this report remain applicable.

² Under the NSW Work Health and Safety Act and Regulation, dangerous goods are termed hazardous chemicals. Australian Standards still use the term 'dangerous goods' when referring to the definitions and classes as set out in the Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Code).



Figure 1 Aerial Photograph of Site (Source: Urbis GIS, 2025)

The project comprises the construction of a data centre development including the following key components:

- Site preparation and bulk earthworks.
- Temporary construction access from Lenore Drive.
- Construction of a three-storey data centre comprising two buildings, with a maximum height of 26.5 metres and a total gross floor area (GFA) of approximately 56,506m², including technical data halls, office and administrative areas, and ancillary circulation space.
- At-grade under-croft car parking (34 spaces) within the building footprint, plus an additional 44 on-site spaces, providing a total of 78 parking spaces.
- Separate generator gantry accommodating 188 backup generators.
- Landscaping and associated public domain works.
- Extension and augmentation of physical infrastructure and utilities as required, including an on-site substation and water storage tanks integrated within the building footprints.
- Off-site works comprising the delivery of two 330kV transmission lines from the TransGrid Sydney West Substation site to the subject site, utilising existing road reserve along Lenore Drive.

3 Response to SEARS

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARS) dated 11 April 2025 issued for the SSDA (SSD-82211208). Specifically, this report has been prepared to respond to the SEARS requirement (Item 16) issued below.

Table 2 SEARS Compliance

Item	Description of Requirement	Section Reference (this Report)
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 prepare in accordance with <i>Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis and Multi-Level Risk Assessment</i>. - 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.	9.3

To respond to the requirements of the SEARS cover letter, ACOR has prepared a separate document covering dangerous goods compliance. The specific requirements covered in this Dangerous Goods Compliance Report are shown in Table 3 SEARS Cover Letter Requirements Covered in the Dangerous Goods Compliance Report

Table 3 SEARS Cover Letter Requirements Covered in the Dangerous Goods Compliance Report

SEARS Requirement (Cover Letter)	ACOR Document Title	Section Reference (Dangerous Goods Compliance Report)
- Hazards and risk – 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: - AS/NSS 4681 – Storage and handling of Class 9 (miscellaneous) dangerous goods and articles. - AS IEC 62619 – Storage cells and batteries containing alkaline or other non-acid electrolytes – Safety requirements for secondary lithium cells and batteries, for use in industrial applications. - AS 1940 – Storage and handling of flammable and combustible liquids.	NA251463-DG-02	3

4 Scope

The scope is to conduct a risk screening, as per the guideline of *Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines (2011)* for the proposed DG storage located within the proposed data centre. This report has been prepared to support the State Significant Development Application (SSDA) for the data centre, specifically addressing the diesel in the generator day tanks and the lithium-ion batteries in the data halls.

This document applies the methods in *Applying SEPP 33* for comparison of the screening threshold and whether the hazardous materials stored on site exceed the threshold limits and therefore require a PHA.

5 Criteria

The assessment will be based on the on the criteria of the NSW *Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines (2011)*.

6 Limitations

ACOR has assessed this application based on the information provided to us for the project in relation to the storage quantities, locations, design layout, etc. It is the end user's responsibility to ensure that the installation meets the requirements and initiates the controls as required by the relevant legislation.

This project is limited to the proposed Dangerous Goods (DG) within the proposed data centre development only.

Note: The report and findings are not a substitute for full compliance with Australian Standards and Codes of Practice, the client shall ensure that they maintain their duty of care and consult the relevant legislation and guidelines.

Should the storage conditions or volumes change the contents and findings in the report shall be reviewed, and the risks associated with any change assessed and controlled.

7 Methodology

The methodology for the risk screening is to evaluate the proposed development and identify any exceedance in threshold limits as outlined in *Applying SEPP 33*.

The following steps were undertaken:

1. Review of all the hazardous materials proposed to be stored within the facility, their location, quantities, and mode of storage used.
2. Review of the average number of road movements for the hazardous materials to and from the facility.
3. Assessment of the quantities and movements identified and comparison to the threshold limits identified in *Applying SEPP 33*.
4. Summarising findings and determining whether a Preliminary Hazard Analysis is required.

