



**PROPOSED WAREHOUSE, LOGISTICS & INDUSTRIAL HUB  
657-769 MAMRE ROAD, KEMPS CREEK  
SEPP33 ASSESSMENT - MODIFICATION**

# PROPOSED WAREHOUSE, LOGISTICS & INDUSTRIAL HUB 657-769 MAMRE ROAD, KEMPS CREEK

## SEPP33 ASSESSMENT - MODIFICATION

Frasers-Altis Mamre Road Redevelopment – SEPP33 Assessment Modification

Prepared by

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## DETAILS OF SEARS FOR HAZARD AND RISK

The Secretary's Environmental Assessment Requirement (SEAR) No.12, regarding Hazard and Risk, was issued in the Department of Planning, Industry & Environments letter to Frasers Property Australia on 22 February 2021 in relation to SSD-9522-Mod-1. Further to the Mod-1 development an additional modification has been issued regarding the proposed development. The modification, which is assessed in this document, remains subject to the original SEARs which state:

**Hazard and risk** – including a preliminary risk screening completed 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 and location of all dangerous goods and hazardous materials associated with the development. Should preliminary 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 table below details the relevant sections of this document where the assessment compliance is met:

Item No.	Specific Requirement of the SEAR	Report section demonstrating where the requirement is met
1	Preliminary Screening conducted in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), and  Clear indication of the Class & quantity of dangerous goods and hazardous materials associated with each warehouse.	Lot 1 - Warehouse 1 - Table 4.1 & Fig. 4.2 Lot 2 - Warehouse 2 - Table 4.3 & Fig. 4.4 Lot 3 - Warehouse 3 - Table 4.5 & Fig. 4.6 Lot 4 - Warehouse 4 - Table 4.7 & Fig. 4.8
2	Clear indication of the Class & location of dangerous goods and hazardous materials associated with each warehouse	Lot 1 - Warehouse 1 - Figure 4.1 Lot 2 - Warehouse 2 - Figure 4.3 Lot 3 - Warehouse 3 - Figure 4.5 Lot 4 - Warehouse 4 - Figure 4.7
3	Conclusion that SEPP33 does not apply to the proposed development and a Preliminary Hazard Analysis is not required for any of the proposed warehouses.	Section 5

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## Quality Management

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D	18 Feb 20	Draft, incorporating updates to Warehouses 15, 16 & 17		
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1	24 Feb 2021	Final (warehouse change update)		
2	12 November 21	Final (Modification)		

## EXECUTIVE SUMMARY

### Introduction

Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd (Frasers/Altis) proposes to develop land at 657-769 Mamre Road, Kemps Creek, NSW (the Project). The land is subject to a State Significant Development Application for the proposed Warehouse and Industrial Facilities Hub, hence, Secretary's Environmental Assessment Requirements (SEARs) have been issued that require the storage of DGs to be assessed under State Environmental Planning Policy No.33 (SEPP33, Ref.1), which requires review of the proposed development using the document "Applying SEPP33" (Ref.1).

An assessment of the original development has been conducted and the results of the assessment indicated that SEPP33 does not apply to the proposed development. Since the original assessment, a modification has been proposed, which requires a SEPP33 review and update of the original documentation.

RiskCon Engineering Pty Ltd (RiskCon) has been commissioned to conduct the SEPP33 assessment and update of the Project modification, the objectives of which are to identify whether the quantities of Dangerous Goods proposed for storage as a result of the modification do not exceed the SEPP33 threshold and, in the event any warehouses exceed the SEPP33 DG storage threshold values, to recommend a Preliminary Hazard Analysis study for the specific warehouse.

### Methodology

The Secretary's Environmental Assessment Requirements (SEARs – Application No. 9522-Modification) require a number of conditions to be met as part of the proposed State Significant Development Application. The original SEARs section relating to key issues includes a requirement to address hazards and risks (Dot Point 12). This section states that a preliminary screening must be carried out in accordance with SEPP33, providing details of the proposed storage of Dangerous Goods (DGs) and the location of these goods within each facility. Where the SEPP33 screening thresholds are exceeded, the SEARs require a Preliminary Hazard Analysis (PHA) to be conducted to demonstrate that the risks associated with the operations of facilities do not exceed acceptable risk criteria.

The methodology applied to the SEPP33 assessment of the Project was that recommended in "Applying SEPP33 - Hazardous and Offensive Developments"(Ref.1). The quantity of DGs stored in each warehouse within the Project was reviewed in turn against the threshold levels listed in SEPP33 (Ref.1) to identify whether the threshold levels are exceeded. In the event a threshold level is exceeded, a PHA study is recommended. The results of the assessment are summarised below.

### Brief Description of the Project

The Project comprises the following warehouses:

- Warehouse 1 - 3,507 m<sup>2</sup> (freestanding warehouse, no common wall);
- Warehouse 2 - 27,814 m<sup>2</sup> (freestanding warehouse, no common wall);
- Warehouse 3 - 10,145 m<sup>2</sup> (freestanding warehouse, no common wall);
- Warehouse 4 - 25,321 m<sup>2</sup> (freestanding warehouse, no common wall);

Note: warehouse locations are shown on **Figure 1.1**.

## Summary and Conclusions

An analysis of the application of State Environmental Planning Policy No.33, Hazardous and Offensive Developments (SEPP33) was conducted for a modification to the proposed Frasers-Altis development on a parcel of land located on the western side of Mamre Road, Kemps Creek, NSW. The proposed modification to the development involves the construction of 4 warehouses on 4 lots within the development, with all warehouses being single occupancy. The analysis was conducted based on a limited quantity of Dangerous Goods (DGs) stored and handled at each warehouse, noting that the development has considered the potential for warehouse tenants to store and handle limited DGs as part of their operations.

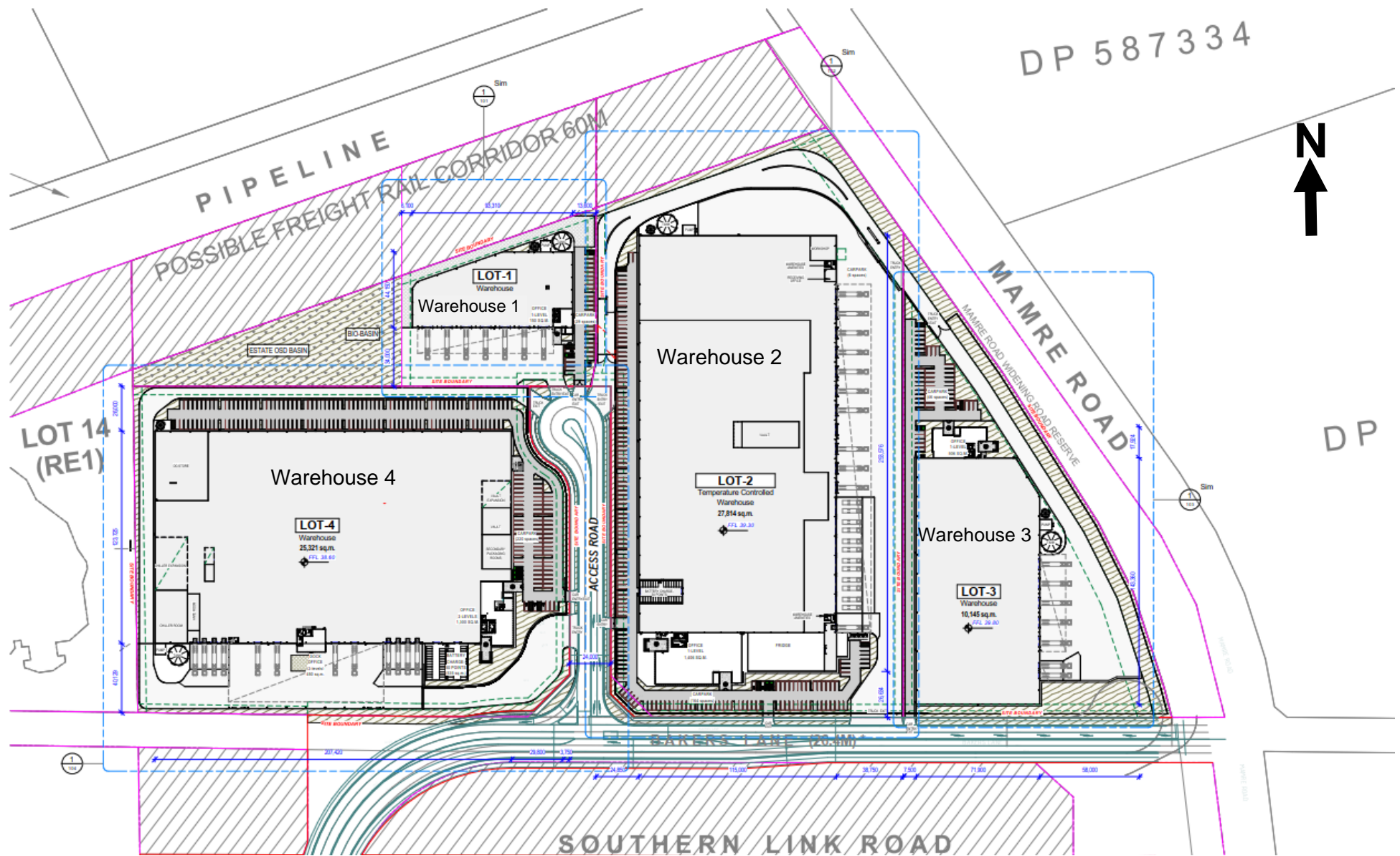
The analysis identified that the quantity of DGs held at each warehouse did not exceed the storage threshold levels listed in “Applying SEPP33”(Ref.1). It was also identified that based on the relatively low quantity of DGs stored and handled at the warehouses, and the type of operations proposed at the warehouses (i.e. warehouses are not dedicated DG storage facilities), it was unlikely that the maximum permissible transport quantity and number of vehicle operation listed in “Applying SEPP33”(Ref.1) would be exceeded. Hence, based on the assessment conducted for the proposed DG storages identified in in this study, it is concluded that SEPP33 does not apply to the proposed development.

In addition to the SEPP33 review of Dangerous Goods storage a review of the potential for offensive operations was conducted. It was identified that the proposed warehouses would not require an Environmental Protection Licence (EPL), hence, the offensive developments component of SEPP33 would not apply.

Based on the assessment conducted in this study and the results indicating that SEPP33 does not apply to any of the warehouses within the development, it is concluded that the requirements of the Hazard and Risk Section of the SEARs (Key Issues, Dot point 12) have been addressed.

