



File Ref. No: FRN24/1950 BFS25/3497 8000042869  
TRIM Doc. No: D25/62070  
Contact: Senior Firefighter Sarah Tobin

5 June 2025

SAMANTHA WYNN  
NSW Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Samantha,

**Re: Advice on Environmental Impact Statement (EIS) – FINLEY BESS - RIVERINA HIGHWAY, FINLEY NSW 2713 (SSD-72430958)**


Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 29 June 2025, requesting advice on the EIS for FINLEY BESS - RIVERINA HIGHWAY, FINLEY NSW 2713 (SSD-72430958). FRNSW have reviewed the EIS with particular focus to the Preliminary Hazards Analysis (PHA).

The EIS details a 100 Megawatt AC (MWAC) / 200 Megawatt Hour (MWh) 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 2022<sup>1</sup>. 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.2<sup>2</sup> and submitted to FRNSW for review.
  - The FSS is to be used to inform the design and as such it is FRNSW Position<sup>3</sup> 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 considerations<sup>4</sup>.
2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1<sup>5</sup>.
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 plans<sup>6</sup>.

Project proponents undertaking the FSS are to engage directly with FRNSW by submitting all correspondence electronically to [FireSafety@fire.nsw.gov.au](mailto:FireSafety@fire.nsw.gov.au) and reference FRNSW file number FRN24/1950. Further information regarding FRNSW Meetings<sup>7</sup> and FRNSW Written Reports<sup>8</sup> can be found at the FRNSW Building Fire Safety Industry Portal<sup>9</sup>.

Yours sincerely,



A/Superintendent Luke Loseby  
Manager  
Fire Safety Liaison Unit

Cc: [samantha.wynn@dpie.nsw.gov.au](mailto:samantha.wynn@dpie.nsw.gov.au)

---

<sup>1</sup> <https://ncc.abcb.gov.au/editions/ncc-2022>

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

<sup>3</sup> <https://www.fire.nsw.gov.au/page.php?id=9447&position=51>

<sup>4</sup> <https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/Tech%20info%20sheet%20-%20Large-scale%20external%20LIBESS%20-%20Fire%20safety%20study%20considerations.pdf>

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

<sup>6</sup> <https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/03%20Emergency%20services%20information%20package%20and%20tactical%20fire%20plans.pdf>

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

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

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