Planning Inspectorate
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Hearing Transcript

Project:	East Park Energy
Hearing:	Issue Specific Hearing 4 (ISH4) - Part 1
Date:	09 June 2026

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TRANSCRIPT_ISH4_SESSION1_EAST PARK_ENERGY

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Good afternoon. It is now 2pm time for this hearing to begin. I'd like to welcome you all to this issue-specific hearing relating to the potential impact of the battery energy storage systems for the East Park Energy application, can I just confirm that everybody can hear me clearly, both in the room and online, and can I also confirm with the case team that live streaming and recording of the event has commenced. Thank you. My name is Graham Sword. I am a planning inspector, and I have been appointed by the Secretary of State to examine this application. I will now deal with a few housekeeping matters for those attending in person today. Could everyone please set all devices, including phones, smart watches, and laptops to silent if you do need the toilet. These are to be found on the ground floor, and there are no fire alarms due today. So, if the alarm does go, we need to treat it as the real thing and leave calmly and quickly. Fire exit is to the rear of the room, my right, and the assembly point is to the front of the building in the car park. Meeting will follow the agenda published on the National Infrastructure Planning website on the 18th of May 2026 Examination library reference CV 7001 It would be helpful if you had a copy of this in front of you. The agenda is for guidance only, and we may add other considerations or issues as we progress. We will conclude the hearing as soon as all relevant contributions have been made and all questions asked and responded to, however, but if the discussions can't be concluded, then it may be necessary for us to prioritize matters that's happened earlier this morning. Defer other matters to written questions, comments. Likewise, if you cannot answer the questions being asked or acquired time to get the information requested, and please indicate that you need to do so, and respond in writing. Today's hearing has been undertaken in a blended way, meaning some of you are present with us at the hearing venue, and some of you are joining us virtually using Microsoft Teams. We will make sure that, however, you decide at 10 a day, you will be given a fair opportunity to participate. A recording of today's hearing will be made available on the East Park Energy Project section of the National Infrastructure Planning website as soon as practical after the hearing has finished. A transcript will also be made available, which will utilize AI technology. With this in mind, please ensure that you speak clearly into a microphone, stating your name and who you are representing each time before you speak. For those with a microphone, you need to press the button to work. The red light indicates that the microphone is live. If you're not at a table with a microphone, then there is a roving microphone that the case team will bring to you. So, please wait for one of these to be brought to you before you speak. A link to the planning inspectorate privacy notice was provided in the notification for this hearing. We assume that everybody here today has familiarized themselves with this document, which establishes how the personal data of our customers is handled. Please speak to the case team if you have any questions about this. Now, going to ask those of you who are participating in today's meeting, to introduce yourselves, when I state your organisation's name, could you introduce yourself, state your name, and who you represent, and which agenda item you wish to speak on. If you are not representing an organization, please confirm your name, summarize your interest in the application, and confirm the agenda item upon which you wish to speak, so if I could now start with the applicant. Please,

good afternoon, sir. My name is Lady Samandra. I'm a solicitor with Bertie Salmon, representing the applicant. I will now ask everybody on my table, which forms part of our team to introduce themselves, working from my left. Thank you,

Julian Boswell's list with Burgess Simon on behalf of the applicant.

Good afternoon, I am Nila Marshall, Miss Nila Marshall, I. I work for AOC Archeology on behalf of the applicant, and I'm here to talk about section 4d or agenda item 4d

Good afternoon, sir. Martin Pollard, I'm from Axis on behalf of the applicant, going to be discussing items four A, 4b and possibly 4d as well, I

Good afternoon. I'm Hannah Dennett, mrs. Hannah Dennett. On behalf of the applicant, I'll be answering questions related to Best Fire missions for agenda item 3c

Good afternoon, I'm Paul Gregory, speaking on behalf of the applicant for best safety from BST and T Consultancy Services.

Okay. Thank you. Local authorities, please.

Thank you, sir. I'm Daniel Steadman James, Council, acting on behalf of the three host authorities, and to my left. Good afternoon, sir. I'm Peter Day case, lead case officer for Bidfield Borough Council.

