

SEPP 33 - PRELIMINARY RISK SCREENING & HAZARD ASSESSMENT

**Lots 107, 63 & 10 Clunies Ross Street,
Greystanes NSW 2145**

Prepared for:

ISPT Pty Ltd
Level 11
8 Exhibition Street
Melbourne VIC 3000

SLR Ref: 620.13835.00000-R01
Version No: -v1.0
June 2020



PREPARED BY

SLR Consulting Australia Pty Ltd
ABN 29 001 584 612
Tenancy 202 Submarine School, Sub Base Platypus, 120 High Street
North Sydney NSW 2060 Australia

T: +61 2 9427 8100
E: sydney@slrconsulting.com www.slrconsulting.com

BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with ISPT Pty Ltd (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 |
|--------------------------|-------------|---------------|--------------|------------|
| 620.13835.00000-R01-v1.0 | 4 June 2020 | Craig Simpson | Ewan Cummins | Neil Kumar |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

CONTENTS

| | | |
|----------|--|-----------|
| 1 | INTRODUCTION | 4 |
| 2 | PROPOSED DEVELOPMENT | 7 |
| 2.1 | Over view | 7 |
| 2.2 | Hours of Operation | 9 |
| 2.3 | Vehicular Access and Parking | 9 |
| 3 | SURROUNDING LAND USES AND ZONING | 9 |
| 4 | PRELIMINARY RISK SCREENING | 10 |
| 4.1 | Dangerous Goods Storage | 10 |
| 4.2 | Dangerous Goods Transport | 11 |
| 5 | PRELIMINARY RISK SCREENING CONCLUSION | 11 |
| 6 | REFERENCES | 11 |

DOCUMENT REFERENCES

TABLES

| | | |
|---------|--|----|
| Table 1 | Neighbouring properties and distance to properties | 9 |
| Table 2 | Dangerous Goods Classes in Storage* | 10 |
| Table 3 | Dangerous Goods Vehicle Movements* | 11 |

FIGURES

| | | |
|----------|---|---|
| Figure 1 | Location of proposed development | 5 |
| Figure 2 | Land zoning map (see overleaf) | 5 |
| Figure 3 | State Environmental Planning Policy (Western Sydney Employment Area) 2009 Land Zoning Map (see overleaf) | 5 |
| Figure 4 | Warehouse concept plan (overleaf) | 7 |
| Figure 5 | Warehouse concept plan | 8 |

1 Introduction

SLR Consulting Australia Pty Ltd (SLR Consulting) has been engaged by ISPT Pty Ltd (ISPT) to assess the potential impacts of the proposed construction and operation of the a warehouse complex at 44 Clunies Ross Street, Pemulwuy New South Wales (NSW) 2145.

The Development is located at 44 Clunies Ross Street, Pemulwuy, NSW 2145 and 615A Great Western Highway, Greystanes NSW 2145 and Lot 107 in DP1028208 (the site). The site (Figure 1) is within the local government areas of Cumberland City Council and Blacktown City Council (Council) (see Figure 1). The Development Site is zoned IN1 General Industrial in the State Environmental Planning Policy (Western Sydney Employment Area) 2009 Land Zoning Map (see Figure 2 & Figure 3).

This Preliminary Risk Screening assessment forms part of the supporting documentation for the State Significant Development Application (SSDA) for the Proposal in accordance with Secretary's Environmental Assessment Requirements, which included 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.