## Recommendations

Notwithstanding the conclusion reached above, it is noted that tenants may require to store DGs at quantities exceeding those assessed in this study. Should a tenant require to store and handle additional DGs to those listed for the specific warehouse in this study, it is recommended that a review of the application of SEPP33 should be conducted and where required a Preliminary Hazard Analysis (PHA) study be performed, in accordance with HIPAP No.6 (Ref.3), should it be identified that SEPP33 applies to the specific warehouse.



**Figure 1.1: Layout of the Proposed Frasers-Altis Development (Application No. 9522-Modification), Mamre Road, Kemp's Creek, NSW**



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## Abbreviations

Abbreviation	Description
DPIE	Department of Planning, Industry and Environment
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
DG	Dangerous Goods
PHA	Preliminary Hazard Analysis
DA	Development Application
m	metres
m <sup>2</sup>	square metres
AS	Australian Standard
LPG	Liquefied Petroleum Gas
PG	Packing Group
kg	kilogram
C1	Combustible Materials with a flash point $\geq 60^{\circ}\text{C}$ and $\leq 93^{\circ}\text{C}$
C2	Combustible Materials with a flash point $\geq 93^{\circ}\text{C}$
ADG	Australian Dangerous Goods Code



## 1.0 INTRODUCTION

### 1.1 Background

Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd (Frasers/Altis) proposes to develop land on the western side of Mamre Road, Kemps Creek, NSW. As part of the development, it was necessary to submit a State Significant Development Application for the land for the proposed use, hence, the NSW Department of Planning, Industry and Environment (DPIE) has issued the Secretary's Environmental Assessment Requirements (SEARs) that include a review of the proposed storage and handling of Dangerous Goods (DGs). The SEARs require the DGs to be assessed under State Environmental Planning Policy No.33 (SEPP33, Ref.1), which requires review of the proposed development using the document "Applying SEPP33" (Ref.1).

As the project has proceeded, a number of modifications have occurred due to specific requirements of tenants and other factors. Lots 1 to 4 have been modified and the modification (Application No. 9522-Modification) submitted to DPIE for approval, which requires an update to the SEPP33 assessments.

Frasers/Altis has commissioned RiskCon Engineering Pty Ltd (RiskCon) to update the proposed modification development with regards to the storage and handling of DGs. This document provides RiskCon's SEPP33 assessment of the proposed land use at 657-796 Mamre Road, Kemps Creek, NSW,

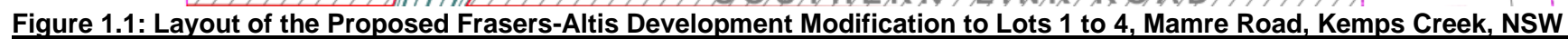
### 1.2 Objectives

The objectives of the SEPP33 assessment for the proposed Warehouse, Logistics and Industrial Facilities Hub at Mamre Road, Kemps Creek, NSW, is to identify whether the quantities of Dangerous Goods proposed for storage at the various warehouses within the site area do not exceed the SEPP33 threshold and, in the event any warehouses exceed the SEPP33 DG storage threshold values, to recommend a Preliminary Hazard Analysis study for the specific warehouse.

### 1.3 Scope of Services

The scope of work for the study is for the SEPP33 assessment of the modification to Lots 1 to 4 at the Logistics & Industrial Hub, at 657-796 Mamre Road, Kemps Creek, NSW (the Project). The scope covers 4 warehouses on 4 lots within the development, with all 4 warehouses being single occupancy buildings as shown on **Figure 1.1**. The scope includes the development of a report for each of the warehouses detailing maximum permissible storage quantities to limit the application of SEPP33 to the development. The following warehouses are included in the assessment;

- Lot 1 - Warehouses 1 (freestanding warehouse);
- Lot 2 – Warehouse 2 (freestanding warehouse);
- Lot 3 – Warehouse 3 (freestanding warehouse); and
- Lot 4 – Warehouse 4(freestanding warehouse).;



## 2.0 METHODOLOGY

### 2.1 Study Requirements (SEARs)

The Secretary's Environmental Assessment Requirements (SEARs – Application No. 9522 - Modification) require a number of conditions to be met as part of the proposed State Significant Development Application. The original SEARs section relating to key issues includes a requirement to address hazards and risks (Dot Point 12). This section states that a preliminary screening must be carried out in accordance with SEPP33, providing details of the proposed storage of Dangerous Goods (DGs) and the location of these goods within each facility. Where the SEPP33 screening thresholds are exceeded, the SEARs require a Preliminary Hazard Analysis (PHA) to be conducted to demonstrate that the risks associated with the operations of facilities do not exceed acceptable risk criteria.

### 2.2 Study Background

The proposed development modification to Lots 1 to 4 at the Project will comprise four (4) Lots and four (4) warehouses, with all warehouses being single occupancy buildings. The state significant development application is for warehouse facilities to be constructed and operated. At this stage of the project tenants and operators are unknown, hence, the exact quantity of Dangerous Goods (DGs) proposed for storage at the various warehouses is unknown.

In order to provide operational flexibility for warehouse occupants, it is proposed to submit Development Applications (DAs) for individual warehouses with an allowance for limited storage of DGs. In many cases, warehouse facilities store limited DGs during logistics operations and short-term storage campaigns, hence, flexibility of storage and the ability to store limited quantities is a key function of efficient logistic operations.

Based on this, each warehouse will be reviewed, its use assessed and the maximum quantities of DGs selected, that would be stored, to allow future tenants to select an appropriate warehouse for their operation.

### 2.3 Study Approach

The following study approach was applied:

- An overall review of the development and warehouse layouts was conducted to determine whether maximum permissible quantities can be stored in individual warehouses or whether the close proximity of warehouses will require consolidation of the maximum permissible quantities distributed between the two closely located buildings;
- Once the DG distribution was assessed, location of DGs within the warehouses was allocated, based on required layouts in SEPP33 (Ref.1, e.g. separation of flammable liquids from boundaries and other DGs, etc.);
- A layout for each warehouse was then developed and confirmed with the developer before final report completion;
- Once all DG quantities and layouts were confirmed a draft report was developed containing details of each warehouse location; and
- A final report was issued for submission with the development documentation.

The results of the study and fulfilment of the SEARs requirements are provided in **Section 4**.

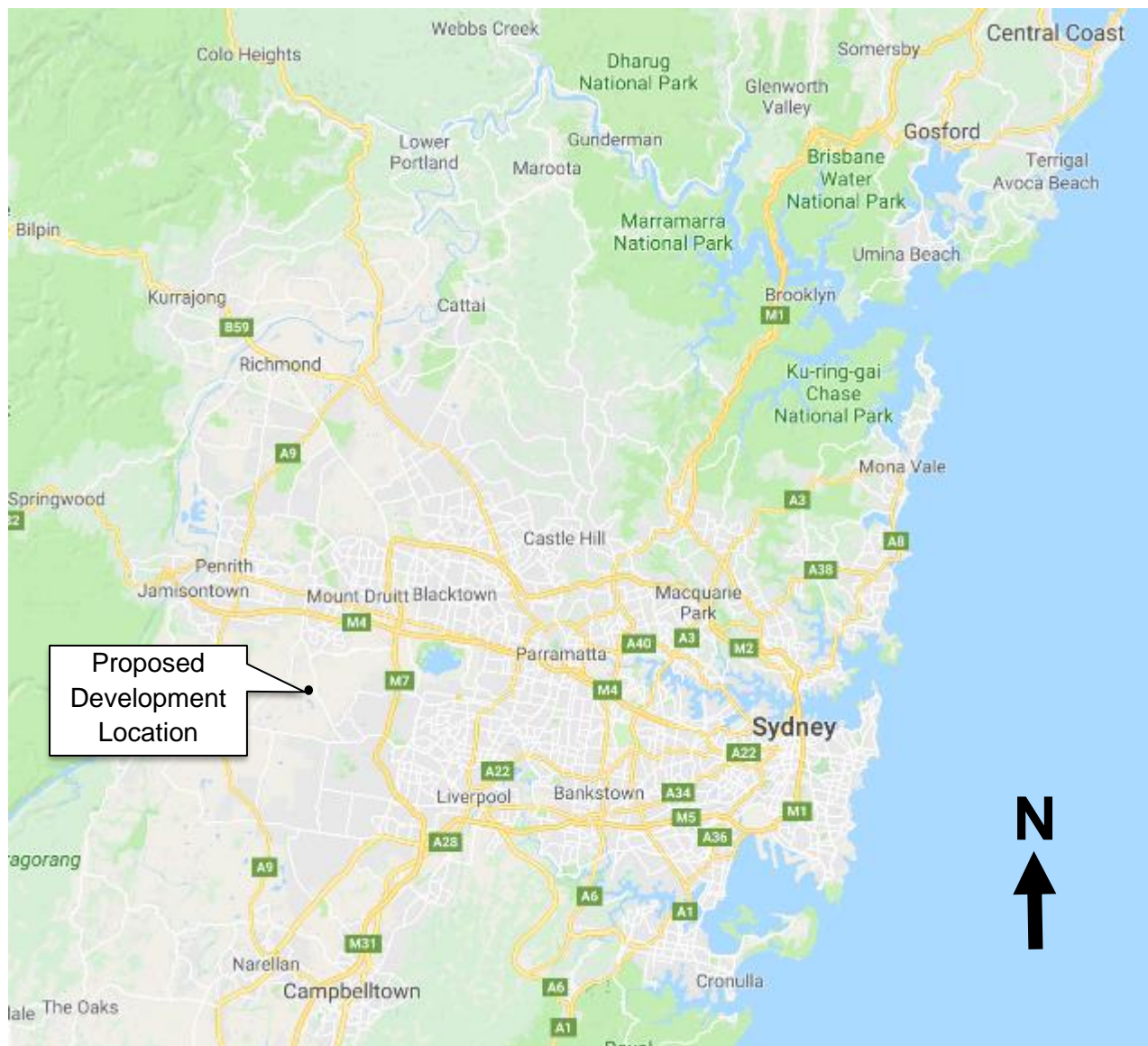


### 3.0 BRIEF DESCRIPTION OF THE WAREHOUSE DEVELOPMENT

#### 3.1 Site Location and Surrounding Land Use

The Project is be located in Kemps Creek, NSW, between Mamre Road and South Creek. The area is predominantly rural, with a warehouse development located across Mamre Road to the north-east and the Twin Creeks Golf & Country Club located across the South Creek buffer zone to the west. The land to the north and south is currently vacant (rural). The Water NSW Pipeline from Warragamba to Prospect is located on the northern side of the development.

