



SARA reference: 2404-40203 SRA
 Applicant reference: 6182
 Council reference: OTH/2024/20

22 May 2024

FPI Queensland Pty Ltd
 c/- Gassman Development Perspectives Pty Ltd
 mail@gassman.com.au

Attention: Mr Fraser Gassman

Dear Mr Gassman

SARA information request - 10 Homestead Drive, Stapylton

(Given under section 12 of the Development Assessment Rules)

This notice has been issued because the State Assessment and Referral Agency (SARA) has identified that the information necessary to assess your application against the relevant provisions of the State Development Assessment Provisions (SDAP) has not been provided.

Chemical hazardous facility	
1.	Issue: Performance Outcome (PO)5 of the State code 21: Hazardous chemical facility (State code 21) of the SDAP requires, in part, hazardous chemical facilities to not create a dangerous dose to the built environment. The proposed development includes a flammable liquid store with FRL 240/240/240 firewalls and a water-only sprinkler system. This system is not effective in extinguishing flammable liquid pool fire. A major fire in the flammable liquid store that escapes the store and escalates to a full warehouse fire may result in a dangerous dose to the built environment (12.6 kW/m²) being exceeded at the property boundary. Insufficient information has been submitted to demonstrate compliance with PO5 of State code 21 of the SDAP. Action: Submit information that adequately addresses how the proposed development will comply with PO5 of State code 21 of the SDAP, given that a full warehouse fire or a fire in the aerosol compartment may cause a dangerous dose to the built environment (12.6 kW/m²) to be exceeded at the property boundary.

2.	Issue: PO7 of State code 21 of the SDAP requires storage and handling areas for packages of liquid or solid fire risk hazardous chemicals are provided with a spill containment system with a working volume capable of containing a minimum of 100% of all packages (prescribed hazardous chemicals and/or non-hazardous chemicals) within the area plus the output of any fixed firefighting system provided for the area over a minimum of 90 minutes. The term 'storage and handling area' is described in State code 21 of the SDAP as any area designed for the storage and/or handling of a particular prescribed hazardous chemical or group of prescribed hazardous chemicals in a quantity that exceeds a placard quantity and includes any separation distances, barriers and spill containment systems required to adequately isolate an area. SARA notes multiple storage and handling areas within a development may be considered as individual storage and handling areas however, if an area contains packages and/or tanks of flammable liquids, toxic liquids, and corrosive solids all within the same spill compound; such an area is to be considered a single storage and handling area. The Preliminary Hazard Analysis prepared by Riskcon engineering, dated 5/04/2024, document no. RCE-24075_Wurth_PHA_Final_5Apr24_Rev(0) and revision 0 indicates 200 tonnes of flammable liquids will be stored within an internal package store which will be designed to comply with AS1940:2017 section 4.4.3(d). However, the spill containment capacity will equate to only around 5% of the total volume of packages plus an allowance for 20 minutes of firewater. As the flammable liquid store bund will not have sufficient spillage capacity to contain 100% of packages plus 90 minutes of fire water, the entire warehouse is considered a single storage and handling area. Insufficient information has been submitted to demonstrate compliance with PO7 of State code 21 of the SDAP. Action: To demonstrate the proposed development complies with PO7 of the State code 21 of the SDAP, submit information to adequately: (a) determine the volume of hazardous chemicals to be contained noting the entire warehouse is considered a single storage and handling area (b) determine the volume of fire water required and explain the difference between the estimated fire water volume for this application and a similar application that Riskcon engineering provided hazard analysis for (2312-38084 SRA) (c) demonstrate the spill containment system(s) will contain the combined volume of hazardous chemicals and firewater. This may be supported by information including drawings, calculations, and any other information necessary and must: (i) confirm that spill containment systems are impervious, fire-resistant (no plastic or rubber components), and chemical resistant (ii) detail the spill containment volume of the flammable liquid store and other sections of the warehouse that have separate compartments (iii) detail any connections/interactions with the site stormwater systems such as interceptor pits, stormwater drain valves etc.
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Advice	
1.	Concerning item 1, the applicant should consider: • including fire-rated walls (FRL 120/120/120) to at least the west and south walls (not limiting other solutions). SARA notes compliance with other codes relating to fire protection (e.g. National Construction Code) is unlikely to be sufficient to meet State code 21 of the SDAP. • installing a foam extinguishing system in the flammable liquid store. A water-only sprinkler system is likely to contravene section 359 of the Work Health and Safety Regulation because water is not a suitable extinguishing medium for water-insoluble flammable liquids. The Office of Industrial Relations may issue an improvement notice

	to remedy if the facility commences operation with a water-only system. Alternatively, it may be recommended as a condition of development approval.
2	Concerning item 2: As the flammable liquid store bund will not have sufficient spillage capacity to contain 100% of packages plus 90 minutes of fire water, the entire warehouse must be considered a single storage and handling area for the purpose of PO7 of State code 21 of the SDAP. As such, the spill capacity requirement is 100% of packages which is 437 tonnes. This must be converted to volume. Assuming an average liquid density of 800kg/m ³ the volume is about 550,000 litres.

How to respond

You have three months to respond to this request and the due date to SARA is 22 August 2024.

You may respond by providing either: (a) all of the information requested; (b) part of the information requested; or (c) a notice that none of the information will be provided. Further guidance on responding to an information request is provided in section 13 of the [Development Assessment Rules](#) (DA Rules).

It is recommended that you provide all the information requested above. If you decide not to provide all the information requested, your application will be assessed and decided based on the information provided to date.

You are requested to upload your response and complete the relevant tasks in [MyDAS2](#).

As SARA is a referral agency for this application, a copy of this information request will be provided to the assessment manager in accordance with section 12.4 of the DA Rules.

If you require further information or have any questions about the above, please contact Amanda Hosken, Principal Planning Officer, on (07) 5644 3216 or via email SEQSouthPlanning@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Fletcher Smith
Principal Planning Officer, Planning and Development Services (SEQ South)

cc Gold Coast City Council, mail@goldcoast.qld.gov.au

Development details	
Description:	Request for a change application, other than a minor change, to a development approval pursuant to section 82 of the <i>Planning Act 2016</i> , to Development Permit for a Material change of use for Warehouse and Development Permit for Operational work for Change to ground level.
SARA role:	Referral Agency
SARA trigger:	Schedule 10, Part 7, Division 3, Table 1, Item 1 - Material change of use for a hazardous chemical facility (Planning Regulation 2017)
SARA reference:	2404-40203 SRA
Assessment criteria:	SDAP State code 21