



State Environmental Planning Policy (Resilience & Hazards)

Bidfood - Charter Hall Light Horse Logistics Hub

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Next Level Up Construction Services

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Executive Summary

Introduction

Next Level Up Construction Services is involved in the development of a warehouse for Bidfood at the Charter Hall Light Horse Logistics Hub – 475 Ferrers Road, Eastern Creek 2766.

To allow for the storage of the Dangerous Goods (DGs), the site requires the preparation of an assessment against Chapter 3 of the State Environmental Planning Policy (Resilience and Hazards) 2021 per the Secretary's Environmental Assessment Requirements (SEARs) to demonstrate the site does not exceed the DG thresholds within Chapter 3. Where an exceedance occurs, a Preliminary Hazard Analysis (PHA) is required to demonstrate the risks are compliant with the land zoning.

Additionally, Conditions B39, B40 & B41 of the SSDA (SSD-67924472) relate to DGs. B39 is satisfied by the conclusion of this report, B40 is satisfied by the "Dangerous Goods Suitability for New Storage Facility" report prepared by Ultra Fire Protection, and B41 is not relevant as no inconsistencies are present.

Architectural drawings are available and **Figure 3-2** shows the site plan from this drawing set of Warehouse 3b.

Riskcon Engineering Pty Ltd (Riskcon) has been engaged to prepare the Chapter 3 SEPP assessment for the site.

Conclusions

A review of the quantities of DGs proposed to be stored at the Bidfood site at Charter Hall Light Horse Logistics Hub – 475 Ferrers Road, Eastern Creek 2766 and the associated vehicle movements was conducted and compared to the threshold quantities outlined in "Applying SEPP 33" (Ref.). The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, Chapter 3 of the SEPP does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as Chapter 3 of the SEPP does 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 3833:2007 or Class specific standards such as AS 1940:2017).
- The documentation required by the Work Health and Safety (WHS) Regulation 2017 (Ref.) shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFARP) as required by the WHS Regulations.
- Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2009 (Ref.) 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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1.0 Introduction

1.1 Background

Next Level Up Construction Services is involved in the development of a warehouse for Bidfood at the Charter Hall Light Horse Logistics Hub – 475 Ferrers Road, Eastern Creek 2766.

To allow for the storage of the Dangerous Goods (DGs), the site requires the preparation of an assessment against Chapter 3 of the State Environmental Planning Policy (Resilience and Hazards) 2021 per the Secretary's Environmental Assessment Requirements (SEARs) to demonstrate the site does not exceed the DG thresholds within Chapter 3. Where an exceedance occurs, a Preliminary Hazard Analysis (PHA) is required to demonstrate the risks are compliant with the land zoning.

Additionally, Conditions B39, B40 & B41 of the SSDA (SSD-67924472) relate to DGs. B39 is satisfied by the conclusion of this report, B40 is satisfied by the "Dangerous Goods Suitability for New Storage Facility" report prepared by Ultra Fire Protection, and B41 is not relevant as no inconsistencies are present.

Architectural drawings are available and **Figure 3-2** shows the site plan from this drawing set of Warehouse 3b.

Riskcon Engineering Pty Ltd (Riskcon) has been engaged to prepare the Chapter 3 SEPP assessment for the site.

1.2 Scope of Work

The scope of work is to prepare a Chapter 3 SEPP assessment for the proposed Bidfood warehouse at Charter Hall Light Horse Logistics Hub – 475 Ferrers Road, Eastern Creek 2766. Should any additional studies be required (i.e. PHA) these are not included within the scope of works. No other sites are included within the scope of works.

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 against the threshold quantities listed in “Applying SEPP 33 – Hazardous and Offensive Development” (Ref. [1]) to identify whether the storage location or quantity triggers Chapter 3 of the SEPP.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33.
- Report on the findings of the assessment.

2.2 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 for each class of DG. **Figure 2-2** indicates the general screening thresholds for DG storage (Table 3 from the document) and **Figure 2-3** indicates the general screening thresholds for vehicular movements (Table 2 from the document).

