BUSH FIRE ASSESSMENT REPORT

FINLEY BATTERY ENERGY STORAGE SYSTEM
Lot 3 DP740920 Riverina Highway
FINLEY

PREPARED BY:

PEAK LAND MANAGEMENT

APRIL 2025

BPAD Bushfire Planning & Design Accredited Practitioner Level 3

PEAK LAND MANAGEMENT

Land management consulting services:

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Cover Photo: View of Development Site.

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Document History

Document Id.	Prep. Date	Version	Submitted to
Draft Bush Fire Report	10.3.25	1	Premise
Bush Fire Report	2.4.25	2	Premise
Bush Fire Report	8.4.25	3	Premise

AUTHOR DETAILS

Ted Smith is the director of PEAK LAND MANAGEMENT. He is a qualified Land Management Consultant with a Bachelor of Science Honours Degree in Physical Geography. He has over 25 years experience commercially consulting with PEAK LAND MANAGEMENT PTY LTD and working within state government.

Ted has completed a Graduate Diploma in Design for Bush Fire Prone Areas from the University of Western Sydney and is a member of the Fire Protection Association of Australia (FPA of Australia), being a BPAD Accredited Bush Fire Practitioner Level 3.

CERTIFICATION

Ted Smith of PEAK LAND MANAGEMENT has prepared this detailed Bush Fire Assessment Report which includes the requirements set out in *Appendix 2 & 4* of *Planning for Bush Fire Protection 2019* together with recommendations as to how the relevant specifications and requirements are to be achieved.

I hereby certify, in accordance with Section 4.14 of the *Environmental Planning and Assessment Act 1979 No 203*:

1. That I am a person recognised by the *NSW Rural Fire Service* as a qualified consultant in Bush Fire Risk Assessment; and

2. That subject to the recommendations contained in the attached Bush Fire Assessment Report the proposed development conforms to the ***relevant specifications and requirements*** being the document entitled *Planning for Bush Fire Protection* prepared by the NSW Rural Fire Service in co-operation with the Department of Planning and any other document as prescribed by Section 4.14 of the *Environmental Planning and Assessment Act 1979 No 203*.

Signature

8th April, 2025

Date

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TERMS AND ABBREVIATIONS

Abbreviation	Meaning
AHIMS	Aboriginal Heritage Information Management System
APZ	Asset Protection Zone
AS2419 -2005	Australian Standard – Fire Hydrant Installations
AS3959-2018	Australian Standard – Construction of Buildings in Bush Fire Prone Areas
BESS	Battery Energy Storage System
BCA	Building Code of Australia
BPL	Bush Fire Prone Land
BPMs	Bush Fire Protection Measures
BRMP	Bushfire Risk Management Plan
BTA	Bushfire Threat Assessment
EPA Act	*NSW Environmental Planning and Assessment Act 1979*
EMP	Emergency Management Plan
FDI	Fire Danger Index
FMP	Fuel Management Plan
Ha	Hectare
IPA	Inner Protection Area
LEP	Local Environment Plan
LGA	Local Government Area
OPA	Outer Protection Area
PBP 2019	Planning for Bushfire Protection 2019
RF Act	*Rural Fires Act 1997*
RF Regulation	Rural Fires Regulation, 2022
SEARs	Depart of Planning & Environment - Secretary's Environmental Assessment Requirements

1.1 INTRODUCTION

BESS Pacific c/o Gransolar Development Australia (the Applicant) is proposing to develop a 100 Megawatt, 200 MW hour (MWh) Battery Energy Storage System (BESS). The proposed Finley BESS development is to be located on a portion of Lot 3 DP 740920 at Riverina Highway, Finley New South Wales.

SLR, Scoping Report, 2024 state:

BESS Pacific Pty Ltd seeks to establish a Battery Energy Storage System (BESS) facility with a connection to the existing electricity grid via a transmission line (TL) route comprising of below ground cables, connecting to TransGrid's FINLEY 132/66 kilovolt (kV) Transmission Substation (TS) (herein referred to as the 'Project').

The BESS is proposed on a portion Lot 3 DP740920 at Riverina Highway, Finley New South Wales (NSW) 2713 (the 'BESS Site'). A TL is proposed to the FINLEY 132/66 kV TS located on Lot B DP961693, 168 Canalla Road, Finley NSW 2713 (the 'Substation Site'), approximately 250 m to the south west of the BESS Site. The TL will be tunnelled below Broockmanns Road and the Mulwala No. 19 canal. The overall TL route will have a proposed connection length of 480 m.

Collectively, these properties are hereafter referred to as the 'Subject Sites'.

The BESS comprises approximately 80 x 20-foot modular containers comprising of Lithium-Ion batteries with the appropriate cooling and protection system. A total of approximately 40 inverters (one per every two batteries) will be located externally to the modular containers. Batteries and inverters are fixed to hardstand footings where they are accessible by an internal road.

Other physical features of the Project include a control room/switchgear and auxiliary transmission, car parking, landscaping, security fencing/lighting, and a single storage structure.

The Project is self-operating and only requires minor periodic visitation by an authorised person. The facility is otherwise restricted to the public.

The development site will occupy an area of approximately 3 hectares. Access to the BESS Site is proposed to be via Broockmanns Road via two new driveway crossings. An internal access road will accommodate heavy vehicles associated with the construction of the BESS.

The development site is in the Berrigan Local Government Area (LGA).

PEAK LAND MANAGEMENT has been engaged by Premise Pty Ltd on behalf of BESS Pacific Pty Ltd to prepare this Bush Fire Assessment Report for inclusion within the Environmental Impact Statement (EIS) for the Project.

The Project is deemed to be State Significant Development (SSD) being a development for the purposes of a large-scale BESS development. The Project therefore requires assessment and approval in accordance with Part 4, Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

Figures 1-9 show the development site location, topography, vegetation, site plan and Appendix 1 shows photos of the development site.

This Report has been prepared to address the bushfire element of the NSW Planning Secretary's Environmental Assessment Requirements (SEARs) for the Project (SSD-72430958), specifically to:

- *Bushfire - identify potential hazards and risks associated with bushfires / use of bushfire prone land including the risks that a BESS would cause a bush fire and demonstrate compliance with the RFS Planning for Bush Fire Protection 2019.*

Section 8.3.5 of Planning for Bushfire Protection (PBP) 2019 (Wind and Solar Farms) is the relevant section of PBP, 2019 that addresses this proposal. It states in part that:-

Wind and solar farms require special consideration and should be provided with adequate clearances to combustible vegetation as well as firefighting access and water.

The following should be provided for wind and solar farms:

- *a minimum 10m APZ for the structures and associated buildings/infrastructure; and*
- *the APZ must be maintained to the standard of an IPA for the life of the development.*

Infrastructure for the purposes of requiring APZ excludes:

- *road access to the site; and*
- *power or other services to the site and associated fencing.*

Essential equipment should be designed and housed in such a way as to minimise the impact of bush fires on the capabilities of the infrastructure during bush fire emergencies. It should also be designed and maintained so that it will not serve as a bush fire risk to surrounding bush.