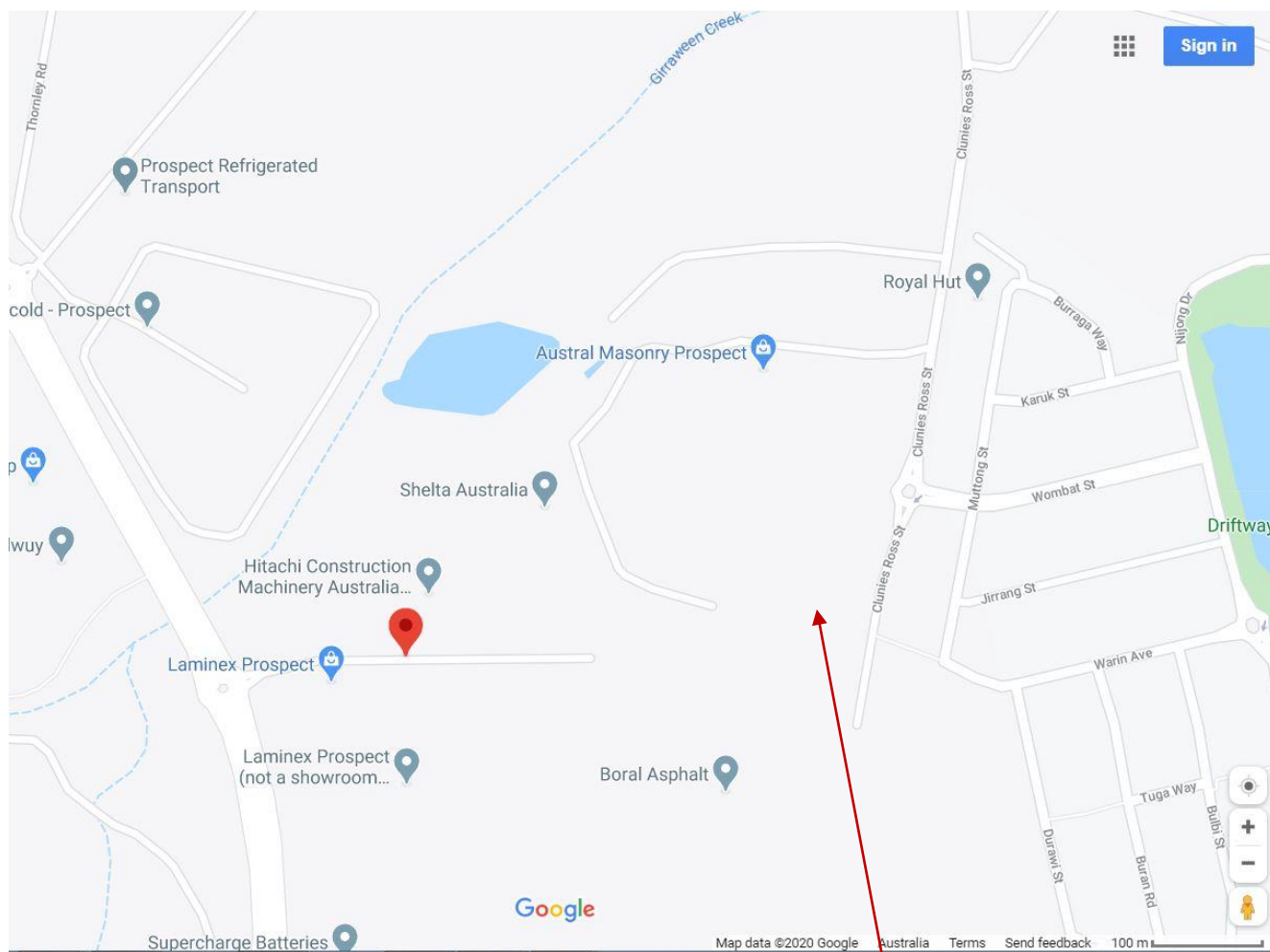
Where SEPP 33 identifies a development as potentially hazardous and/or offensive, developments are required to undertake a Preliminary Hazard Analysis (PHA) to determine the level of risk to people, property and the environment at the proposed location and in the presence of controls.

