

From: [John Marks](#)
To: [Hamish McTaggart](#)
Cc: [Doris Yau](#)
Subject: 4548 DPHI HAZARDS Review, 981 New England Highway, Aberdeen, 2336
Date: Tuesday, 6 February 2024 12:08:24 PM
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Dear Hamish

We have reviewed the information regarding the proposed development at 981 New England Highway, Aberdeen, New South Wales, 2336.

Proposed Development

The proposed development is for a Battery Energy Storage System (BESS) with a maximum discharge capacity of 5MW and a maximum energy storage capacity of 27 MWh. The BESS includes a proposed power conversion unit, power cabling, a switchroom, and associated infrastructure.

Documents Reviewed

The relevant sections of the following documents were reviewed to form this advice.

1. State Environmental Planning Policy (Resilience and Hazards), Site 10 (Magna) - 981 New England Hwy, Aberdeen 2336, Riskcon Engineering, Revision 0, 12 October 2023; and
2. Fire Incident Management Plan, Site 10 (Magna) - 981 New England Hwy, Aberdeen 2336, Riskcon Engineering, Revision 0, 21 December 2023.

Department Review

The Applicant has highlighted that for State Significant Development (SSDs) that the Department does not require a Preliminary Hazard Analysis (PHA) for Battery Energy Storage Systems (BESS) with a maximum discharge capacity of less than 30 MW. The Department acknowledges this and confirms it does not require a PHA for a BESS below 30MW maximum discharge capacity.

Furthermore, the Applicant has undertaken a preliminary risk screening in accordance with the Department's Hazardous and Offensive Development Application Guidelines Applying SEPP 33 and not identified any dangerous goods requiring screening. The Department has reviewed the screening and agrees that there are no dangerous goods that would be above the threshold quantities in Applying SEPP 33. As such, a PHA is not required for dangerous goods.

The Department has reviewed the location of the proposed development and notes it is separated from the nearest resident by distances greater than 100 metres.

Given the review, the Department would not require a PHA for the proposed development. Furthermore, given the energy storage capacity and separation to surrounding residents, the Department would assess the risks to surrounding land uses as low.

Recommended Conditions

As such the Department would recommend the following conditions if the proposed development were approved:

BATTERY STORAGE RESTRICTION

The total battery storage associated with the development must not exceed a total delivery capacity of 5 MW.

Note: This condition does not prevent the Applicant from seeking to lodge a separate

development application or modify the consent to increase the capacity of the battery storage facility or system in the future.

HAZARDS

Fire Safety Study

Prior to commencing construction of the battery storage (except for construction of those preliminary works that are outside the scope of the hazard studies), the Applicant must prepare a Fire Safety Study for the battery storage, to the satisfaction of the Council and meet the requirements of Fire and Rescue NSW. The study must:

- a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline;
- b) describe the final design of the battery storage;
- c) include reasonable worst-case fire scenario to and from the battery storage and the associated fire management;
- d) identify measures to eliminate the expansion of any fire incident including:
 - adequate fire safety systems and water supply;
 - separation and / or compartmentalisation of battery units; and
 - strategies and incident control measures specific to the battery storage design.

Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study.

Note: to satisfy 'meet the requirements of Fire & Rescue NSW' above, the Applicant should provide confirmation in writing from Fire & Rescue NSW that the Study meets the requirements of Fire & Rescue NSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline. In undertaking the Fire Safety Study, the Applicant must be consistent with the Fire Safety Guideline, Technical Information, D22/107002, Large-scale external lithium-ion battery energy storage system- Fire Safety Study Guidelines, FRRNSW Version 01, 26 July 2023.

If you have any further questions do not hesitate to contact me

Regards

John Marks

Planning Officer

Industrial Assessments

Department of Planning, Housing and Infrastructure

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