A Bush Fire Emergency Management and Operations Plan should identify all relevant risks and mitigation measures associated with the construction and operation of the wind or solar farm.

Under the EP&A Act (and its regulations), and the *Rural Fires Act 1997* (and its regulations), councils/NSW Government are required to assess and control new developments in bush fire prone areas. This land has been assessed as not being part of a Bush Fire Prone Land Area (Figure 6) as mapped under the NSW Rural Fire Service Bushfire Prone Land mapping. The closest land to be classed as bushfire prone are located approximately 4 km to the west.

It should be noted that development which is classified as State significant development (SSD) is not required to be assessed under section 4.14 of the EP&A Act and is exempt from requiring a Bush Fire Safety Authority (BFSA) as per section 4.14(1B) of the EP&A Act. State significant infrastructure (SSI) is also not subject to BFSA requirements (as per section 5.23(1)(f) of the EP&A Act). Given the scale of SSI and SSD projects, it is suggested that the requirements of PBP 2019 should still be applied, and seeking advice from the NSW RFS is encouraged. This report addresses the SEARs requirements from NSW RFS. Note consultation with NSW RFS has confirmed that Aboriginal and Ecological issues do not have to be addressed/summarised within this report, and will be assessed as part of the EIS.

This report has been prepared in accordance with PBP guidelines. Clause 46 of the *Rural Fires Regulation 2022* sets out these requirements, which are addressed in this report. A Bush Fire Assessment Report is required showing the current situation and recommending how the risk may be ameliorated.

Figure 1: Project location (from Premise, 2025). North to top of all figures unless otherwise shown.

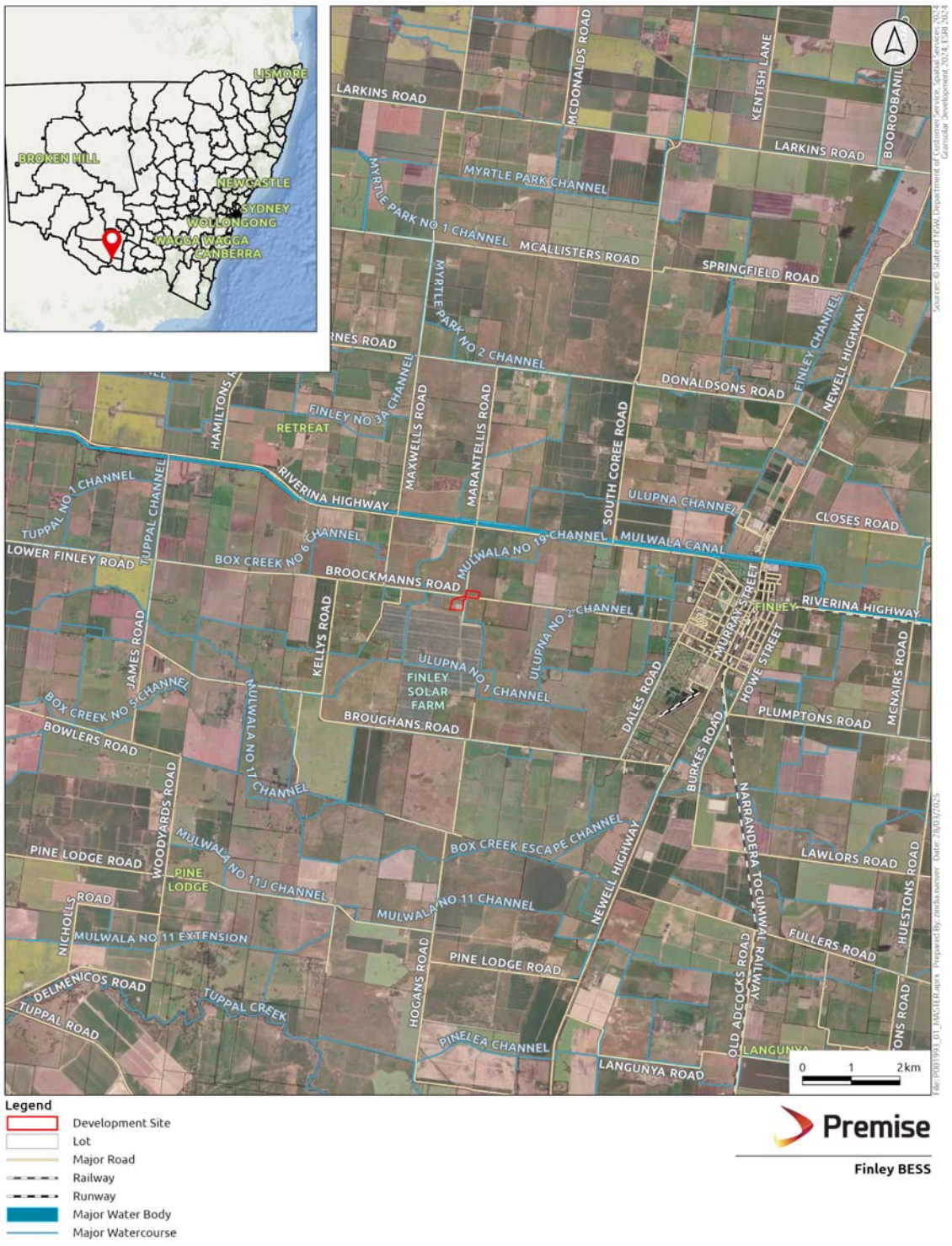


Figure 2: Topographic map of subject BESS development site and surrounds (from SIX Maps, NSW Government)

