Riskcon engineering

# State Environmental Planning Policy (Resilience and Hazards)

## Lot O, 200 Aldington Road, Kemps Creek

Stockland Fife Kemps Creek Pty Ltd
Document No. RCE-25556_SFKC-LotO_SEPP-RH_Final_19Mar26_Rev(1)
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Lot O, 200 Aldington Road, Kemps Creek

Stockland Fife Kemps Creek Pty Ltd

Prepared by

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## Quality Management

| Rev | Date | Remarks | Prepared By | Reviewed By |
|---|---|---|---|---|
| A | 12 November 2025 | Draft issue for comment | Renton Parker | Jason Costa |
| 0 | 15 December 2025 | Issued final | | |
| 1 | 19 February 2026 | Updated layouts and changes from Lot E | | |

# Executive Summary

## Background

Stockland Fife Kemps Creek Pty Ltd (SFKC) is developing one (1) which is composed of two (2) tenancies at Lot O, 200 Aldington Road, Kemps Creek. Each tenancy will require a CO2 based refrigeration system to provide temperature control within the warehouse(s). CO2 is classified as a Dangerous Good (DG); hence, the site is subject to Chapter 3 of the State Environmental Planning Policy – Resilience & Hazards (SEPP-RH) which is required to demonstrate that the risk profile of the facility is acceptable for the proposed location.

It is anticipated that DGs for both warehouse operations may be required and have been allowed for. Lot O is one of multiple lots containing warehouses within the 200 Aldington Rd estate. Thus, the impact of the new warehouse(s) in proximity to other approved warehouses containing DGs is also assessed.

SFKC has engaged Riskcon Engineering Pty Ltd (Riskcon) to prepare an assessment of the site to determine if it should be deemed potentially hazardous or offensive, thus requiring further assessment.

## Conclusions

A review of the quantities of DGs stored at the proposed facility and the associated vehicle movements was conducted and compared to the threshold quantities outlined in “Applying SEPP 33”. The assessment was conducted both for storage and transport for the DGs, as well as for potential to be either hazardous or offensive.

Class 2.2 DGs are excluded from SEPP-33 thresholds. Additionally, the speculated quantities of Class 2.1 DGs (LPG) and Class 3 DGs (flammable liquids) are much lower than the SEPP-33 thresholds. Thus, the criteria of Chapter 3 of SEPP (Resilience and Hazards) are fulfilled and no further assessment is required.

Furthermore, the introduction of the DGs to Lot O will not increase the risk of the entire estate, which includes Lots A, B,C, E, F, G, J, K and M previously assessed by Riskcon, as the quantity of DGs stored at each warehouse does not exceed SEPP-RH thresholds. Additionally, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

As the facility is not considered ‘potentially hazardous’ or ‘potentially offensive’, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as Chapter 3 of SEPP (Resilience and Hazards) will not apply.

## Recommendations

The following recommendations have been made generally for sites storing DGs:

- The DGs shall be stored in a manner which complies with the applicable storage standards (i.e. AS/NZS 1596:2014 or class specific standards such as AS 1940:2017).
- The documentation required by the Work Health and Safety (WHS) Regulation 2025 (Ref. [1]) shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFAIRP) as required by the WHS Regulations.

- Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2022 (Ref. [2]) shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

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# Abbreviations

| Abbreviation | Description |
|---|---|
| ADG | Australian Dangerous Goods Code |
| CBD | Central Business District |
| DGs | Dangerous Goods |
| LPG | Liquefied Petroleum Gas |
| PG | Packing Group |
| PHA | Preliminary Hazard Analysis |
| RH | Resilience & Hazards |
| SEPP | State Environmental Planning Policy |

# 1.0 Introduction

## 1.1 Background

Stockland Fife Kemps Creek Pty Ltd (SFKC) is developing one (1) which is composed of two (2) tenancies at Lot O, 200 Aldington Road, Kemps Creek. Each tenancy will require a $CO_2$ based refrigeration system to provide temperature control within the warehouse(s). $CO_2$ is classified as a Dangerous Good (DG); hence, the site is subject to Chapter 3 of the State Environmental Planning Policy – Resilience & Hazards (SEPP-RH) which is required to demonstrate that the risk profile of the facility is acceptable for the proposed location.

It is anticipated that DGs for both warehouse operations may be required and have been allowed for. Lot O is one of multiple lots containing warehouses within the 200 Aldington Rd estate. Thus, the impact of the new warehouse(s) in proximity to other approved warehouses containing DGs is also assessed.

SFKC has engaged Riskcon Engineering Pty Ltd (Riskcon) to prepare an assessment of the site to determine if it should be deemed potentially hazardous or offensive, thus requiring further assessment.

## 1.2 Scope of Services

The scope of work is to prepare a SEPP-RH assessment for the two (2) tenancies proposed as part of the Lot O, 200 Aldington Road, Kemps Creek development. The assessment does not include any other sites (bar the assessment of risk of the Lot O warhouse in proximity to the existing warehouses) nor the preparation of any additional planning studies should they be required.

