



State Environmental Planning Policy (Resilience & Hazards)

Racecourse Road, West Gosford

State Environmental Planning Policy (Resilience & Hazards)

Racecourse Road, West Gosford

Waluya Pty Ltd

Prepared by

Riskcon Engineering Pty Ltd

37 Pogson Drive

Cherrybrook NSW 2126

www.riskcon-eng.com

ABN 74 626 753 820

© Riskcon Engineering Pty Ltd. All rights reserved.

This report has been prepared in accordance with the scope of services described in the contract or agreement between Riskcon Engineering Pty Ltd and the Client. The report relies upon data, surveys, measurements and results taken at or under the particular times and conditions specified herein. Changes to circumstances or facts after certain information or material has been submitted may impact on the accuracy, completeness or currency of the information or material. This report has been prepared solely for use by the Client. Riskcon Engineering Pty Ltd accepts no responsibility for its use by other parties without the specific authorization of Riskcon Engineering Pty Ltd. Riskcon Engineering Pty Ltd reserves the right to alter, amend, discontinue, vary or otherwise change any information, material or service at any time without subsequent notification. All access to, or use of, the information or material is at the user's risk and Riskcon Engineering Pty Ltd accepts no responsibility for the results of any actions taken on the basis of information or material provided, nor for its accuracy, completeness or currency.

Quality Management

Rev	Date	Remarks	Prepared By	Reviewed By
A	6 th December 2022	Draft issued for review	Jason Costa	Renton Parker
0	12 th December 2022	Final issued		

Executive Summary

Introduction

Urbis are involved in the development of a new Bus Depot at Racecourse Road, West Gosford, NSW. Pre-DA advice has been provided by the Department of Planning and Environment which outlines that a Statement of Environmental Effects (SEE) must be submitted with the Development Application (DA) and shall include assessment against State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33), which is now known as Chapter 3 of State Environmental Planning Policy (Resilience and Hazards) 2021.

Where an exceedance occurs, a Preliminary Hazard Analysis (PHA) is required to demonstrate the risks are compliant with the land zoning.

Conclusions

A review of the quantities of DGs proposed to be stored at the facility at Racecourse Road, West Gosford 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.

It is noted specifically that the only storage of chemicals at the site is in the form of C1 combustible liquids (diesel) which is not assessable by “Applying SEPP 33” as it is not recognised as a DG by the Australian Dangerous Goods Code (Ref. [2]).

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

Based upon the assessment conducted, the following recommendations have been made:

- In order to comply with the NSW Work Health and Safety Regulation 2017 (Ref. [3]), a DG design report shall be prepared to review the storage of diesel against AS 1940:2017 (Ref. [4]), the standard for the storage and handling of flammable and combustible liquids.

Table of Contents

Executive Summary	i
1.0 Introduction	3
1.1 Background	3
1.2 Scope of Work	3
2.0 Methodology	4
2.1 General Methodology	4
2.2 Data taken from "Applying SEPP 33"	4
3.0 General Description	7
3.1 Site Location	7
4.0 SEPP 33 Review	9
4.1 Introduction	9
4.2 Assessment	9
4.2.1 Proposed Storage Details	9
4.2.2 Storage Assessment	9
4.2.3 Transport	9
4.3 Cumulative Transport Assessment	10
5.0 Conclusion and Recommendations	11
5.1 Conclusions	11
5.2 Recommendations	11
6.0 References	12

List of Figures

Figure 2-1: Screening Method to be Used	4
Figure 2-2: General Screening Threshold Quantities	5
Figure 2-3: Transportation Screening Thresholds	6
Figure 3-1: Site Location	7
Figure 3-2: Site Layout	8

List of Tables

Table 4-1: DG Classes or Materials Stored and Maximum Quantities	9
Table 4-2: Quantities Stored and SEPP 33 Threshold	9

1.0 Introduction

1.1 Background

Urbis are involved in the development of a new Bus Depot at Racecourse Road, West Gosford, NSW. Pre-DA advice has been provided by the Department of Planning and Environment which outlines that a Statement of Environmental Effects (SEE) must be submitted with the Development Application (DA) and shall include assessment against State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33), which is now known as Chapter 3 of State Environmental Planning Policy (Resilience and Hazards) 2021.

Where an exceedance occurs, a Preliminary Hazard Analysis (PHA) is required to demonstrate the risks are compliant with the land zoning.

Urbis has engaged Riskcon Engineering Pty Ltd (Riskcon) 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 facility at Racecourse Road, West Gosford. 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 SEPP (Resilience and Hazards).
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in “Applying SEPP 33”.
- Report on the findings of the Chapter 3 of SEPP (Resilience and Hazards) 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 located at 7A-11 Racecourse Road, West Gosford, which is approximately 50 km north of the Sydney Central Business District (CBD). **Figure 3-1** shows the regional location of the site in relation to the Sydney CBD and **Figure 3-2** shows the proposed layout.