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

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 or 16 m ³	if stored above ground
	40 tonne or 64 m ³	if stored underground or mounded
2.3	5 tonne	anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale
	1 tonne	chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg
	2.5 tonne	chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg
	100 kg	liquefied gas kept in or on premises
	100 kg	other poisonous gases
4.1	5 tonne	
4.2	1 tonne	
4.3	1 tonne	
5.1	25 tonne	ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary
	5 tonne	ammonium nitrate — elsewhere
	2.5 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers <30 kg
	1 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg
	5 tonne	any other class 5.1
5.2	10 tonne	
6.1	0.5 tonne	packing group I
	2.5 tonne	packing groups II and III
6.2	0.5 tonne	includes clinical waste
7	all	should demonstrate compliance with Australian codes
8	5 tonne	packing group I
	25 tonne	packing group II
	50 tonne	packing group III

Figure 2-2: General Screening Threshold Quantities

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 2-3: Transportation Screening Thresholds

3.0 General Description

3.1 Site Location

The site is known as Charter Hall Light Horse Logistics Hub – 475 Ferrers Road, Eastern Creek 2766. It comprises multiple Lots and Bidfood will be tenanted one half of the Lot 3 Building.

Figure 3-1 shows the regional location of the site in relation to the Sydney CBD. Provided in **Figure 3-2** is the site layout for the industrial estate.

