



5 Millner Avenue
HORSLEY PARK NSW
(Lot 2B – Oakdale Central Warehouse Distribution Centre)

S.96(1A) Application to vary SSD 6078

Statement of Environmental Effects



Prepared for DHL Supply Chain (Australia) Pty Ltd
Issue A – J17061
23 October 2017

1. Introduction

This is a Statement of Environmental Effects (SEE) relating to proposed modifications to the approved development at 5 Millner Avenue (Lot 2B within the Oakdale Central Warehouse Distribution Centre), Horsley Park for the storage of additional Dangerous Goods (DGS) classes and volumes. The proposed development is described in the Preliminary Hazard Analysis (PHA) Report, including plans, prepared by Blackie Mendham, Industrial Fire and Risk Engineering.

Specifically, the proposal is to modify State Significant Development 6078 (SSD 6078), Condition 4C. The proposed modifications are detailed on Blackie Mendham Plans:

- Figure 3-2 Lot 2B Dangerous Goods Locations Racking Layout
- Figure 3.3 Lot 2B Warehouse Layout

This SEE is divided into the following sections. Part 2 describes the site and its locality. Part 3 describes the **approved** development on the site. Part 4 describes the **proposed** development on the site. Part 5 sets out the relevant town planning controls and considers the proposal in relation to those controls. Part 6 sets out concluding comments.

2. Description of the site and its locality

The subject site is 5 Millner Avenue (Lot 2B within Oakdale Central), Horsley Park, comprising part Lot 21, DP1173181 (Figures 1 & 2). This land is owned by BGAI 6 Pty Limited, with a lease to DHL Supply Chain (Australia) of 2B, 5 Millner Avenue, expiring 16/5/2026 with a 5-year option of renewal and a further 2 options of 5-year renewals.

The site is located on the southern side of Millner Avenue which is a cul-de-sac that runs off Old Wallgrove Road, Horsley Park. Millner Avenue is a locally classified road serving Oakdale Central. The distance by road from the intersection of Millner Avenue and Old Wallgrove Road to the M7 Westlink is 3.3 kilometres.

The site is within the Fairfield City Council Local Government Area.

Consent was granted by a delegate for the Minister for Planning (SSD 13_6078) for the staged construction and operation of warehouse, distribution and freight transport facilities in 3 buildings on Lot 21, DP1173181. There has subsequently been 8 modifications to the original consent. The original consent and modifications relevant to Lot 2B are detailed in Part 3 of this report.

The development at 5 Millner Avenue (Lot 2B) is a warehouse operated by DHL Supply Chain (Australia) Pty Ltd (DHL). External photographs of the site are provided as Figures 3 & 4 and internal photographs as Figures 5 & 6. The warehouse has a total floor area of 29,500 square metres, including two DGS stores (Figures 7 & 8). The facility was approved for several classes of DGS, as part of SSD 6078 MOD 2, as detailed in Part 3 of this report. The warehouse also includes an office area and amenities for staff. There are 50 office staff on-site and some 150 warehouse staff, working on shift rotation.