Good afternoon, sir. Greg Logan, Principal Planning Officer, supporting mr. Dacus this afternoon.

Afternoon, sir. David Carford from Cambridge County Council.

Good afternoon, sir. Miss Lucy Patman from Huntingdonshire District Council.

Yes, thank you. And any other bodies that wish to speak this afternoon, any other interested parties that would like to contribute to this afternoon's discussion.

Yes, Andy Pike, on behalf of Stop East Park Energy, I would like to contribute to the section on best safety and the other business. Thank you,

Ms. Acute

Les Rand, local resident, and I would like to comment on items three A, B, and C.

Nicholas Bolton from Perth and Hall, speaking on behalf of myself and the community, talking about duty of care in the best design and duty of care regarding safety. Thank you,

Simon Beverley, resident from Keyso, and I'd like to deal with item A.

Anybody else in the room? Hand up in the corner there,

Amanda Patel, local resident, and I'd like to speak at item one, please.

Well, Moving to Microsoft Teams, anybody like to participate? Nope. Okay. Thank you,

Sir Daniel Stedman Jones. On behalf of the host authorities, can I just check? I'm sure you, you've seen it, sir, but just to check, there was a written submission that went in from Cambridgeshire Fire and Rescue Service. They're not attending today, but they did send in a written representation, I believe. So, just just checking that you, that you have, have that

to give, see. seen it.

Okay, it may be that in that case, mr. Carford, in due course, under safety, can can speak to that. Okay. Thank you, sir.

Yes, so that concludes the first item on the agenda. I'm going to move to item two, purpose of this issue, specific hearing. So let me briefly explain the purpose of this hearing. I will invite the applicant to rehearse its approach to the issue of the proposed battery storage systems. Principally, they will be invited to explain the need as part of the proposed development, acknowledging that they have touched upon this in previous set of hearings in March, and also its proposed design approach, including distribution across the proposed site. I will then invite them to do the same in relation to pollution control, safety, and archeology again. I asked the applicant team to keep a record of action points during the course of this hearing and report back when invited towards the end of this hearing. Okay. Thank you. Does anyone have any questions about the purpose of today's hearing? Keith, thank you. I will now move on to item three, the need for battery energy storage. So, could I invite the applicant to remind us of its overall approach? Please.

Good afternoon, sir. Martin Pollard, on behalf of the applicant, in response to agenda item four, a, I'm going to set out why a battery energy storage system, and I'll hereafter refer to it as a best, is needed in the context of the East Park scheme. The design approach to the best development, starting with the rationale for its positioning within the site, and thereafter the rationale for the adoption of a centralized BEST system. So, why is it best needed in the context of the East Park scheme? ES Volume One, Chapter Two, that's REP 3023 provides a description of the scheme and confirms that it will allow the generation and export of 400 megawatts of electricity from solar generating station, with the best designed to be capable of both exporting and importing up to 100 megawatts. The primary function of the best in the context of the scheme is for the storage of electrical electricity generated by the solar PV modules at times of low demand on the electricity network, releasing the stored electricity at times of peak demand. In doing so, they will increase the overall efficiency and flexibility of the scheme, ensuring there is less wasted energy, and that the energy is more dispatchable than solar generation without Bess. These functional and efficiency benefits are explicitly supported within the National Policy Statement NPS EM one, and when I refer to National Policy Statement EM one, I refer to the 2024 version. I'll explicitly refer to the latest version where necessary. Paragraph 3.36 which states storage and interconnection can provide flexibility, meaning that less of the outputs of plant is wasted, as it can either be stored or exported where there is excess production. They can also supply electricity when domestic demand is higher than generation, supporting security of supply. This means that the total amount of generation plant capacity required to meet peak demand is reduced, bringing significant system savings alongside demand side response. Similar statements are also included in the latest version of EM one at paragraphs three point 3.26 and three point 3.27 the applicant is satisfied that the BES is a viable part of the scheme as a temporary storage device for its solar generation with stored solar electricity capable of being exported through the applicant's solar generation connection offer. The applicant intends to build out the best within the defined and assessed maximum parameters set out within work number two of the draft DCO, that is, REP 3009 It is important to note that the principal function of the BESS as part of the scheme remains wholly unaffected by the recent grid connection reform implemented by the National Energy System Operator NISO NISO Grid Connections Reform has restructured Great Britain's electricity connection queue, moving away from largely first come, first serve approach towards a more selective process that prioritizes projects which are ready to progress and aligned with strategic system needs. Under the reform process, developments are assessed through the Gate one and gate two framework gate one gate one applies to projects that do not yet meet the full gate two criteria. These projects may retain a route to progress, but do not receive a