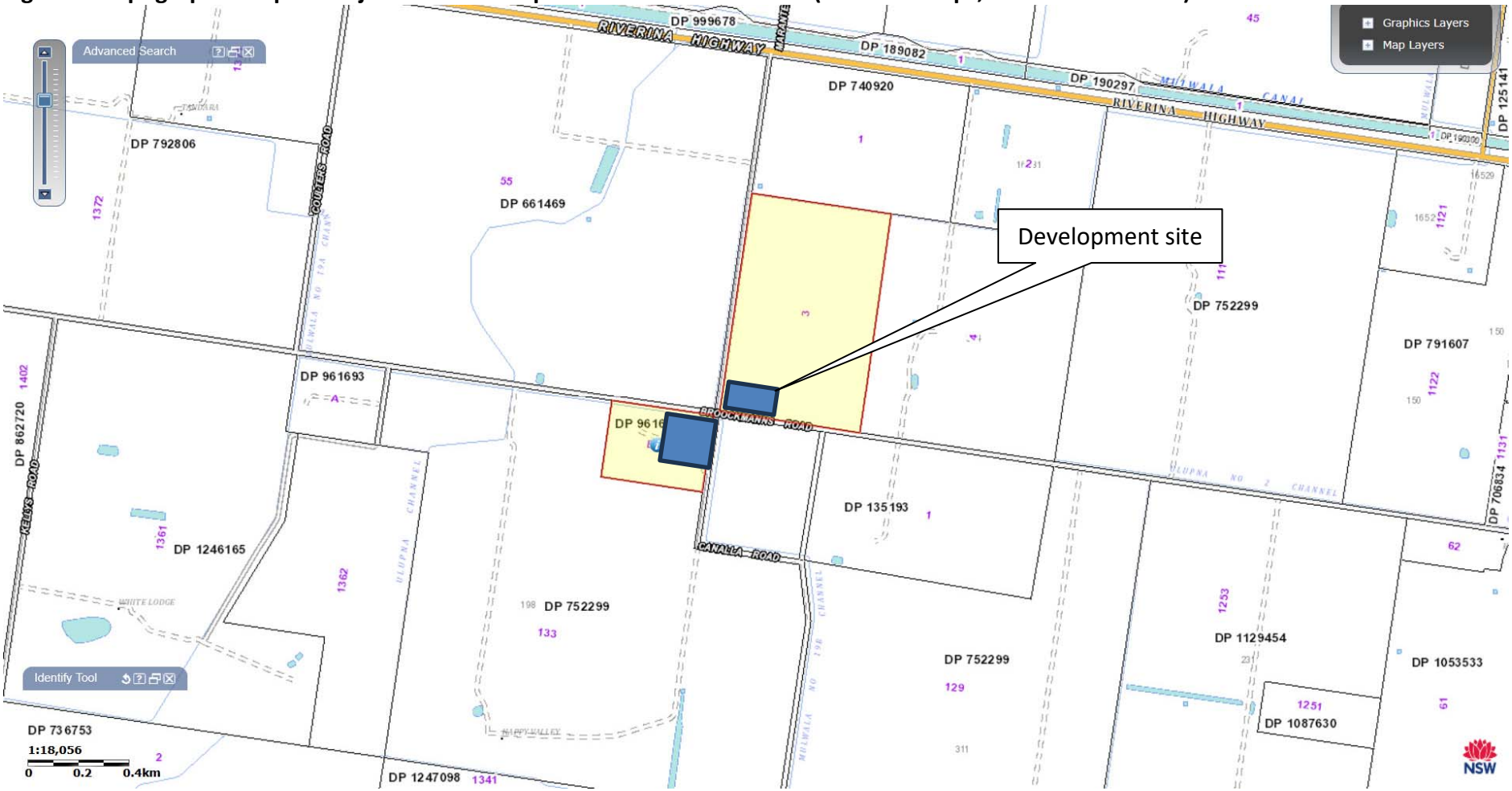


Figure 3: Project layout & location (from Premise).

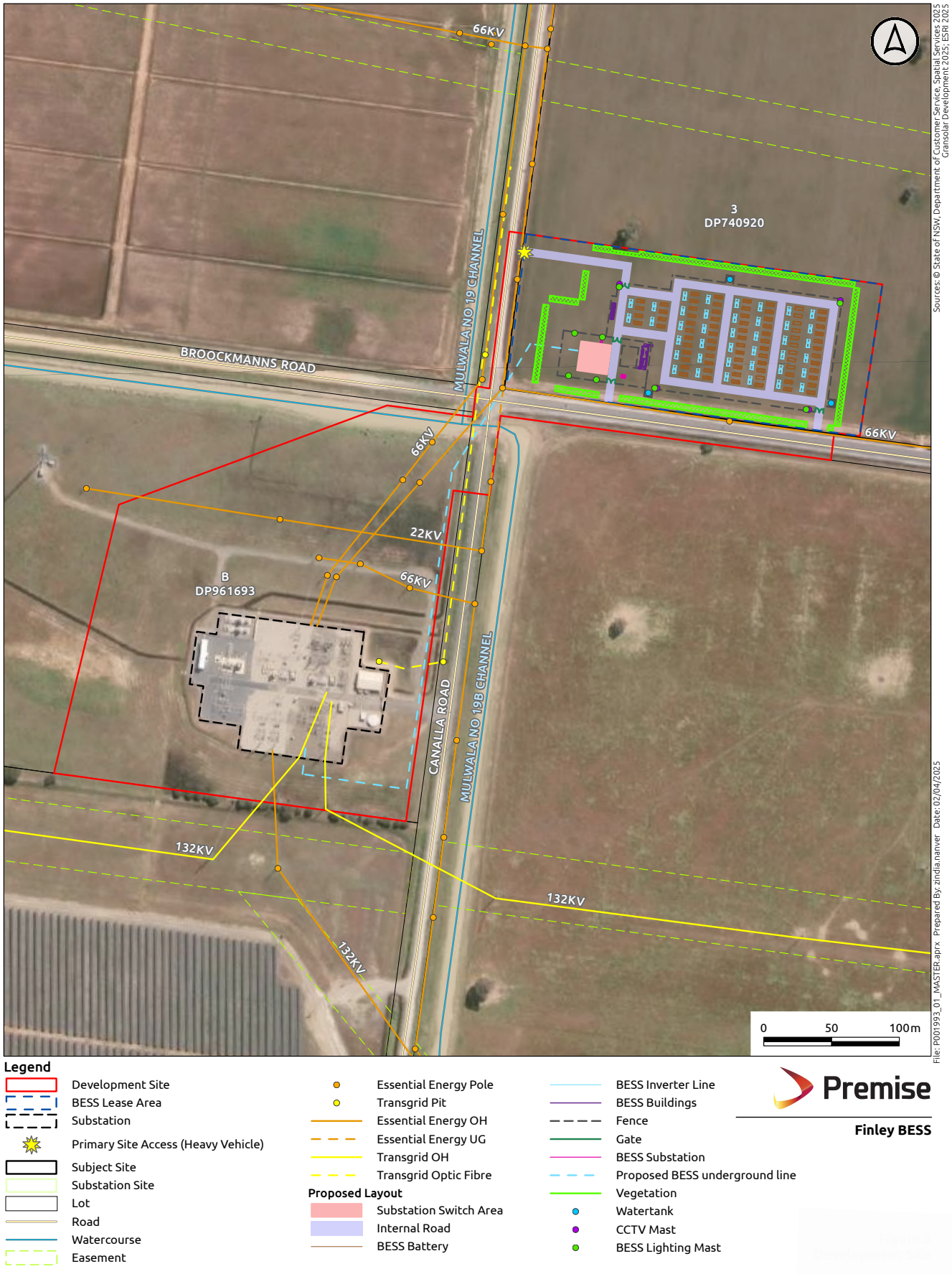


Figure 4: BESS Layout (from Premise).

Figure 5: Bush Fire Prone Land Map (from NSW Planning Portal Spatial Viewer, 2025).