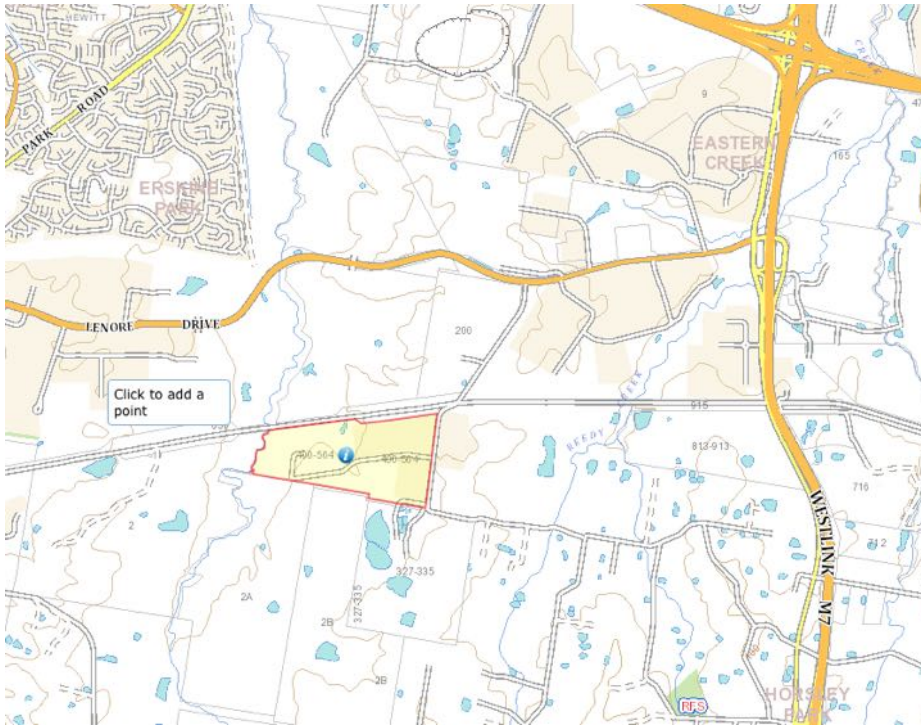


Figure 1: Location of the Oakdale Central - Source NSW Government Six Maps



Figure 2: Aerial photo of the site and locality - Source NSW Government Six Maps



Figure 3: 5 Millner Avenue (Lot 2B, Oakdale Central), Horsley Park



Figure 4: 5 Millner Avenue (Lot 2B, Oakdale Central), Horsley Park – Loading Dock



Figure 5: 5 Millner Avenue (Lot 2B, Oakdale Central), Horsley Park - Internal



Figure 6: 5 Millner Avenue (Lot 2B, Oakdale Central), Horsley Park - Internal



Figure 7: 5 Millner Avenue (Lot 2B, Oakdale Central), Horsley Park – Dangerous Goods Store - External



Figure 8: 5 Millner Avenue (Lot 2B, Oakdale Central), Horsley Park – Dangerous Goods Store – Internal

3. Approved Development on the site

SSD 6078 was approved by the delegate of the Minister for Planning on 18 March 2015. The approval was for the staged construction and operation of three warehouse, distribution and freight transport facilities on lots 1C, 2B and 3 at Oakdale Central, Horsley Park, and the upgrade of the Old Wallgrove Road between Milner Avenue and Lenore Drive.

There have been 8 subsequent approved modifications to SSD 6078, of which MOD 2, MOD 3, MOD 4 and MOD 8 relate to the warehouse on Lot 2B.

SSD 6078 MOD 2 amended the layout of the warehouse on Lot 2B including the reconfiguration of the loading docks and office; the addition of a dangerous goods store; and conversion of 22,280m² of warehouse floorspace to a temperature controlled facility. New Conditions were inserted into the Development Consent for SSD 6078 including Conditions 4B and 4C into Schedule 2. Conditions 4B and 4C provided the controls for the size (m²) of the 2 new DGS stores and the classes and quantities of DGS to be stored. Conditions 4B and 4C were subsequently amended by MOD 3.

SSD 6078 MOD 3 amended the layout of the warehouse on Lot 2B to include the repositioning and increasing the size of the dangerous goods store (DGS), increasing the temperature control position of the warehouse, removal of the truck wash, reduction in awning and minor changes to the building façade. Conditions 4B and 4C were amended and changed to the following:

“4B. The Applicant must ensure that the total area of:

- (a) the warehouse on Lot 2B does not exceed 31,081m²;
- (b) the dangerous goods area 1 in the warehouse on Lot 2B does not exceed 2,310m²; and
- (c) the dangerous goods area 2 in the warehouse on Lot 2B does not exceed 350m².

4C. The storage of dangerous goods on-site shall not exceed the quantities provided in Table 1 at any one time.

Table 1: Dangerous Goods Storage

Hazardous Material	Dangerous Goods Class	Packing Group	Total Store Capacity (kg and L or Kg)
Flammable gases	2.1	N/A	90,000 kg
Flammable liquids	3	II & III	900,000 L
Oxidising agents	5.1	II & III	45,000 kg
Corrosive substances	8	II & III	20,000 kg
Miscellaneous Dangerous Goods	9	III	10,000 kg

SSD 6078 MOD 4 relates to the removal of Condition 34 for screen fencing and planting to the water tank and pump room toward the north western side of Lot 2B.