**Figure 3.1** shows the regional location of the Project and **Figure 3.2** shows the detailed location in the Kemps Creek area.



**Figure 3.1: Regional Location of the Proposed Frasers-Altis Warehouse Development, Kemps Creek**



**Figure 3.2: Location of the Proposed Frasers-Altis Warehouse Development in Kemps Creek**

## 3.2 Brief Description of the Proposed Project

**Figure 3.3** shows the overall development layout. At this stage of the site development modification, only 4 lots will be modified. A brief description of the modification is provided below.

**Lot 1** - Warehouse 1 is a freestanding warehouse located in the northern section of the modification area, adjacent to the possible freight rail corridor and the Water for NSW pipeline on the northern side of the proposed lot. Warehouse 1 will be 27,335 m<sup>2</sup> + 1056 m<sup>2</sup> office space. The long axis of the building is located north/south, with a property setback from the rail corridor by 24 m and around 60 m from the pipelines corridor. Warehouse 1 is separated from adjacent warehouses (Lots 2 & 4) by vehicle (truck) access corridors. The site is accessed by an internal access road on the southern side of the site. The following distances are provided between Warehouse 1 and the adjacent warehouse buildings:

- Warehouse Building 1 and Warehouse Building 2 – 38 m; and
- Warehouse Building 1 and Warehouse Building 4 – 60 m.

The distance from the building to the various boundaries is provided below:

- North – 6 m from the building wall to the boundary fence (fire vehicle access);
- West – 6 m from the warehouse building to the western boundary (fire vehicle access);
- South – 34m from the warehouse building to the southern boundary (forecourt); and
- East – 14 m from the warehouse to the eastern boundary (car park).

**Lot 2** - Warehouse 2 is a freestanding warehouse located between the possible rail corridor and Bakers Lane. The possible freight rail corridor and the Water for NSW pipeline are located on the

northern side of the proposed lot. Warehouse 1 will be 3,507 m<sup>2</sup> + 150 m<sup>2</sup> office space. The long axis of the building is located east/west, with a property setback from the rail corridor by 24m and around 84 m from the pipelines corridor. Warehouses 2 is separated from adjacent warehouses (Lots 1 & 4) by vehicle (truck) access corridors. The site is accessed by an internal access road on the western side of the site. The following distances are provided between Warehouses 2 and the adjacent warehouse buildings:

- Warehouse Building 2 and Warehouse Building 1 – 38 m;
- Warehouse Building 2 and Warehouse Building 4 – 74 m; and
- Warehouse Building 2 and Warehouse Building 3 – 45 m.

The distance from Warehouse 2 building to the various boundaries is provided below:

- North – 24 m from the building wall to the boundary fence (internal truck access road);
- West – 25 m from the warehouse building to the western boundary (internal truck access road And car park);
- South – 20 m from the warehouse building to the southern boundary (Car Park); and
- East – 39 m from the warehouse to the southern boundary (forecourt & truck access road).

**Lot 3** - Warehouses 3 is a freestanding warehouse located in the eastern section of the modification area, adjacent to Mamre Road on the eastern side of the development. Warehouse 3 will be 10,145 m<sup>2</sup> + 506 m<sup>2</sup> office space. The long axis of the building is located north/south, with a property setback from Mamre Road (being the Mamre Road widening reserve) of 20m. Warehouses 3 is separated from the adjacent warehouse (Lots 2) by the forecourt in Warehouse 2. The site is accessed by an internal access road on the eastern and northern side of the site. The following distances are provided between Warehouses 1 and the adjacent warehouse buildings:

- Warehouse Building 3 and Warehouse Building 2 – 45 m.

The distance from the building to the various boundaries is provided below:

- North – 20 m from the building wall to the boundary fence (internal access road);
- West – 8 m from the warehouse building to the western boundary (car park access);
- South – 8m from the warehouse building to the southern boundary (land scaping); and
- East – 25 m from the closest point on the warehouse to the eastern boundary (forecourt).

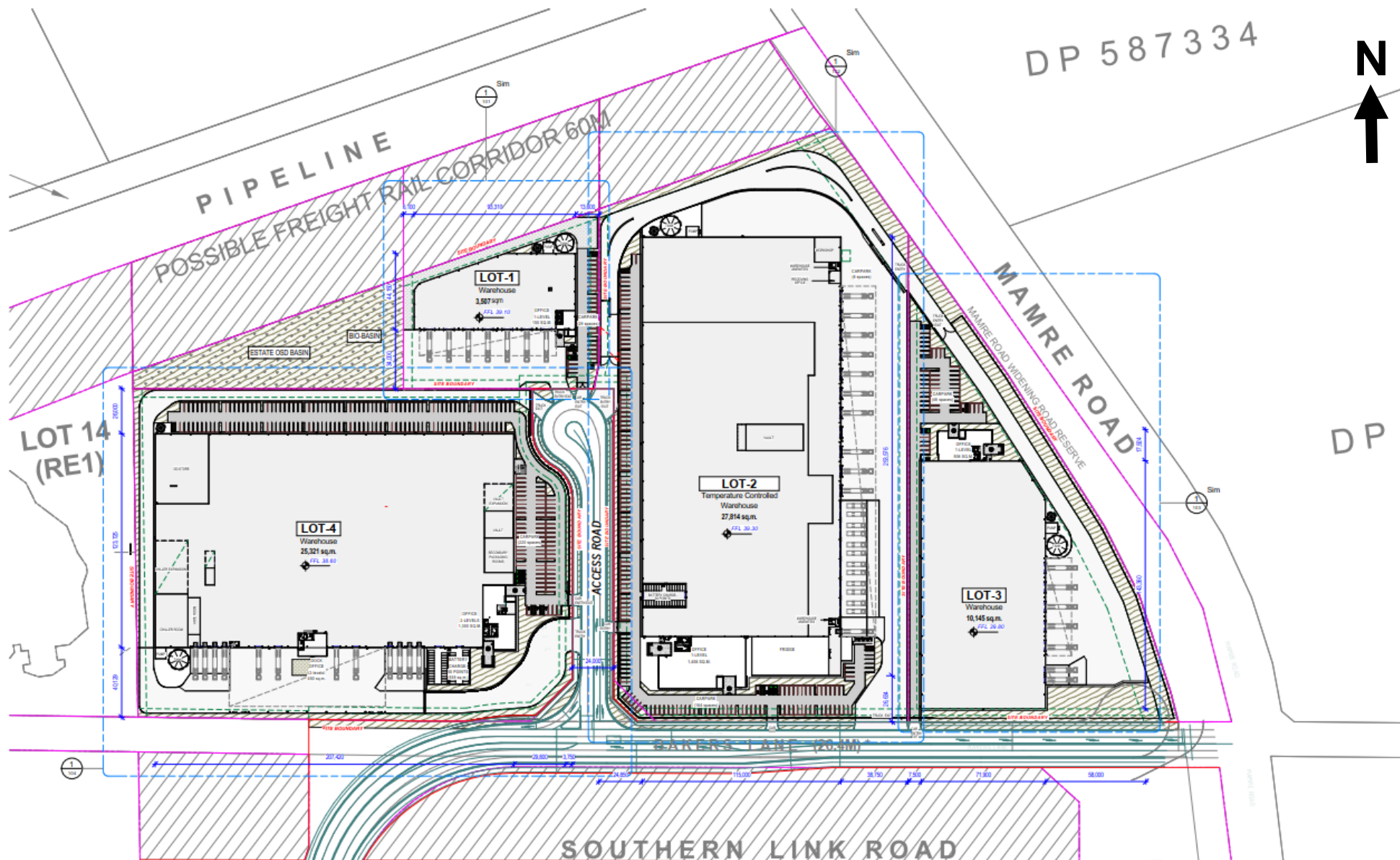
**Lot 4** - Warehouses 4 is a freestanding warehouse located in the western section of the modification area, adjacent to the lots to be developed in the future. Warehouse 4 will be 25,321 m<sup>2</sup> + 1,300 m<sup>2</sup> office space. The long axis of the building is located east/west, with a property setback from the rail corridor by 9 m and around 69 m from the pipelines corridor. Warehouses 4 is separated from adjacent warehouses (Lots 1 & 2) by vehicle (truck) access corridors and the site access road. The site is accessed by an internal access road on the eastern side of the site. The following distances are provided between Warehouses 4 and the adjacent warehouse buildings:

- Warehouse Building 4 and Warehouse Building 1 – 60 m; and
- Warehouse Building 4 and Warehouse Building 2 – 74 m.

The distance from the building to the various boundaries is provided below:

- North – 26 m from the building wall to the boundary fence (Car Park);
- West – 11 m from the warehouse building to the western boundary (internal truck access road);
- South – 40m from the closest point on the warehouse building to the southern boundary (forecourt); and
- East – 11 m from the closest point on the warehouse building to the eastern boundary (car park access road).





**Figure 3.3: Mamre Road Development Modification showing Lots 1 to 4 and Warehouse Locations**



## 4.0 STUDY RESULTS

The applicable screening thresholds for the warehouses have been extracted from Applying SEPP33 (Ref.1) and are included at **Appendix A**. These screening thresholds have been used to determine acceptable levels of DGs that may be held in each warehouse.