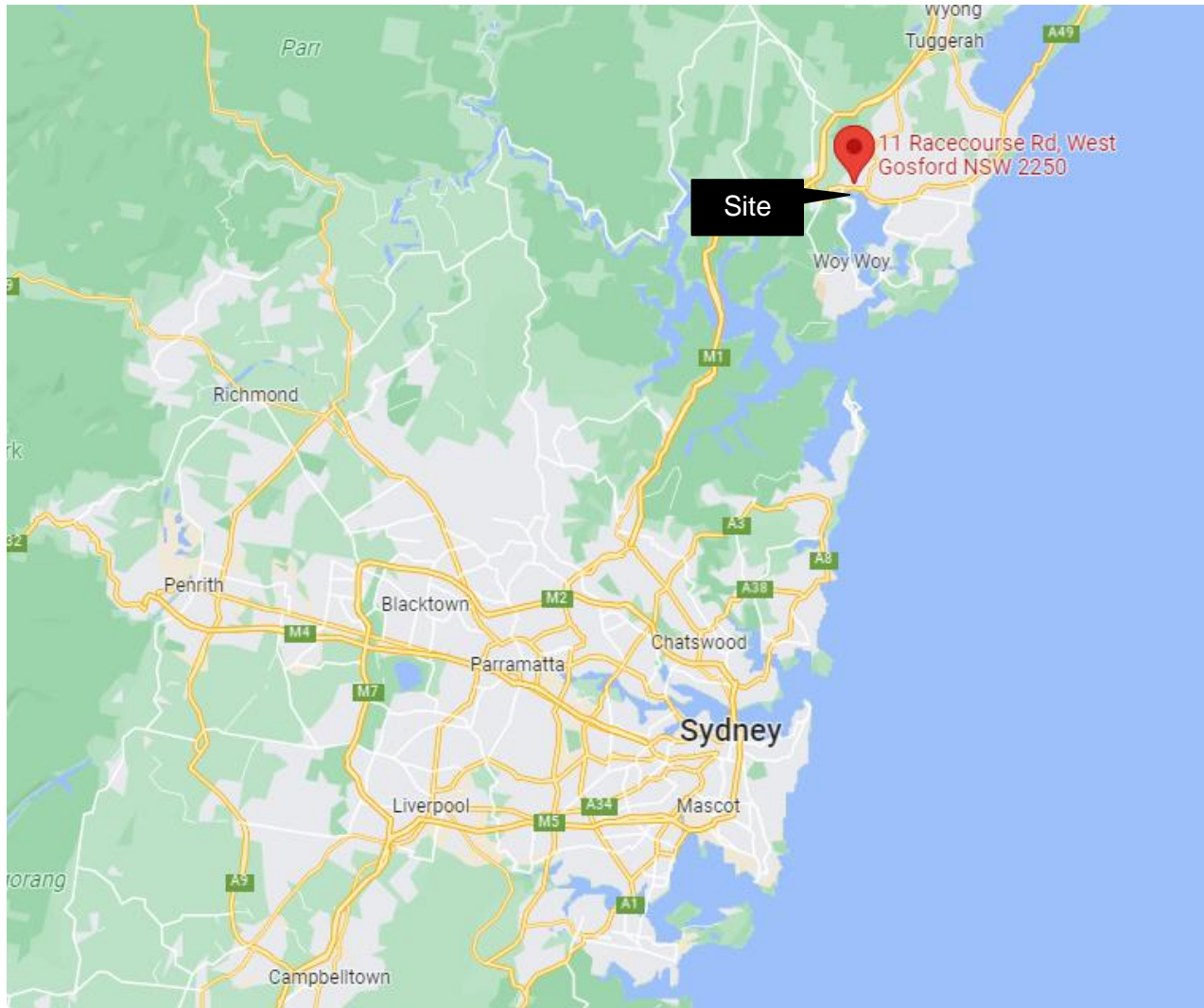


Figure 3-1: Site Location

8

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, Industry, and Environment in the conditions of consent.

4.2 Assessment

4.2.1 Proposed Storage Details

Provided in **Table 4-1** is a summary of the DGs proposed to be stored at the site as part of the site operations.

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

Class	Description	Current Quantity (kg)	Maximum Quantity (kg)
C1	Combustible liquids – diesel	110,000	110,000

4.2.2 Storage Assessment

Threshold limits for the application of SEPP 33 are presented in **Table 4-2** indicating the maximum quantity that can be stored on site for each class.

Table 4-2: Quantities Stored and SEPP 33 Threshold

Class	Description	Maximum Quantity (kg)	SEPP 33 Threshold (kg)	SEPP 33 Exceeded?
C1	Combustible liquids – diesel	110,000	-	N

C1 combustible liquids such as diesel are not considered a Dangerous Good under United Nations (UN) classification such as within the Australian Dangerous Goods Code (Ref. [2]). Therefore, C1 combustible liquids are not assessable by the screening document “Applying SEPP 33” and do not result in an exceedance or requirement for further assessment via Preliminary Hazard Analysis (PHA).

4.2.3 Transport

The quantities to be stored are less than 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 SEPP 33 would not be exceeded and therefore, SEPP 33 would not apply.

4.3 Cumulative Transport Assessment

A review of the facility indicates that even if the sites were all operating with the expected limits of DG storage proposed, 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 facility at Racecourse Road, West Gosford 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.

It is noted specifically that the only storage of chemicals at the site is in the form of C1 combustible liquids (diesel) which is not assessable by “Applying SEPP 33” as it is not recognised as a DG by the Australian Dangerous Goods Code (Ref. [2]).

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

Based upon the assessment conducted, the following recommendations have been made:

- In order to comply with the NSW Work Health and Safety Regulation 2017 (Ref. [3]), a DG design report shall be prepared to review the storage of diesel against AS 1940:2017 (Ref. [4]), the standard for the storage and handling of flammable and combustible liquids.

6.0 References

- [1] Department of Planning, "Applying SEPP 33," Department of Planning, Sydney, 2011.
- [2] National Transport Commission (NTC), "Australian Code for the Transport of Dangerous Goods by Road & Rail, Edition 7.7," 2020.
- [3] SafeWork NSW, "Work Health and Safety Regulation," SafeWork NSW, Lisarow, 2017.
- [4] Standards Australia, AS 1940-2017 - Storage and Handling of Flammable and Combustible Liquids, Sydney: Standards Australia, 2017.
- [5] 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.