SSD 6078 MOD 8 relates to amendments to estate signage and warehouse design and amended provisions for on-site car parking spaces during operation of the development across Lot 1C, Lot 2B and Lots 3A, 3C & 3D.

4. Description of the proposed development

This proposal is a s.96(1A) application to modify State Significant Development 6078 (SSD 6078) to extend the volume of DGS classes and volume of DGS storage at 5 Millner Avenue (Lot 2B), Oakdale Central.

Specifically, the proposal is to modify State Significant Development 6078 (SSD 6078), Condition 4C to extend the DGS volumes and classes stored.

A summary of the DG holdings **currently approved** for storage in the warehouse at Lot 2B is presented above in Table 1. DGS Classes 2.1 and 3 are stored in DGS1 and DGS Classes 5.1, 8 and 9 are stored in DGS2.

There are 2 DGS stores and no change to the size of these stores is proposed as part of this application.

The purpose of this proposal is to modify the approved development (SSD 6078) at Lot 2B, Oakdale Central, Horsley Park for the storage of additional DGS classes and volumes. More specifically, the proposal is to modify Condition 4C of SSD 6078, to store additional classes and volumes of DGS within the warehouse premises.

The proposed development is described in detail in the Preliminary Hazard Analysis (PHA) Report, including plans, prepared by Blackie Mendham, Industrial Fire and Risk Engineering.

Details of the proposed additional classes and volumes of DGS to be stored are presented below in Table 2.

Table 2: Proposed Dangerous Goods Classes and Quantities to be Stored

Class	Packing Group	Quantity (kg or L)	DGS Location
2.1 (aerosols)	N/A	90,000 kg (weight of LPG*)	DGS1
2.2	N/A	200,000 L #	
3	II & III	900,000 L	
4.1	II & III	75,000 kg	
5.1	II & III		
5.2^	II & III		
6.1	II & III		
8	II & III	200,000 kg	General Warehouse
9	III	100,000 kg #	

*The LPG in an aerosol is the propellant and it is approximately 25% of the product weight.

Package volume (note: not subject to SEPP 33)

^ No temperature controlled organic peroxides will be stored.

Source: Blackie Mendham Industrial Fire and Risk Engineering, Preliminary Hazard Analysis, dated 12/09/2017

Figure 9 below, prepared by Blackie Mendham, shows the location of the DGS storage, within DGS Stores 1 and 2. This Plan was requested by the Department of Planning and Environment's Hazard Team at a meeting with the Department on 3 August 2017.

