

File Ref. No: BFS16/574 (10149)  
TRIM Doc. No: D16/27861  
Contact: Mark Castelli

12 April 2016

The Department of Planning & Environment  
C/- Diana Charteris  
GPO Box 39  
SYDNEY NSW 2001

E: [diana.charteris@planning.nsw.gov.au](mailto:diana.charteris@planning.nsw.gov.au)

Dear Ms Charteris

**Proposed Parkes Solar Farm  
Hilltop, Pat Meredith Drive, Parkes (SSD14\_6784)**

I refer to the above development proposal's Environmental Impact Statement (EIS) which is currently on public exhibition. Fire & Rescue NSW (FRNSW) have reviewed the EIS and the following comments and recommendations are submitted for consideration.

FRNSW notes that the facility's proposed location is approximately 10 kilometres from the Parkes Township and will be within the Parkes Local Government Area. In the event of a significant emergency incident involving the proposed development it is highly likely that both fire agencies (i.e. FRNSW and the NSW Rural Fire Service [RFS]) would respond to the site.

FRNSW would respond to the site to either assist the RFS or to fulfill our statutory duties in managing a hazardous material incident (as required by Section 6 (2) of the Fire Brigades Act 1989).

It is FRNSW experience that small and large scale photovoltaic installations present unique electrical hazard risks to personnel when fulfilling their emergency first responder role (N.b. the Fire Brigades Act 1989 imposes specific statutory functions and duties upon the Commissioner of FRNSW).

In addition, the Work Health and Safety (WHS) Act 2011 (and its subordinate Regulation) classify FRNSW as an entity (person) conducting a business or undertaking (PCBU). Clauses 34 and 35 of the WHS Regulation impose specific obligations upon a PCBU to identify hazards and manage risks at workplaces.

We note that Section 7.9 of the EIS primarily addresses hazards associated with bush/grass fires and repair and maintenance activities that will increase the likelihood of bush fire events. It appears that specific analysis of the fire hazard potential of all infrastructure associated with the facility has not been comprehensively considered (e.g. the potential for solar array fires, fires involving electrical components, sub-station fires and so on).

Due to the electrical hazards associated with large scale photovoltaic installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.

### **Recommendation/s**

Should a fire or hazardous material incident occur, it is important that first responders have ready access to information which enables effective control measures to be rapidly implemented. Without limiting the scope of the emergency response plan (ERP), the following matters are recommended to be addressed:

1. That a comprehensive ERP is developed for the site.
2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents, (e.g. fires involving solar panel arrays, bushfires in the immediate vicinity or potential hazmat incidents).
3. That the ERP detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the minimum level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment).
4. The ERP should also specify additional other risk control measures that may need to be implemented in an emergency due to unique hazards associated with the facility.
5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.
6. Once constructed and prior to operation, that the operator of the facility make contact with the relevant local emergency management committee (LEMC). The LEMC is a committee established by virtue of Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government agencies can proactively develop comprehensive inter agency local

emergency procedures for significant hazardous sites within their particular local government area. The contact details of members of the LEMC can be obtained from the relevant local council.

For further information please contact Mark Castelli of the Fire Safety Assessment Unit, referencing FRNSW file number BFS16/574 (10149). Please ensure that all correspondence in relation to this matter is submitted electronically to [bfs@fire.nsw.gov.au](mailto:bfs@fire.nsw.gov.au).

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'D Fleming', is written over the printed name.

Daire Fleming  
Manager  
Fire Safety Advisory Unit