confirmed connection date, connection point, or queue position. Gate two developments are those that can demonstrate sufficient readiness and benefit from a confirmed connection date and queue position. The best pronounced proposed in connection with the scheme has been afforded a gate one status by NISA. As such, it is not currently assigned a confirmed connection date, but may progress through future windows where readiness is demonstrated. However, it must be emphasized that the gate one position only relates to best ability to import electricity from the grid for wider grid balancing services. It doesn't affect whether the best can be charged from the scheme's solar generation and then used to export stored solar electricity under the scheme's solar generation connection offer. In short, the absence of a gate to import offer does not affect the primary function of the best, supporting more efficient, flexible energy generation, or make its inclusion in the scheme unviable or redundant in any way. It merely affects the timing and extent of the best's ability to provide grid imports and balancing services at some point in the future. So, turning to the matter of design, firstly, what was the rationale for its location within the site?

The location of the Bes within the site has been a key feature of the wider design approach adopted by the applicant, and it was a key component of their early site feasibility and optioneering. One of the key environmental factors associated with the operation of a Bess is noise generation, and this, along with the ability to provide a suitable access, including emergency access, where the mate were the main locational factors during the design development process. The early feasibility work established that it wouldn't be possible to locate the best within either site A or site B, given the proximity to residential properties and a consequential inability for the applicant to adequately mitigate noise impacts, the locations where this could be avoided were not readily accessible. Consequently, the preferred location for the best was initially established in Site C, to the west of Moore Road and to the south of the River Kim. This was on the basis it provided the necessary separation from residential properties and allowed suitable vehicular and emergency access. At the time it was also understood to be a location with limited environmental constraint. Following the initial feasibility exercise, it was subsequently established through the geophysical surveys undertaken as part of the archeological assessment that the planned location for the best in sightsee was on the site of a former Roman town, which has subsequently been designated as a scheduled monument, given the high potential for a significant adverse effect on the scheduled monument and the lack of suitable locations in sites A and B, the applicant then considered the suitability of land within site D. Locations within the south and east of site D were discounted due to the proximity of residential properties and the associated potential for noise locations within the west of Site D were discounted based on a lack of adequate access and accessibility, and it was ultimately determined by the applicant that the northern part of Site D would provide the best alternative, as it is remote from residential properties. The nearest is circa 478 meters from the best boundary, is where the main site access is to be installed, providing better access, including emergency access, than site C. It's next to the main state substation and cable corridor, and it would result in comparatively less environmental effects than the location in site C. The option of including the best within either site C or D form part of the applicant statutory consultation exercise and the environmental benefits and disbenefits of each option were set out within the preliminary Environmental Information Report (PEIR) The consultation process concluded that the majority of the public, the host local planning authorities and other statutory consultees, including Historic England, preferred Site D, which is why it was ultimately selected and taken forward in the applicant's submission, turning to the point of why a single centralized best facility is proposed over a distributed network. There are a number of points. Sorry, sir, just bear with me. Just lost my place. The applicant's approach to the concentration of best is summarized within section four, paragraphs four point 3.29 to four point 3.32 of the design approach document D A D A P P 034 It confirms that the decision making was led by the desire to have an AC coupled BESS over a DC coupled Bess. An AC coupled best provides greater flexibility in terms of its ability to charge from the solar arrays and from the grid, and under such an arrangement, it is technically preferable to have a best unit in a single centralized location. The main rationale for the selection of a centralized AC coupled system was not just led by

technology type. The DAD also confirms that it was, and I quote, to reduce the need for large items of equipment to be distributed across the site, instead focusing the best in one location, which can have specific control measures put in place to manage the facility in case of an incident, such as a fire. The applicant appreciates that this is a brief summary of the design philosophy and does not fully set out the other construction, operational, and design considerations regarding the use of a centralized best.

