



State Environmental Planning Policy (Resilience and Hazards)

28-30 Burrows Road, St Peters

LOGOS Development Management Pty Ltd  
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## State Environmental Planning Policy (Resilience and Hazards)

28-30 Burrows Road, St Peters

LOGOS Development Management Pty Ltd

Prepared by

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## Quality Management

Rev	Date	Remarks	Prepared By	Reviewed By
A	19 July 2022	Draft issue for comment	Renton Parker	Jason Costa
0	23 September 2022	Issued Final		

## Executive Summary

### Background

LOGOS Development Management Pty Ltd (Logos) proposes to develop the site at 28-30 Burrows Road, St Peters for the purposes of a flight training centre which will be operated by CAE Inc. As part of their operations, they will require the use of a range of materials classified as Dangerous Goods (DGs).

As DGs are stored, the site is subject to the Environmental Planning and Assessment Regulation 2021 (Ref. [1]) which requires the risks of the facility upon the surrounding land uses to be reviewed. The assessment has been prepared in accordance with Chapter 3 of the State Environmental Planning Policy – Resilience and Hazards (SEPP-RH, Ref. [2]) which is to be submitted in support of the State Significant Development Application (SSD – 47601708) for the Project. It is noted that the former State Environmental Planning Policy No. 33 (SEPP 33) has been consolidated into SEPP-RN, however the guidance notes continue to reference SEPP 33.

LOGOS has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a Chapter 3 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP-RH assessment for 28-30 Burrows Road, St Peters.

### Conclusions

A review of the quantities of DGs stored at the proposed facility and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Chapter 3 of SEPP (Resilience and Hazards). The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, the Chapter 3 of SEPP (Resilience and Hazards) does not apply to the project. Furthermore, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

As the facility is not classified as potentially hazardous or offensive, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as Chapter 3 of SEPP (Resilience and Hazards) does not apply.

### Recommendations

No recommendations have been made as a result of the assessment.

### Secretary’s Environmental Assessment Requirements

The Secretary’s Environmental Assessment Requirements (SEARs) have been summarised in the table below.

Requirement	Location in Report
<p>A preliminary risk screening completed in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 and Applying SEPP 33 (DoP, 2011), that includes:</p> <ul style="list-style-type: none"> <li>• a clear indication of class, storage and handling quantities and location of all dangerous goods and hazardous materials associated with the development</li> <li>• a Preliminary Hazard Analysis (PHA) prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for</li> </ul>	<p>This report. The SEPP thresholds were not exceeded so a PHA is not required.</p>

Requirement	Location in Report
Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011), should the preliminary risk screening indicate that the project is “potentially hazardous”.	

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## Abbreviations

Abbreviation	Description
ADG	Australian Dangerous Goods Code
DA	Development Application
DGs	Dangerous Goods
DPE	Department of Planning and Environment
LPG	Liquefied Petroleum Gas
RH	Resilience and Hazards
SEPP	State Environmental Planning Policy

## 1.0 Introduction

### 1.1 Background

LOGOS Development Management Pty Ltd (Logos) proposes to develop the site at 28-30 Burrows Road, St Peters for the purposes of a flight training centre which will be operated by CAE Inc. As part of their operations, they will require the use of a range of materials classified as Dangerous Goods (DGs).

As DGs are stored, the site is subject to the Environmental Planning and Assessment Regulation 2021 (Ref. [1]) which requires the risks of the facility upon the surrounding land uses to be reviewed. The assessment has been prepared in accordance with Chapter 3 of the State Environmental Planning Policy – Resilience and Hazards (SEPP-RH, Ref. [2]) which is to be submitted in support of the State Significant Development Application (SSD – 47601708) for the Project. It is noted that the former State Environmental Planning Policy No. 33 (SEPP 33) has been consolidated into SEPP-RN, however the guidance notes continue to reference SEPP 33.

LOGOS has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a Chapter 3 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP-RH assessment for 28-30 Burrows Road, St Peters.

### 1.2 Scope of Services

The scope of work is to prepare a SEPP-RH assessment for the facility located at 28-30 Burrows Road, St Peters. The assessment does not include any other sites or the preparation of any additional planning studies should they be required.

### 1.3 Qualifications of the Assessor

The assessment has been performed by Renton Parker who is a Director at Riskcon Engineering Pty Ltd. Renton is a chartered chemical engineer with 10 years of experience working the field of risk engineering dealing specifically with Dangerous Goods consulting. He is a full member of the Australasian Institute of Dangerous Goods Consultants (AIDGC) in addition he has held roles as President, Vice President and Board Member of the AIDGC. He is a listed hazards and risk consultant under the Three Ports SEPP. Renton has performed numerous risk, DG, and fire assessments for industrial facilities storing DGs and other materials with unique hazards ranging from minor storage below SEPP-RH (previously SEPP 33) up to Major Hazard Facilities.



