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Contact: Senior Firefighter Michael Millar

20 November 2025

RITA HATEM
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Rita,

Re: Advice on Environmental Impact Statement (EIS) – STONEY CREEK BATTERY ENERGY STORAGE SYSTEM - 41 STONEY CREEK ROAD NARRABRI (SSD-75680468).

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 18 November 2025, requesting advice on the EIS for STONEY CREEK BATTERY ENERGY STORAGE SYSTEM - 41 STONEY CREEK ROAD NARRABRI (SSD-75680468). FRNSW have reviewed the EIS with particular focus to the Hazard and Risk Assessment (Appendix Q).

The EIS details a 125 MW/1000 MWH 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.

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 FRN24/2766. Further information regarding FRNSW Meetings⁷ and FRNSW Written Reports⁸ can be found at the FRNSW Building Fire Safety Industry Portal⁹.

Yours sincerely,



Inspector Luke Loseby
Team Leader
Fire Safety Liaison Unit

Cc: Rita.Hatem@planning.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/03%20Emergency%20services%20information%20package%20and%20tactical%20fire%20plans.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>