In response, the application applicant prepared a detailed clarification on the design rationale behind the centralized approach, and that is set out in their written response to the examining authority's first written questions, re p3 072 whilst the shunt repeat the response in full, the key factors for the use of a centralized best facility were dictated by a combination of practical, technical, safety and environmental factors, as mentioned earlier technology choice AC coupled over DC coupled, less impactful access from the public highway for construction, operation and emergency response, only a single retained access and emergency access point needs to be provided, rather than multiple permanent access points across the site. More sustainable construction using less materials, less equipment infrastructure, less clear, less and clearer cabling, and less land, which. All significant factors in a predominantly rural location. A dispersed layout multiplies the need for much of the associated plant and equipment. A centralized solution is more sustainable, requiring far less materials and equipment to achieve the same purpose. It requires less complex construction with reduced construction phase disruption and reduced commissioning requirements. It requires the installation of less and much clearer cable routing with fewer interfaces, resulting in reduced length of the 400 kv grid connection between the East Park substation and the Eastern Socon substation. A single dedicated best compound is easier for emergency services to find, access, isolate, and understand as part of the operation, the outline battery safety management plan, APP 162 It has been necessary to consider fire response, chemical release, smoke plume impact, contaminated runoff, provision of appropriate access and egress routes, secondary access routes, and out of hours response. The development of an appropriate management plan becomes much more complex and difficult to manage, maintain when batteries are situated in multiple locations within the scheme. A central compound allows clear emergency plans, drawing signage, access roads, isolation procedures, drainage containment, and fire water strategy. On a similar note, it also enhanced the ability to provide a better design solution for site security, a single fence line and CCTV system to monitor a single location, the ability to more effectively mitigate amenity and environmental effects, particularly noise, soils, drainage, and highways, less intrusive replacement of best containers and other equipment during the operational phase, and less impactful decommissioning at the end of the scheme, that's the end of my,

thank you for that. Get some questions relating to the documents submitted in support of the application in relation to the environment agencies matters raised in their statement of common ground, attaining to the approach to best design and foundation depth, and they also reference management of fire safety, which will obviously come on to later. Can you update on any progress of resolving the matters with the Enrollment Agency.

Thank you, sir. My understanding is that those matters have been resolved with the Environment Agency. The issue regarding foundation depth was to do with a typographical error in the applicant's submission.

Okay. Thank you. I also note the statement of Common Ground with Huntington that they broadly agree with the conclusions of the climate change assessment, but have requested clarifications in relation to the operational replacement phase, the use of best in a grid balancing capacity, and the assessed counterfactual scenario. I also know the applicant's response to that, but again, has that issue been moved on between the two parties? Just

think that I think that remains a point to be to be agreed in a final statement of common ground.

Okay.

a number of interested parties, such as Bolton Hurst and Keysora Parish Council, in their relevant representation, have concerns regarding the visual impact of the battery storage systems on the landscape, and then industrializing it in terms of the external appearance, could the battery storage units and water tanks be designed so that structures look more agrarian, perhaps? And also, what other mitigate measures could be used, acknowledging that these facilities are utilitarian, but terms of exploring options, I just like to hear what's been explored, I

so in terms of the in putting them in alternative buildings that they. Are within their own units, which are specifically designed with control measures in place to prevent fire, fire safety, or other safety issues, which will come on to it for C. So, putting so whilst the containers can be can be painted, putting them in different structures to the ones that they're intended to be within or enclosing them further isn't necessarily the best solution from a from a battery safety perspective, but that helps answer the question.

Okay, anybody like to respond to the presentation, local authorities like to make any reflective responses.

Daniel Steadman Jones, on behalf of the host authorities, sir. No comment from the host authorities at this stage, or nothing to add. Thank you.

