

SEPP 33 - PRELIMINARY RISK SCREENING

**Proposed Data Centre
1 Sirius Road,
Lane Cove West NSW 2066**

Prepared for:
Greenbox Architecture
Level 25
25 Ligh Street
Sydney NSW 2000

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BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Greenbox Architecture (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
630.12671.00200-R01-v0.5	18 February 2020	Craig Simpson	Liam Munro	Neil Kumar

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1 Introduction

SLR Consulting Australia Pty Ltd (SLR Consulting) has been engaged by Greenbox Architecture to assess the potential impacts of the proposed construction and operation of the Air Trunk Data Centre, at 1 Sirius Road, Lane Cove West, New South Wales (NSW) 2066.

The Development is located at 1 Sirius Road, Lane Cove West, NSW 2066 and comprises the property title Lot 1 on DP 1151370 (the site). The site (**Figure 1**) is within the local government area of Lane Cove Council (Council) (see **Figure 1**). The Development Site is zoned IN2 Light Industry in the Lane Cove Local Environment Plan 2009, as are the Lots surrounding the site (see **Figure 2**).

This Preliminary Risk Screening assessment forms part of the supporting documentation for the Development Application (DA) for the Proposal in accordance with Secretary's Environmental Assessment Requirements (SEARs), which required the following in relation to Land Use Safety:

A preliminary risk screening completed in accordance with Applying SEPP 33 - Hazardous and Offensive Development Application Guidelines (DoP 2011). Should the screening indicate that the development 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). The PHA should estimate the cumulative risks from the existing and proposed development.

The purpose of this report is to provide a screening assessment of the hazards associated with the storage of dangerous goods on the site in accordance with *NSW State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* (SEPP 33). The purpose of the initial SEPP 33 risk screening is to exclude from more detailed studies those developments which do not pose significant risk.

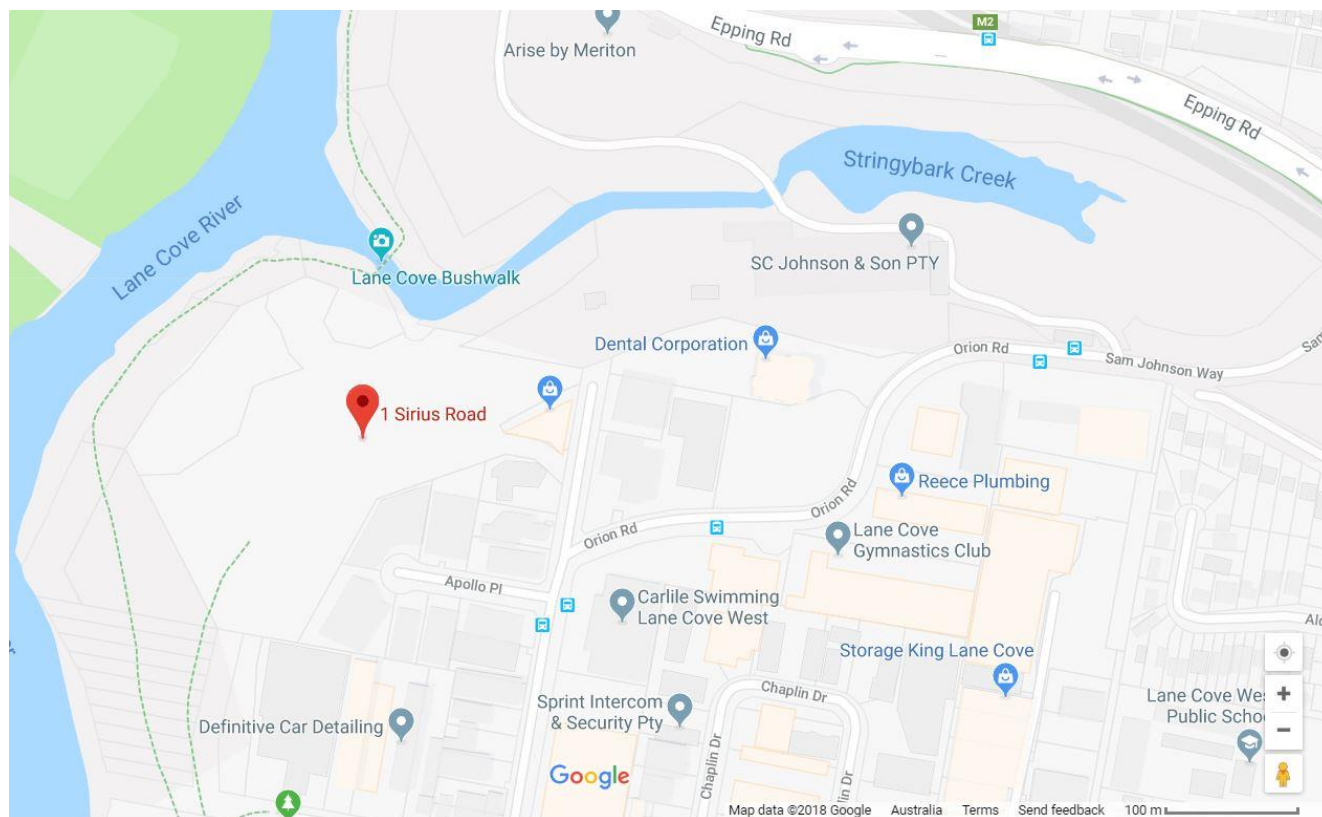
Where SEPP 33 identifies a development as potentially hazardous and/or offensive, developments are required to undertake a Preliminary Hazard Analysis (PHA) to determine the level of risk to people, property and the environment at the proposed location and in the presence of controls.

