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 Southport, QLD 4215
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HPC Ref: 23057
 Council Ref: DA2024/0128 – Prop 183360

2 May 2024

Sent via: online lodgement form

Richmond Valley Council
 Locked Bag 10
 Casino, NSW 2470
Council@richmondvalley.nsw.gov.au

Development Application for Development Consent for Transport Depot, Warehouse (cold storage) and Distribution Centre and Signage on land at 35 Cassino Drive, Casino NSW 2470 and described as Lot 50 on DP1281364.

Dear Sir/Madam,

We refer to the letter received on 01 May 2024 whereby the Council have requested the applicant provide further details on the industrial ammonia refrigerator system. In response to the letter, we have set out in Table 1 below the maximum quantity of ammonia that will be stored within the refrigeration plant system. This table has also been included in the addendum to the Statement of Environmental Effects enclosed with this letter. This quantity has been determined by a suitably qualified refrigeration specialist engaged by Spaceframe Buildings. Refer below for signed letter. Column 4 of Table 1 sets out the minimum screening threshold for determining whether the development is ‘potentially hazardous’ for the purposes of SEPP (Resilience and Hazards) 2021.

Proposed Quantity	Material	Classification	Minimum Screening Threshold
400kg	Anhydrous ammonia	2.3	5 tonne – anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale

Table 1: Proposed Quantity and Minimum Screening Thresholds under the *Hazardous and Offensive Development Application Guidelines*

Per the above table, the proposed cold storage component of the Warehouse will only require the storage of a maximum of 400kg of ammonia gas. This is well within the screening thresholds – quantities set out in Tables 1 and 3 of the *Hazardous and Offensive Development Application Guidelines*. Per these guidelines, where the quantity of the hazardous materials is below the minimum quantities, it is not ‘potentially hazardous’, as follows:

“If the quantity is below the minimum quantity in Table 1, then the amount is unlikely to represent a significant risk and therefore, is not potentially hazardous.” (page 32) *Emphasis added.

Therefore, on the basis of material quantity alone, there is unlikely to be a significant off-site risk that would classify the development as ‘potentially hazardous’. As such, Chapter 3 of the SEPP (Resilience and Hazards) 2021 does not apply as the development is evidently not for the purposes of potentially hazardous industry or potentially offensive industry. Accordingly, no further assessment by way of a Preliminary Hazard Analysis (PHA) is required because the proposal is not assessable against the SEPP. Furthermore, as the quantity of ammonia gas is considered to have a negligible risk to safety, detailed design of the refrigeration system is not warranted at this stage to demonstrate the acceptability of the proposal on hazards grounds.

Notwithstanding the above, per the SEE, the ultimate refrigeration system operation will be conducted with the highest regard to safety and hazard and risk mitigation. Detailed design of the type of refrigerator system

will be undertaken by a suitably qualified refrigeration engineer or technician during the CC phase of the development (post consent). The applicant is willing to submit these detailed designs of the refrigeration system as well as the relevant associated safety management systems, subject to a reasonable and relevant condition of planning consent.

In light of the above, there should be no further reason for the Council to withhold processing the application other than the application fee which will be paid in due course.

If you have any questions please do not hesitate to contact the office on (07) 3217 5800 or 0457 472 576.

Yours sincerely,
HPC Planning
A.B.N. 93 670 815 022



Borisa Miletovic
Town Planner
Borisa.M@hpcplanning.com.au



2 May 2024

Spaceframe Buildings Pty. Ltd.
225 Queensport Road North
Murarrie QLD 4172
Attention: Wayne Pringle, Business Development.

Dear Sir,

Re: Refrigeration System Ammonia (NH₃) Inventory.

**NSW Planning Portal Development Application - PAN-430039 - DA2024/0158 Lot
50 DP 1281364 – 35 Cassino Drive, Casino.**

This is to confirm that the ammonia refrigerant inventory within the new refrigerating plant proposed to service the food processing, storage, and distribution facility at the above address will be 400 kg ± 10%.

Yours sincerely
scantec refrigeration technologies pty ltd

A handwritten signature in blue ink, appearing to read "Stefan S. Jensen", is written over a light blue horizontal line.

Stefan S. Jensen
FIEAust CPEng NER, APEC Engineer IntPE(Aus) RPEQ, L.AIRAH
Managing Director

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Refrigerant Authorization Number AU 00063