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Contact: Senior Firefighter Michael Millar

7 April 2025

KIRSTY VOGEL
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Kirsty,

Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – MCCULLYS GAP BATTERY ENERGY STORAGE SYSTEM - 578 SANDY CREEK ROAD, MCCULLYS GAP (SSD-81555720).

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 27 March 2025, requesting input into the preparation of the SEARs for the MCCULLYS GAP BESS - 578 SANDY CREEK ROAD, MCCULLYS GAP (SSD-81555720). FRNSW have reviewed the SEARs along with the Scoping Report with particular focus to Section 6.4 Hazards and Risks.

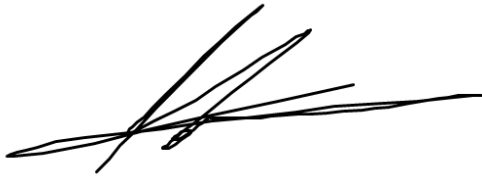
The Scoping Report details a 400 MW/1600MWH Battery Energy Storage System (BESS). It has been the experience of FRNSW that BESS Facilities present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction 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 FRN25/1091. Further information regarding FRNSW Meetings⁶ and FRNSW Written Reports⁷ can be found at the FRNSW Building Fire Safety Industry Portal⁸.

Yours sincerely,



A/Superintendent Luke Loseby
Manager
Fire Safety Liaison Unit

Cc: kirsty.vogel@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/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>