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 15/05/202

Location of proposed development

Figure 2 Land zoning map (see overleaf)

Figure 3 State Environmental Planning Policy (Western Sydney Employment Area) 2009 Land Zoning Map (see overleaf)



Holroyd Local Environmental Plan 2013

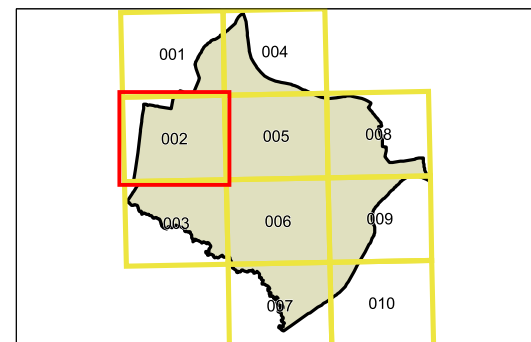
Land Zoning Map Sheet LZN_002

Zone

- B1 Neighbourhood Centre
- B2 Local Centre
- B4 Mixed Use
- B5 Business Development
- B6 Enterprise Corridor
- E2 Environmental Conservation
- IN1 General Industrial
- IN2 Light Industrial
- R2 Low Density Residential
- R3 Medium Density Residential
- R4 High Density Residential
- RE1 Public Recreation
- RE2 Private Recreation
- SP2 Infrastructure
- UL Unzoned Land
- SS SEPP (State Significant) 2005
- WSE SEPP (Western Sydney Employment Area) 2009

