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Contact: Senior Firefighter Courtney Goodhew

27 May 2025

JESS FOUNTAIN
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Jess,

Re: Advice on Development Application (Exhibition) – MOREE BATTERY ENERGY STORAGE SYSTEM - BULLUSS DRIVE, MOREE (DA25/6636)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 20 May 2025, requesting advice on the DA for MOREE BATTERY ENERGY STORAGE SYSTEM - BULLUSS DRIVE, MOREE (DA25/6636). FRNSW have reviewed the DA with particular focus to the Statement of Environmental Effects (SEE) and the Preliminary Hazards Analysis (PHA).

The SEE 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 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 FRN25/1583. Further information regarding FRNSW Meetings⁷ and FRNSW Written Reports⁸ can be found at the FRNSW Building Fire Safety Industry Portal⁹.

Yours sincerely,



A/Superintendent Luke Loseby
Manager
Fire Safety Liaison Unit

Cc: jessica.fountain@dpie.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>