If the risk levels exceed the criteria of acceptability and/or if the controls are assessed as inadequate, or unable to be readily controlled, then the development is classified as 'hazardous industry'. Where it is unable to prevent offensive impacts on the surrounding land users, the development is classified as 'offensive industry'. Both of these classifications may not be permissible within most industrial zones in NSW.

A development may also be considered potentially hazardous with respect to the transport of dangerous goods. A proposed development may be potentially hazardous if the number of generated traffic movements (for significant quantities of hazardous materials entering or leaving the site) is above the cumulative annual or peak weekly vehicle movements. **Table 2** in the document *Applying SEPP 33: Hazardous and Offensive Development Application Guidelines* (NSW Department of Planning, 2011), outlines the screening thresholds for transportation.

This report presents information pertaining to the presence of any hazardous materials, flammable substances, and compressed or liquefied gases proposed to be stored or handled in relation to the Development Site, including on site storage, or transported to or from the site.

Figure 1 Location of proposed development



Source: Google Map Accessed 17/12/2018

Figure 2 Land Zoning Map (over page)

Figure 2 Land Zoning Map



**Lane Cove Local
Environmental
Plan 2009**

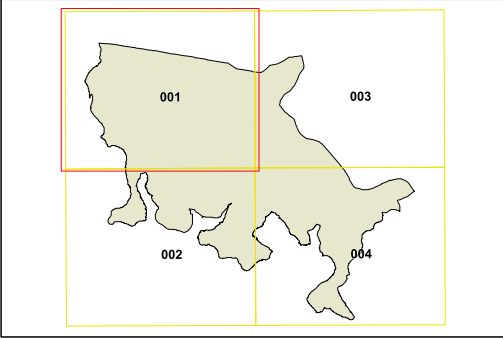
Land Zoning Map - Sheet LZN_001

Zone

- B1** Neighbourhood Centre
- B2** Local Centre
- B3** Commercial Core
- B4** Mixed Use
- E2** Environmental Conservation
- E4** Environmental Living
- IN2** Light Industrial
- IN4** Working Waterfront
- R2** Low Density Residential
- R3** Medium Density Residential
- R4** High Density Residential
- RE1** Public Recreation
- SP2** Infrastructure
- UL** Unzoned Land