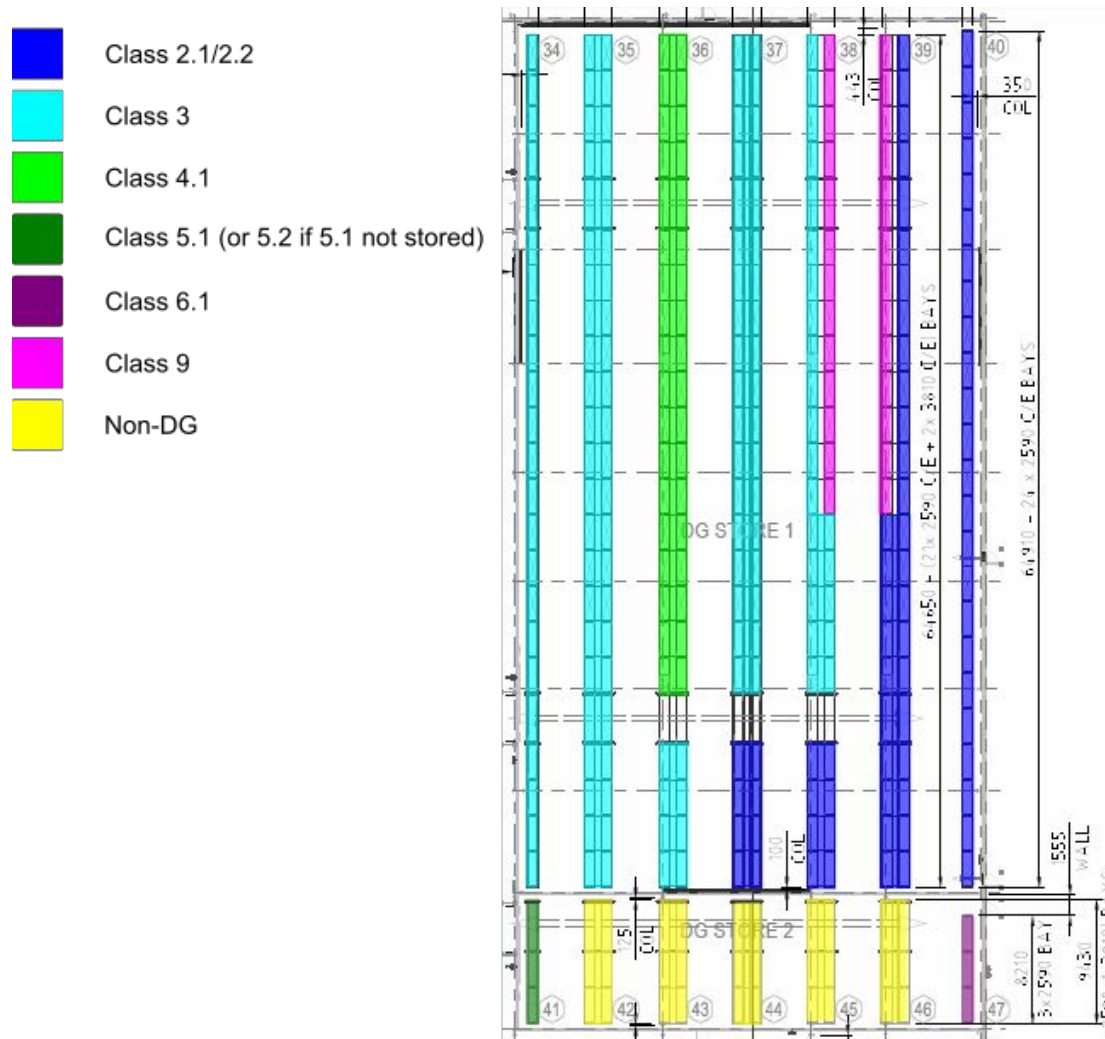


Figure 9: 5 Millner Avenue, Horsley Park, Proposed locations of DGS within DGS Store 1 and DGS Store 2
Source: Blackie Mendham Goodman 12 September 2017

To facilitate picking and packing operations at the warehouse, small quantities of each class of DGS product will be located throughout the warehouse. The quantity of each DGS product stored within the general warehouse is shown in Table 3, with the location of the DGS products within the general warehouse shown in Figure 10. DGS products within the general warehouse, packaged as retail products, are stored in individually defined areas for each customer (i.e. Customer 1, customer 2 etc.).

The PHA report prepared by Blackie Mendham explains how the small quantities of products to be stored within the general warehouse comply with the definitions of retail packages and therefore that the facility can be operated as a Retail Distribution Centre (RDC) as permitted by AS/NZS 3833:2007¹. The main requirements associated with RDC storages involve fire protection and containment of potentially contaminated liquids within the premises of the facility and this is addressed on page 11 of the Blackie Mendham PHA.

Table3: DGS classes and quantities to be stored as retail packages within general warehouse

Customer	Class	Maximum Pallets	Maximum Quantity
1	2.1	6	6,000 L*
2	4.1	6	6,000 kg
3	3	8	8,000 L
4	2.1	1	1,000 L*
	3	1	1,000 L
	4.1	1	1,000 kg
5	3	3	3,000 L
6	2.1	1	1,000 L*
	3	5	5,000 L
	6.1	1	1,000 L
	8	-	200,000 L
	9	-	100,000 L

* Package volume

¹ Source: Blackie Mendham PHA Report 2017, page 11.