# 2.0 Methodology

## 2.1 General Methodology

The methodology used in this assessment is as follows:

- Review the types and proposed quantities of DGs to be stored at the site.
- Compare the quantities of DGs the threshold quantities listed in “Applying SEPP 33 – Hazardous and Offensive Development” (Ref. [3]) to identify whether the storage location or quantity triggers SEPP-RH.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33 (Ref. [3]).
- Report on the findings of the SEPP-RH assessment.

## 2.2 Application of Chapter 3 of the State Environmental Planning Policy – Resilience & Hazards

State Environmental Planning Policy (Resilience and Hazards) 2021 (which now includes the former SEPP 33) has been developed under the Environmental Planning and Assesment Act 1979 to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a faclity to ensure the risks to surrounding land uses is minimised.

The policy includes a guideline that assists government and industry alike in determining whether SEPP-RH applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [3]) provides a list of threshold levels, for the storage of DGs, above which the regulator considers the DG storage to be potentially hazardous. In the event the threshold levels are exceeded, SEPP-RH applies and a Preliminary Hazard Analysis (PHA) is required, followed by a series of hazard analysis studies stipulated by the Department of Planning and Environment in the conditions of consent.

## 2.3 Data taken from “Applying SEPP 33”

**Figure 2-1**, extracted from “Applying SEPP 33” provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold (Ref. [3]).

| 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 2-1: Screening Method to be Used**

Table 3 from “Applying SEPP 33” has been extracted and is shown in **Figure 2-2**.

| 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[1]) | |
| | 10 tonne or16 $m^3$ | if stored above ground |
| | 40 tonne or 64 $m^3$ | if stored underground or mounded |
| 2.3 | 5 tonne | anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale |
| | 1 tonne | chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg |
| | 2.5 tonne | chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg |
| | 100 kg | liquefied gas kept in or on premises |
| | 100 kg | other poisonous gases |
| 4.1 | 5 tonne | |
| 4.2 | 1 tonne | |
| 4.3 | 1 tonne | |
| 5.1 | 25 tonne | ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary |
| | 5 tonne | ammonium nitrate — elsewhere |
| | 2.5 tonne | dry pool chlorine — if at a dedicated pool supply shop, in containers <30 kg |
| | 1 tonne | dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg |
| | 5 tonne | any other class 5.1 |
| 5.2 | 10 tonne | |
| 6.1 | 0.5 tonne | packing group I |
| | 2.5 tonne | packing groups II and III |
| 6.2 | 0.5 tonne | includes clinical waste |
| 7 | all | should demonstrate compliance with Australian codes |
| 8 | 5 tonne | packing group I |
| | 25 tonne | packing group II |
| | 50 tonne | packing group III |

**Figure 2-2: General Screening Threshold Quantities**

Transportation screen thresholds have been provided in **Figure 2-3**, based on Table 2 from Ref. ( [3]).

| | Vehicle Movements | | Minimum quantity* | |
|---|---|---|---|---|
| | Cumulative | Peak | per load (tonne) | |
| Class | 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 2-3: Transportation Screening Thresholds**

# 3.0 Project Description

## 3.1 Site Description

Lot O is located at 200 Aldington Road, Kemps Creek which is approximately 52 km west of the Sydney Central Business District (CBD). **Figure 3-1** shows the regional location of the site in relation to the Sydney CBD.


**Figure 3-1: Site Location**

## 3.2 Site Background

The proposed development on Lot O is a temperature-controlled warehouse and distribution centre extending to approximately 14,617 sqm and configured to accommodate two cold-store logistics operators. Access to the warehouse will be via a mix of recessed docks and on-grade roller shutter doors.

The western tenancy will be referred to as Warehouse 1 & Office 1 with the eastern tenancy being referred to as Warehouse 2 & Office 2. Each tenancy is provided a main office component arranged over two-levels with Warehouse 2 also providing a dock office. The tenancies are separated by an internal intertenancy wall and each tenancy will benefit from their own truck entry and exit, hardstand for loading/unloading and car parking. The development's aesthetic appeal will include perimeter landscaping and visual treatments to achieve a desirable streetscape.

The site is zoned IN1 General Industrial under the Chapter 2 of the State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP). Industries (other than offensive or hazardous industries) are permitted with development consent within land zoned IN1. Development for the purpose of a warehouse or distribution centre is defined as a type of 'general industry' and therefore falls within the permissible development of 'industries'.

The vision for Lot O, and other lots within the Kemps Creek Industrial Estate, is to create a world class facility for industrial businesses with an emphasis on design quality, sustainability, innovation and a complementary mix of estate occupants.

The warehouse and distribution centre is classified as SSD due to the estimated development cost which is greater than $50 million, as prescribed under Section 12 of Schedule 1 to the State Environmental Planning Policy (Planning Systems) 2021. The layout of the estate is provided in **Figure 3-3**.