Okay, thank you. So move to the interested parties.

Les ran local resident, yeah, minimum spacing requirements. I see on page five of the safety management plan, item 143 and also on page 19, item 242 appears to conflict with what's on page 22 which is item 251 Item 251 refers to multiple joint or close coupled containers, so some of the minimum distances given on page 20 seem unnecessarily minimal. We're talking one to three meters in the event of a fire boundary cooling within meters of a lithium battery has got to be really quite dangerous, hasn't it? So that is one of the downsides of your centralized system. So, is it correct to assume that the centralized system was chosen merely because it was cheaper when it would appear to be significantly more dangerous in the event of a disperse site? In the, if you have a lithium battery on fire, you can just let it burn out. That's the end of it, if you've got them all in a centralized system, then you have to implement boundary cooling, which involves vast quantities of water. We're talking on previous fires, 8 million liters. So, is it fair to say that you've put economics before safety and the environment

is that something you want to address as part of the safety,

yes, yeah, the other thing is with your choice of site, site D, I'm assuming that's because it's on the north-facing slope, which would be not very productive from the point of view of solar generation. The other thing is also with the choice of site, it's quite close to the River Kim, which is which feeds into the great ooze, which in turn feeds into graph and water reservoir, so I've got other items that will link to safety, but it's all very much along the same line, really.

Okay, well, we'll, we'll be able to pick up all of the safety points under under 4c just in regard to the choice of site, I obviously explained the rationale behind that, and it's been located there primarily because of access, but also because of its remoteness from receptors and its lack of environmental impact. With regard to the point on the river, Kim, again, we will come on to, we can, we can either

discuss now the specific drainage design requirements, or we can discuss it at a later date under the safety matters. We were prepared to present it at either point.

Yeah, if you reference it in either safety or pollution,

yeah, the solution is explained in the safety.

Okay. Thank you. Any other interested parties that would like to make a comment, mr.

Todd. Thank you, sir. In terms of the best design, there's clearly an issue of duty of care, just as there is on a second point I'll make later, which is on the safety aspects in the statement of common ground. You, sir, have required that the statement of common ground. Be finalized and signed off during the examination process, so this current process, however, in a number of sections in that document, and also in the battery safety management plan, where Cams Fire and Rescue sadly not here today state their position regarding those key elements of the design, the applicant is not prepared to commit to specifications until, and that covers the spacing of cabinets, etc. etc. Not prepared to commit to specifications until detailed design stage, which it proposes would only come after the approval of the DCO, mr. Examining Authority, mr. Sword. My question, therefore, at this point in the hearing is, is it correct that there could be no valid statement of common ground until after the DCO approval has been achieved?

Can you comment on that, mr. Sword? I appreciate that you have made it clear in your comments and requirements within the statement of common ground. I just want to clarify, in terms of the position the applicant is bringing forward with other interested parties, and particularly Cambridge Fire and Rescue, they have tabled the position. They've also tabled previous evidence of dialog with the Fire and Rescue Service for me to consider. We still have another few months of the examination process to go, so we will see what the process brings. Would the applicant like to comment on the issues in relation to statement of common ground?

I don't think there's anything more we need to say on that, so we have a statement of common ground with the Cambridgeshire Fire Rescue Service.

May I interrupt there and say that the statement of common ground covers specifically design, and if the design is not going to be made available until after a DCO is applied, then it is not possible to assess the safety elements of the design, etc. etc. until after the approval process, which brings me back to the comment duty of care and duty of care on safety. If I can, then move on to the safety aspects

here. Leave the safety aspect until the relevant agenda item, please. Thank you. Just like if

we can establish that establishing a design is a feature of a signed off statement of common ground, the community needs to know that there is a design that is finalized, so that you can sign off on it as you've requested. Thank you. Okay,

Paul Gregory, for the applicant, so for mr. Bolton. So, just to confirm, with regards to best design, typically those change every 12 to 18 months. So, within a DCO application, you cannot commit to a design which will be obsolete at detailed design, which can often be between two to sort of five years further down the line. However, the key, which we will come to in detail, in the best safety aspects, are all secured through the DCO with regard to Cambridgeshire Fire and Rescue. I understand there's a statement which council can read out to establish their position, but we are very clear that all fire

emission, pollution, explosion risks are covered in the outline batch safety management plan, and they're secured through the DCO, and the BSMP must be fully in alignment with that plan.