8 Information

8.1 Site Description

The site is located at 78 Lockwood Road, Erskine Park, within the Penrith Local Government Area (LGA), approximately 40 km west of the Sydney Central Business District (CBD), 20 km west of the Parramatta CBD, and 10 km north-east of the future Western Sydney International Airport.

The site is an irregular shaped 7.7-hectare (ha) lot bounded to the north by Lenore Drive and to the east by a zoned E2 Environmental Conservation corridor that follows Ropes Creek. It relies upon access from a cul-de-sac at the eastern end of Lockwood Road at the site's southern boundary. An aerial photograph is provided Figure 1.

The site is located within the 'Fitzpatrick Industrial Estate', an area of approximately 140-ha of land located on Lenore Drive. The estate is bounded by Ropes Creek to the east, the Erskine Park residential area to the north, and the Sydney Catchment Authority pipeline to the south. The Fitzpatrick Industrial Estate is located within the Western Sydney Employment Area (WSEA). The WSEA has long been identified as the single largest greenfield industrial precinct to serve the growing demand for industrial lands in the Sydney Metropolitan Area for the next 20 to 30 years.

The site is surrounded by a variety of industrial land use activities and significant transport and utilities infrastructure. Immediate surrounding development includes:

- **North:** The site is bounded to the north by Lenore Drive and the adjacent AutoNexus, a provider of automotive logistics and supply chain solutions. Further afield is the Erskine Park residential area.
- **East:** Ropes Creek adjoins the site to the east. This is zoned E2 – Environmental Conservation. An artificial wetland was established immediately east of the subject property boundary and within this E2 zoned land to support the industrial use of the site which results in stormwater runoff being conveyed to the E2 corridor.

- **South:** The Sydney Catchment Authority Pipeline is located approximately 540 metres to the south.
- **West:** Lot 101 and the remainder of the Fitzpatrick Industrial Estate comprise the surrounding land uses to the west. These include a variety of warehouse and logistics land uses.

The following table summarises the key features of the site.

Table 4 Property Details

Feature	Description
Site address	78 Lockwood Road, Erskine Park, NSW, 2759
Legal Description	Lot 101 in Deposited Plan 1268632
Site area	77,241.97sqm
Frontages	North (approx. 357m): Lenore Drive East (approx. 498m): Environmental conservation land, including an artificial dam at the immediate north-east and Ropes Creek further east South (approx. 292m): Lockwood Road (at south-west); Residual industrial land (along remainder of frontage) West (approx. 207m): Industrial land
Site Topography	The site is generally flat, however exhibits a fall of approximately 3m from the west to the east. The existing site levels were created following the approval of DA19/0818.
Vegetation	The site has been largely cleared of vegetation. There is a small strip of grass and young trees along the northern boundary alignment, on a temporary bund established under DA19/0818. This area of the site is not identified as having any significant biodiversity or environmental qualities. A small portion of the site area – approx. 538sqm of land at the south-east – is zoned C2 Environmental Conservation zone and contains a small amount of grass and tree canopy.
Built Environment	The site comprises vacant land and does not contain any existing built form structures. The site survey indicates that there is a drainage channel along the northern boundary of the site.
Contamination	Contamination issues on the site and across the broader, original landholding (being the Fitzpatrick Estate) were considered and resolved as part of development consent DA06/1646. A Validation Report dated 2007 outlined remediation works required and confirmed that the Fitzpatrick Estate lands could be made suitable for industrial uses. A later Validation Report, dated November 2008, was commissioned subsequent to site remediation. This report confirmed that the risk of contamination on the site was greatly reduced following the remediation works.
Flooding	The eastern portion of the site is identified as flood prone land.
Bushfire	The majority of the site is identified as Vegetation Category 2 bushfire land, with the exception of land along the norther boundary which is identified as Vegetation Buffer land.
Biodiversity	The site is predominantly cleared of all vegetation.
Salinity	The 'Salinity Potential of Western Sydney' map prepared in 2002 by the then Department of Infrastructure, Planning and Natural Resources identifies the site is an Area of Moderate Salinity Potential.
Acid Sulfate Soils	The land is not mapped as containing Acid Sulfate Soils.
European heritage	The land is not affected by any heritage listings or draft heritage listings. The site is not located within any listed or draft Heritage Conservation Area.
Aboriginal Heritage	Previous Aboriginal cultural investigations have confirmed that given the highly disturbed nature of the site, the potential for Aboriginal cultural relics on the land was found to be low.
Obstacle limitation surface	The land is affected by the Obstacle Limitation Surface (OLS) restrictions which apply to the Western Sydney Airport, pursuant to Chapter 4 of State Environmental Planning Policy (Precincts—Western Parkland City) 2021. Development on the land is restricted to a maximum height of RL 230.5m AHD.