### 4.1 Lot 1 – Warehouses 1

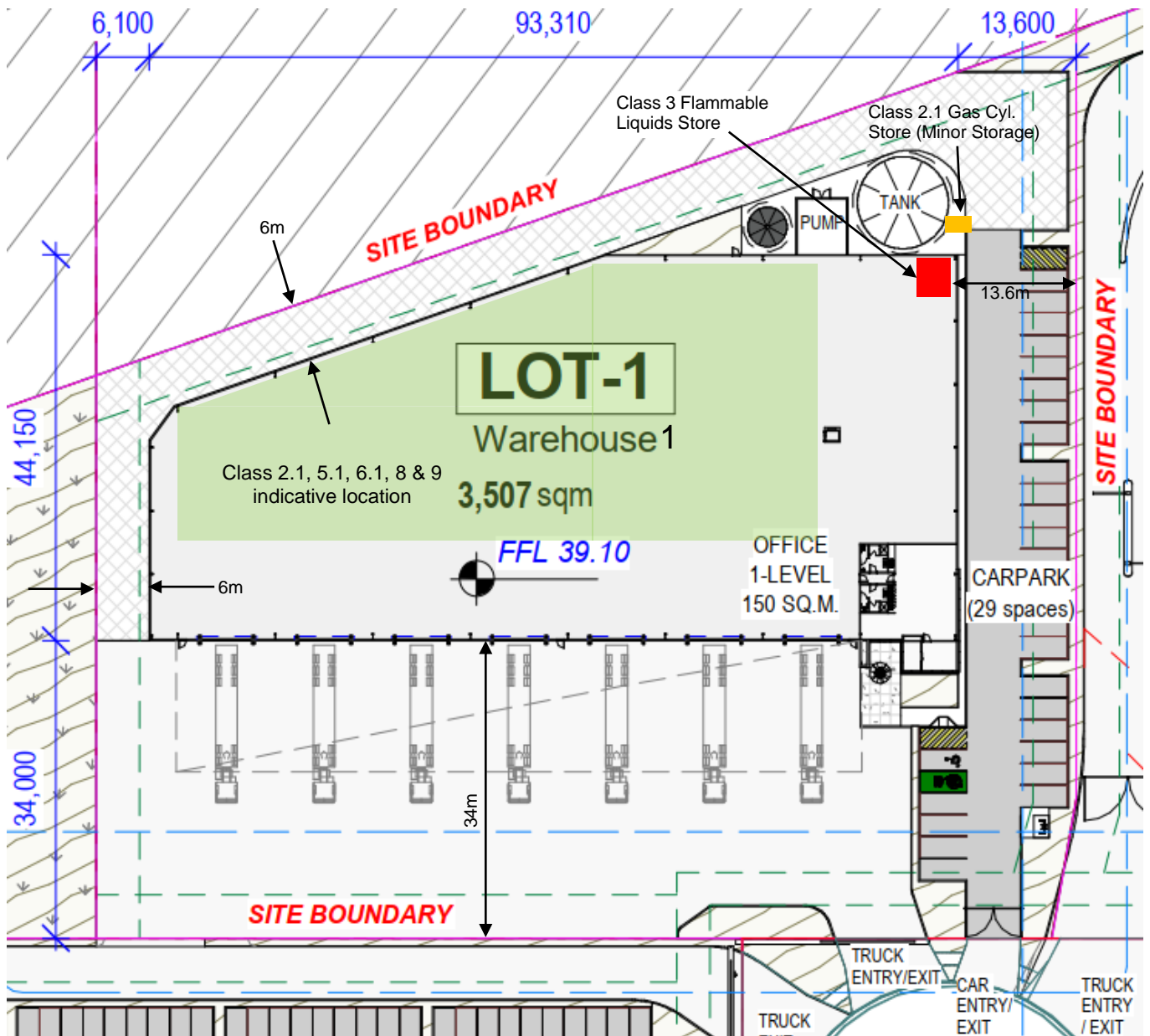
#### 4.1.1 SEPP 33 Storage Assessment (Warehouse 1)

**Figure 4.1** shows the layout of Warehouses 1, including the location of DGs within the warehouse. The figure also shows the location of the warehouse in relation to the surrounding land uses, including separation distances between the warehouses and the boundaries.

The quantity of DGs that are proposed for storage in the warehouses is shown in **Table 4.1**. It is noted that Warehouse 1 is a single occupancy warehouse and therefore the separation distances to the site boundary have been used in the application of SEPP33 to the warehouse. It is noted that Class 3 flammable liquids will be held in a storage facility that complies with the relevant Australian Standard (i.e. bunded), hence, the separation distance to the site boundary has been measured from the storage bund.

Threshold limits for the application of SEPP 33 to Warehouse 1 are presented in **Table 4.1** along with maximum DG quantities that will be stored in the warehouse. **Figure 4.2** shows the maximum permissible quantity of flammable liquids that may be stored in each warehouse, as listed in SEPP33, based on the specific separation distances of the flammable liquids storages areas from the boundary (Ref.1).

**Table 4.1** shows that threshold quantities are not exceeded at Warehouses 1 and **Figure 4.2** shows that the maximum permissible storage quantities of flammable liquids is not exceeded, hence, SEPP 33 does not apply to the storage of DGs, as all DGs are under the storage screening threshold.



**Figure 4.1: Lot 1 – Warehouses 1 Layout showing DG Locations**

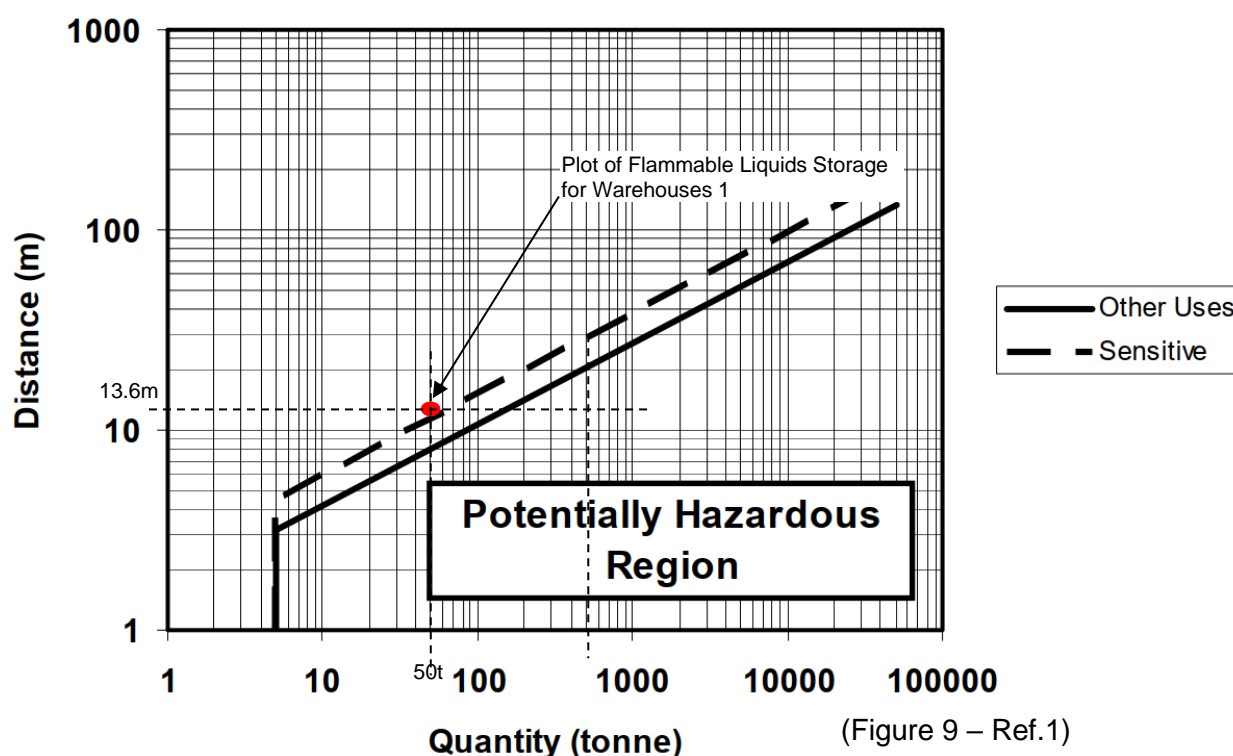
**Table 4.1: Quantities Stored in Warehouses 1 and SEPP33 Threshold Values for the Specific DGs Stored**

Class	Description	PG	Quantities Stored Warehouse 1	SEPP 33 Threshold (Ref.1)	Does SEPP33 Apply?
2.1	Aerosols	-	<7,500 kg (LPG)	10,000 kg	NO
	Cylinders	-	<1,000 kg (LPG)		
3	Flammable Liquids	II & III	20,000 kg (PGII) 30,000 kg (PGIII)	500,000 kg (500t)	NO (See Fig. 4.2 & Note 1 below)
4.1	Flammable Solids	II & III	4,000 kg	5,000 kg	NO
5.1	Oxidising Substances	II & III	4,000 kg	5,000 kg	NO
6.1	Toxic Substances	II & III	2,000 kg	2,500 kg	NO
8	Corrosives	II & III	24,000 kg	25,000 kg <sup>(Note 2)</sup>	NO
9	Miscellaneous	III	40,000 kg	Not subject to SEPP33	
C1/C2	Combustible Liquids	-	40,000 kg	Not subject to SEPP33	

Notes: 1. The flammable liquids stores are located in the north-eastern corner of the Warehouse with the closest boundary to the east being 13.6m from the bund of the flammable liquids store. The distances to the other boundaries from the storage areas are greater than the distances to the eastern boundary, hence, the boundaries are well separated from the storage and the facility is therefore not within the potentially hazardous region of Figure 9 of Applying SEPP33 (see **Figure 4.2**).

2. The threshold value for Class 8 products has been selected as the lower value of PG II & III, being 25,000 kg (noting that PG III corrosives can be stored up to a quantity of 50,000 kg).

### Heat Radiation Effects



**Figure 4.2: Lot 1 – Warehouses 1A & 1B DG Plot Quantity Vs Distance from Boundary**

### 4.1.2 SEPP 33 Transport Assessment (Warehouses 1)

It is necessary to assess the impact of transporting DGs on the surrounding arterial roads to and from Warehouses 1. As the total quantities to be stored in the warehouse are below SEPP 33, it can be assumed that the frequency of movements would be low. Therefore, it is considered prudent to review the SEPP 33 transport criteria on the basis of minimum transport load listed in the guideline (Applying SEPP33, Ref.1). **Table 4.2** has been developed based on the minimum load of goods to compare the maximum storage quantity within the warehouse to conceptualise whether the loads would be likely to be exceeded based on the maximum storage quantities.

**Table 4.2: SEPP33 Transport Quantity vs Warehouse Storage Limits - Warehouses 1**

Class	Minimum Load Quantity	Maximum Storage within Each Warehouse
2.1	4.5 tonnes	8.5 tonnes
3(II)	10 tonnes	20 tonnes
3(III)	No limits	30 tonnes
4.1	2 tonnes	4 tonnes
5.1	5 tonnes	4 tonnes
6.1	3 tonnes	2 tonnes
8	5 tonnes	24 tonnes
9	No Limit	40 tonnes
Comb. Liquid	No Limit	40 tonnes

Based on the maximum quantity to be stored in the warehouse (Warehouse 1) and the SEPP33 load limits, the quantities are unlikely to be exceeded as that would indicate very high turnover of product which would be unlikely to be achieved considering that vehicle movements will be predominantly non-DG products, resulting in the majority of vehicles not carrying DGs. In addition, those movements where DGs are transported as a combined load (Non-DGs and DGs together), the majority of loads would be below the transport placard quantity, which does not exceed the maximum load quantities listed in **Table 4.2**.