## 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 the threshold quantities listed in “Applying SEPP 33 – Hazardous and Offensive Development” (Ref. [2]) to identify whether the storage location or quantity triggers SEPP 33.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33 (Ref. [2]).
- Report on the findings of the SEPP 33 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 (Ref. [2]).

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**

Table 3 from “Applying SEPP 33” has been extracted and is shown in **Figure 2-2**.

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 <sup>1</sup> )	
	10 tonne or 16 m <sup>3</sup>	if stored above ground
	40 tonne or 64 m <sup>3</sup>	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**

Transportation screen thresholds have been provided in **Figure 2-3**.

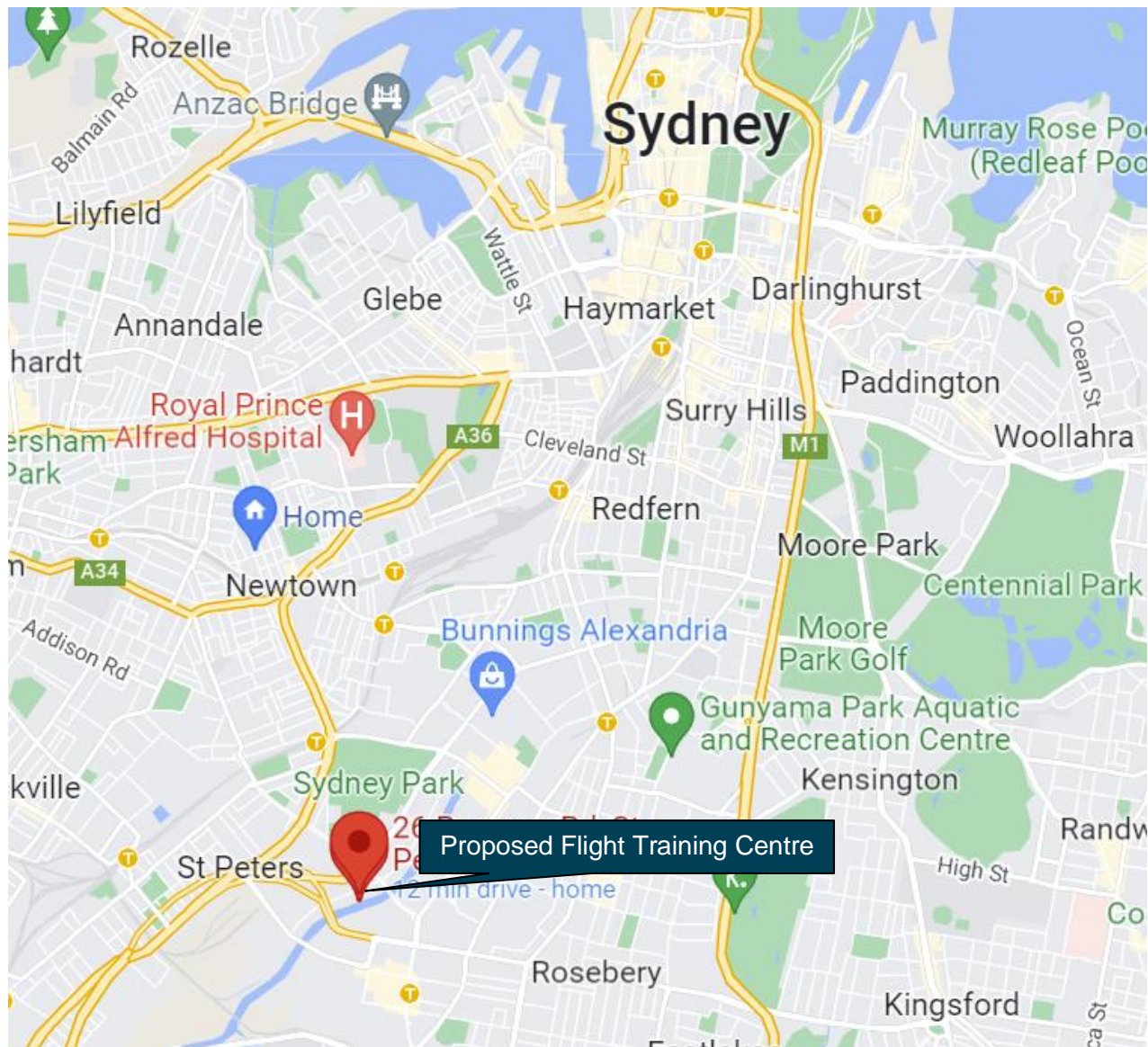
Class	Vehicle Movements		Minimum quantity*	
	Cumulative	Peak	per load (tonne)	
	Annual	or Weekly	Bulk	Packages
1	see note	see note	see note	
2.1	>500	>30	2	5
2.3	>100	>6	1	2
3PGI	>500	>30	1	1
3PGII	>750	>45	3	10
3PGIII	>1000	>60	10	no limit
4.1	>200	>12	1	2
4.2	>100	>3	2	5
4.3	>200	>12	5	10
5	>500	>30	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 Project Description