Cadastre

- Cadastre 07/07/2017 © Cumberland Council

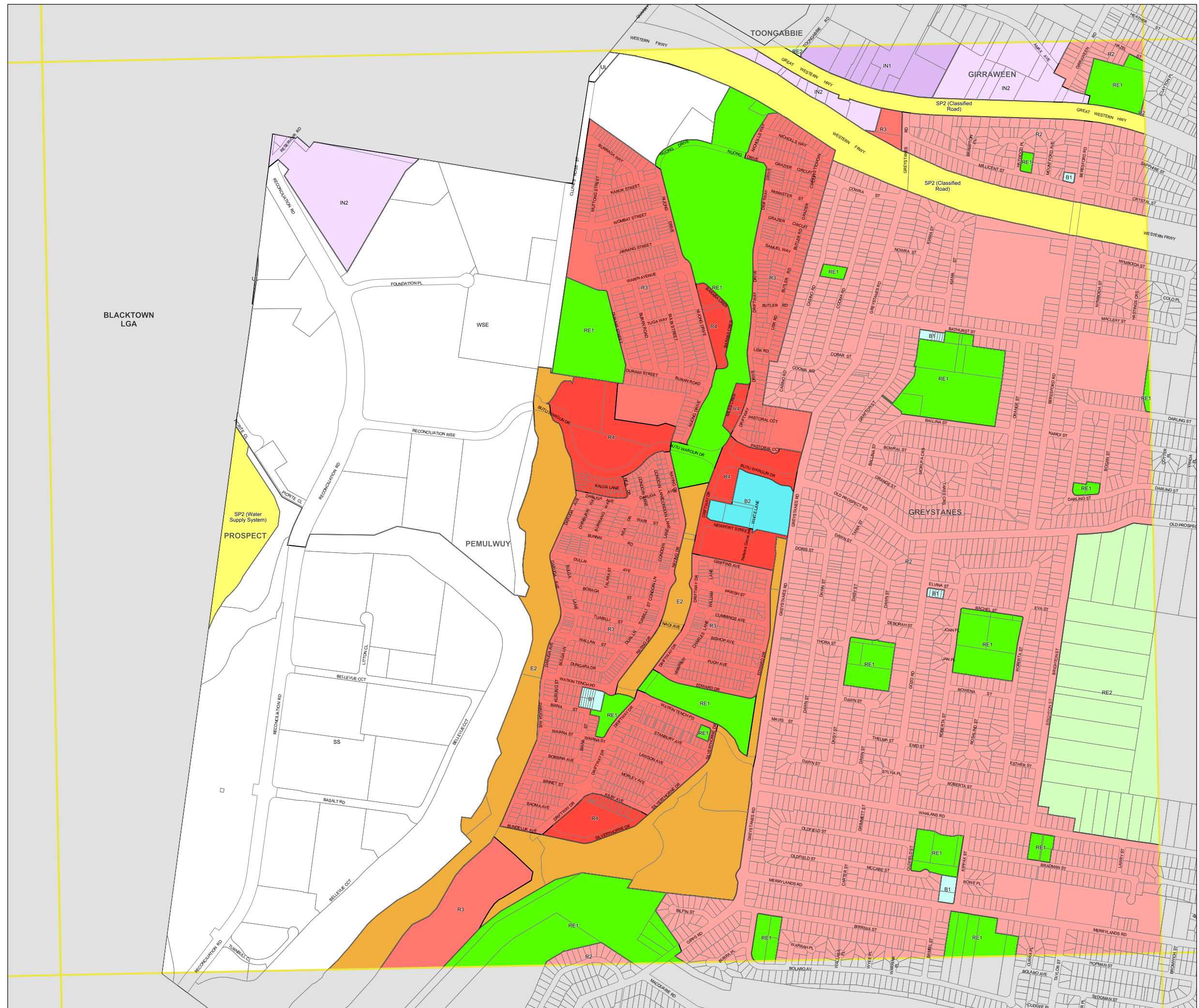


0 50 100 150 200 250 300 350 400
Metres

Scale 1: 10,000 @ A3

Projection: GDA 1994
MGA Zone 56

Map identification number:
3950_COM_LZN_002_010_20170707



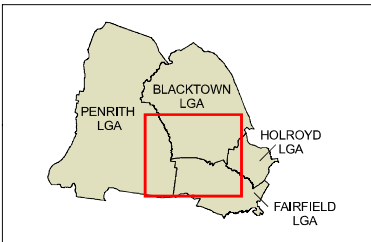


NSW GOVERNMENT