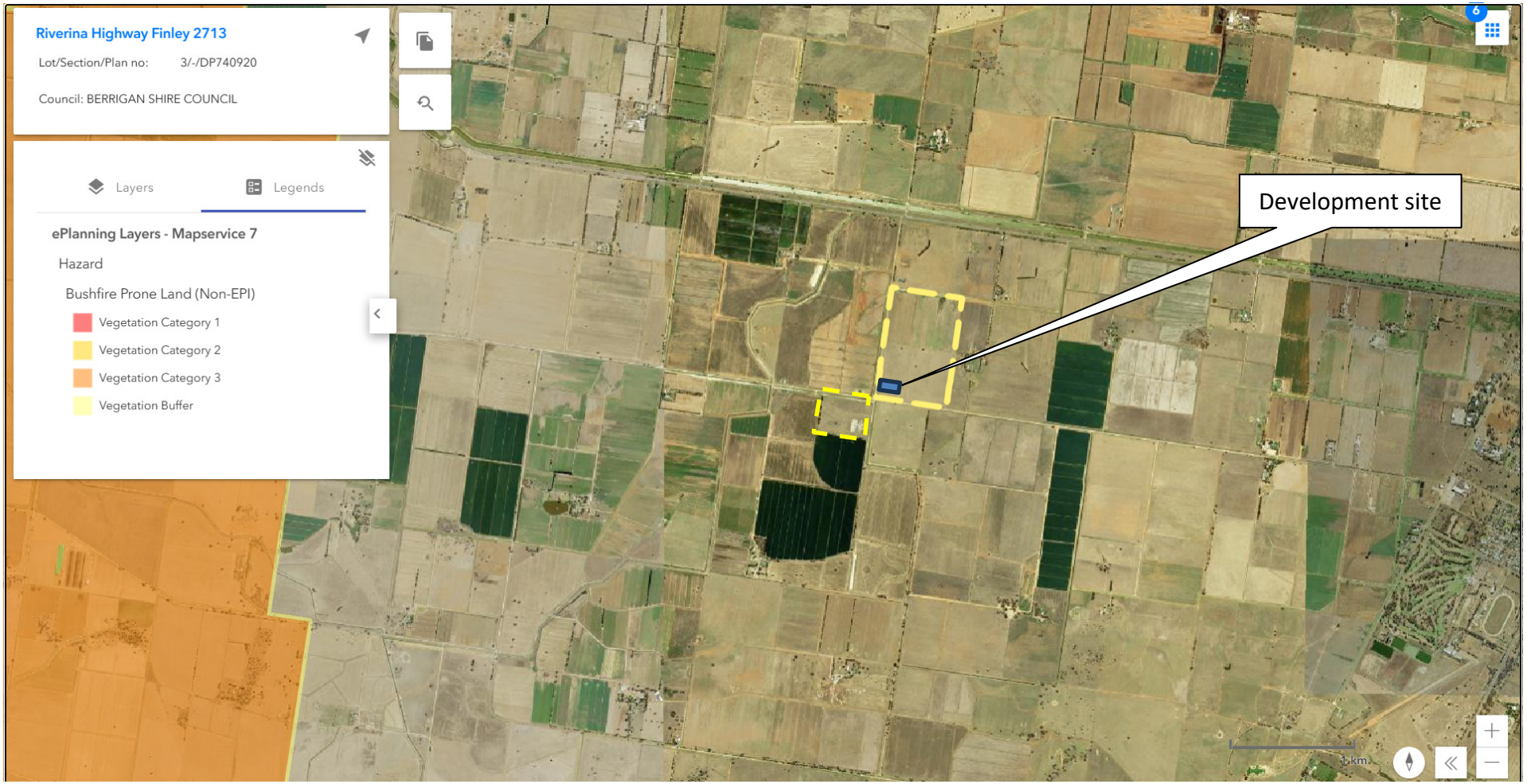


Figure 6: Landuse (from Premise).

Figure 7: Bush fire vegetation assessment over Development site (BESS) and surrounds within 140m (imagery from NSW Planning Portal Spatial Viewer, 2025)

