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Contact: Inspector Chris Naisby

23 January 2026

RACHAEL HELSHAM
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Rachael,

Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – GILLENBAH BESS - THE GAP ROAD, GILLENBAH, NSW 2700 (SSD-104186459)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 20 January 2026, requesting input into the preparation of the SEARs for the GILLENBAH BESS - THE GAP ROAD, GILLENBAH, NSW 2700 (SSD-104186459). FRNSW have reviewed the SEARs along with the Scoping Report with particular focus to Section 6.1.11 Hazard and Risk.

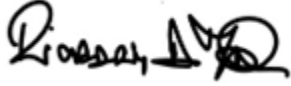
The Scoping Report details a 400 MW / 1,600 MWh Battery Energy Storage System (BESS). It has been the experience of FRNSW that BESS Facilities present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022¹.

FRNSW will likely recommend a Fire Safety Study (FSS) be developed in accordance with the Hazardous Industry Planning Advisory Paper No 2² as a condition of consent. The FSS should be used to inform the design and as such it is FRNSW Position³ that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).

The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets⁴ with particular focus to Large-scale external lithium-ion battery energy storage systems – Fire safety study considerations⁵.

Project proponents undertaking the FSS are to engage directly with FRNSW by submitting all correspondence electronically to FireSafety@fire.nsw.gov.au and reference FRNSW file number FRN26/409. Further information regarding FRNSW Meetings⁶ and FRNSW Written Reports⁷ can be found at the FRNSW Building Fire Safety Industry Portal⁸.

Yours sincerely,



Richard Jay
Team Leader
Fire Safety Liaison Unit

Cc: rachael.helsham@dpie.nsw.gov.au

¹ <https://ncc.abcba.gov.au/editions/ncc-2022>

² <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-and-offensive-planning-advisory-paper-no-2-fire-safety-study-guidelines.pdf>

³ <https://www.fire.nsw.gov.au/page.php?id=9447&position=51>

⁴ <https://www.fire.nsw.gov.au/page.php?id=9166>

⁵ <https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/Tech%20info%20sheet%20-%20Large-scale%20external%20LIBESS%20-%20Fire%20safety%20study%20considerations.pdf>

⁶ <https://www.fire.nsw.gov.au/page.php?id=9193>

⁷ <https://www.fire.nsw.gov.au/page.php?id=9156>

⁸ <https://www.fire.nsw.gov.au/page.php?id=9140>