Department of Planning

State Environmental Planning Policy (Western Sydney Employment Area) 2009 Land Zoning Map

sheet LZN 001

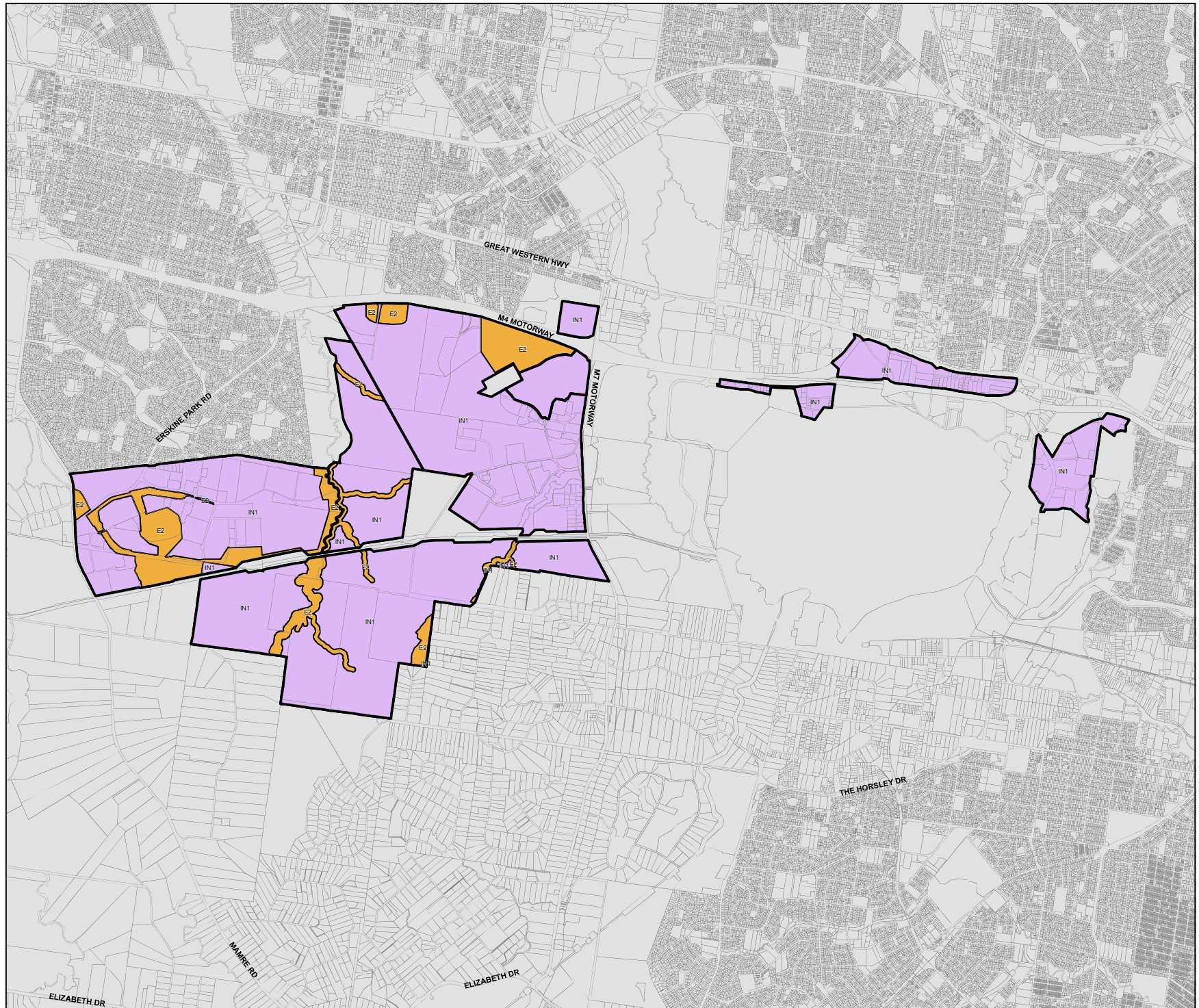
- Subject Land**
- Zone**
- E2** Environmental Conservation
 - IN1** General Industrial
- Cadastre**
- Cadastre 04/08/2009 © Dept of Lands



