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Contact: Station Officer Richard Jay

2 December 2024

EWAN REID
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ewan,

Re: Advice on Environmental Impact Statement (EIS) – GREGADOO SOLAR FARM MOD 4 - BESS AND INCREASE DEVELOPMENT FOOTPRINT (SSD-8825-MOD-4)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 15 November 2024, requesting advice on the Modification Report for GREGADOO SOLAR FARM MOD 4 - BESS AND INCREASE DEVELOPMENT FOOTPRINT (SSD-8825-MOD-4). FRNSW have reviewed the Modification Report with particular focus to Appendix J, Preliminary Hazards Analysis (PHA).

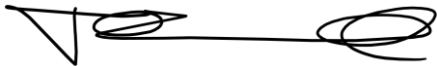
The Modification Report details a 200MWAC and 400MWh Battery Energy Storage System (BESS). It has been the experience of FRNSW that BESS Facilities present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022¹. FRNSW therefore recommend the following conditions:

1. Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.2² and submitted to FRNSW for review.
 - The FSS is to 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 FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations⁴.
2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1⁵.
3. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans⁶.

4. Prior to occupation or commissioning an emergency responder's 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. The format of the induction package should be such that it can be readily shared across all agencies.

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 FRN18/874. Further information regarding FRNSW Meetings⁷ and FRNSW Written Reports⁸ can be found at the FRNSW Building Fire Safety Industry Portal⁹.

Yours sincerely,



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

Cc: ewan.reid@dpie.nsw.gov.au

¹ <https://ncc.abcb.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/gallery/files/pdf/guidelines/Tech%20info%20sheet%20-%20Large-scale%20external%20LiBESS%20-%20Fire%20safety%20study%20considerations.pdf>

⁵ <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-industry-planning-advisory-paper-no-1-emergency-planning.pdf>

⁶ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_ESIP_and_TFP.pdf

⁷ <https://www.fire.nsw.gov.au/page.php?id=9193>

⁸ <https://www.fire.nsw.gov.au/page.php?id=9156>

⁹ <https://www.fire.nsw.gov.au/page.php?id=9140>