## 3.3 Quantities of Dangerous Goods Stored and Handled

The quantities of DG stored and handled at the site have been summarised in **Table 3-1**. The layout of Lot O, which consists of Warehouse 1 and 2, is shown in **Figure 3-2**. The only confirmed DGs to be stored within the Lot O site boundaries is the $CO_2$ associated with the refrigeration systems in both warehouses. The other DGs are speculative due to their common use in regular warehouse operations. The quantities indicated of these DGs are rough estimates and subject to change.

**Table 3-1: Quantities of DGs Stored and Handled**

| Warehouse | Class | DG Description | PG | Quantity (kg or L) |
|---|---|---|---|---|
| 1 | 2.1 | Speculated LPG | n/a | 90 kg |
| | 2.1 | Aerosols | n/a | 50 kg |
| | 2.2 | Carbon dioxide (in refrigeration system) | n/a | 1,000 kg |
| | 3 | Speculated flammable liquids storage | II | 50 L |
| | | | III | 110 L |
| 2 | 2.1 | Speculated LPG storage | n/a | 90 kg |
| | 2.1 | Aerosols | n/a | 50 kg |
| | 2.2 | Carbon dioxide (in refrigeration system) | n/a | 4,000 kg |
| | 3 | Speculated flammable liquids storage | II | 50 L |
| | | | III | 110 L |

## 3.4 Major Hazard Facility Review

Where more than one class of dangerous goods are stored and handled at the site an AQR exists. This ratio is calculated using **Equation 3-1:**

$$AQR = \frac{q_x}{Q_x} + \frac{q_y}{Q_y} + [\ldots] + \frac{q_n}{Q_n}$$ **Equation 3-1**

Where:

x,y […] and n are the dangerous goods present

$q_x$, $q_y$, […] and $q_n$ is the total quantity of dangerous goods x, y, […] and n present.

$Q_x$, $Q_y$, […] and $Q_n$ is the individual threshold quantity for each dangerous good of x, y, […] and n

Where the ratio AQR exceeds a value of 1, the site would be considered a Major Hazard Warehouse (MHF). The threshold quantity for each class is taken from Schedule 15 of the WHS Regulation (Ref. [1]). These AQR assessment has been summarised in **Table 3-2**.

**Table 3-2: Major Hazard Warehouse Thresholds**

| Class | Packing Group | Quantity (Tonnes) | | Quantity Ratio |
|---|---|---|---|---|
| | | Storage | Threshold | |
| 2.1 | n/a | 0.28 | 200 | 0.002 |
| 2.2 | n/a | 5 | 200 | 0.025 |
| 3 | II & III | 0.26 | 50,000 | negligible |
| | | | **AQR** | **0.027** |

The AQR is <1; hence, the warehouse would be unlikely to be classified as an MHF. Further, the site is <10% of the MHF threshold; hence, notification to SafeWork NSW is not required.