Cadastre

- Cadastre 22/12/99 © Land & Property Information (LPI)
- Addendum 22/10/15 © Lane Cove Council

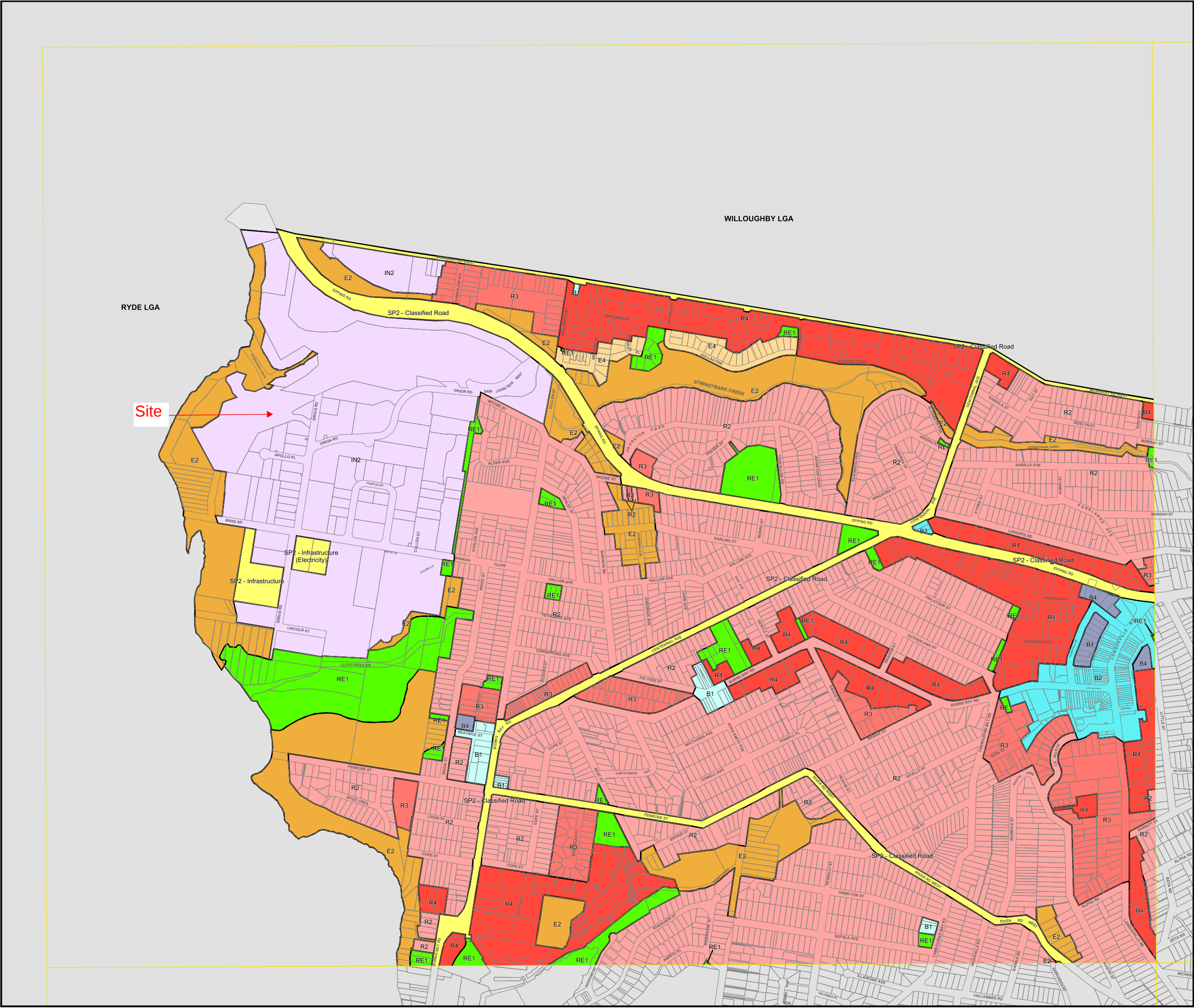


0 200 400 Metres

Projection: GDA 1994
MGA Zone 56

Scale: 1:10,000 @ A3

Map identification number:
4700_COM_LZN_001_010_20151022



2 PROPOSED DEVELOPMENT

2.1 Overview

The Air Trunk Data Centre facility will cater for the storage of data, essentially large halls with server racks. There will be no process related to this facility, other than electronic storage of data. No Dangerous Goods will be required for this operation.

The only potentially hazardous material associated with the facility will be diesel fuel associated with the back-up generators. There will be 116 gen-sets holding a potential total of 1,952,000 L of diesel fuel storage on site. Fuel will be stored within a 4hr rated compartment in the basement (L1) in individual steel tanks. The room is bunded and protected by various leak detection systems. The proposed data centre has established procedures for the safe delivery and handling of fuel.

Generators are periodically fired up for maintenance. Diesel fuel top up would occur infrequently to ensure stocks remain at the required level. Replenishment of stock in significant quantities would only occur in the event of a major power failure to the site.

2.2 Hours of Operation

The proposed development will operate 24 hours a day, seven days a week.

2.3 Vehicular Access and Parking

Access to the Development Site will be via Sirius Road (refer **Figure 1**).

3 SURROUNDING LAND USES AND ZONING

Under the provision of the Lane Cove Local Environmental Plan (LEP) 2009, the Development Site is zoned IN2 Light Industrial as is the land surrounding the site. (see **Figure 2**).

In accordance with the LEP, within land zoned IN2 Light Industrial.

Those land uses permissible with consent in the IN2 zone are:

Car parks; Centre-based child care facilities; Community facilities; Depots; Food and drink premises; Garden centres; Hardware and building supplies; Industrial training facilities; Light industries; Medical centres; Neighbourhood shops; Places of public worship; Recreation areas; Recreation facilities (indoor); Respite day care centres; Roads; Self-storage units; Sex services premises; Signage; Vehicle body repair workshops; Vehicle repair stations; Vehicle sales or hire premises; Warehouse or distribution centres

Those land uses prohibited in the IN2 zone are:

Any development not specified above.

The Development Site is located in within land zoned IN2 Light Industrial. The nearest residential area is identified on Epping Road, located approximately 280 metres to the north-east of the site.

Details of neighbouring properties and distance to residential properties have been set out in **Table 1** and **Figure 3**.

Table 1 Neighbouring properties and distance to residential properties

Direction	Approximate Distance from Boundary of Development Site	Company/Operations	Use of Premises
East	50 m	2 Apollo Place – Currently vacant	Light Industry
East North East	70 m	1 Apollo Place – CGI (IT company) 1 Apollo Place - Zumbo	Office use Commercial kitchen use
East South East	100 m	3 Apollo Place – Heyday Group	Office use
South	140 m	91 Mars Road – Fast Future Brands -	Warehouse distribution and ancillary office
North	280 m	Residence	Residential

Figure 3 Neighbouring properties to 1 Sirius Rd Lane Cove



4 PRELIMINARY RISK SCREENING

Preliminary risk screening of the proposed development is required under SEPP 33 to determine the need for a Preliminary Hazard Analysis (PHA). The preliminary screening assesses the storage of specific dangerous goods classes that have the potential for significant, off-site effects. Specifically, the assessment involves the identification of classes and quantities of all dangerous goods to be used, stored or produced on site with respect to storage depot locations as well as transported to and from the site.

4.1 Dangerous Goods Storage

There are no Dangerous Goods to be used or stored at the facility and therefore the facility is not considered potentially hazardous.

Diesel fuel to be stored on site, is not classed as a Dangerous Goods, but is classed as a C1 Combustible Liquid provided no flammable liquids are stored with the diesel.

