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 Contact: Senior Firefighter Michael Millar

12 September 2025

GRACIE JACKEL  
 NSW Department of Planning, Housing and Infrastructure  
 Locked Bag 5022  
 PARRAMATTA NSW 2124

Dear Gracie,

**Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – SUNSHINE ESTATE BATTERY ENERGY STORAGE SYSTEM – 1337 WINE COUNTRY DRIVE, ROTHBURY (SSD-92914712).**

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 4 September 2025, requesting input into the preparation of the SEARs for the SUNSHINE ESTATE BATTERY ENERGY STORAGE SYSTEM – 1337 WINE COUNTRY DRIVE, ROTHBURY (SSD-92914712). FRNSW have reviewed the SEARs along with the Scoping Report with particular focus to Section 6.7 Hazards.

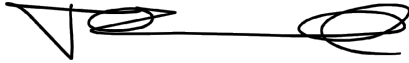
The Scoping Report details a 120MW/480MWH Battery Energy Storage System (BESS). It has been the experience of FRNSW that BESS Facilities present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022<sup>1</sup>.

FRNSW will likely recommend a Fire Safety Study (FSS) be developed in accordance with the Hazardous Industry Planning Advisory Paper No 2<sup>2</sup> as a condition of consent. The FSS should 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 relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets<sup>4</sup> with particular focus to Large-scale external lithium-ion battery energy storage systems – Fire safety study considerations<sup>5</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 FRN25/2765. Further information regarding FRNSW Meetings<sup>6</sup> and FRNSW Written Reports<sup>7</sup> can be found at the FRNSW Building Fire Safety Industry Portal<sup>8</sup>.

Yours sincerely,



Superintendent James O'Carroll  
Manager  
Fire Safety Liaison Unit

Cc: [gracie.jackel@dpie.nsw.gov.au](mailto:gracie.jackel@dpie.nsw.gov.au)

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<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/page.php?id=9166>

<sup>5</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>6</sup> <https://www.fire.nsw.gov.au/page.php?id=9193>

<sup>7</sup> <https://www.fire.nsw.gov.au/page.php?id=9156>

<sup>8</sup> <https://www.fire.nsw.gov.au/page.php?id=9140>