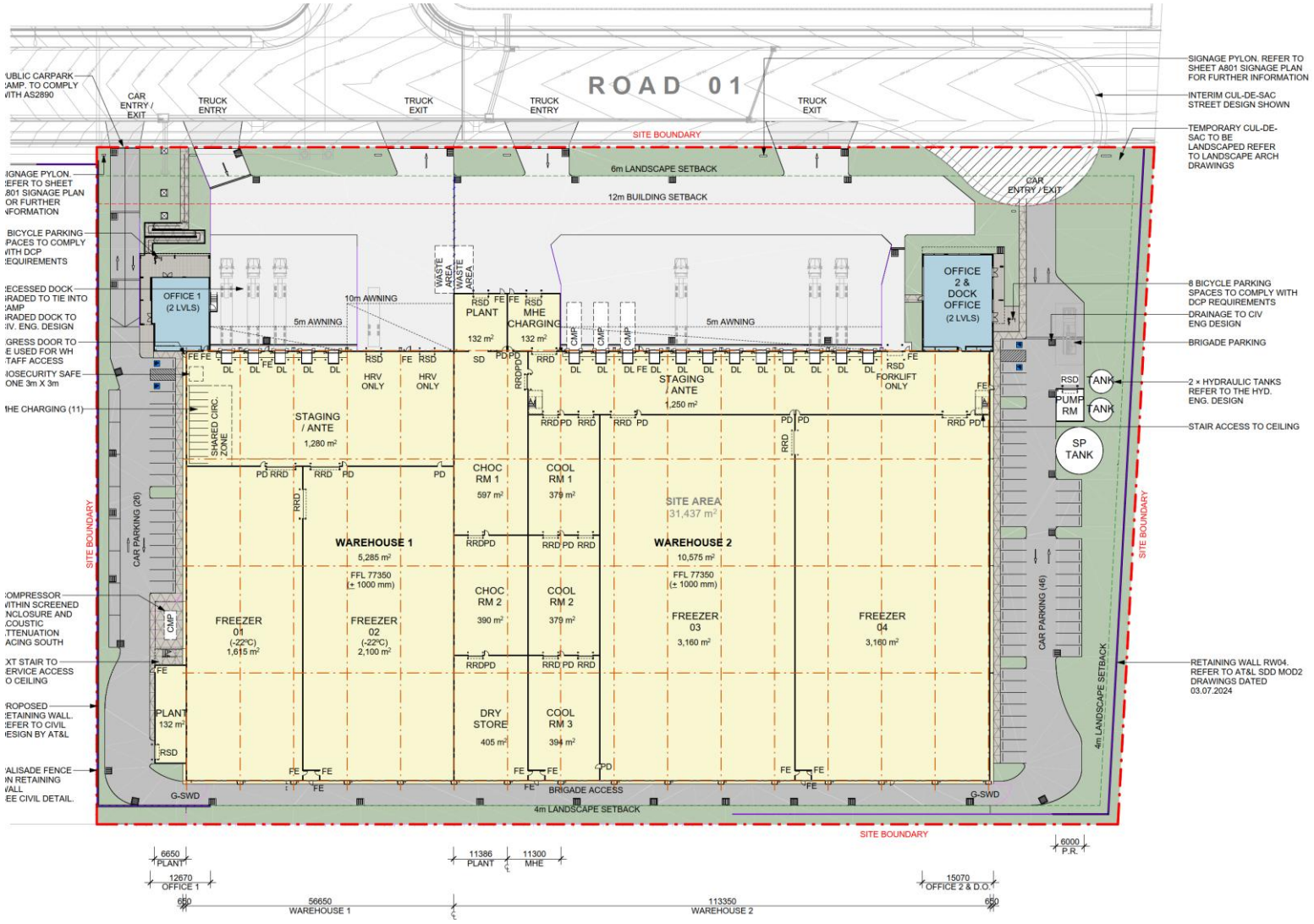



**Figure 3-2: Site Plan**

| AREA SCHEDULE *All areas subject to survey | |
|---|---|
| SITE AREA | 720,906 m² |
| LOT D (including basin B) | 52,426 m² |
| LOT L (including basin A) | 10,570 m² |
| ESTATE ROAD RESERVE | 64,215 m² |
| ROAD WIDENING (Aldington Rd) | 6,112 m² |
| NET DEVELOPABLE SITE AREA | 587,583 m² |
| WAREHOUSE OR INDUSTRIAL | 237,685 m² |
| OFFICE (Approx. 5% WH) | 14,289 m² |
| GROSS FLOOR AREA | 251,974 m² |
| CARPARKING BASED ON WAREHOUSING | |
| REQUIRED (DCP WH1/300 OFFICE1/40) | 1151 |
| PROVIDED | 1249 |
| NOTE: ADJUSTMENTS WILL BE MADE WITH APPLICABLE DAs TO GFA AND CARPARKING IF INDUSTRIAL USE IS IDENTIFIED TO ACHIEVE DCP INDUSTRY 1/200m2 | |
| SITE PERMEABILITY | 22% |
| SITE COVERAGE | 45% |

| LOT A | |
|---|---|
| LOT AREA | 26,320 m² |
| GFA | 2,361 m² |
| LANDSCAPE | 18,069 m² |
| HARDSTAND\ROAD | 5,249 m² |
| PERMEABILITY | 68% |
| CAR PARKS | 15 |

| LOT B | |
|---|---|
| LOT AREA | 35,581 m² |
| GFA | 19,300 m² |
| LANDSCAPE | 2,577 m² |
| HARDSTAND\ROAD | 11,905 m² |
| PERMEABILITY | 7% |
| CAR PARKS | 95 |

| LOT C | |
|---|---|
| LOT AREA | 38,792 m² |
| GFA | 18,471 m² |
| LANDSCAPE | 5,319 m² |
| HARDSTAND\ROAD | 13,205 m² |
| PERMEABILITY | 13% |
| CAR PARKS | 87 |

| LOT D - Basin B | |
|---|---|
| LOT AREA | 52,426 m² |
| PERMEABILITY | 93% |

| LOT E | |
|---|---|
| LOT AREA | 68,251 m² |
| GFA | 39,259 m² |
| LANDSCAPE | 5,981 m² |
| HARDSTAND/ROAD | 20,584 m² |
| PERMEABILITY | 9% |
| CAR PARKS | 172 |

| LOT F | |
|---|---|
| LOT AREA | 78,422 m² |
| GFA | 51,027 m² |
| LANDSCAPE | 8,820 m² |
| HARDSTAND\ROAD | 13,430 m² |
| PERMEABILITY | 11% |
| CARPARKS | 250 |

| LOT G | |
|---|---|
| LOT AREA | 58,092 m² |
| GFA | 27,548 m² |
| LANDSCAPE | 10,542 m² |
| HARDSTAND\ROAD | 16,690 m² |
| PERMEABILITY | 18% |
| CAR PARKS | 118 |

| LOT J | |
|---|---|
| LOT AREA | 129,278 m² |
| GFA | 15,561 m² |
| LANDSCAPE | 19,386 m² |
| HARDSTAND ROAD | 89,816 m² |
| PERMEABILITY | 15% |
| CAR PARKS | 91 |

