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Contact: Senior Firefighter Gavin Scott

23 May 2024

LAUREN CLEAR
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Lauren,

Re: Advice on Environmental Impact Statement (EIS) – KERI KERI WIND FARM – STURT HIGHWAY, KERI KERI NSW 2711 (SSD-38358962)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 23 May 2024, requesting advice on the EIS for KERI KERI WIND FARM – STURT HIGHWAY, KERI KERI NSW 2711 (SSD-38358962). FRNSW have reviewed the EIS with particular focus to 6.7 Hazards and Risks, along with the Preliminary Hazards Analysis (PHA).

FRNSW notes the proposal of a 200MW/800MWH Battery Energy Storage System (BESS). BESS facilities pose special problems of firefighting and special hazards exist that may require additional fire safety and management measures. Should this project be approved FRNSW make the following recommendations:

1. That a Fire Safety Study (FSS) is developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2¹ and submitted to FRNSW for review.
 - The FSS is to 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 FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations².
2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1.³
3. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.⁴
4. Prior to occupation or commissioning an Emergency Responders Induction Package is developed for the site in consultation with, and to the satisfaction of FRNSW. 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 BFS24/3027. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,

8579 Lynden Moyes

A/Superintendent Lynden Moyes
Manager
Operational Liaison and Special Hazards Unit

Cc: lauren.clear@dpie.nsw.gov.au

¹ <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-and-offensive-planning-advisory-paper-no-2-fire-safety-study-guidelines.pdf>

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/sites/default/files/2023-03/hazardous-industry-planning-advisory-paper-no-1-emergency-planning.pdf>

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