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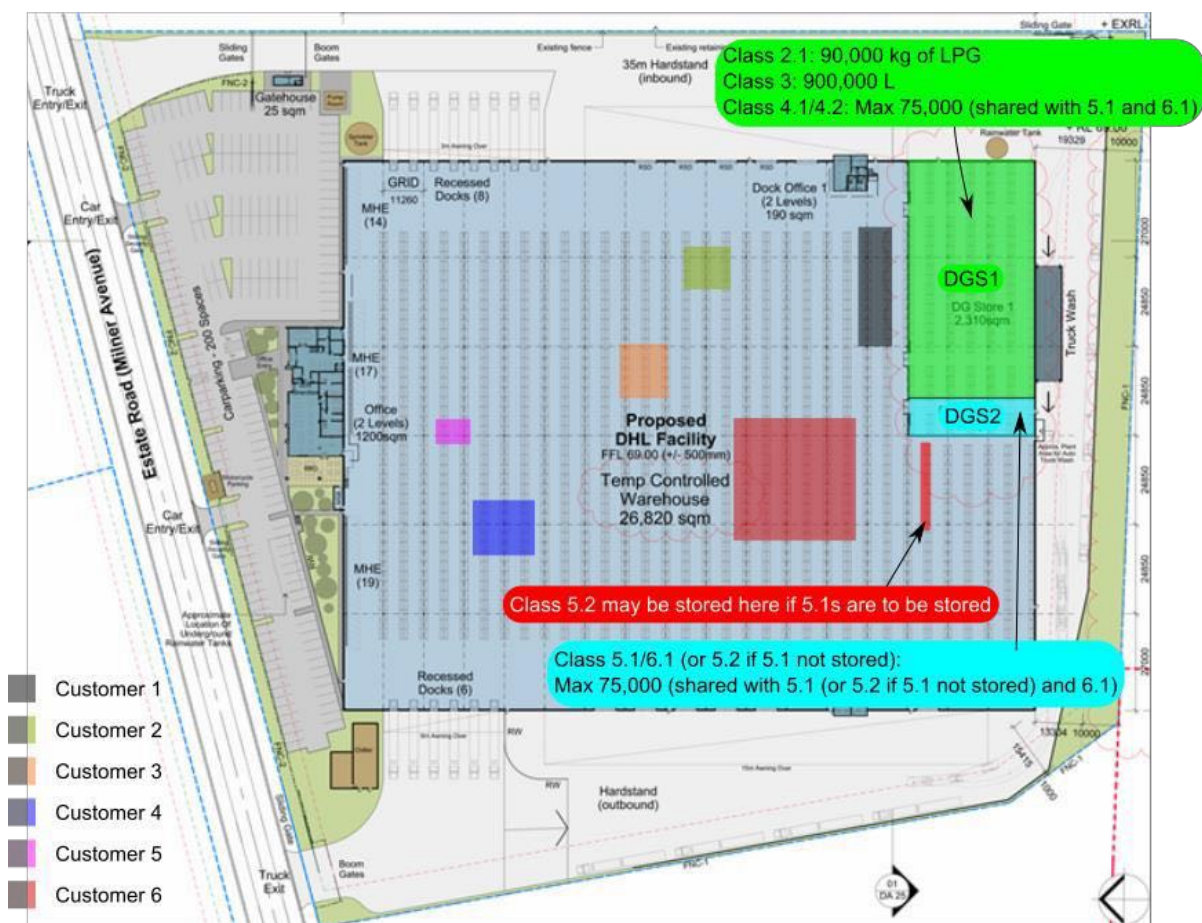


Figure 10: 5 Millner Avenue, Horsley Park, Internal Layout Lot 2B – DHL facility

Source: Blackie Mendham Industrial Fire and Risk Engineering, Preliminary Hazard Analysis, 12 September 2017

5. Consideration of the applicable town planning controls

Environmental Planning & Assessment Act 1979

The Development Application is made under S.96(1A) of the Environmental, Planning and Assessment Act (EPA Act). Section 96 (1A) addresses modifications of consents involving minimal environmental impact.

Section 96(1A) (a) and (b) are relevant for consideration by the proponent within this report, as follows:

“A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:

(a) it is satisfied that the proposed modification is of minimal environmental impact, and

(b) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all)...”

Having regard to the above, the proposed Section 96(1A) modification to the approved development is considered to be of minimal environmental impact as there will be no changes made to the development on Lot 2B, Oakdale Central, in regard to the following:

Land and building use	Building façade design
Building footprint, bulk and height	Vehicular access and vehicle movements
Gross floor area and floor space ratio	Office
Layout and size	

The impact of the proposed modification to extend the DGS classes and volume of DGS storage at the subject site is addressed in the Preliminary Hazard Analysis (PHA), dated 12 September 2017, prepared by Blackie Mendham, Industrial Fire and Risk Engineering. A copy of the PHA accompanies this development application.