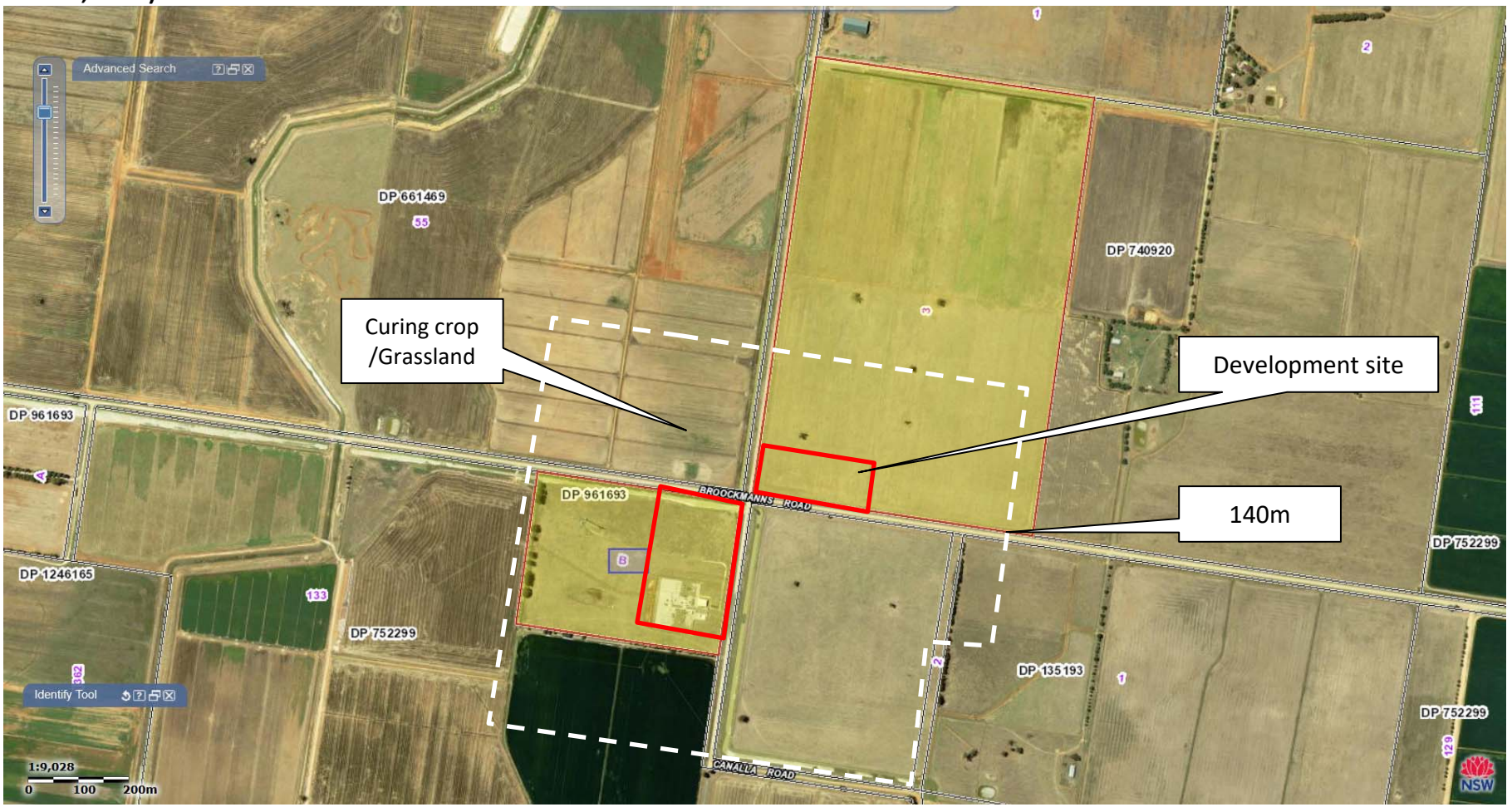


Figure 8: Transmission route (from Premise)

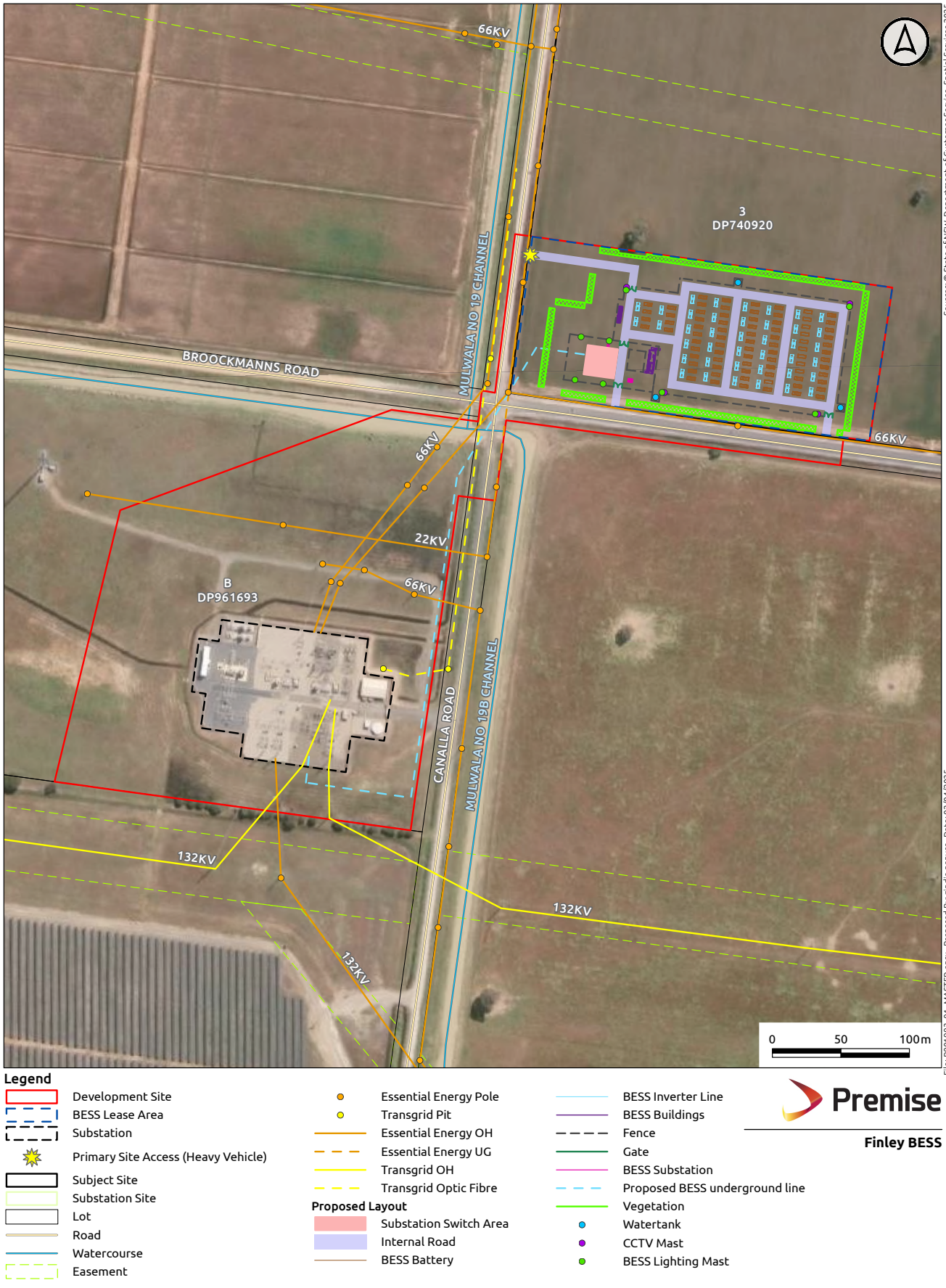
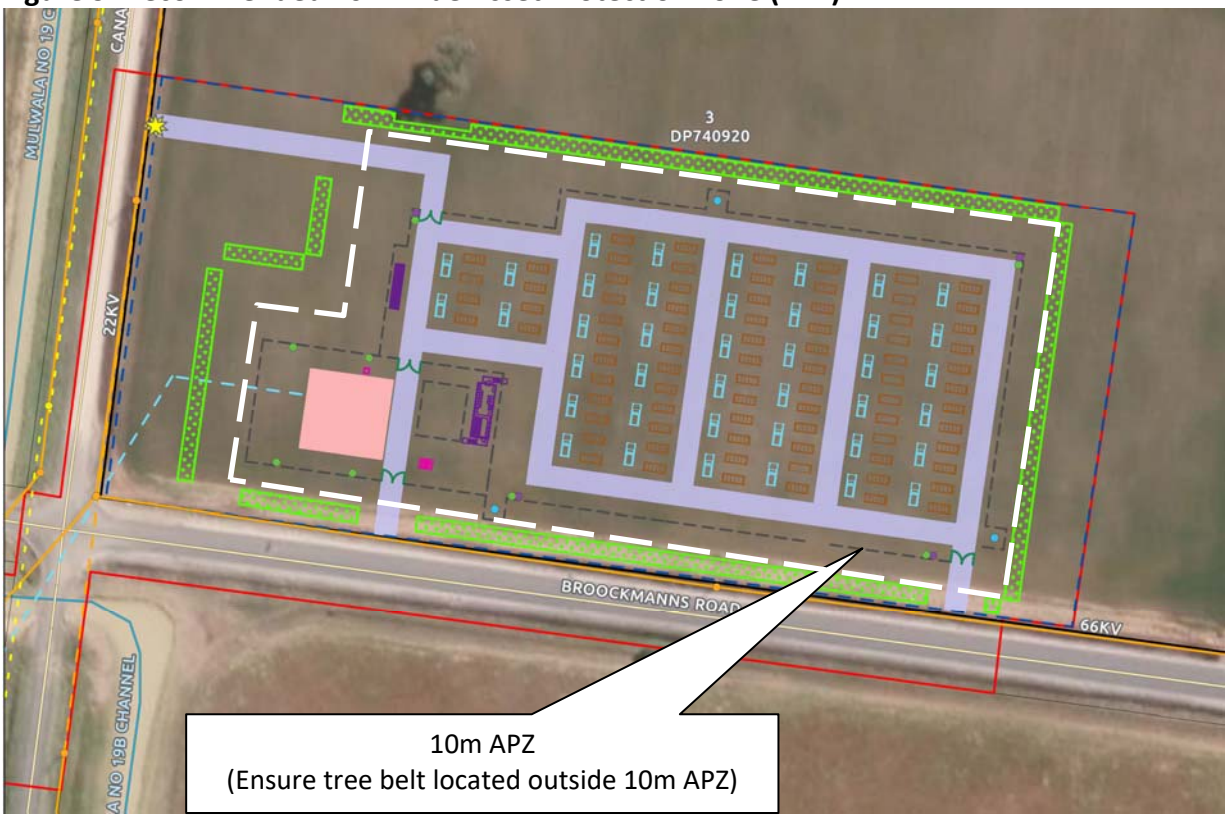
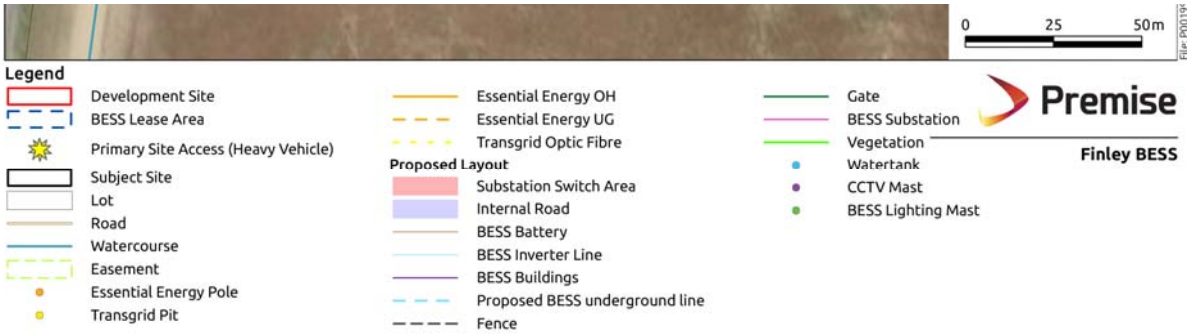