Okay. Thank you. As an interested party at the rear of the room, that would I can make a comment.

Thank you, Amanda Patel, local resident. Significant new evidence was disclosed at the outset of this examination. In its deadline one representation, National Grid stated that the East Park solar generating station has a gate two grid connection, but the best only has a gate one offer. This emerged after the application had been presented as a fully integrated solar and battery development, the distinction is significant under gate one. The best cannot secure the grid access relied on in the application. The implications have not yet been properly scrutinized. This is not a minor technical issue or a matter of timing. The applicant seeks positive weight for the best, relying on claimed benefits, including flexibility. Balancing and intermittency mitigation, if uncertainty exists around the basis on which those benefits are claimed, it is relevant to the planning balance. National Grid's own evidence is significant. It is advancing connection design work for the solar element only, confirming that the two components are not progressing through the connections process on the same basis. Gate one status now carries uncertainty in its response to my submission. The applicant characterizes its gate one status as a timing issue, but Desnes and Ofgem suggests the opposite. They highlight substantial oversubscription of the battery pipeline relative to system requirements for 2030 and 2035 Progression from gate one to gate two is not guaranteed. Sector commentators support this interpretation, identifying challenges for solar and battery hybrids, where the solar secures gate two, but the battery does not. One analyst warns that these developments could face delivery and operational risks. The applicant does not respond to these battery connection surplus concerns that I set out, instead suggesting that the best can now sit behind the solar connection, as we heard earlier, but the issue is not whether the best can operate via the solar connection, it is whether the broad operational capabilities for which the applicant seeks planning weight remain justified given its current connection status. In fact, the role of the best has been narrowed, the applicant now frames the best as a storage device for solar generation and describes wider grid balancing and import activities as supplementary. This is a shift in emphasis. The application has not been updated to reflect it. Its statement of reasons, the very latest version that has been published on the portal, continues to claim that the battery storage ensures grid stability and reliability, and that battery benefits include acting as a flexible energy hub. The examination has not been shown how these differing positions are reconciled. The reality of solar generation is relevant here. UK solar output is highly seasonal. Sector analysis indicates that opportunities for charging solely from contemporaneous solar generation significantly reduced during autumn and winter. The best reliant on solar charging, as the applicant now suggests, may be largely inactive for substantial periods of every year. There remains an evidential gap. The applicant seeks weight for the benefits of the best, but the examination has not been provided with the evidence necessary to test those claims, following National Grid confirming its gate one status, and what we've heard here earlier today. There has not been a quantified assessment of how the connection position affects the operational assumptions, capabilities, or benefits attributed to the best until an evidential basis is established. Caution should be exercised when determining the weight to be attached to the benefits claimed for the best within the planning balance, the burden rests with the applicant to demonstrate that those benefits remain robust, deliverable, and evidenced under its current connection position. Thank you.

Yes, thank you for that. The applicant later responded, and I was issues,

as I, as I explained, as I explained earlier, the function of the best, the primary function of the best, is to support the solar generation from the scheme, and as set out in the MPS EN one and its successor, the role that the battery storage has to play in a solar development, and the benefits that that can bring are quite clearly supported and set out in the national policy. The fact that we didn't get a gate to import

offer doesn't necessarily mean that that won't be forthcoming in the future, and as an AC coupled facility, we will be able to provide benefit to the grid should that position change in the future, but the principal purpose of this, of the best, remains and is indeed supported by national policy.

Thank you.

Yes, thank you.

Yeah, one other item, the applicant has claimed that the best system could provide energy for 100,000 homes, so based on their own estimates of what they can provide in real terms, this would be less than one kilowatt hour for just four hours for these 100,000 homes, so this would run sort of lighting, fridge, freezer, and television, but would be totally inadequate for heating appliances, you could just make up the numbers there. You could say 200,000 homes wouldn't run anything.