Therefore, it is considered that the SEPP33 limits for transport would not be exceeded; hence, additional traffic management plans would not be required. It is noted, that the transport of DGs is covered by the Australian Dangerous Goods Code (ADG, Ref.2) Therefore, incident response will be covered by the transport of DGs via the ADG as appropriate with the loads being carried.

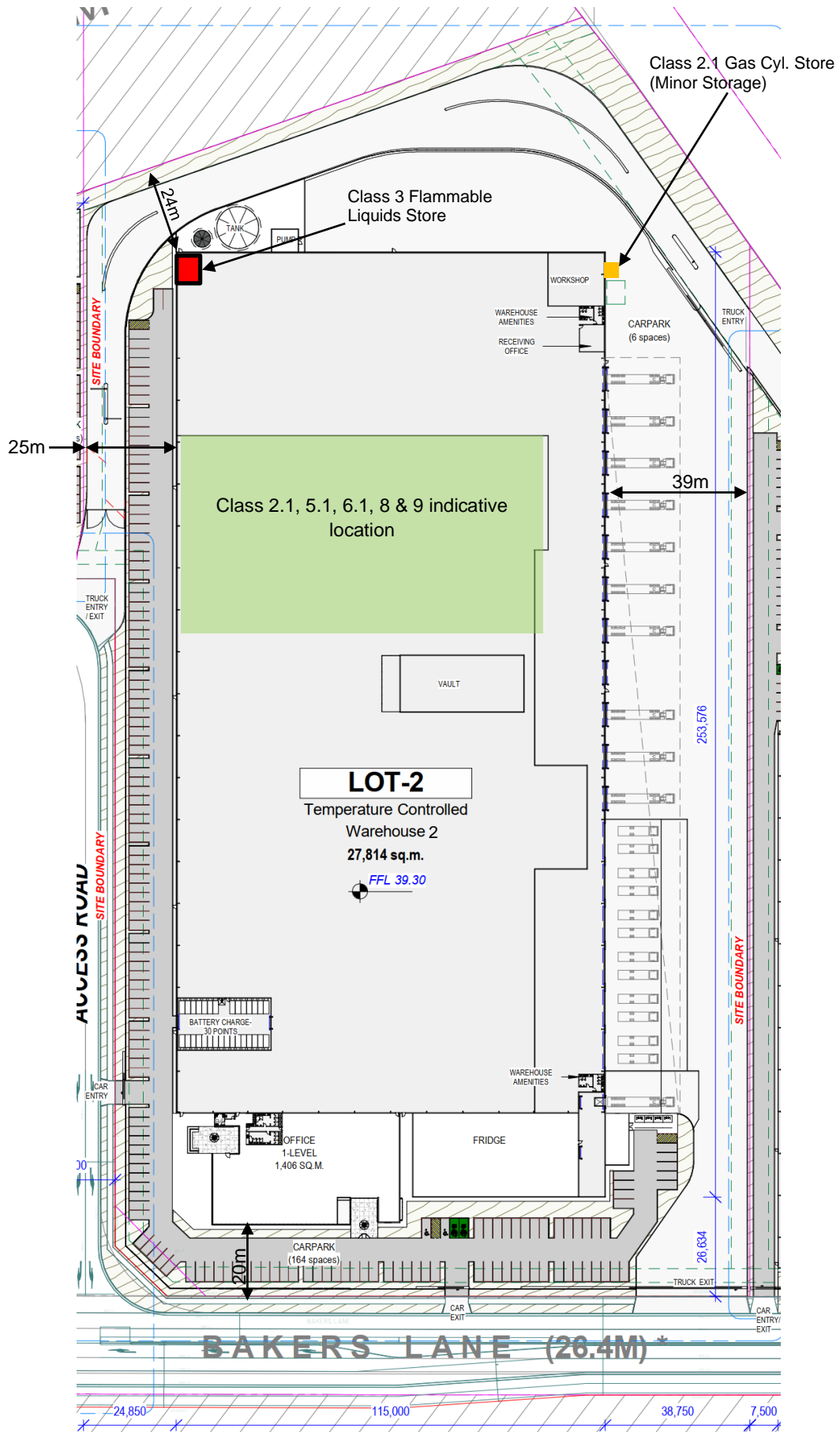
## 4.2 Lot 2 – Warehouse 2

### 4.2.1 SEPP 33 Storage Assessment (Warehouse 2)

**Figure 4.3** shows the layout of Warehouse 2, including the location of DGs within the warehouse. The figure also shows the location of the warehouse in relation to the surrounding land uses, including separation distances between the warehouses and the boundaries.

Threshold limits for the application of SEPP 33 to Warehouse 2 are presented in **Table 4.3** along with maximum DG quantities that will be stored in the warehouses. **Figure 4.4** shows the maximum permissible quantity of flammable liquids that may be stored in the warehouse, as listed in SEPP33, based on the specific separation distances of the flammable liquids storages areas from the boundary (Ref.1).

**Table 4.3** shows that threshold quantities are not exceeded at Warehouse 2 and **Figure 4.4** shows that the maximum permissible storage quantities of flammable liquids is not exceeded, hence, SEPP 33 does not apply, as all DGs are under the storage screening threshold.



**Figure 4.3: Lot 2 – Warehouses 2 Layout showing DG Locations**

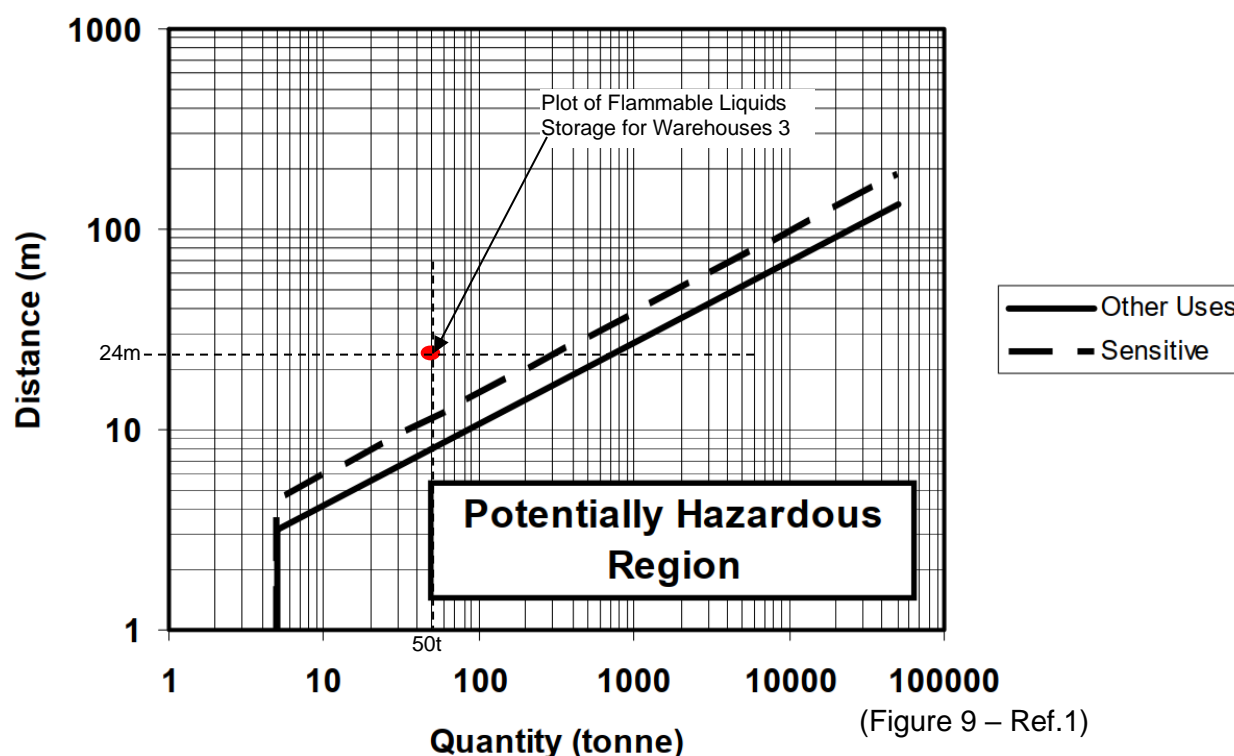
**Table 4.3: Quantities Stored in W/house 2 & SEPP33 Threshold Values for the DGs Stored**

Class	Description	PG	Quantities Stored	SEPP 33 Threshold (Ref.1)	Does SEPP33 Apply?
			Warehouse 2		
2.1	Aerosols	-	<7,500 kg (LPG)	10,000 kg	NO
	Cylinders	-	<1,000 kg (LPG)		
3	Flammable Liquids	II & III	20,000 kg (PGII) 30,000 kg (PGIII)	500,000 kg (500t)	NO (See Fig. 4.4 & Note 1 below)
4.1	Flammable Solids	II & III	4,000 kg	5,000 kg	NO
5.1	Oxidising Substances	II & III	4,000 kg	5,000 kg	NO
6.1	Toxic Substances	II & III	2,000 kg	2,500 kg	NO
8	Corrosives	II & III	20,000 kg	25,000 kg <sup>(Note 2)</sup>	NO
9	Miscellaneous	II & III	20,000 kg	Not subject to SEPP33	
C1/C2	Combustible Liquids	-	20,000 kg	Not subject to SEPP33	

Notes: 1. The flammable liquids store is located on the north-western corner of Warehouse 2, with the closest boundary to the north being 24m to the bund of the flammable liquids store. The distances to the other boundaries from the storage area is greater than the distances to the north, hence, the boundaries are well separated from the warehouse and the facility is therefore not within the potentially hazardous region of Figure 9 of Applying SEPP33 (see **Figure 4.4**).

2. The threshold value for Class 8 products has been selected as the lower value of PG II & III, being 25,000 kg (noting that PG III corrosives can be stored up to a quantity of 50,000 kg).