Figure 9: Recommended 10m wide Asset Protection Zone (APZ)





2.0 SPECIFICATIONS, UTILITIES, ACCESS AND SURROUNDING LANDUSE

2.1 PROJECT OVERVIEW

SLR, 2024 state: "*The Project will involve the development, construction, operation, and eventual decommissioning of a BESS with a capacity of 100 MW, 200 MWh connecting via underground TL directly to the existing FINLEY 132/66 kV TS operated by Transgrid. The BESS will consist of BESS containers (or enclosures), with each container having an approximate weight of 42,000kg. The BESS will be supported by inverters which will convert the electricity from the BESS and connect to the existing Transgrid substation via approximately 480 m of 132 kV TLs. A portion of the underground TL infrastructure will traverse below Broockmanns Road and the Mulwala No. 19 canal.*

The key aspects of the project are summarised in Table ES1 and shown in Figure 2, and are described in detail below. The area of project disturbance will be approximately 0.3 Ha.

Plate 1: Indicative Image of BESS Modules

2.2 SURROUNDING LAND USE

The site is located in a rural area, which is cropped currently over and around the site. A landuse map (Fig 6) shows almost the entire surrounds being cropping land.

The site (apart from substation) is used for grazing/hay cropping at present. Vegetation is assessed within this report as a curing crop (hay), and is therefore considered a bush fire hazard and is assessed as Grassland. It is noted no hazard occurs at all for certain periods of the year when recently harvested, which is why it may not have been mapped as Bush Fire Prone Land.

2.5 ACCESS

All public and internal roads used for Project access will be constructed to meet the requirements of PBP, 2019.

It is proposed that access to and from the BESS Site will be provided from two new driveway crossovers from Broockmanns Road.

Premise, 2025 state: *Of importance is the proposed vehicle circulation: Council as the local road manager has asked if we can concentrate vehicle access off Canalla Road, which is constructed with a gravel finish, as it will be easier to maintain and repair from heavy over site/mass/dimension vehicles moving slowly on it. BESS Pacific Pty Ltd is discussing having a heavy vehicle-only access dedicated off Canalla Road, and passenger-car-only access via the constructed and bitumen sealed Brookmanns Road.*

There is ample room for fire fighting vehicles to access and turn around on site, and access the Asset Protection Zone around the perimeter of the BESS.

2.6 UTILITIES/WATER SUPPLIES

The Development site is not serviced by reticulated town water supplies.

A canal occurs near the site (see Fig 2 & 3 & photos Appendix 1) off Riverina Highway, and another off Broockmanns Rd. It has unknown permanency of water.

The proposed development will have three x 25 000l dedicated non combustible tanks (75 000 litre (l) in total) with Storz fittings, and other fire fighting equipment in compliance with Australian Standards. Emergency fire fighting water would be stored in a suitable accessible location.

Section 8.3.5 PBP, 2019 makes no reference to water supply required amount for Solar & Wind Farms. This dedicated water tank supply, is considered adequate, based upon the scale of the project, lack of permanent on site dwellings, availability of additional water from canal (when present), low bush fire risk, and is consistent with other Solar & Wind Farm developments.

The Development site is serviced by above ground power to the site. There are no permanent proposed gas tanks/bottling.

2.7 CONSTRUCTION STANDARDS

No construction standards are applicable for the Battery development as it is a commercial development. Construction standards are only applicable for any temporary workers camp, or office buildings, which are not proposed.

PBP, 2019 states "*Buildings of Class 5 to 8 and 10 of the BCA- The BCA does not provide any bush fire specific performance requirements and as such AS 3959 does not apply as a set of deemed to satisfy requirements. The general fire safety construction provisions are taken as acceptable solutions, but the aim and objectives of PBP 2019 apply in relation to other matters such as access, water and services, emergency planning and landscaping/vegetation management."*

This report has addressed PBP, 2019 aims and objectives.

A preliminary hazard analysis has been undertaken by Riskcon to investigate hazardous events and risks such as the explosion / spontaneous ignition risk associated with the operation of batteries. The level of risk / hazard depends on the type of battery and design, placement, safety measures etc.