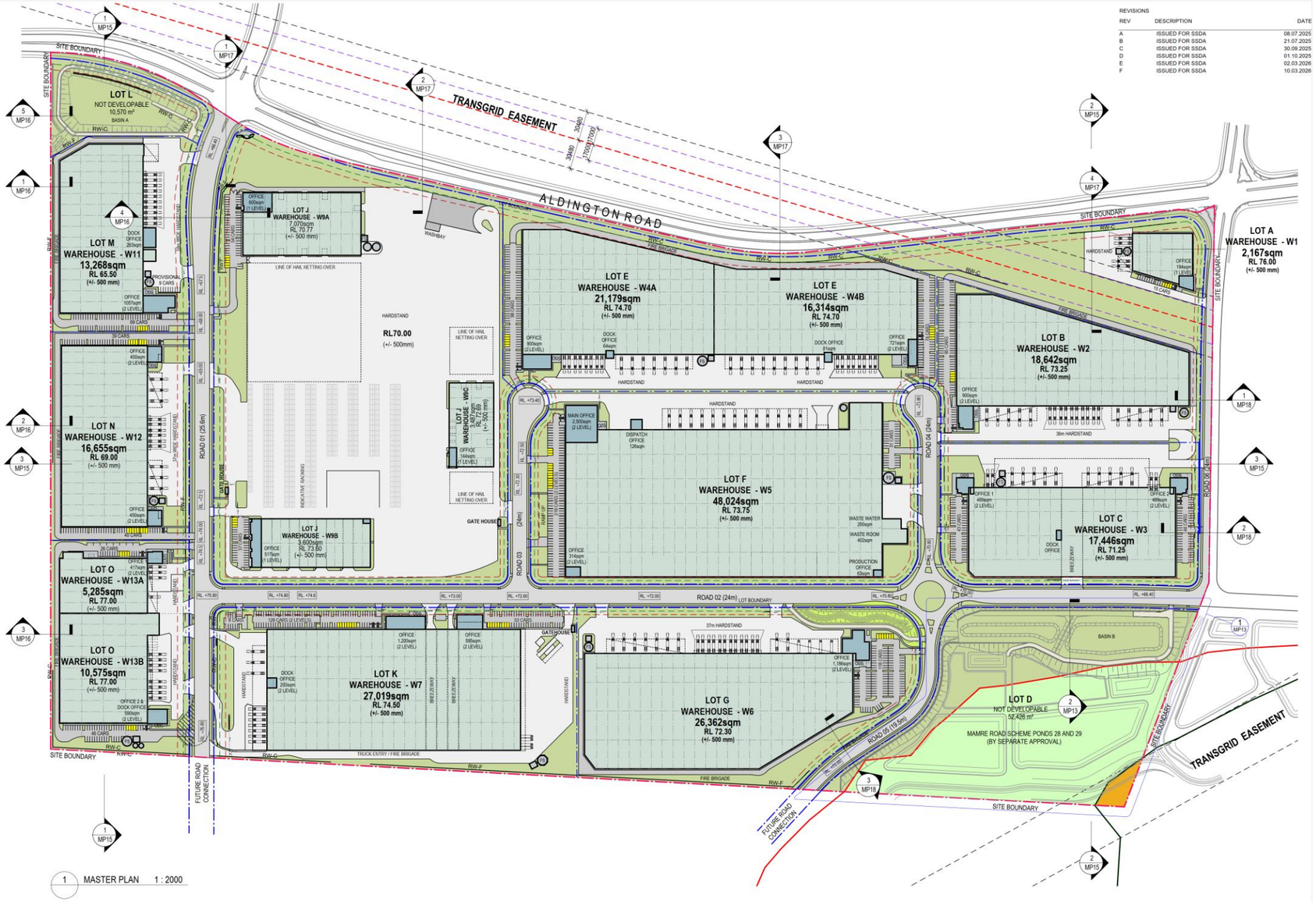
| LOT K | |
|---|---|
| LOT AREA | 62,123 m² |
| GFA | 29,034 m² |
| LANDSCAPE | 8,190 m² |
| HARDSTAND/ROAD | 19,030 m² |
| PERMEABILITY | 13% |
| CAR PARKS | 189 |

| LOT L - Basin A | |
|---|---|
| LOT AREA | 10,570 m² |
| PERMEABILITY | 58% |

| LOT M | |
|---|---|
| LOT AREA | 28,442 m² |
| GFA | 14,588 m² |
| LANDSCAPE | 2,769 m² |
| HARDSTAND\ROAD | 9,070 m² |
| PERMEABILITY | 12% |
| CAR PARKS | 78 |

| LOT N | |
|---|---|
| LOT AREA | 30,833 m² |
| GFA | 17,555 m² |
| LANDSCAPE | 3,573 m² |
| HARDSTAND\ROAD | 10,120 m² |
| PERMEABILITY | 12% |
| CAR PARKS | 79 |

| LOT O | |
|---|---|
| LOT AREA | 31,130 m² |
| GFA | 14,617 m² |
| LANDSCAPE | 4,497 m² |
| HARDSTAND\ROAD | 10,556 m² |
| PERMEABILITY | 14% |
| CAR PARKS | 72 |