Could you let the applicant respond?

It's okay. The figures that were presented within the application document were for the energy generation from the whole scheme, not just. From the battery energy storage facility, and were based on typical usage figures per household, and obviously we consider a fair basis for setting out that position.

I'm conscious I would like to give other people an opportunity to speak on this item. Somebody with that hand up again,

local resident. I just wanted to come back on the response to to my representation that I've just made. I understand that, obviously, that the scheme can generate and have the best purely from the solemn, but at the moment the application is entirely set up as if the best has gates to the benefits that it is drawing on none of that has been changed in the application, so that the latest iteration of the statement of reason still talks about the additional benefits, the supplementary benefits, as the applicant has it, but surely it's appropriate for those sections of the application to be adjusted while the scheme sits at gate one status for the best, as I've outlined, and we'll submit further details on this following the hearing. There's a lot of evidence available to show that gate two status isn't a slam dunk. It's not necessarily going to happen for this scheme and many others. The battery pipeline is very heavily oversubscribed, and it's caused a lot of problems in the sector. Thank you. You

don't think you want to add on that

it's nothing further to add, so we'll take, we'll take it away and not provide any further response.

Simon Beverly, resident from Keys, again slight repetition, but also elaborate upon this is supposed to be in particular to your need to explain the need for a best, as well as the proposed design approach, including distribution across the proposed site. This examination is for an end sip, and it's for a scheme that's currently described as a single integrated solar and Bess N-SIP solar facility, as we've heard, has guaranteed gate two connection, and the best facility does not. It only's got this gate one, as discussed earlier. This immediately divides the project's deliverability into two parts. Brock will need the best to ensure true viability of the scheme, with that best being able to trade off-peak frequently gas-generated electricity. Without the best, there must be serious doubts about the scheme's overall deliverability. At this stage, the NGET are only able to progress designs for solar connection under the gate two offer, they have confirmed the best element of the scheme does not even feature in their plans for the Eastern Socon substation. This uncertainty regarding any possibility of a gate two connection is

highlighted in the April 2026 open letter issued by the Department for Energy Security net zero and off gem, which explicitly acknowledges the current grid connections queue contains a battery surplus that is a substantial oversupply of battery storage projects. Hence, many schemes may never secure viable collections or proceed to delivery the commercial ability of any best to trade electricity as a standalone operation accounts for much of this battery surplus. Brock rules best is effectively a standalone commercial venture, not an NSIP, and should therefore require independent justification under EN one Brockwell should be required to separate their application for the commercial best from the solar elements. It has clearly been assessed as a discrete piece of infrastructure by the NESO in its connections reform that deals with the best need. Turning to the distribution across the proposed site, as shown, Brock will originally indicated the best on site C and has now moved it to site D. This clearly demonstrates that moving the best from one location to another is achievable, and whilst this may also be a consideration for tomorrow's compulsory acquisition hearing. There now be as no reason not to locate the best, which is on AC, not DC, at the other end of the proposed connection cable route, immediately adjacent to the Eaton Soak and substation. Once again, I'd urge the examining authority to require full transparent answer. From the applicant not to accept arguments, which might all be sorted later, once we have permission. What is the purpose of the inquiry and examination if it does not receive answers to such basic fundamental questions? Thank you.

Anything you would like to add on that, given that we, the examination process is still ongoing,

so I'll take, take the two, the two distinct points in turn, so the first, the first point to make is that the best is there to support the solar generation as ancillary infrastructure and aiding it in delivering the national need that's set out in MPSE n3 and it's acting as a flexible supporting infrastructure for the delivery of the solar generation, so it captures any excess, and then will allow more efficiently that solar generation to be distributed to the grid, the distinction being that the gate to offer only relates to it accepting electricity from the grid to be stored to then be released at another time, the primary function of it and the function that's supported in MPS en one is for that flexibility and grit and grid balancing, insofar as the location of the best within the scheme is concerned. We've considered that point, but we are satisfied that it is in the preferred location within the scheme, and there's justification for it being where it