#### 3.1 Site Location and Layout

The proposed facility is located at 28-30 Burrows Road, St Peters which is located 7 km south of the Sydney Central Business District (CBD). **Figure 3-1** shows the regional location of the site in relation to Sydney



**Figure 3-1: Site Location (source Google Maps)**

#### 3.2 General Description

The site will contain a range of goods as listed below:

- Hydraulic oil – 3 x 208 L drums
- Miscellaneous lubricating oils – 5 L
- Grease – 10 L
- Solvents/degreasers – 2 L

- Nitrogen cylinder (G-sized)
- Liquefied Petroleum Gas (LPG) - 2 x 10 kg bottles caged outside
- Paint – 6 L
- Paint thinner – 2 L

The above information has been collated into classes of goods and is summarised in **Table 3-1**.

**Table 3-1: Classes and Quantities of DGs Stored and Handled**

Class	Description	PG	Quantity
2.1	LPG	n/a	20 kg
2.2	Nitrogen	n/a	50 L
3	Flammable liquids	II & III	10 L
C2	Combustible liquid C2	n/a	633 L



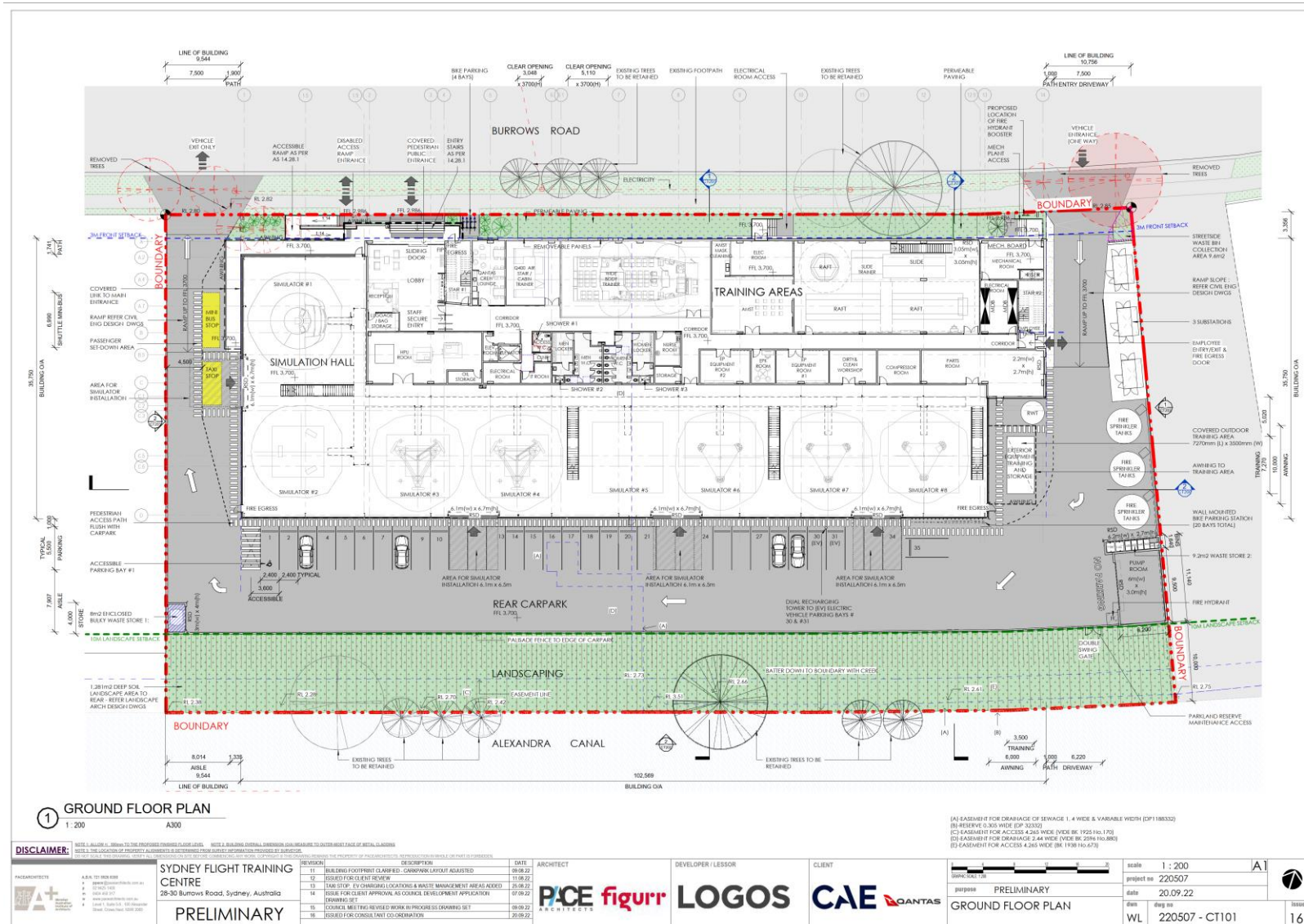


Figure 3-2: Site Layout

## 4.0 SEPP Review

### 4.1 Proposed Storage Details

The maximum quantities of products that are to be stored at the site are shown in **Table 4-1**. The data has been provided by CAE for the site SSDA. Provided in **Table 4-1** is an assessment of whether the Class is subject to SEPP.

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

Class	Description	PG	Quantity (kg)	Class Subject to SEPP 33 (Y/N)
2.1	LPG	n/a	20 kg	Y
2.2	Nitrogen	n/a	50 L	N
3	Flammable liquids	II & III	10 L	Y
C2	Combustible liquid C2	n/a	633 L	N

### 4.2 Application of Chapter 3 of the State Environmental Planning Policy – Resilience and Hazards

State Environmental Planning Policy (Resilience and Hazards) 2021 (which now includes the former SEPP 33) 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 is minimised.

The policy includes a guideline that assists government and industry alike in determining whether SEPP-RH applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [2]) 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, SEPP-RH 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.

### 4.3 Assessment of Hazards

#### 4.3.1 Storage

Threshold limits for the application of SEPP-RH are presented in **Table 4-2** along with maximum DG quantities that will be stored at the site. The results summarised in the table indicates the SEPP-RH criteria is not exceeded; hence, no further assessment would be required.

**Table 4-2: Quantities Stored and SEPP-RH Threshold**

Class	Description	PG	Quantity (kg)	SEPP Threshold (kg)	Does SEPP-RH Apply (Y/N)
2.1	LPG	n/a	20	10,000	N
3	Flammable liquid	II & III	10	5,000	N

