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TRIM Doc. No: D24/91291
Contact: Station Officer Richard Jay

31 July 2024

JAMES BELLAMY
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear James,

Re: Advice on Environmental Impact Statement (EIS) – KINGSWOOD BATTERY ENERGY STORAGE SYSTEM – 744 BURGMANN'S LANE, KINGSWOOD 2340 (SSD-63207219)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 22 July 2024, requesting advice on the EIS for KINGSWOOD BATTERY ENERGY STORAGE SYSTEM – 744 BURGMANN'S LANE, KINGSWOOD 2340 (SSD-63207219). FRNSW have reviewed the EIS with particular focus to section 6.4 Hazards and Risk, along with the Preliminary Hazards Analysis (PHA), Bushfire Impact Assessment and the Engagement Report.

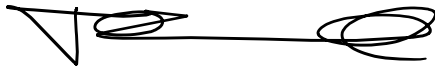
FRNSW notes the proposal of a 270MW/1080MWH Battery Energy Storage System (BESS). BESS facilities pose special problems of firefighting and special hazards exist that may require additional fire safety and management measures. Should this project be approved FRNSW make the following recommendations:

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 BFS24/4415. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,



Superintendent James O'Carroll
Manager
Operational Liaison and Special Hazards Unit

Cc: james.bellamy@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