8.2 Project Description

Table 5 Project Details

Project Element	Summary
Project Summary	Site preparation and bulk earthworks. Temporary construction access from Lenore Drive. Construction of a three-storey data centre comprising two buildings, with a maximum height of 26.5 metres and a total GFA of approximately 56,506m², including technical data halls, office and administrative areas, and ancillary circulation space. At-grade under-croft car parking (34 spaces) within the building footprint, plus an additional 44 on-site spaces, providing a total of 78 parking spaces. Separate generator gantry accommodating 188 backup generators. Landscaping and associated public domain works. Extension and augmentation of physical infrastructure and utilities as required, including an on-site substation and water storage tanks integrated within the building footprints. Off-site works comprising the delivery of two 330kV transmission lines from the TransGrid Sydney West Substation site to the subject site, utilising existing road reserve along Lenore Drive.
Site/Project Area	The data centre development relates to Lot 101 in DP 1268632 which comprises an area of approximately 77,241.97m ² , together with land within Lenore Drive (public road, part C2 Environmental Conservation and Part IN1 General Industrial zone) associated with the proposed HV route.
Proposed uses	Data centre with ancillary office space
Data halls	32 data halls
GFA	56,506m ²
FSR	0.73:1
Site Coverage	43,313.09m ² (56.07% of site)
Utilities	Provision of required utilities including: 188 x diesel generators accommodated with generator gantry structure. Two x above-ground water tanks for fire water. 330/132/11kV switching station.
Power consumption	450 MW
Maximum height	26.5m over three storeys
Vehicular Access	Vehicle access via Lockwood Road
Parking	78 car spaces including two accessible spaces
Bicycle Parking	30 spaces
Motorbike Parking	Three spaces
Deep Soil Area	15,806.37m ² (20.5% of site)
Tree Canopy Coverage	8,181m ² (10.59% of site)
Earthworks/Cut and Fill	Net fill of approximately 38,460m ³
Hours of Operation	The facility will be operated on a 24-hour, 7 day a week basis.
Jobs	Construction: 1,482 Operation: 200
Staging and Construction	The project is to be constructed over two stages:

Project Element	Summary
	Stage 1 – Eastern data centre building, on-site substation, generator gantry, external plant and equipment, new Lockwood Road access, internal roads, car parking, and landscaping, External HV Cabling Route Stage 2 – Western data centre building, gantry expansion, external plant and equipment, additional car parking and landscaping.
Estimated Development Cost	\$3,699,726,631.89

8.3 Proposed Site Layout

The proposed development will consist of two main buildings holding data houses and offices, a generator enclosure on the east side of the site, and transformer substations on the north corner. The entire site plan for the proposed 78 Lockwood Road Data Centre is shown below in Figure 2.