#### 4.3.2 Transport

The DGs stored at the site will be for use in maintaining equipment at the site and would be used infrequently and would not require large volumes to be delivered to the site. Therefore, it is not

expected that the presence of the facility would measurably increase the transportation of DGs within the area. Therefore, the transport limits within SEPP-RH would not be exceeded; hence, with respect to transport, SEPP-RH does not apply.

#### 4.4 Assessment of Offense

SEPP-RH also contains a requirement for review of operations that may cause offense in the form of odour, environmental impact, nuisance (noise), etc. An indication of whether “offensiveness” may occur at the facility is whether an Environmental Protection Authority (EPA) licence is required for specific operations at the site (Ref. [3] and [4]).

A review of the facilities operations indicates that there are no processes that would result in the manufacture, production, or transfer of materials in a form that may result in the release of bulk materials at the site or that could result in odour generation or excessive noise. An EPA licence would not be required for this site.

Further, there would be no unusual operations that would cause potential odours, or excessive noise at the closest residential areas. Therefore, it is considered that noise generated from the site operations would not exceed the background noise already exposed at residential areas.

In summary, there is no potential for “offensive” operations at the site or noise that has been assessed as part of the estate SSSA and therefore Chapter 3 of the SEPP-RH does not apply in this case.



## 5.0 Conclusion and Recommendations

### 5.1 Conclusions

A review of the quantities of DGs stored at the proposed facility and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Chapter 3 of SEPP (Resilience and Hazards). The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, the Chapter 3 of SEPP-RH does not apply to the project. Furthermore, a reivew of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

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

### 5.2 Recommendations

No recommendations have been made as a result of the assessment.

## 6.0 References

- [1] New South Wales Government, “Environmental Planning and Assessment Regulation 2021,” New South Wales Government, Sydney, 2021.
- [2] Department of Planning, “Applying SEPP 33,” Department of Planning, Sydney, 2011.
- [3] “Protection of the Environment Operations (General) Regulation,” 2009.
- [4] “Protection of the Environment Operations Act,” 1997.