State Environmental Planning Policy (Western Sydney Employment Area) 2009

The proposal will remain consistent with the strategic objectives of the State Environmental Planning Policy (Western Sydney Employment Area) 2009. Clause 3(2)(A) of the SEPP states that a particular aim of the Policy is:

“to promote economic development and the creation of employment in the Western Sydney Employment Area by providing for development including major warehousing, distribution, freight transport, industrial, high technology and research facilities”

The proposed modification to SSD 6078 therefore complies with the strategic objectives of this SEPP.

State Environmental Planning Policy No 33—Hazardous and Offensive Development

State Environmental Planning Policy No. 33 - Hazardous and Offensive Development (SEPP 33) and the Applying SEPP 33 Guidelines (January 2011) indicate that the facility would exceed the threshold criteria for the storage of DGS resulting in a classification for the site of potentially hazardous. Therefore, a Preliminary Hazard Analysis (PHA) is required to show the site is not hazardous. A PHA, dated 12 September 2017, for the proposal has been prepared by Blackie Mendham Industrial Fire and Risk Engineering and is submitted with the Development Application. The findings of the PHA are summarised in the following paragraphs.

A hazard identification table was prepared as part of the PHA to identify potential hazards that may be present at the site because of operations or storage of materials within the warehouse facility. Based on the identified hazards, scenarios were postulated that may result in an incident with a potential for off-site impacts. Postulated scenarios were discussed qualitatively and any scenarios that would not impact off-site were eliminated from further assessment. Scenarios not eliminated were then carried forward for consequence analysis.

Incidents carried forward for consequence analysis were assessed in detail to estimate the impact distances. Impact distances were developed into scenario contours and overlaid onto the site layout diagram to determine if an off-site impact would occur. The consequence analysis showed that one of the scenarios (full warehouse fire) would impact over the site boundary and into the adjacent land use and therefore this incident was carried forward for frequency analysis and risk assessment.

The frequency analysis and risk assessment showed that the full warehouse fire would have a fatality risk of 3.53 chances per million per year (pmpy) at the site boundary, with lesser risk at further distances from the boundary. The NSW Government's Hazardous Industry Planning Advisory Paper No 4 – Risk Criteria for Land Use Safety Planning (HIPAP No. 4) publishes acceptable risk criteria at the site boundary of 50 pmpy (for industrial sites). Therefore, the probability of a fatality from a full warehouse fire at the site boundary is within the acceptable risk criteria.

In addition, the analysis of smoke involving toxic products or toxic bi-products of combustion resulted in an injury risk of 3.53 pmpy. The acceptable criterion for injury is 10 pmpy and therefore, this criterion is not exceeded and is within the acceptable criteria.

Based on the analysis conducted, the PHA concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria and hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

Notwithstanding the above, the PHA makes the following recommendations for the proposal:

1. Multiple spill kits should be provided around the DGS to ensure spills can be cleaned up immediately following identification.
2. The fire pumps should be started at least once per month and the system operated at full pump pressure during this monthly test.
3. The site emergency plan should include response to spills and spill clean-up procedures.

These recommendations can be dealt with by the consent authority by as Conditions on the Instrument of Modification.

6. Summary and conclusion

This proposal is a s.96(1A) application to modify State Significant Development 6078 (SSD 6078) to extend the DGS classes and volumes of DGS storage at 5 Millner Avenue (Lot 2B) Oakdale Central, Horsley Park.

In conclusion, the modifications to the approved scheme are considered to be of minimal environmental impact as there will be no change to the existing warehouse on Lot 2B, Oakdale Central, with respect to the following:

- Land and building use
- Building footprint, bulk and height
- Gross floor area and floor space ratio
- Building façade design
- Vehicular access and movements
- Office layout and size

The proposed modification to extend the DGS classes and volume of DGS storage at the subject site is considered to be minor in nature, with minimal environmental impact. A Preliminary Hazard Analysis (PHA) prepared by Blackie Mendham, Industrial Fire and Risk Engineering, concludes that the risks of the proposal to extend the DGS classes and volume of DGS storage at the site are not considered to exceed the acceptable risk criteria.



Matthew Benson
Principal - MB Town Planning