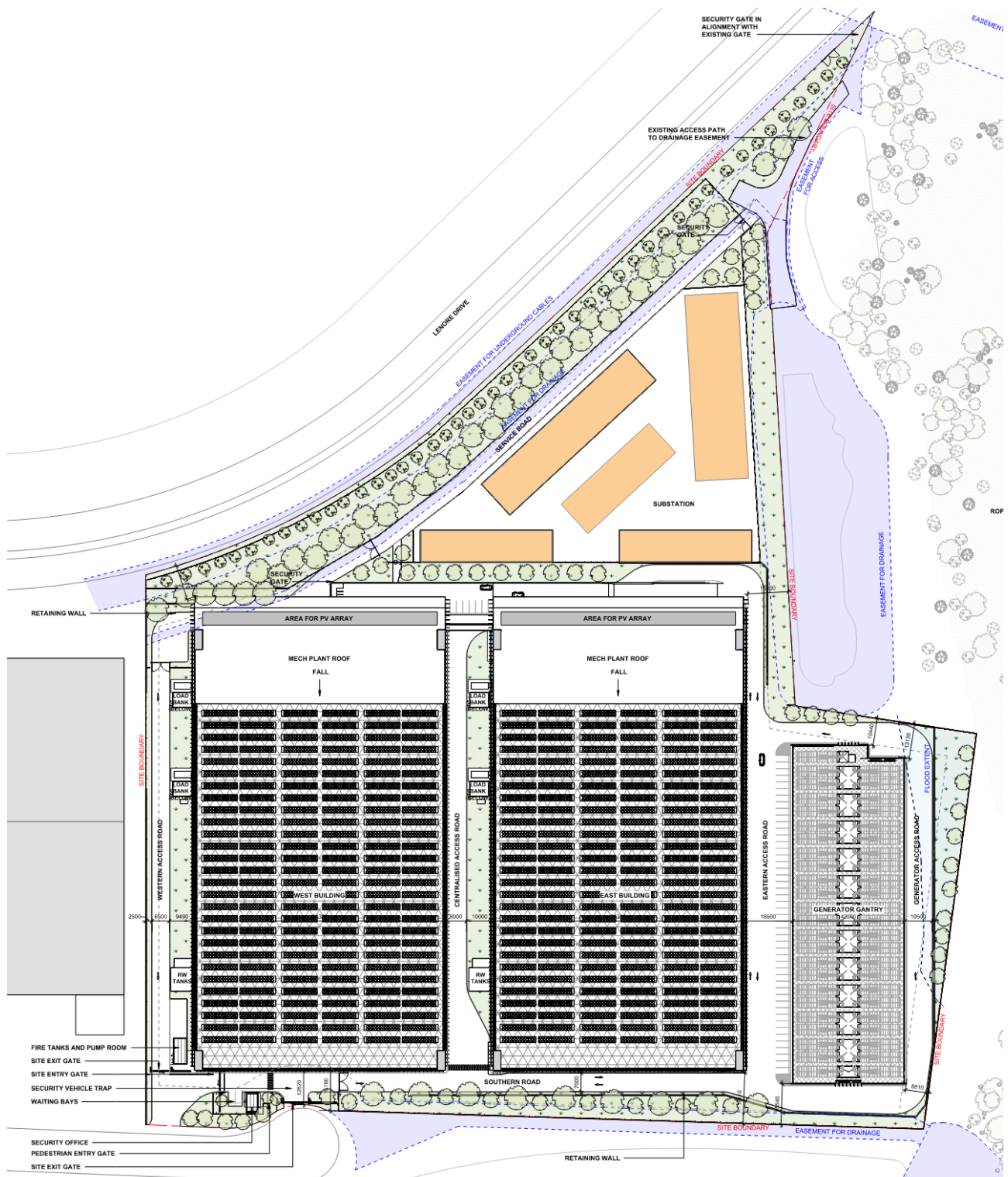


Figure 2 Proposed Site Layout

The separation distances from the proposed dangerous goods storage to the property boundary are summarised in Table 6 below, and shown in Figure 3 and Figure 4.

Table 6 Proposed Dangerous Goods Storage and Distance from Property Boundary

Proposed DG Storage	Minimum Distance from Property Boundary
Diesel (Generator Tanks)	8.8 m
Electrolytes (Lithium-ion Batteries in Data Centre)	12.6 m
Diesel (Dire Pump Tanks)	9.0 m