Projection: MGA Zone 56
Datum: GDA94

Scale: 1:50,000 @ A3

Map Identification Number
SEPP_WSEA_LZN_001_20090805



2 PROPOSED DEVELOPMENT

2.1 Over view

The development consists of seven warehouses. Warehouses 2-7 in the concept plan (attached) will be standard warehouse and distribution centres and are not anticipated to store high quantities of dangerous goods. If a future tenant in these buildings require storage of dangerous goods, then a consent for this should be sought as modification/separate application.

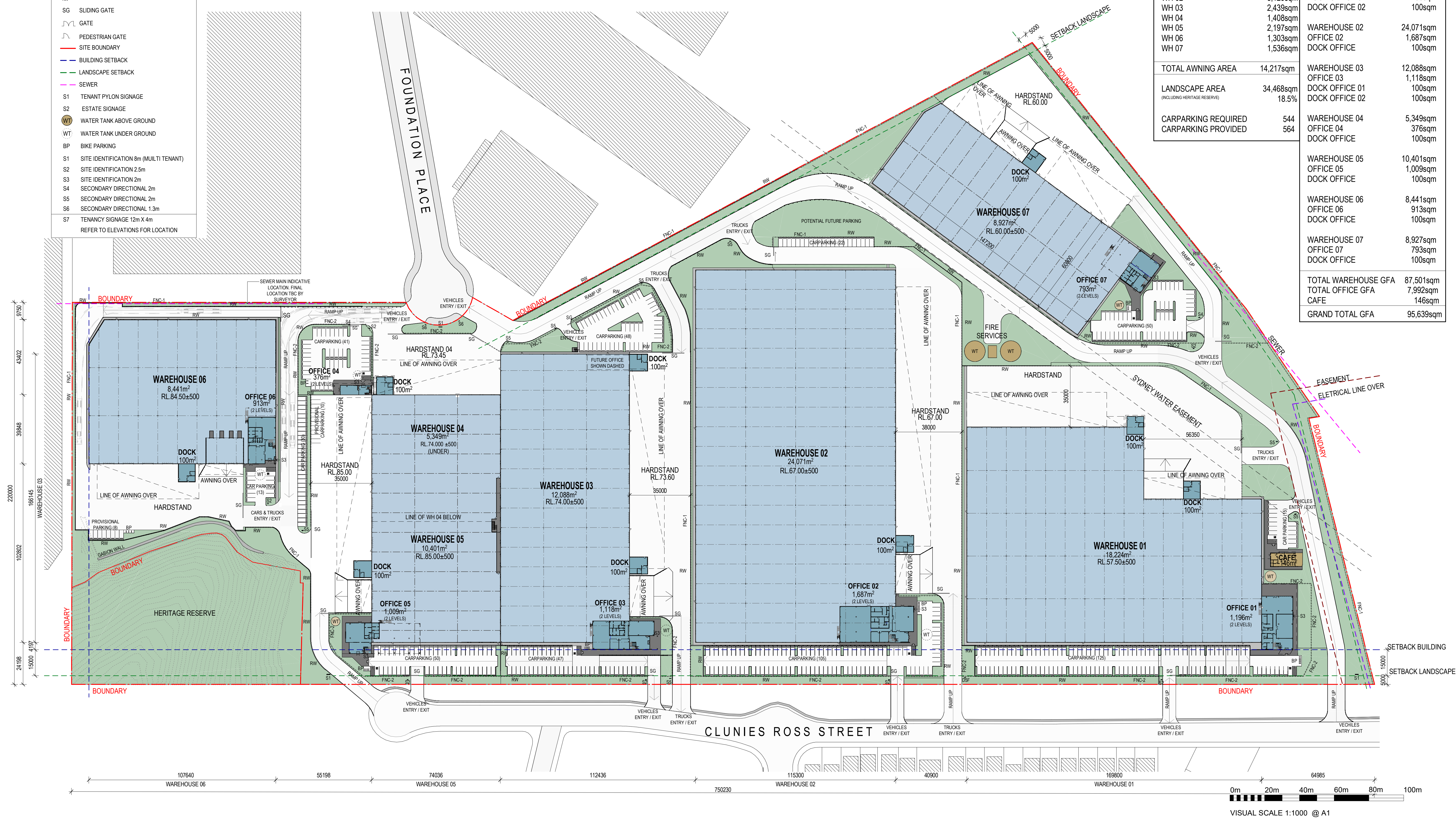
Warehouse 1 in the concept plan will be a 42m-high fridge/freezer high bay facility.

The concept plan has been set out in **Figure 4** (see over page).

Figure 4 Warehouse concept plan (overleaf)

| SITE LEGEND | |
|-------------|---------------------------------------|
| | FNC-1, CHAINMESH FENCING |
| | FNC-2, PALISADE FENCING |
| | RETAINING WALL - INDICATIVE |
| | SLIDING GATE |
| | GATE |
| | PEDESTRIAN GATE |
| | SITE BOUNDARY |
| | BUILDING SETBACK |
| | LANDSCAPE SETBACK |
| | SEWER |
| | TENANT PYLON SIGNAGE |
| | ESTATE SIGNAGE |
| | WATER TANK ABOVE GROUND |
| | WATER TANK UNDER GROUND |
| | BIKE PARKING |
| | SITE IDENTIFICATION 8m (MULTI TENANT) |
| | SITE IDENTIFICATION 2.5m |
| | SITE IDENTIFICATION 2m |
| | SECONDARY DIRECTIONAL 2m |
| | SECONDARY DIRECTIONAL 2m |
| | SECONDARY DIRECTIONAL 1.3m |
| | TENANCY SIGNAGE 12m X 4m |
| | REFER TO ELEVATIONS FOR LOCATION |