### Heat Radiation Effects



**Figure 4.4: Lot 2 – Warehouses 2 DG Plot Class 3 Quantity Vs Distance from Boundary**



## 4.2.2 SEPP 33 Transport Assessment (Warehouses 2)

It is necessary to assess the impact of transporting DGs on the surrounding arterial roads to and from Warehouse 2. As the total quantities to be stored in the warehouse is below SEPP 33, it can be assumed that the frequency of movements would be low. Therefore, it is considered prudent to review the SEPP 33 transport criteria on the basis of minimum transport load listed in the guideline (Applying SEPP33, Ref.1). **Table 4.4** has been developed based on the minimum load of goods to compare the maximum storage quantity within the warehouse to conceptualise whether the loads would be likely to be exceeded based on the maximum storage quantities.

**Table 4.4: SEPP33 Transport Quantity vs Warehouse Storage Limits - Warehouses 2**

Class	Minimum Load Quantity	Maximum Storage within Each Warehouse
2.1	4.5 tonnes	8.5 tonnes
3(II)	10 tonnes	20 tonnes
3(III)	No limits	30 tonnes
4.1	2 tonnes	4 tonnes
5.1	5 tonnes	4 tonnes
6.1	3 tonnes	2 tonnes
8	5 tonnes	20 tonnes
9	No Limit	20 tonnes
Comb. Liquid	No Limit	20 tonnes

Based on the maximum quantity to be stored in the warehouse (Warehouse 2) and the SEPP33 load limits, the quantities are unlikely to be exceeded as that would indicate very high turnover of product which would be unlikely to be achieved considering that vehicle movements will be predominantly non-DG products, resulting in the majority of vehicles not carrying DGs. In addition, those movements where DGs are transported as a combined load (Non-DGs and DGs together), the majority of loads would be below the transport placard quantity, which does not exceed the maximum load quantities listed in **Table 4.4**.

Therefore, it is considered that the SEPP33 limits for transport would not be exceeded; hence, additional traffic management plans would not be required. It is noted, that the transport of DGs is covered by the Australian Dangerous Goods Code (ADG, Ref.2) Therefore, incident response will be covered by the transport of DGs via the ADG as appropriate with the loads being carried.

## 4.3 Lot 3 – Warehouses 3

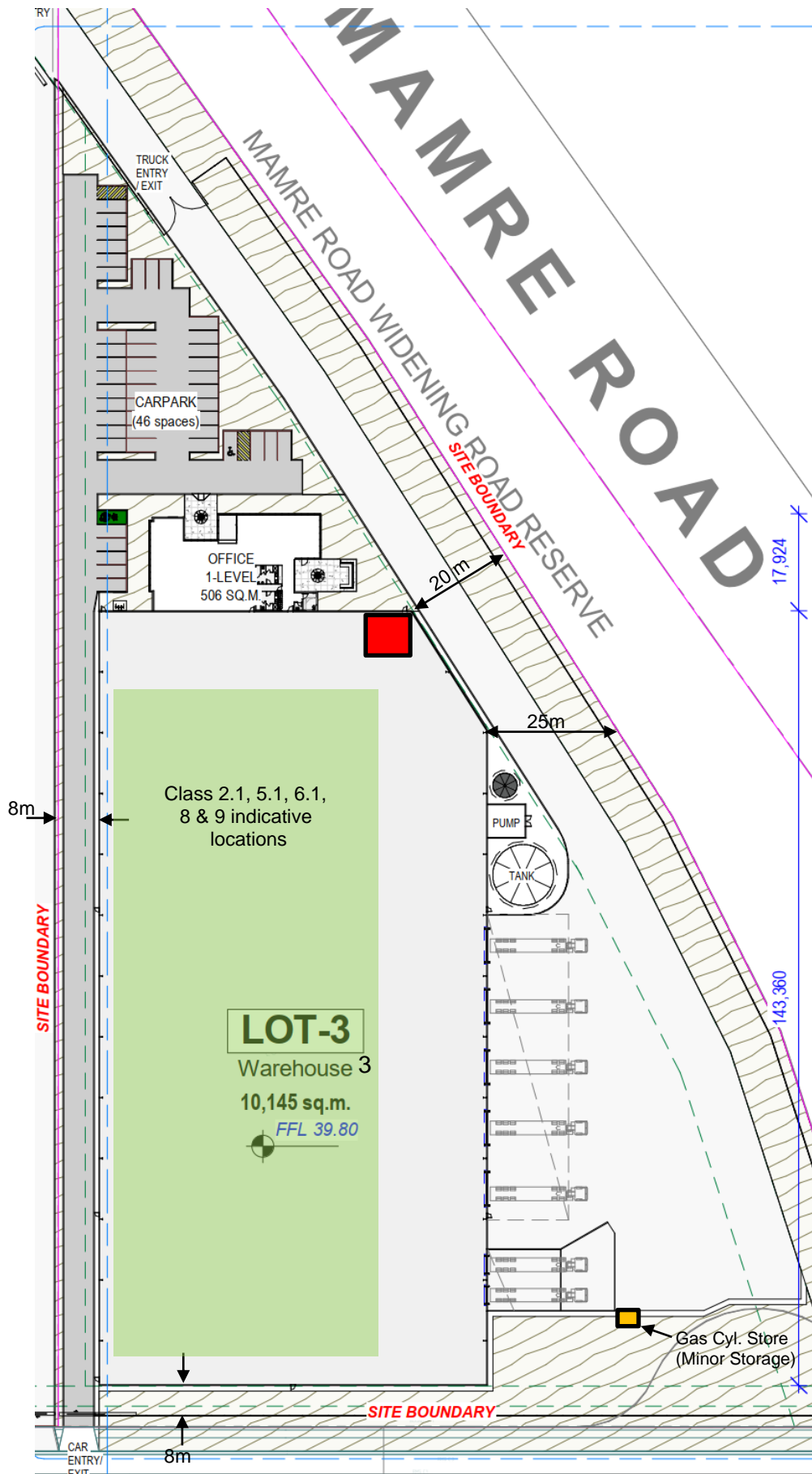
### 4.3.1 SEPP 33 Storage Assessment (Warehouses 3)

**Figure 4.5** shows the layout of Warehouses 3, including the location of DGs within the warehouses. The figure also shows the location of the warehouse in relation to the surrounding land uses, including separation distances between the warehouses and the boundaries.

The quantity of DGs that are proposed for storage in Warehouse 3 is shown in **Table 4.5**, along with maximum DG quantities that will be stored in the warehouse. **Figure 4.5** shows the maximum permissible quantity of flammable liquids that may be stored in the warehouse, as listed in SEPP33, based on the specific separation distances of the flammable liquids storage areas from the boundary (Ref.1).

**Table 4.5** shows that threshold quantities are not exceeded at Warehouses 3 and **Figure 4.6** shows that the maximum permissible storage quantities of flammable liquids is not exceeded, hence, SEPP 33 does not apply to the DG storage, as all DGs are under the storage screening threshold.





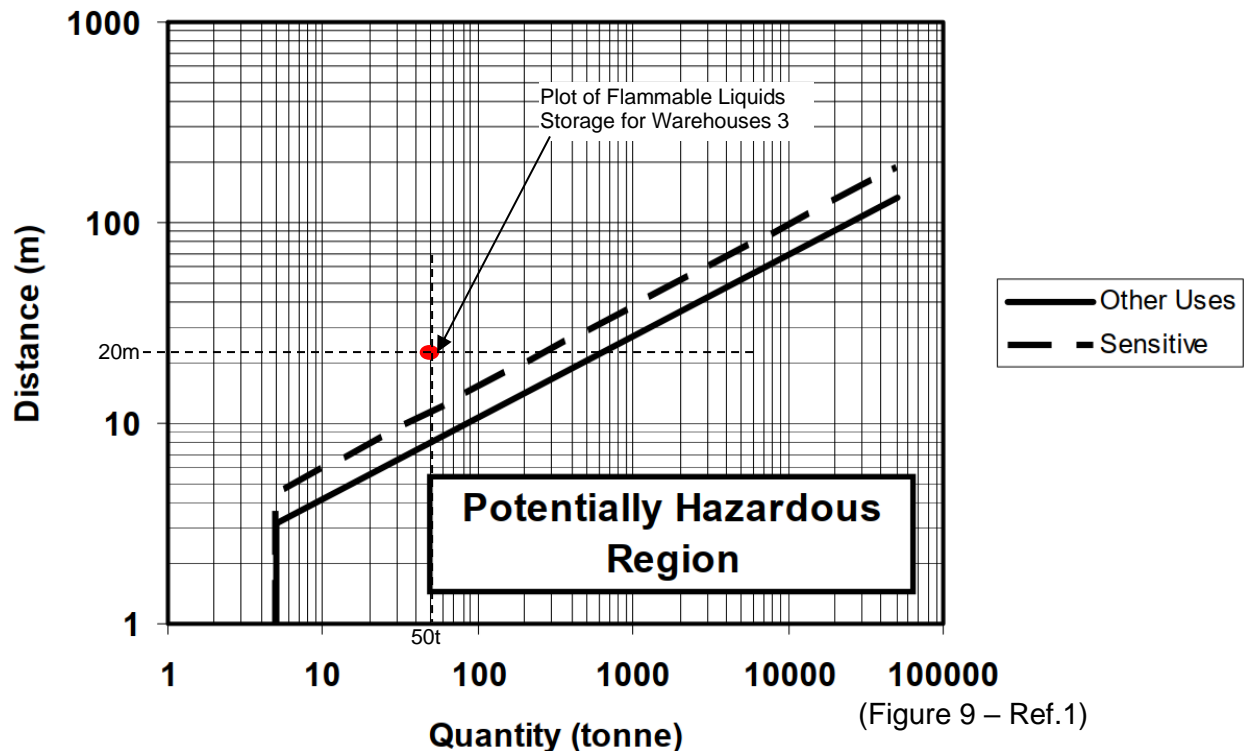
**Figure 4.5: Lot 3 – Warehouses 3 Layout showing DG Locations**

**Table 4.5: Quantities Stored in Warehouses 3 and SEPP33 Threshold Values for the Specific DGs Stored**

Class	Description	PG	Quantities Stored Warehouse 3	SEPP 33 Threshold (Ref.1)	Does SEPP33 Apply?
2.1	Aerosols	-	<7,500 kg (LPG)	10,000 kg	NO
	Cylinders	-	<1,000 kg (LPG)		
3	Flammable Liquids	II & III	20,000 kg (PGII) 30,000 kg (PGIII)	500,000 kg (500t)	NO (See Fig. 4.2 & Note 1 below)
4.1	Flammable Solids	II & III	4,000 kg	5,000 kg	NO
5.1	Oxidising Substances	II & III	4,000 kg	5,000 kg	NO
6.1	Toxic Substances	II & III	2,000 kg	2,500 kg	NO
8	Corrosives	II & III	24,000 kg	25,000 kg <sup>(Note 2)</sup>	NO
9	Miscellaneous	III	40,000 kg	Not subject to SEPP33	
C1/C2	Combustible Liquids	-	40,000 kg	Not subject to SEPP33	

- Notes: 1. The flammable liquids stores are located on the north-eastern side of Warehouse 3, with the closest boundary to the north-east being 20m from the bund of the flammable liquids store. The distances to the other boundaries from the storage areas are equal to or greater than the distances to the north-eastern boundary, hence, the boundaries are well separated from the storage and the facility is therefore not within the potentially hazardous region of Figure 9 of Applying SEPP33 (see **Figure 4.6**).
2. The threshold value for Class 8 products has been selected as the lower value of PG II & III, being 25,000 kg (noting that PG III corrosives can be stored up to a quantity of 50,000 kg).