Riskcon, 2025 state:

A hazard identification table was developed for the Finley BESS project to identify potential hazards that may be present at the site as a result of operations or storage of materials. Based on the identified hazards, scenarios were postulated that may result in an incident with the potential for offsite impacts. Postulated scenarios were discussed qualitatively and any scenarios that would not impact offsite were eliminated from further assessment. Scenarios not eliminated were then carried forward for consequence analysis.

A review of the incidents carried forward for further analysis indicates that there were no observed offsite impacts; therefore, based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the project would only be classified as potentially hazardous and would be permitted within the current land zoning for the site. It must be noted that the required bushfire assessment is provided under separate cover.

Recommendations

The following recommendations have been made as a result of the assessment:

- *End-to-end spacing (short side) of BESS containerised units shall be a minimum of 3 m*
- *Back-to-back spacing (long side) of BESS containerised units shall be a minimum of 3 m*
- *Spacing between BESS container accumulations (i.e. 4 containerised units) shall be a minimum of 3 m.*
- *The BESS containerised units shall be provided with the fire protection system specified by the BESS manufacturer.*
- *The vents shall not be located above battery packs within the BESS container.*
- *The vent covers of the BESS shall be constructed of non-combustible material.*
    - *Prior to commissioning, the UL test data for the selected battery units shall be made available to the DPHI.*

These recommendations are to be adopted by BESS Pacific Pty Ltd in the BESS design.

2.8 OTHER FIRE PROTECTION MEASURES/EMERGENCY EVACUATION

The EIS will document the requirement to prepare and implement an Emergency Response Plan – which will be developed with Department of Planning, Housing and Infrastructure (DHPI) Hazards / FRNSW / RFS. There will also be a commitment to prepare and implement a Bushfire Emergency Management Plan in consultation with FRNSW/RFS.

There will be up to 1-3 personnel during operations, operated by site-based staff during normal work days.

APZs will be established around selected Project infrastructure as detailed in Section 5.1. All vegetation and landscaping within the APZs shall be in accordance with PBP, 2019.

A Bushfire Emergency Management Plan is required, nominating an emergency meeting point, and preferred evacuation route, and methodology for ensuring all occupants are safe and accounted for. In regards to bushfire, the threat at this site is considered low, being possible ember and smoke attack only assuming the APZ is maintained.

All landscaping within the nominated APZ should be in accordance with APZ requirements as detailed within PBP, 2019. The proposed row of trees shall not be within the 10m wide Asset Protection Zone.

Other mitigation measures which are recommended to improve bushfire safety include:

- Informing Local Fire & Rescue Brigade of the proposal once approved regarding its operation, water supplies, and layout;
- It is anticipated relevant exterior fire fighting equipment will be provided including a protective clothing/PPE clothing/equipment, CO2 fire extinguishers, etc.
- Three 25 000l dedicated non combustible water tanks, with Storz fittings (accessible at all times to NSW RFS fire tankers/others.)
- Training for all on-site personnel regarding bushfire response procedures.
- Fire fighting training for operational workers.

3.0 VEGETATION

The predominant vegetation types over and within 140m of the Development site are Grassland assessed as per PBP 2019 (Figure 6, Appendix 1 - photos).

The site is located in a rural area, which is cropped currently over and around the site. A landuse map (Fig 6) shows almost the entire surrounds being cropping land.

The site (apart from substation) is used for grazing/hay cropping at present. Vegetation is assessed within this report as a curing crop (hay), and is therefore considered a bush fire hazard and is assessed as Grassland. It is noted no hazard occurs at all for certain periods of the year when recently harvested, which is why it may not have been mapped as Bush Fire Prone Land.

Note: Grassland if <100mm grass height is not classed as a hazard at all (as per the Bush Fire Prone Land Map, Fig 6) being equivalent to an Asset Protection Zone.

It has been mapped conservatively as Grassland within this report as ongoing cropping/harvesting regime not known and likely there is a crop >100mm in height at certain times of the year.

Note scattered trees can be retained and are not considered a bush fire threat or hazard, and can actually help trap airborne embers and provide partial ember filtering. There are no known vegetation regeneration/protection areas, so it is taken as not being able to regenerate back to a Woodland or Forest structure within 100m of the Development Site. Note- if this is proposed the outcomes /recommendations of this report remain unchanged anyway.

It is noted a vegetation screen is proposed. These shelter belts/screens are considered managed land/not a hazard under Sect A1.10 PBP, 2019. They shall however not be located within the Asset Protection Zone.

4.0 SLOPE

PBP, 2019 states: - "*The effective slope is considered to be the slope under the vegetation which will most significantly influence the bush fire behaviour for each aspect. This is usually the steepest slope. In situations where this is not the case, the proposed approach must be fully justified. Vegetation located closest to an asset may not necessarily be located on the effective slope*".

The slopes surrounding the BESS site are generally flat, and taken as flat within this report.

It is noted that slope is irrelevant for determining APZ requirements for wind and solar farm developments. Minimum 10 m APZs are required as per Section 8.3.5 of PBP, 2019. Therefore no further slope site assessment is required under PBP, 2019, and this is considered adequate detail.

5.0 BUSH FIRE ASSESSMENT

The legislation as it relates to this site calls for APZ to be established around the proposed development, provision of adequate access, design staging and citing of the development and provision of appropriate water supply for bush fire fighting purposes.

5.1 SETBACKS INCLUDING ASSET PROTECTION ZONE

Table 1 shows the bush fire assessment for the Development site.

APZs will be established for the Project as follows, in compliance with PBP, 2019:

- Ten (10) m wide APZ around the main project compound inside the security fence and around the site office building.

Table 1: Bush Fire Site Assessment –Fire Danger Index (FDI) 80 –BESS development

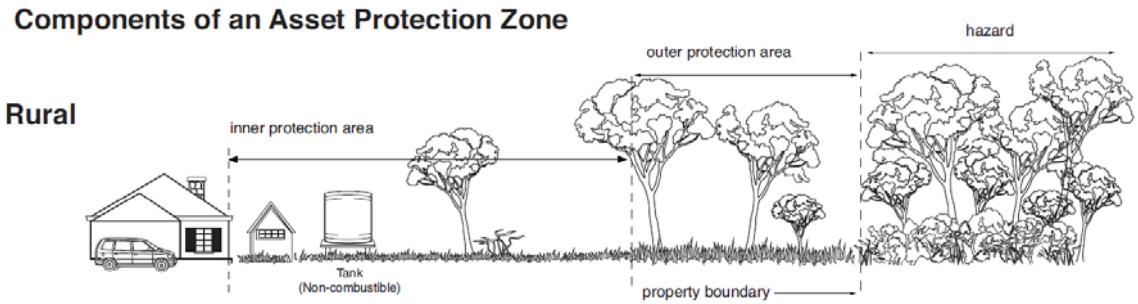
DIRECTION TO BUSH FIRE HAZARD	EFFECTIVE SLOPE	PREDOMINANT VEGETATION TYPE WITHIN 140m as per PBP, 2019	Distance to edge of hazard	PBP, 2019 required min APZ	Bush Fire Attack Level (BAL) (from PBP, 2019)
All directions	Flat	Grassland	>10m	10m	N/A

Note: BAL refers to the maximum Bush fire attack level expressed in kW/m^2 radiant heat flux exposure for the given slope, distance to hazard, and type of hazard (i.e. vegetation type and fuel load).