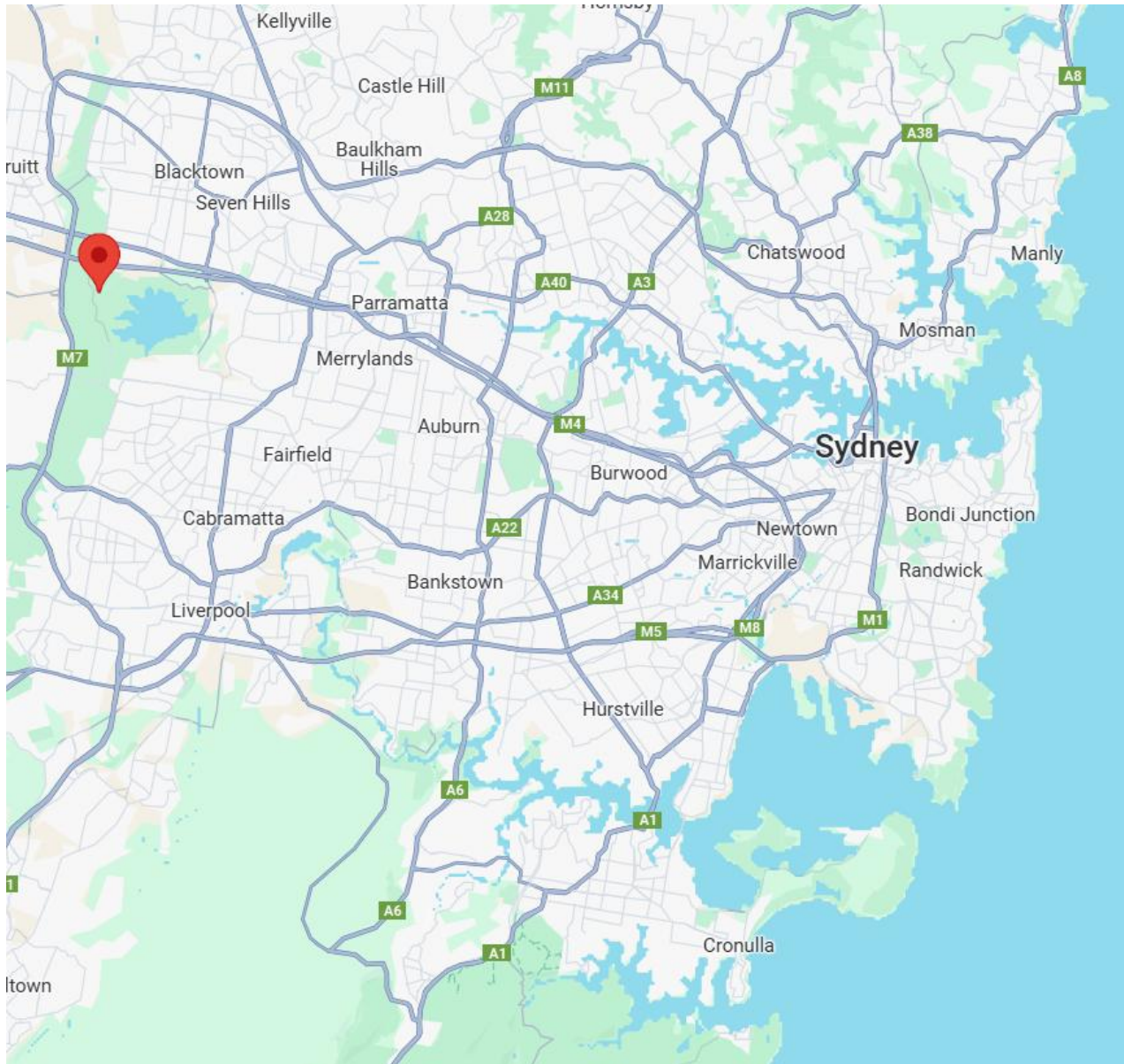


Figure 3-1: Site Location

3.2 Adjacent Land Uses

The warehouses are located within an industrial estate currently being developed by Charter Hall. The exact nature of the adjacent land uses is not established as tenants are not yet in the warehouses; however, all immediately adjacent uses will be industrial in nature with no sensitive land uses within the estate.

3.3 Project Description

This application seeks to modify the approved SSD-67924472 development consent for the Light Horse Business Hub (LHBH). Specifically, the changes are proposed in response to an incoming tenant, secured since the original Lot 3 detailed SSDA was lodged. The changes are submitted in accordance with Section 4.55(1A) of the EP&A Act 1979.

The key features of the proposal are summarised below:

General Changes

- Revised grid line spacing between Grid B and E
- Revised landscape design in front of Office 3A and 3B buildings

Warehouse 3B Changes

- Added new temperature-controlled spaces (Ante Room, Freezer & Chiller) including external refrigeration plant area and a 4.5m high louvre screen in the hardstand area
- Revised egress doors on the East and West elevations to accommodate the new temperature-controlled spaces
- Added new external stairway and egress door on the Western Elevation between Grids 9 and 10
- Revised recessed dock door type to insulated sectional door from a roller shutter
- Added new internal Dock Office (48m²) on the Western Elevation between Grids 6 and 7, resulting in the removal of one roller shutter door
- Reduced warehouse GFA to 6,380m² from 6,580m² due to the addition of the new Dock Office and increased ground floor office area

Office 3B Changes (Ground Floor)

- Increased office GFA to 347m² from 195m² (internal expansion only)
- Revised amenities layout to include additional sanitary facilities, lunchroom and new locker rooms
- Added new fit-out partition walls for a Boardroom, Meeting 1, IT/Comms Room, Manager's Office and Operation Office

Office 3B Changes (Level 1)

- Revised amenities layout to include additional sanitary facilities and relocating the kitchenette
- Added new fit-out partition walls for Office 1, Office 2, Office 3, Meeting 2 and G/M Office

For the complete avoidance of doubt, no other changes are proposed via this modification application to the remainder of the LHBH.

4.0 SEPP 33 Review

4.1 Introduction

Chapter 3 of the State Environmental Planning Policy (Resilience and Hazards) contains the document “Applying SEPP 33” that has been developed under the Environmental Planning and Assessment Act 1979 to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a facility to ensure the risks to surrounding land uses are minimised.