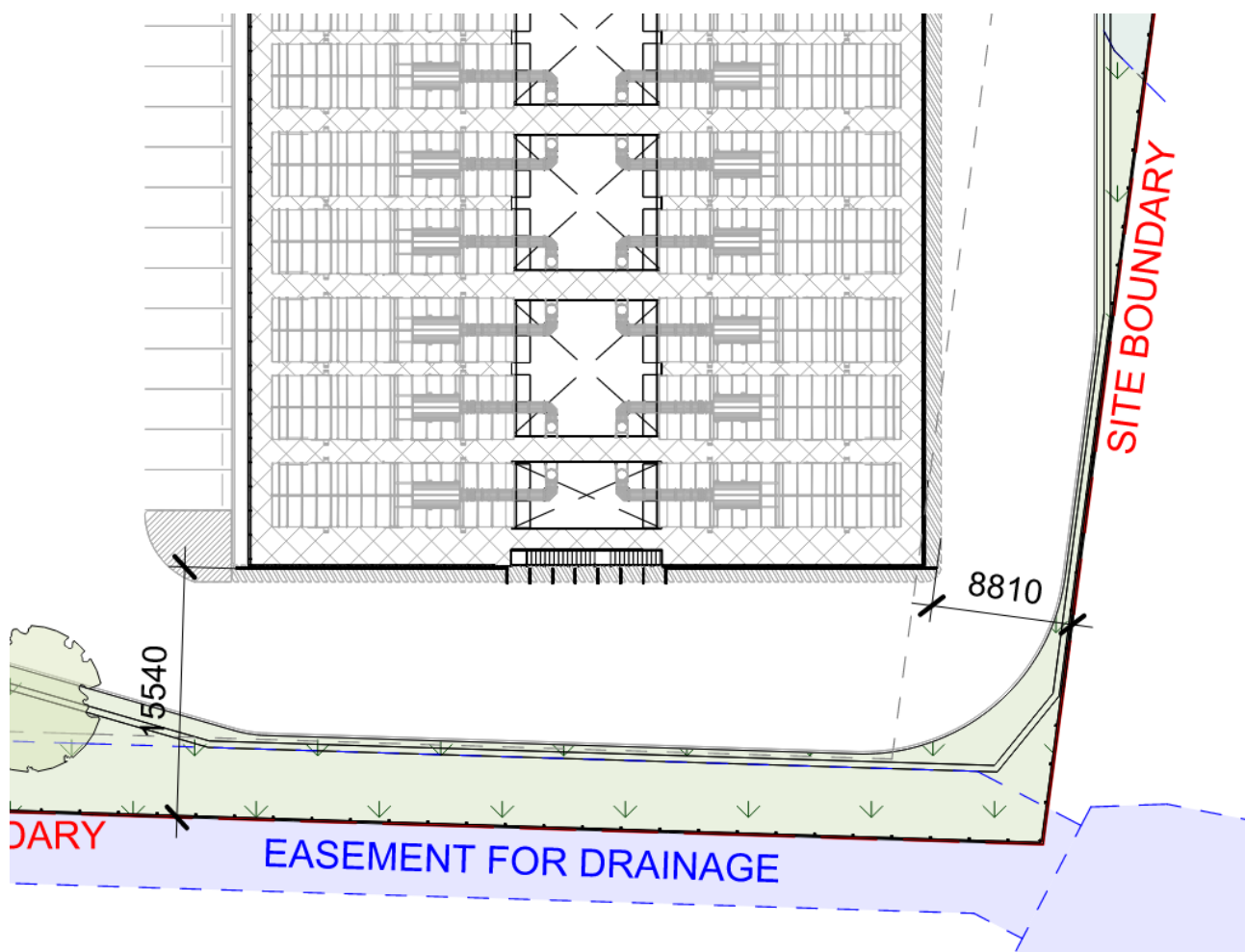


Figure 3 Minimum Separation Distance of Diesel Tanks to the Property Boundary

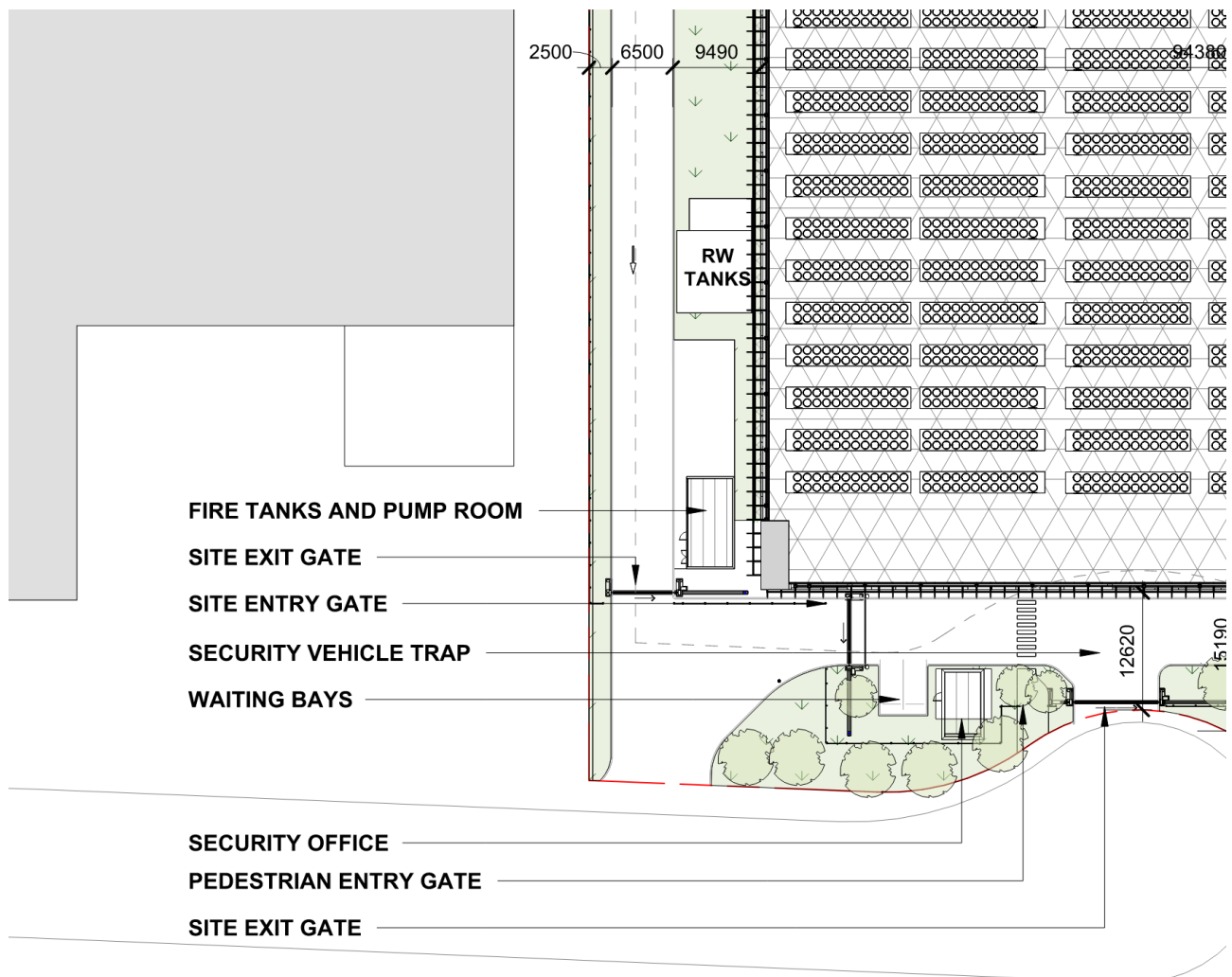


Figure 4 Minimum Separation Distance of Data Centre and Fire Pumphouse to the Property Boundary

9 Risk Screening

A risk screening was performed to determine if the proposed development would be classified as a potentially hazardous industry under the conditions of State Environmental Planning Policy (SEPP) (Resilience and Hazards) 2021– Potentially Hazardous and Offensive Development.

The risk screening method described in the *Applying SEPP 33 Hazardous and Offensive Development Application Guidelines* was applied to the proposed development. This method involves collating information about the proposed dangerous goods storage and proposed road movements and then comparing that information to threshold limits as part of a screening assessment.

9.1 Proposed Dangerous Goods Storage

The proposed site will have 2 buildings, each with 16 data house's, 8 UPS battery rooms and dedicated BBU battery storage for new and spent batteries. Batteries in the data houses and UPS battery rooms are connected to circuit and considered to be "in-use" while batteries inside dedicated BBU storage rooms are not connected to circuit and considered "not in-use".

Batteries connected in a circuit, charging continuously to be ready for deployment are considered to be 'in-use' and therefore not a stored dangerous good.

