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Contact: Station Officer Richard Jay

6 June 2025

ROHAN JOHNSTON Junee Shire Council PO Box 93 JUNEE NSW 2663

Dear Rohan,

Re: Advice on Environmental Impact Statement (EIS) - JUNEE/MARINNA SOLAR FARM BATTERY ENERGY STORAGE SYSTEM 346 OLD SYDNEY ROAD, MARINNA (DA2025/18)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 21 May 2025, requesting advice on the EIS for JUNEE/MARINNA SOLAR FARM BATTERY ENERGY STORAGE SYSTEM 346 OLD SYDNEY ROAD, MARINNA (DA2025/18). FRNSW have reviewed the EIS with particular focus to Section 6.1, Hazards and Risks, as well as the Preliminary Hazards Analysis (PHA).

The EIS details a 17.6MW/35.2MWH 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.

Fire and Rescue NSW

ABN 12 593 473 110 Community Safety Directorate Locked Bag 12. T 02 9742 7434 Greenacre NSW 2190 **F** 02 9742 7483 Fire Safety Liaison Unit

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 FRN25/1595. Further information regarding FRNSW Meetings⁷ and FRNSW Written Reports⁸ can be found at the FRNSW Building Fire Safety Industry Portal⁹.

Yours sincerely,

Manager

A/Superintendent Luke Loseby

Fire Safety Liaison Unit

Cc: rjohnston@junee.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

⁶https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/03%20Emergency%20services%20information%20packagew20and%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