1 MASTER PLAN 1 : 2000

REVISIONS

| REV | DESCRIPTION | DATE |
|---|---|---|
| A | ISSUED FOR SSDA | 08.07.2025 |
| B | ISSUED FOR SSDA | 21.07.2025 |
| C | ISSUED FOR SSDA | 30.09.2025 |
| D | ISSUED FOR SSDA | 01.10.2025 |
| E | ISSUED FOR SSDA | 02.03.2026 |
| F | ISSUED FOR SSDA | 10.03.2026 |

NOTES:

01 ALDINGTON RD RESERVE - 30.6m DISTRIBUTOR ROAD
02 INTERNAL ESTATE ROAD 01 RESERVE - 25.6m COLLECTOR ROAD
03 INTERNAL ESTATE ROAD 02, 03, 04, RESERVE - 24m INDUSTRIAL ROAD
04 INTERNAL ESTATE ROAD 05 RESERVE - 19.5m EDGE ROAD
05 PARKING RATE PROVIDED DCP WH 1 SPACE PER 300sqm / OFFICE 1 SPACE PER 40sqm
06 BUILDING SETBACK TO ALDINGTON RD AND ESTATE RD No.1 - 12m
07 LANDSCAPE SETBACK TO ALDINGTON RD AND ESTATE RD No.1 - 6m
08 BUILDING SETBACK FROM ESTATE RD - 7.5m
09 LANDSCAPE SETBACK FROM ESTATE RD - 3.75m
10 RECYCLED WATER - CONNECTION FROM EACH BUILDING LOT TO PROPOSED PRECINCT WIDE SYDNEY WATER RECYCLED WATER SYSTEM
11 BIKE PARKING TO BE PROVIDED IN ACCORDANCE WITH MRP DCP

LEGEND

- Site Boundary
- Lot Boundary
- Road Boundary
- Building Setback
- Landscape Setback
- Building Outline
- Easement
- RW Retaining Wall
- FS Fire Services
- ODS Outdoor Staff Area
- Electric Vehicle Charging Bay
- RE2 Zone
- C2 Environmental Conservation Zone
- Naturalised channel and Vegetated Riparian Zone (LOT G)

sba

200 ALDINGTON ROAD INDUSTRIAL ESTATE - MOD 7
200 ALDINGTON ROAD, KEMPS CREEK NSW

SSDA MOD 7 ESTATE MASTER PLAN

DATE 10.03.2026 SCALE As indicated@A1 PROJECT NO 25162 MP04 F

**Figure 3-3: Estate Plan**

# 4.0 SEPP Review

## 4.1 Proposed Storage Details

The maximum quantities of products and DGs that are to be stored at the facility, are shown in **Table 4-1**. The data has been estimated to provide some flexibility for units that may potentially store DGs as part of operations within the tenancies. Provided in **Table 4-2** is an assessment of whether the Class is subject to SEPP-RH.

**Table 4-1: DG Classes or Materials Stored and Maximum Quantities**

| Description | Class | PG | Total Quantity | Class Subject to SEPP (Y/N) |
|---|---|---|---|---|
| Forklift cylinders | 2.1 | n/a | 180 kg | Y |
| Aerosols | 2.1 | n/a | 100 kg | Y |
| Carbon dioxide | 2.2 | n/a | 5,000 kg | N |
| Flammable liquids | 3 | II & III | 320 L | Y |

## 4.2 Assessment of Hazards

### 4.2.1 Storage Individual Tenancies

Threshold limits for the application of SEPP-RH are presented in **Table 4-2** along with maximum DG quantities that will be stored in each tenancy.

The results summarised in the table indicates the SEPP-RH criteria is not exceeded; hence, no further assessment would be required. It is noted, that this assessment has been conducted on an individual tenancy; hence, it would be necessary to assess the cumulative impact of the tenancies all holding the DG quantities. This has been conducted in **Section 4.2.2**.

**Table 4-2: Quantities Stored and SEPP-RH Threshold (Individual Tenancies)**

| Description | Class | PG | Quantity | | SEPP-RH Threshold (kg) | Does SEPP-RH Apply? (Y/N) |
|---|---|---|---|---|---|---|
| | | | L | kg | | |
| Forklift cylinders | 2.1 | n/a | - | 140 | 10,000 | N |
| Aerosols | 2.1 | n/a | - | | | |
| Flammable liquids | 3 | II & III | 160 | 160* | 5,000 | N |
| Batteries | 8 | II & III | - | 100 | 50,000 | N |

*Assumed density of 1,000 kg/m$^3$

Threshold limits regarding Placard Quantities as specified by NSW WHS Regulation (Ref. [1]) are presented in **Table 4-3** along with the maximum DG quantities that will be stored in each tenanacy. The result summarised in the table indicates that the quantities of all DGs fall below the Placard Quantities, as required by the DPHI.

