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TRIM Doc. No: D23/71365
Contact: Senior Firefighter Courtney Goodhew

2 August 2023

NESTOR TSAMBOS
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Nestor,

Re: Advice on Environmental Impact Statement (EIS) – SUNDOWN SOLAR FARM – STURMANS ROAD, SPRING MOUNTAIN NSW 2360 (SSD-8911)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 5 July 2023, requesting advice on the EIS for SUNDOWN SOLAR FARM – STURMANS ROAD, SPRING MOUNTAIN NSW 2360 (SSD-8911). FRNSW have reviewed the EIS along with the Preliminary Hazards Analysis.

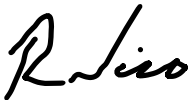
It has been the experience of FRNSW that BESS facilities pose special problems of firefighting and special hazards exist that may require additional fire safety and management measures. Due to these unique challenges FRNSW make the following recommendations:

1. That a comprehensive Fire Safety Study (FSS) is developed. The FSS is to be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2¹ and is to meet the operational requirements of FRNSW.
2. That the development of the FSS consider the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence. The FSS should be prepared consistent with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations².
3. That the FSS be submitted, reviewed, and meet the operational requirements 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).
4. That the development of a FSS be a condition of consent.
5. That a comprehensive Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1.³ The findings of the FSS should inform the development and content of the EP.

6. That an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.⁴
7. An Emergency Responders Induction Package is developed for the site in consultation with, and to the satisfaction of FRNSW prior to commissioning of the site. The package should inform first responders of site-specific features and safety measures to ensure they are able to undertake their duties effectively in accordance with agency specific Standard Operational Guidelines. The format of the Induction Package should be such that it can be readily shared across all Agencies.

For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS23/3698. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,



A/Superintendent Robert Nicoletti
Manager
Operational Liaison and Special Hazards Unit

Cc: nestor.tsambos@dpie.nsw.gov.au

¹ <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/fire-safety-study-guidelines-2011-01.pdf?la=en>

² <https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/Tech%20info%20sheet%20-%20Large-scale%20external%20LiBESS%20-%20Fire%20safety%20study%20considerations.pdf>

³ <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/hazardous-industry-planning-advisory-paper-no-1-emergency-planning-2011-01.pdf?la=en>

⁴ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_ESIP_and_TFP.pdf