The proposal is located in an area of low bush fire risk, with low risk from any fire caused by the proposal as determined by the PHA. The project is of low risk of being impacted by bush fire after implementing all mitigation measures, and there is a low risk of bush fire on the

subject land due to the project being developed, and due to it being primarily cropped and managed to a low fuel load.

Figure 10: Pictorial diagram of an APZ (diagram from PBP, 2006)



6.0 BUSH FIRE RECOMMENDATIONS

The development complies with PBP, 2019:

- Construction - No BAL applicable for the BESS development. No office or temporary workers buildings proposed- complies with PBP, 2019
- Serviced by static water supplies - complies with PBP, 2019.
- Serviced by underground power - complies with PBP, 2019.
- Serviced by public road & interior property access roads - complies with PBP, 2019.
- APZ - 10m provides a defendable space available around the proposed development, and safe access/egress - complies with PBP, 2019.
- Landscaping- complies with PBP, 2019.
- Emergency Management - complies with PBP, 2019.

The Project therefore meets the criteria outlined in Section 8.3.5 PBP, 2019 (Wind and Solar Farms which includes the BESS).

The following recommendations are made:

- **Design and Construction:** - The intent of measures is that buildings are designed and constructed to withstand the potential impacts of bush fire attack. To achieve this, the following is recommended:
    - Essential equipment should be designed and housed in such a way as to minimise the impact of bush fires on the capabilities of the infrastructure during bush fire emergencies. It should also be designed and maintained so that it will not serve as a bush fire risk to surrounding bush.
    - Fire protection equipment within site is recommended including fire extinguishers, fire hose reels, evacuation signage, first aid kits, etc be available at all times and serviced /maintained regularly;

- **Asset Protection Zone:** - The intent of measures is to provide sufficient space and maintain reduced fuel loads to ensure radiant heat levels at the buildings are below critical limits and prevent direct flame contact. To achieve this, the following should apply:
    - During Construction works and for the life of the Project, a 10m Asset Protection Zone shall be established as set out in Table 1 Section 5.1 & Fig 4 as outlined within Appendix 4 of PBP, 2019.

      In summary PBP, 2019 states *Asset Protection Zone should consist of mown grass, concrete, pavers, pebbles, small clumps of vegetation, isolated trees, etc. Lawns and garden should be maintained so that they do not become overgrown, vegetation does not grow over or touch the dwelling, and canopy of trees do not touch or become continuous with the surrounding bushland (at least 2-5 metres between tree canopies).*

  Please note in this modified agricultural landscape that isolated paddock trees, woodlots, shelterbelts, conservation areas outside of the Asset Protection Zone/development site can be retained as they are environmentally important and of a low risk.

- **Water and Utilities: -** The intent of measures is to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building. To achieve this, the following should apply:
  - Water, electricity and gas shall comply with Table 7.4a (where relevant) of PBP, 2019.
  - The proposed development is to have three non-combustible 25 000l dedicated water tanks with Storz fittings, and other fire fighting equipment in compliance with Australian Standards. Dedicated fire fighting water supply from these tanks is specifically for fire tanker refilling/on-site fire fighting. This Static Water Supply (SWS) should be located in an easy to access part of the Development site by fire tanker (within 4m of a sealed/fire tanker accessible pavement), within the carpark or similar, with 10m APZ around it, and signposted "SWS".

- **Access: -** The intent of measures for access roads is to provide safe operational access for emergency services personnel in suppressing a bush fire, while residents are accessing or egressing an area. To achieve this, the following should apply:
  - The internal road network shall conform to PBP, 2019.
  - Internal roads should have a minimum 4m vertical clearance to any overhanging obstructions, and be a minimum 4m width with 1m traversable shoulders, unsealed/sealed all weather traversable road with suitable load bearing capacity, drainage structures and feature crossings. Road grade should be less than 10^0, short steep sections are acceptable if sealed and $<15^0$ and then suitable cross fall of the road surface provided. Two way traffic flow (with capacity for passing and turning areas) which enables safe access & egress for emergency services and allow crews to work with equipment about the vehicle, and access dedicated water tank, is to be provided by the proposed road system & APZs.

- **Landscaping** - The intent of measures is that landscaping is designed and managed to minimise flame contact and radiant heat to buildings, and the potential for wind-driven embers to cause ignitions. To achieve this, the following should apply:
  - Landscaping of the Asset Protection Zones is to comply with the principles of APZ standards - Appendix 4 of PBP, 2019.

- **Emergency management planning**- The intent of measures is to provide suitable emergency and evacuation arrangements for occupants of the development, and to reduce bush fire risk from the proposed development. To achieve this, the following measures are recommended:
  - A Bush Fire Emergency Management and Operations Plan should identify all relevant risks and mitigation measures associated with the construction, operation and decommissioning of the Project. This should include:
    - detailed measures to prevent or mitigate fires igniting;
    - work that should not be carried out during total fire bans;
    - availability of fire-suppression equipment, access and water;
    - storage and maintenance of fuels and other flammable materials;
    - notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate; and

- appropriate bush fire emergency management planning.

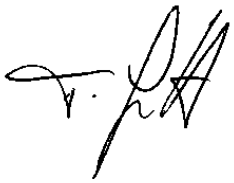
It is important to be aware of operations that may be carried out on days of Total Fire Ban and any prohibited activities or exemptions that are notified by the Commissioner of the NSW RFS under the *Rural Fires Act 1997* s.99. The Bush Fire Emergency Management and Operations Plan should include training, awareness and notification protocols in this regard.

The following information is provided for the proponent in order to improve bush fire safety if desired. It is not compulsory under PBP, 2019:

- Training is recommended for all on-site personnel regarding bushfire response procedures.
- Fire fighting training is recommended for operational workers.
- Operational vehicles should be fitted with basic fire fighting equipment.

The bush fire risk is considered to be adequately managed through the recommendations made above, and in conjunction with consent conditions from NSW DPE/NSW Rural Fire Service.

Report prepared by:



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APPENDIX 1: PHOTOS OF SITE AND SURROUNDS

Looking west from BESS site

Looking east from BESS site

Looking north from BESS site

Looking south over BESS site

Looking south- west to sub station site from intersection of Brookmanns Rd & Canalla Rd

Looking north-east from sub station site

Looking south-west towards sub station site from Canalla Rd

Looking south from Brookmanns Rd to canal