**Table 4-3: Quantities Stored and Placard Quantities (Individual Tenancies)**

| Description | Class | PG | Quantity | | Placard Quantity | | Is Placard Quantity Exceeded? (Y/N) |
|---|---|---|---|---|---|---|---|
| | | | L | kg | L | kg | |
| Forklift cylinders | 2.1 | n/a | 180* | 90 | 200 | - | N |
| Aerosols | 2.1 | n/a | 100* | 50 | 5,000 | - | N |
| Flammable liquids | 3 | II | 50 | 50^ | 250 | - | N |
| | | III | 110 | 110^ | 1,000 | - | N |

*Assumed 500 kg/m$^3$

^Assumed 1,000 kg/m$^3$

### 4.2.2 Storage Cumulative

Threshold limits for the application of SEPP-RH are presented in **Table 4-4** along with maximum DG quantities that will be stored at the site. The results summarised in the table indicates the SEPP-RH criteria is not exceeded; hence, no further assessment would be required.

**Table 4-4: Quantities Stored and SEPP-RH Threshold (Cumulative)**

| Description | Class | PG | Quantity | | SEPP-RH Threshold (kg) | Does SEP-RH Apply? (Y/N) |
|---|---|---|---|---|---|---|
| | | | L | kg | | |
| Forklift cylinders | 2.1 | n/a | - | 280 | 10,000 | N |
| Aerosols | 2.1 | n/a | - | | | |
| Flammable liquids | 3 | II & III | 320 | 320 kg | 5,000 | N |

*Assumed density of 1,000 kg/m$^3$

### 4.2.3 Transport

Any DGs stored at the sites will be used for operational purposes; hence, there would be no regular deliveries of DG quantities in packages exceeding the transport limit thresholds. Therefore, the transport thresholds would not be expected to be exceeded by the development.

Therefore, the transport limits within SEPP-RH would not be exceeded; hence, with respect to transport, SEPP-RH does not apply.

## 4.3 Assessment of Offense

SEPP-RH also contains a requirement for review of operations that may cause offense in the form of odour, environmental impact, nuisance (noise), etc. 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 (Ref. [4] and [5]).

A review of the facilities operations 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 or that could result in odour generation or excessive noise. An EPA license would not be required for this site.

Further, there would be no unusual operations that would cause potential odours, or excessive noise in the closest residential areas. Therefore, it is considered that noise generated from the site operations would not exceed the background noise already exposed at residential areas.

In summary, there is no potential for “offensive” operations at the site; therefore SEPP-RH does not apply in this case.

## 5.0 Assessment of Risk with Adjacent Warehouses

Lot E is one of multiple lots containing DGs within the 200 Arlington Rd, Kemps Creek address. Lot E is immediately adjacent to Lot F. The DGs stored in the warehouses assessed by Riskcon are summarised in **Table 5-1.**

However, as the DGs contained in Lot E do not exceed the SEPP-RH thresholds, there is limited additional risk introduced, insofar as the SEPP-RH thresholds are concerned. Thus, a PHA assessing the risk of the warehouses as a collective is not required.

**Table 5-1: DGs Stored in Various Warehouses in the Estate**

| Lot ID | Class | Description | PG | Quantity (kg) | Discussion |
|---|---|---|---|---|---|
| Lot A | 2.1 | Flammable Gas | n/a | 75 | The closest Lot (C) is >880 m away. Cumulative impacts is not expected. |
| | 3 | Flammable Liquid | II & III | 70 | |
| Lot B | 2.1 | Flammable Gas | n/a | 160 | |
| | 3 | Flammable Liquid | II & III | 220 | |
| Lot C | 2.1 | Flammable Gas | n/a | 160 | |
| | 3 | Flammable Liquid | II & III | 220 | |
| Lot E | 2.1 | Flammable Gas (LPG) | n/a | 360 | Lot E is >450 m from Lot O. Cumulative impacts is not expected. |
| | 3 | Flammable Liquid | II & III | 320 | |
| | 8 | Corrosive Substances | II | 200 | |
| Lot F | 2.1 | Flammable Gas (Excluding LPG) | n/a | 162 | Lot F is >430 m from Lot O. Cumulative impacts is not expected. |
| | 2.1 | Flammable Gas (LPG) | n/a | 2,840 | |
| | 2.2 (5.1) | Oxygen | n/a | 48 | |
| | 3 | Flammable Liquid | II & III | 1,250 | |
| | 8 | Corrosive Substances | II | 3,500 | |
| Lot G | 2.1 | Flammable Gas (LPG) | n/a | 8,000 | Lot G is >450 m from Lot O. Cumulative impacts is not expected. |
| | 3 | Flammable Liquid | II & III | 200,000 | |
| | 4.1 | Flammable Solid | III | 4,000 | |
| | 5.1 | Oxidising Agent | III | 4,000 | |
| | 8 | Corrosive Substances | II | 15,000 | |
| | | | III | 40,000 | |
| Lot J | 3 | Flammable Liquid | II & III | 470 | Lot J is >115 m from Lot O. Cumulative impacts is not expected. |
| | C1 | Combustible Liquids | n/a | 205 | |
| | 8 | Corrosive Substances | II | 205 | |
| Lot K | 2.1 | Flammable Gas (LPG) | n/a | 2,500 | Lot K is >120 m from Lot O. Cumulative impacts is not expected. |
| | C1 | Diesel (Fuel) | n/a | 45,630 | |
| | C1 | Diesel (Generator) | n/a | 2,500 | |
| Lot M | 2.1 | Flammable Gas (LPG) | n/a | 1,000 | |