SLR has been advised that no flammable liquids will be stored with the diesel. Therefore in the proposed development diesel will be classed as a C1 Combustible Liquid.

Note that C1 combustible liquids are not a dangerous good under UN (United Nations) classification. However, they are defined as dangerous goods under NSW workplace legislation. Where dangerous goods are used or stored in volumes greater than the manifest quantities specified in schedule 11 of the Work Health and Safety Regulation 2017, Safework NSW must be notified, which will include manifests and lodgement an emergency plan to Fire and Rescue NSW. Further advice on these requirements should be sort from Safework NSW.

It should be noted that the Protection of the Environment Operations Act 1997, Schedule 1, Clause 9(1) indicates that 'petroleum products storage', which would include diesel fuel storage, is a Scheduled Activity. Capacity to store greater than 2,000 tonnes requires an environment protection licence under the Protection of the Environment Operations Act 1997 (POEO Act), from the NSW Environmental Protection Authority (EPA).

The proposed inventory of diesel, and classification is provided in **Table 2** below.

Table 2 Classification of Diesel in Storage*

Substance	Hazardous Class	Packing Group	Combustible Liquid Class	Total Storage on Site	Manifest Quantity	SEPP 33 Threshold Level Findings
Diesel	Not applicable	-	C1	1,952,000 litres	100,000 kg or litres	Safework NSW notification required
				Equivalent to 1,651 tonnes [^]	2,000 tonnes	Environmental Protection Licence under (POEO Act) not required from NSW EPA

* Information provided by Greenbox Architecture;

[^] Conversion based on 1,182 L per tonne for automotive, source: Department of the Environment and Energy diesel (use of automotive diesel as advised by A W Edwards Pty Limited)

4.2 Dangerous Goods Transport

There will be no transport of Dangerous Goods associated with the facility.

5 PRELIMINARY RISK SCREENING CONCLUSION

This report has reviewed and applied the requirements of SEPP 33 in order to determine whether the policy applies to the Project.

The SEPP33 screenings for storage of dangerous goods indicate that the development may not be classified as a hazardous or offensive industry.

It is the conclusion that the proposed development with suitable engineering and design controls in place, meets all the requirements stipulated by the Department of Planning and Environment, and hence would not be considered, to be an offensive or hazardous development on site.

Under the Protection of the Environment Operations Act 1997, Schedule 1, Clause 9(1) 'petroleum products storage', which would include diesel fuel storage, is a Scheduled Activity. Capacity to store greater than 2,000 tonnes requires an environment protection licence from the NSW Environmental Protection Authority (EPA). Under the current design the storage capacity at 1,651 tonnes is not expected to require an environment protection licence.

However, the volume of diesel fuel storage exceeds the manifest quantities for C1 combustible liquids specified in schedule 11 of the Work Health and Safety Regulation 2017. Therefore, Safework NSW must be notified, which will include manifests and lodgement an emergency plan to Fire and Rescue NSW. Further advice on these requirements should be sort from Safework NSW.

6 REFERENCES

Commonwealth Government, 2014, Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Number 7.3).

Department of the Environment and Energy (2017), Guide to the Australian Energy Statistics 2017, Canberra, August.

Department of Planning NSW, 2011, Applying SEPP 33 - Hazardous and Offensive Development Application Guidelines.

NSW Government Code of Practice Managing Risks of Hazardous Chemicals in the Workplace, August 2019

NSW Government Notifications of Schedule 11 Hazardous Chemicals and Abandoned Tanks – Guidance Material. Safework NSW

Planning NSW, 2011 Risk Criteria for Land Use Safety Planning – Hazardous Industry Planning Advisory Paper No 4, New South Wales Government

Planning NSW, 2011 Hazard Analysis – Hazardous Industry Planning Advisory Paper No 6, New South Wales Government

State Environmental Planning Policy No. 33-Hazardous and Offensive Development.

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