The first part of the risk screening is to collate information about the proposed dangerous goods storage. ACOR understands that the proposed dangerous goods storage within the 78 Lockwood Road Data Centre includes the following:

Table 7 Summary of Proposed Dangerous Goods Storage

DG	Storage Type	Class/ Division	Quantity	Unit Capacity	Total Capacity
Diesel	Individual Double Bunded Tank	C1	188	22,700 L	4,267,600 L
Diesel	Day Tank	C1	188	990 L	186,120 L
Diesel	Diesel Fire Pump Tank	C1	2	515 L	1,030 L
Electrolyte	Data House	Non-DG	32	3501 kg	112,032 kg
Electrolyte	UPS Battery Room	Non-DG	16	672 kg	10,752 kg
Electrolyte	BBU Battery Storage	9	2	650 kg	1,300 kg
Total Diesel Storage					4,454,750 L
Total Electrolyte Storage (in-use)					122,784 kg
Total Electrolyte Storage (not in-use)					1,300 kg

9.2 Proposed Road Movements

The next part of the risk screening is to collate information about the proposed road movements that might impact whether the development is considered a hazardous industry.

The diesel generators are standby only. They are expected to run for testing, maintenance, and grid outage events for a total of less than two hours per year. Based on the generator information provided and the average capacity of fuel tanker trucks, the annual fuel consumption and expected deliveries for diesel can be estimated. Deliveries of lithium-ion batteries can be expected at the end of their lifetime.

It is understood that frequency of expected deliveries of dangerous goods will be as follows:

- Batteries delivered initially with no future expected deliveries within 10 years.
- Diesel delivered monthly as required.

It is expected that the peak maximum delivery frequency will occur monthly. This equates to approximately 12 annual deliveries.

9.3 Screening Assessment

The screening assessment as described in the *Applying SEPP 33* was then applied to collated information. If the screening reveals that the proposed development is determined to be potentially hazardous, then *SEPP (Resilience and Hazards)* requires a PHA to be undertaken.

The risk screening is based on the potential for, and consequences of, an explosion, fire, or release of toxic substances. It takes the following factors into account:

- The properties of the substances being handled or stored;
- The conditions of storage or use;
- The quantity involved;
- The location in respect to the site boundary; and
- The surrounding land use.

Applying SEPP 33 indicates that C1 combustible liquids are not considered to be potentially hazardous if they are stored in an area where they are the only flammable liquid present. Therefore, the diesel (C1 combustible liquid) is not considered potentially hazardous in the proposed development.

Figure 5 as shown below (extracted as Table 1 from *Applying SEPP 33*), indicates that the electrolytes in the lithium-ion batteries (class 9 miscellaneous dangerous goods) are excluded from the quantity risk screening requirements.

Table 1: Screening Method to be Used

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 5 Extract from *Applying SEPP 33: Screening Method to be Used*

Note: This extracted table acts as a starting point for which table/graph in Applying SEPP 33 is to be used to compare threshold limits.

Because the proposed Class 9 dangerous goods onsite are excluded from the initial screening method and the C1 combustible liquids are not considered to be potentially hazardous, further risk screening based on quantity and location is not required.

The proposed development may also be potentially hazardous based on transportation issues, so it is required to consider traffic movements of significant quantities of hazardous materials entering or leaving the site. The transport risk screening method (extracted as Table 2 from *Applying SEPP 33*) shown in Figure 6 indicates that the proposed road movements at the site do not exceed the transportation threshold.

Table 2: Transportation Screening Thresholds

Class	Vehicle Movements		Minimum quantity*	
	Cumulative Annual	Peak or Weekly	per load (tonne)	
			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 6 Extract from *Applying SEPP 33: Transport Screening Thresholds*

During normal operation, there is no Class 9 transportation, so the proposed movement is below the Class 9 threshold. There is no relevant threshold for C1 combustible liquid transportation, so the proposed movement does not make the development a hazardous industry.

Because the collated information does not exceed their respective threshold limits, this preliminary risk screening in accordance with *Applying SEPP 33* determined that the proposed development is not classified as potentially hazardous. Therefore, the proposed development does not require a PHA.

10 Conclusion

As part of the State Environmental Planning Policy (SEPP) (Resilience and Hazards) 2021 – Potentially Hazardous and Offensive Development risk screening process for a potentially hazardous industry, the hazardous materials identified for storage are required to be assessed to determine if quantities stored or circumstances of storage require a further Preliminary Hazard Analysis (PHA).

Based on the proposed storage and transportation volumes for the proposed 78 Lockwood Road Data Centre and utilising the screening methods outlined in *Applying SEPP 33*, the proposed development would not be considered a potentially hazardous industry and therefore does not require a Preliminary Hazard Analysis (PHA).