### Heat Radiation Effects



**Figure 4.5: Lot 3 – Warehouses 3 DG Plot Class 3 Quantity Vs Distance from Boundary**

### 4.3.2 SEPP 33 Transport Assessment (Warehouses 3)

It is necessary to assess the impact of transporting DGs on the surrounding arterial roads to and from Warehouse 3. As the total quantity of DGs to be stored in the warehouse is below SEPP 33, it can be assumed that the frequency of movements would be low. Therefore, it is considered prudent to review the SEPP 33 transport criteria on the basis of minimum transport load listed in the guideline (Applying SEPP33, Ref.1). **Table 4.6** has been developed based on the minimum load of goods to compare the maximum storage quantity within the warehouses to conceptualise whether the loads would be likely to be exceeded based on the maximum storage quantities.

**Table 4.6: SEPP33 Transport Quantity vs Warehouse Storage Limits - Warehouses 3**

Class	Minimum Load Quantity	Maximum Storage within Each Warehouse
2.1	4.5 tonnes	8.5 tonnes
3(II)	10 tonnes	20 tonnes
3(III)	No limits	30 tonnes
4.1	2 tonnes	4 tonnes
5.1	5 tonnes	4 tonnes
6.1	3 tonnes	2 tonnes
8	5 tonnes	20 tonnes
9	No Limit	20 tonnes
Comb. Liquid	No Limit	20 tonnes

Based on the maximum quantity to be stored in the warehouse (Warehouse 3) and the SEPP33 load limits, the quantities are unlikely to be exceeded as that would indicate very high turnover of product which would be unlikely to be achieved considering that vehicle movements will be predominantly non-DG products, resulting in the majority of vehicles not carrying DGs. In addition, those movements where DGs are transported as a combined load (Non-DGs and DGs together), the majority of loads would be below the transport placard quantity, which does not exceed the maximum load quantities listed in **Table 4.6**.

Therefore, it is considered that the SEPP33 limits for transport would not be exceeded; hence, additional traffic management plans would not be required. It is noted, that the transport of DGs is covered by the Australian Dangerous Goods Code (ADG, Ref.2) Therefore, incident response will be covered by the transport of DGs via the ADG as appropriate with the loads being carried.

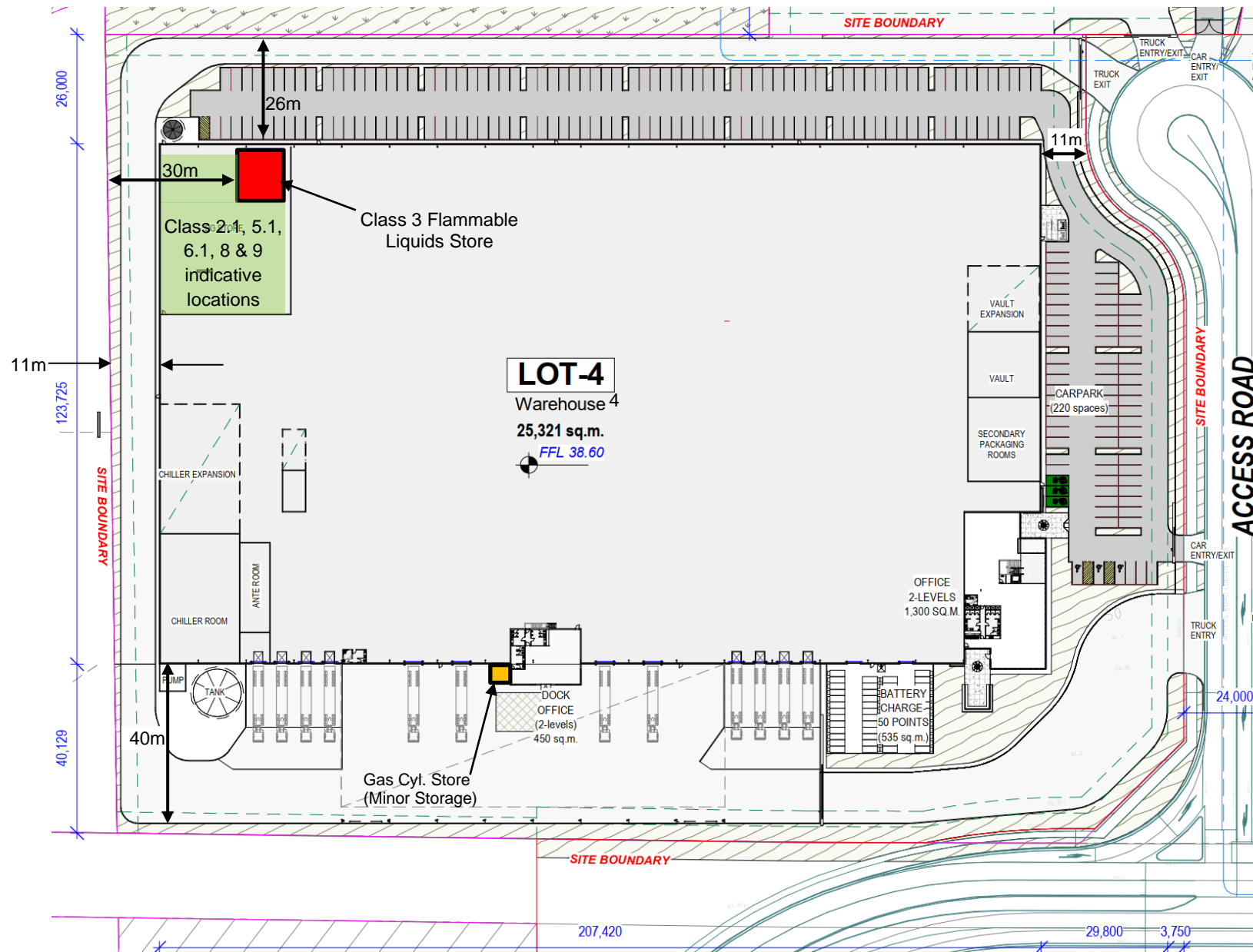
## 4.4 Lot 4 – Warehouse 4

### 4.4.1 SEPP 33 Storage Assessment (Warehouse 4)

**Figure 4.7** shows the layout of Warehouse 4, including the location of DGs within the warehouse. The figure also shows the location of the warehouse in relation to the surrounding land uses, including separation distances between the warehouses and the boundaries.

Threshold limits for the application of SEPP 33 to Warehouse 4 are presented in **Table 4.7** along with maximum DG quantities that will be stored in the warehouses. **Figure 4.8** shows the maximum permissible quantity of flammable liquids that may be stored in the warehouse, as listed in SEPP33, based on the specific separation distances of the flammable liquids storages areas from the closest boundary (Ref.1).

**Table 4.7** shows that threshold quantities are not exceeded at Warehouse 4 and **Figure 4.8** shows that the maximum permissible storage quantities of flammable liquids is not exceeded, hence, SEPP 33 does not apply to the DG store, as all DGs are under the screening threshold.



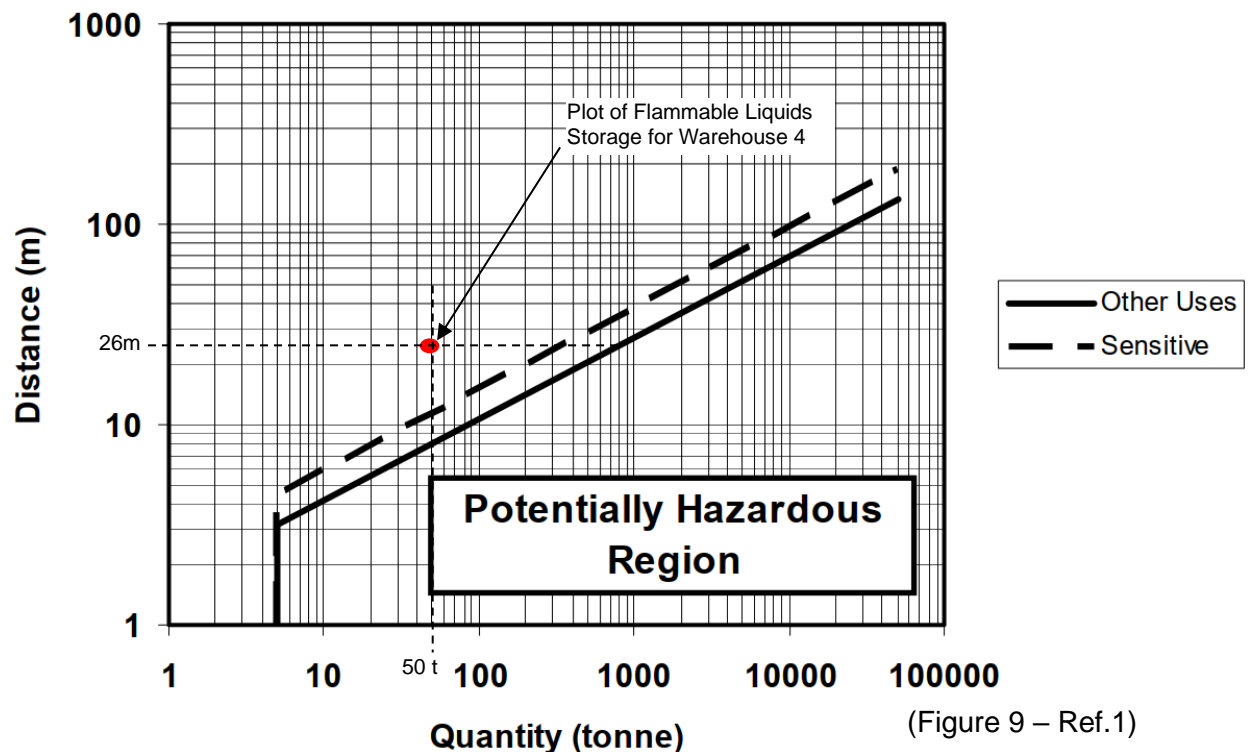
**Figure 4.6: Lot 4 – Warehouse 4 Layout showing DG Locations**