| AREA SCHEDULE (GFA) | | AREA SCHEDULE (GFA) | |
|--|-----------|---|----------------------|
| SITE COVERAGE | 51.2% | SITE AREA (INCLUDING HERITAGE RESERVE) | 186,596.5 sqm |
| AWNINGS AREA | | WAREHOUSE 01 | 18,224sqm |
| WH 01 | 2,205sqm | OFFICE 01 | 1,196sqm |
| WH 02 | 3,129sqm | DOCK OFFICE 01 | 100sqm |
| WH 03 | 2,439sqm | DOCK OFFICE 02 | 100sqm |
| WH 04 | 1,408sqm | WAREHOUSE 02 | 24,071sqm |
| WH 05 | 2,197sqm | OFFICE 02 | 1,687sqm |
| WH 06 | 1,303sqm | DOCK OFFICE | 100sqm |
| WH 07 | 1,536sqm | WAREHOUSE 03 | 12,088sqm |
| TOTAL AWNING AREA | 14,217sqm | OFFICE 03 | 1,118sqm |
| LANDSCAPE AREA (INCLUDING HERITAGE RESERVE) | | DOCK OFFICE 01 | 100sqm |
| | 34,468sqm | DOCK OFFICE 02 | 100sqm |
| | 18.5% | WAREHOUSE 04 | 5,349sqm |
| CARPARKING REQUIRED | 544 | OFFICE 04 | 376sqm |
| CARPARKING PROVIDED | 564 | DOCK OFFICE | 100sqm |
| | | WAREHOUSE 05 | 10,401sqm |
| | | OFFICE 05 | 1,009sqm |
| | | DOCK OFFICE | 100sqm |
| | | WAREHOUSE 06 | 8,441sqm |
| | | OFFICE 06 | 913sqm |
| | | DOCK OFFICE | 100sqm |
| | | WAREHOUSE 07 | 8,927sqm |
| | | OFFICE 07 | 793sqm |
| | | DOCK OFFICE | 100sqm |
| | | TOTAL WAREHOUSE GFA | 87,501sqm |
| | | TOTAL OFFICE GFA | 7,992sqm |
| | | CAFE | 146sqm |
| | | GRAND TOTAL GFA | 95,639sqm |



The only potentially hazardous material associated with the facility will be ammonia refrigerant used in closed systems.

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 Clunies Ross Street (refer Figure 1).

3 SURROUNDING LAND USES AND ZONING

Under the provision of the State Environmental Planning Policy (Western Sydney Employment Area) 2009, the Development Site is zoned IN1 General Industrial as is the land surrounding the site to the north east, south and west.

The land to east of the site is zoned R3 Medium Density Residential.

Those land uses permissible with consent in the IN1 zone are:

Permitted with consent

Building identification signs; Business identification signs; Depots; Food and drink premises; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Heliports; Industrial training facilities; Kiosks; Light industries; Neighbourhood shops; Oyster aquaculture; Places of public worship; Roads; Tank-based aquaculture; Warehouse or distribution centres; Vehicle sales or hire premises; Any other development not specified in item 2 or 4

Table 1 Neighbouring properties and distance to properties

| Direction | Approximate Distance from Boundary of Development Site | Company/Operations | Use of Premises |
|-----------|--|--|--|
| North | Adjacent boundary | Austral Masonry | Manufacturing pavers, bricks, etc |
| West | 30 m | ARJO Australia | Medical and physiotherapy equipment supplier |
| West | 45 m | Hitachi Construction Machinery Australia | Construction machinery |
| East | 50 m | Residential dwellings | homes |
| South | Adjacent boundary | Boral Asphalt | Asphalt supply |

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

The proposed inventory of Dangerous Goods (DG) in accordance with the Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Code) is provided in Table 2 below.

The information contained in the table compares the total storage quantity of the required dangerous goods classes against the storage screening threshold in Table 3, and Figure 9 of Applying SEPP 33 (NSW Department of Planning, 2011).

The dangerous goods to be stored on the site were grouped into their respective ADG classes. If more than one packaging group was present in an ADG class it was assumed that the total amount for that class was the more hazardous packing group.