The policy includes a guideline that assists government and industry alike in determining whether Chapter 3 of the SEPP applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [1]) 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, Chapter 3 of the SEPP 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.

4.2 Assessment

4.2.1 Description

Despite existing in a single industrial estate, each warehouse can be considered a standalone site for the purpose of assessment against Chapter 3 of the SEPP.

4.2.2 Proposed Storage Details

Provided in **Table 4-1** is a summary of the maximum quantity of DGs to be stored in the Bidfood tenancy as part of the site operations.

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

Class (PG)	Description	Maximum Quantity (kg)
2.1	Flammable gases (i.e. aerosols)	1,000 / 250*
2.3	Toxic gases (anhydrous ammonia)	450
3 (II & III)	Flammable liquids	3,000
8 (II & III)	Corrosive substances	3,000
9 (II & III)	Miscellaneous substances	3,000
C1 & C2	Combustible liquids	52,474

*Based upon 25% of the aerosol product weight being LPG;

The flammable liquids threshold of “Applying SEPP 33” is based upon the distance to the site boundary; however, this assessment is only required above 5,000 kg and so is not applicable in this case and the storage would not be considered to be potentially hazardous.

4.2.3 Storage Assessment

Threshold limits for the application of Chapter 3 of the SEPP are presented in **Table 4-2** indicating the maximum quantity that can be stored on site for each class. The listed quantities are the aggregate for the entire site.

Table 4-2: Quantities Stored and SEPP 33 Threshold for Overall Storage

Class	Description	Storage Quantity (kg)	SEPP 33 Threshold (kg)	SEPP 33 Exceeded?
2.1	Flammable gases (i.e. aerosols)	1,000 / 250*	10,000	N
2.3	Toxic gases (anhydrous ammonia)	450	5,000	N
3 (II & III)	Flammable liquids	3,000	5,000	N
8 (II & III)	Corrosive substances	3,000	25,000	N
9 (II & III)	Miscellaneous substances	3,000	N/A	N
C1 & C2	Combustible liquids	52,474	N/A	N

*Based upon 25% of the aerosol product weight being LPG;

4.2.4 Transport

The quantities to be stored are less than “Applying SEPP 33” shown in **Figure 2-3** or not applicable; hence, a high turnover of stored product would be required to exceed the transport movements associated with the corresponding storage. This rate of turnover is not credible; hence, it is considered that the transport screening thresholds of “Applying SEPP 33” would not be exceeded and therefore, Chapter 3 of the SEPP would not apply.

4.3 Cumulative Transport Assessment

A review of the warehouses within the industrial estate indicates that even if the sites were all operating with the expected limits of DG storage proposed for each site, the potential to exceed the transport movements of DGs would require a substantial turnover of product which is not considered credible. Therefore, the cumulative assessment of all sites operating would not be considered to exceed the transport thresholds.

5.0 Conclusion and Recommendations

5.1 Conclusions

A review of the quantities of DGs proposed to be stored at the Bidfood site at Charter Hall Light Horse Logistics Hub – 475 Ferrers Road, Eastern Creek 2766 and the associated vehicle movements was conducted and compared to the threshold quantities outlined in “Applying SEPP 33” (Ref. [1]). The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, Chapter 3 of the SEPP does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as Chapter 3 of the SEPP does not apply.

5.2 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 3833:2007 or Class specific standards such as AS 1940:2017).
- The documentation required by the Work Health and Safety (WHS) Regulation 2017 (Ref. [2]) shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFARP) as required by the WHS Regulations.
- Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2009 (Ref. [3]) shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

6.0 References

- [1] Department of Planning, "Applying SEPP 33," Department of Planning, Sydney, 2011.
- [2] SafeWork NSW, "Work Health and Safety Regulation," SafeWork NSW, Lisarow, 2017.
- [3] Standards Australia, AS/NZS 60079.10.1:2009 - Explosive Atmospheres Part 10.1: Classification of Areas, Explosive Gas Atmospheres, Sydney: Standards Association of Australia, 2009.