**Table 4.7: Quantities Stored in W/house 4 & SEPP33 Threshold Values for the DGs Stored**

Class	Description	PG	Quantities Stored Warehouse 4	SEPP 33 Threshold (Ref.1)	Does SEPP33 Apply?
2.1	Aerosols	-	<7,500 kg (LPG)	10,000 kg	NO
	Cylinders	-	<1,000 kg (LPG)		
3	Flammable Liquids	II & III	20,000 kg (PGII) 30,000 kg (PGIII)	700,000 kg (700 t)	NO (See Fig. 4.8 & Note 1 below)
4.1	Flammable Solids	II & III	4,000 kg	5,000 kg	NO
5.1	Oxidising Substances	II & III	4,000 kg	5,000 kg	NO
6.1	Toxic Substances	II & III	2,000 kg	2,500 kg	NO
8	Corrosives	II & III	20,000 kg	25,000 kg <sup>(Note 2)</sup>	NO
9	Miscellaneous	II & III	20,000 kg	Not subject to SEPP33	
C1/C2	Combustible Liquids	-	20,000 kg	Not subject to SEPP33	

- Notes: 1. The flammable liquids store is located on the north-western corner of Warehouse 4, with the closest boundary to the north being 26m to the bund of the flammable liquids store. The distances to the other boundaries from the storage area is greater than the distances to the south, hence, the boundaries are well separated from the warehouse and the facility is therefore not within the potentially hazardous region of Figure 9 of Applying SEPP33 (see **Figure 4.8**).
2. The threshold value for Class 8 products has been selected as the lower value of PG II & III, being 25,000 kg (noting that PG III corrosives can be stored up to a quantity of 50,000 kg).

### Heat Radiation Effects



**Figure 4.7: Lot 4 – Warehouses 4 DG Plot Quantity Vs Distance from Boundary**

#### 4.4.2 SEPP 33 Transport Assessment (Warehouses 4)

It is necessary to assess the impact of transporting DGs on the surrounding arterial roads to and from Warehouse 4. As the total quantity in the warehouse is below SEPP 33, it can be assumed that the frequency of movements would be low. Therefore, it is considered prudent to review the SEPP 33 transport criteria on the basis of minimum transport load listed in the guideline (Applying SEPP33, Ref.1). **Table 4.8** has been developed based on the minimum load of goods to compare the maximum storage quantity within the warehouses to conceptualise whether the loads would be likely to be exceeded based on the maximum storage quantities.

**Table 4.8: SEPP33 Transport Quantity vs Warehouse Storage Limits - Warehouses 4**

Class	Minimum Load Quantity	Maximum Storage within Each Warehouse
2.1	4.5 tonnes	8.5 tonnes
3(II)	10 tonnes	20 tonnes
3(III)	No limits	30 tonnes
4.1	2 tonnes	4 tonnes
5.1	5 tonnes	4 tonnes
6.1	3 tonnes	2 tonnes
8	5 tonnes	20 tonnes
9	No Limit	20 tonnes
Comb. Liquid	No Limit	20 tonnes

Based on the maximum quantity to be stored in the warehouses (Warehouse 4) and the SEPP33 load limits, the quantities are unlikely to be exceeded as that would indicate very high turnover of product which would be unlikely to be achieved considering that vehicle movements will be predominantly non-DG products, resulting in the majority of vehicles not carrying DGs. In addition, those movements where DGs are transported as a combined load (Non-DGs and DGs together), the majority of loads would be below the transport placard quantity, which does not exceed the maximum load quantities listed in **Table 4.8**.

Therefore, it is considered that the SEPP33 limits for transport would not be exceeded; hence, additional traffic management plans would not be required. It is noted, that the transport of DGs is covered by the Australian Dangerous Goods Code (ADG, Ref.2) Therefore, incident response will be covered by the transport of DGs via the ADG as appropriate with the loads being carried.

#### 4.5 Potentially Offensive Developments

In addition to the hazards associated with the storage of Dangerous Goods, a review of the potentially offensive Developments component of SEPP33 has been made. Applying SEPP33 (Ref.1) indicates that where an Environmental Protection Licence (EPL) is required, there is a potential for environmental impact and the “offensive” requirements of SEPP33 should be assessed.

Noting that the proposed development at 657-769 Mamre Road, Kemps Creek, NSW, comprises warehouses and storage of goods in sealed packages, with the Dangerous Goods quantities below the threshold levels listed in the Protection of Environmental Operations Regulation (Ref.4), there would be no requirement to obtain an EPL and hence, the offensive component of the SEPP does not apply.



## 5.0 CONCLUSIONS AND RECOMMENDATIONS

### 5.1 Conclusions

An analysis of the application of State Environmental Planning Policy No.33, Hazardous and Offensive Developments (SEPP33) was conducted for a modification to the proposed Frasers-Altis development on a parcel of land located on the western side of Mamre Road, Kemps Creek, NSW. The proposed modification to the development involves the construction of 4 warehouses on 4 lots within the development, with all warehouses being single occupancy. The analysis was conducted based on a limited quantity of Dangerous Goods (DGs) stored and handled at each warehouse, noting that the development has considered the potential for warehouse tenants to store and handle limited DGs as part of their operations.

The analysis identified that the quantity of DGs held at each warehouse did not exceed the storage threshold levels listed in “Applying SEPP33”(Ref.1). It was also identified that based on the relatively low quantity of DGs stored and handled at the warehouses, and the type of operations proposed at the warehouses (i.e. warehouses are not dedicated DG storage facilities), it was unlikely that the maximum permissible transport quantity and number of vehicle operation listed in “Applying SEPP33”(Ref.1) would be exceeded. Hence, based on the assessment conducted for the proposed DG storages identified in in this study, it is concluded that SEPP33 does not apply to the proposed development.

In addition to the SEPP33 review of Dangerous Goods storage a review of the potential for offensive operations was conducted. It was identified that the proposed warehouses would not require an Environmental Protection Licence (EPL), hence, the offensive developments component of SEPP33 would not apply.

Based on the assessment conducted in this study and the results indicating that SEPP33 does not apply to any of the warehouses within the development, it is concluded that the requirements of the Hazard and Risk Section of the SEARs (Key Issues, Dot point 12) have been addressed.

### 5.2 Recommendations

Notwithstanding the conclusion reached above, it is noted that tenants may require to store DGs at quantities exceeding those assessed in this study. Should a tenant require to store and handle additional DGs to those listed for the specific warehouse in this study, it is recommended that a review of the application of SEPP33 should be conducted and where required a Preliminary Hazard Analysis (PHA) study be performed, in accordance with HIPAP No.6 (Ref.3), should it be identified that SEPP33 applies to the specific warehouse.

## 6.0 REFERENCES

1. Applying SEPP 33 (2011), “Hazardous and Offensive Development Application Guidelines”, NSW Department of Planning and Infrastructure.
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
3. Hazardous Industry Planning Advisory Paper No.6 (2011) – Guidelines for Hazard Analysis, NSW Department of Planning & Industry.
4. Protection of the Environment Operations (General) Regulation 2021, administered by The NSW Environmental Protection Authority.

## Appendix A

### DATA EXTRACTED FROM “APPLYING SEPP33”

## A1. SCREENING METHODS

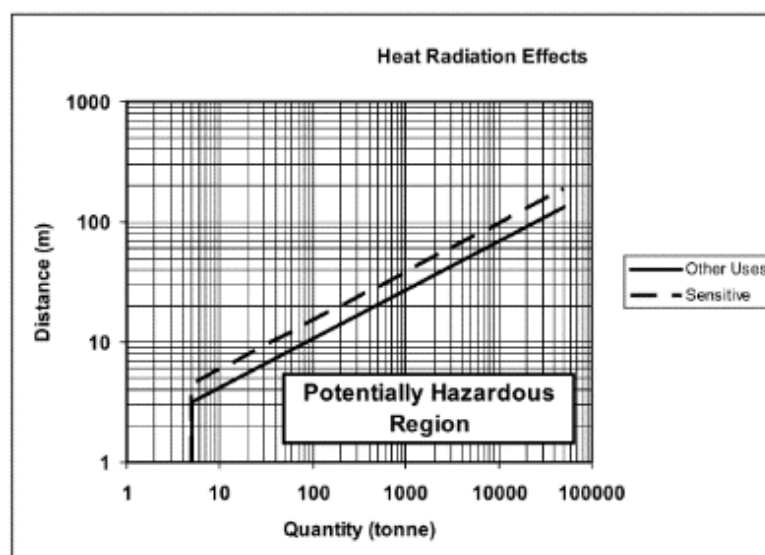
**Figure A.1**, extracted from “Applying SEPP33” provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold. It shows that:

- for LPG, Table 3 shall be used;
- for Class 3 PG II and III, Figure 9 shall be used (note: Class 3 PGI materials will not be stored at the facility);
- for Class 4, Class 5, Class 6, and Class 8, Table 3 shall be used;
- Class 9 is not subject to SEPP33;
- Combustible Liquids is not subject to SEPP33; and
- For transport, Table 2.

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 A.1: Screening Method to be Used**

Figure 9 and Table 3 from “Applying SEPP33” have been extracted and are shown in **Figure A.2**, and **Figure A.3** respectively.



**Figure A.2: Class 3 PGII and PGIII Flammable Liquids**

**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 <sup>1</sup> )	
	10 tonne or 16 m <sup>3</sup>	if stored above ground
	40 tonne or 64 m <sup>3</sup>	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.

**Figure A.3: General Screening Threshold Quantities**

Product will be transported to and from the warehouses/industrial facility; hence, it is necessary to review the implications the transport of DGs will have on the surrounding arterial roads. Table 2 from “Applying SEPP33” has been extracted and is shown in **Figure A.4**.

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 A.4: SEPP33 Transport Thresholds**

\*If quantities are below this level, the potential risk is unlikely to be significant unless the number of traffic movements is high.

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