| Lot ID | Class | Description | PG | Quantity (kg) | Discussion |
|---|---|---|---|---|---|
| | 2.3 | Toxic Gas (Anhydrous Ammonia) | n/a | 700 | Lot M is >260 m away from Lot O. Cumulative impacts is not expected. |
| | 3 | Flammable Liquid | II & III | 3,000 | |
| | 8 | Corrosive Substances | II & III | 3,000 | |
| | 9 | Miscellaneous Substances | II & III | 3,000 | |
| | C1 & C2 | Combustible Liquids | II & III | 52,000 | |
| Lot O (this report) | 2.1 | Flammable Gas (LPG) | n/a | 280 | Lot O is below placard levels and unlikely to impact existing sites due to distance and low risk profile. |
| | 2.2 | Non-Flammable, Non-Toxic Gases | n/a | 5,000 | |
| | 3 | Flammable Liquid | II & III | 256 | |

Furthermore, Lots E, F, G, J and K were previously assessed and shown that the quantities stored do not exceed SEPP-RH thresholds, as per the following reports:

- RCE-26006_SFKC-LotABC_SEPP-RH_Draft_26Feb26_Rev(C).
- RCE-25370_SFKC-LotE_SEPP-RH_Final_26Feb26_Rev(1) for Lot E.
- RCE-24293_ SFKC _SEPP-RH_Final_26Feb25_Rev(2) for Lot F.
- RCE-23290_SFKC_SEPP-RH_Final_Final_1Feb24_Rev(1) for Lot G.
- RCE-24727_SFKC_SEPP-RH-Final_20Aug24_Rev(0) for Lot J.
- RCE-25166_SFKC_SEPP-RH_Final_13Jun25_Rev(1) for Lot K.
- RCE-26004_SKFC-LotM_SEPP-RH_Draft_26Feb26_Rev(C) for Lot M.
- RCE-25556_SFKC-LotO_SEPP-RH_Final_19Mar26_Rev(1) for Lot O.

Thus, the development of Lot o will not increase the risk of the Estate, despite the proximity of the warehouses.

# 6.0 Conclusion and Recommendations

## 6.1 Conclusions

A review of the quantities of DGs stored at the proposed facility and the associated vehicle movements was conducted and compared to the threshold quantities outlined in “Applying SEPP 33”. The assessment was conducted both for storage and transport for the DGs, as well as for potential to be either hazardous or offensive.

Class 2.2 DGs are excluded from SEPP-33 thresholds. Additionally, the speculated quantities of Class 2.1 DGs (LPG) and Class 3 DGs (flammable liquids) are much lower than the SEPP-33 thresholds. Thus, the criteria of Chapter 3 of SEPP (Resilience and Hazards) are fulfilled and no further assessment is required.

Furthermore, the introduction of the DGs to Lot O will not increase the risk of the entire estate, which includes Lots A, B,C, E, F, G, J, K and M previously assessed by Riskcon, as the quantity of DGs stored at each warehouse does not exceed SEPP-RH thresholds. Additionally, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

As the facility is not considered ‘potentially hazardous’ or ‘potentially offensive’, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as Chapter 3 of SEPP (Resilience and Hazards) will not apply.

## 6.2 Recommendations

The following recommendations have been made generally for sites storing DGs:

- The DGs shall be stored in a manner which complies with the applicable storage standards (i.e. AS/NZS 1596:2014 or class specific standards such as AS 1940:2017).
- The documentation required by the Work Health and Safety (WHS) Regulation 2025 (Ref. [1]) shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFAIRP) as required by the WHS Regulations.
- Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2022 (Ref. [2]) shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

# 7.0 References

[1] SafeWork NSW, “Work Health and Safety Regulation,” SafeWork NSW, Lisarow, 2025.

[2] Standards Australia, AS/NZS 60079.10.1:2022 - Explosive Atmospheres Part 10.1: Classification of Areas, Explosive Gas Atmospheres, Sydney: Standards Association of Australia, 2022.

[3] Department of Planning, “Applying SEPP 33,” Department of Planning, Sydney, 2011.

[4] “Protection of the Environment Operations (General) Regulation,” 2009.

[5] “Protection of the Environment Operations Act,” 1997.