The only Dangerous Goods to be used or stored at the facility is ammonia for use in the closed refrigeration system. The amount of ammonia used on site will be dependent on the refrigeration system employed but is expected to be less than 5 tonnes.

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

Table 2 Dangerous Goods Classes in Storage*

| Substance | Hazardous Class | Packing Group | Total Storage on Site | Threshold Quantity | SEPP 33 Threshold Level Findings |
|---|---|---------------|-----------------------|--------------------|----------------------------------|
| Ammonia (in closed loop refrigerant system) | Dangerous Goods Class 2.3 Sub Risk Class 8 | - | Less than 5 tonnes. | 5 tonnes | Below threshold |

* Information provided by ISPT Pty Ltd

The proposed dangerous goods planned to be stored on site is within the screening thresholds and therefore is not considered potentially hazardous.

The Project includes the use of ammonia in a closed system. The technical and management safeguards required in place for ammonia in closed loop refrigerant systems are self-evident and readily implemented as part of plant safety engineering.

Given consideration of the above engineering controls, the Project may not require the preparation of a Preliminary Hazard Analysis.

4.2 Dangerous Goods Transport

In applying SEPP 33 a proposed development may be deemed potentially hazardous if the numbers of generated traffic movements for significant quantities of dangerous goods entering and leaving the site, are above the cumulative vehicle movements shown in Table 2 of the SEPP 33 guideline. The levels of maximum proposed movements at the site per week are provided below in Table 3. Note that the annual levels directly reflect the weekly vehicle movements.

Table 3 Dangerous Goods Vehicle Movements*

| ADG Class | Substance | Maximum Proposed DGs Vehicle Movements (per week) | SEPP 33 Threshold Vehicle Movements (per week) | SEPP 33 Threshold Minimum Quantity per load (tonne) | SEPP 33 Threshold Level Findings |
|-----------|---------------------------|---|--|---|----------------------------------|
| Ammonia | Dangerous Goods Class 2.3 | <1 | >6 | 1 | Below |

Note: Assumes each dangerous good class is transported separately.

* Information provided by ISPT Pty Ltd

There will be no regular 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.

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

ASIA PACIFIC OFFICES

BRISBANE

Level 2, 15 Astor Terrace
Spring Hill QLD 4000
Australia
T: +61 7 3858 4800
F: +61 7 3858 4801

CANBERRA

GPO 410
Canberra ACT 2600
Australia
T: +61 2 6287 0800
F: +61 2 9427 8200

DARWIN

Unit 5, 21 Parap Road
Parap NT 0820
Australia
T: +61 8 8998 0100
F: +61 8 9370 0101

GOLD COAST

Level 2, 194 Varsity Parade
Varsity Lakes QLD 4227
Australia
M: +61 438 763 516

MACKAY

21 River Street
Mackay QLD 4740
Australia
T: +61 7 3181 3300

MELBOURNE

Level 11, 176 Wellington Parade
East Melbourne VIC 3002
Australia
T: +61 3 9249 9400
F: +61 3 9249 9499

NEWCASTLE

10 Kings Road
New Lambton NSW 2305
Australia
T: +61 2 4037 3200
F: +61 2 4037 3201

PERTH

Ground Floor, 503 Murray Street
Perth WA 6000
Australia
T: +61 8 9422 5900
F: +61 8 9422 5901

SYDNEY

Tenancy 202 Submarine School
Sub Base Platypus
120 High Street
North Sydney NSW 2060
Australia
T: +61 2 9427 8100
F: +61 2 9427 8200

TOWNSVILLE

12 Cannan Street
South Townsville QLD 4810
Australia
T: +61 7 4722 8000
F: +61 7 4722 8001

WOLLONGONG

Level 1, The Central Building
UoW Innovation Campus
North Wollongong NSW 2500
Australia
T: +61 404 939 922

AUCKLAND

68 Beach Road
Auckland 1010
New Zealand
T: 0800 757 695

NELSON

6/A Cambridge Street
Richmond, Nelson 7020
New Zealand
T: +64 274 898 628