is. Okay. Thank you. As I mentioned, there's still a period of this examination to go through. It would be the consideration of written submissions following this hearing, just to address your point, so before we move on to the in relation to this current agenda item,

what has been said earlier? Yes, in the interests of fullness and accuracy of information from the developer. The statement about 108,000 homes being fully supplied. I really strongly believe that this should be restated as coming from the the solar panels. This is not because it's recharged, the best is recharging from the grid, because it's not got a gate to license, but to restate what the capacity, what the output of the site will be, recognizing that it will be zero during winter months, and when it is fully charged, it will be for some, I believe, 30 minutes during periods of demand, so that the statement must be readdressed to state boldly that it's going to provide electricity for 108,000 homes is clearly not correct. Thank you. No doubt that's something the applicant will take away and

come back with following the examination, the hearing today, but if there are no other questions on this agenda item or comments, I will move on to the next agenda item, which is pollution control. If it could invite the applicant to again set out its position on this issue, please.

Martin Pollard from Axis, on behalf of the applicant, in responding to this point we've, we've, we've decided to set out the applicants' approach to pollution control and waste in terms of the normal best

operation, and by that I mean the operation of the best outside of any failure or emergency event, for example, fire, so the pollution control measures that will be specifically in place to deal with best safety, we will address in the response to item 4c So this is really talking about pollution control in normal operation, and also. Waste management in normal operation, so the main potential for pollution in its widest sense that can arise during the normal operation of the best is noise, which, without appropriate mitigation, has the potential to arise from the operation of fans, transformers, cooling units, and other auxiliary equipment, the potential effects of noise from both the best and the wider scheme are comprehensively assessed in Chapter 10 of the ES, that's APP 046 The assessment involved a comparison of the measured baseline noise levels at sensitive receptors against the predicted noise levels, including the operation of the Bess and the wider solar farm development, allowing for any associated mitigation measures. The difference in noise levels was then assessed against prescribed standards and limits in both the daytime and nighttime periods. The ES concludes that through the adoption of a series of mitigation measures, specifically the siting of noisier elements of the best, as far as practical from sensitive receptors, the enclosure of the battery storage units and inverters, the design and selection of plant and machinery, so that no tonal character is perceptible, and adopting operational mitigation measures, which will be secured through the outline operational environmental management plan, that's REP 3052 including regular inspection of equipment for disrepair and timely remedial action, taking all of those mitigation measures into account. The ES concludes that individually or in combination, sorry, sir, with the solar infrastructure, the best would not give rise to any significant noise or vibration effects. As such, the applicant is satisfied that they've made all necessary provisions to control pollution during the normal operation of the best facility. Turning specifically to the matter of pollution control, there are a number of measures embedded in the siting design and selection of the best equipment that specifically seek to control pollution in a failure event. They're set out in the outline battery safety management plan, that's APP 162 and relate to measures that are to be implemented to reduce the risk of fire and explosion, measures to prevent the spread of fire, the impact of emissions in the event of fire, and the capture and control of any polluted fire water in such an event. Those matters and measures will be discussed more directly by my colleagues Paul Gregory and Hannah Dennett, and the applicant's response to 4c on the matter of waste management. The applicant has set out their approach to the management of waste arising from the scheme in their outlying waste management plan, that's R E p3 062 The outline waste management plan sets out the applicant's measures for the measurement of waste, the management of waste arising at each stage of development, and for each scheme element, including the best. The overarching aim of the outline waste management plan is to ensure that the scheme complies with the well-established system of waste management legislation, policy, and guidance, which is in place to government that govern the management of waste in England. Most relevant waste legislation is set out within the other consent and licenses document, which is REP 3021 The main requirements and commitments that are of relevance to the best are as follows: ensuring compliance with the waste hierarchy, which is of prevention, reuse, recycling, treatment, and disposal, segregating waste streams on site and storing them securely, ensuring only licensed waste management contractors are used to collect the waste, classifying all waste, including hazardous waste before removal, keeping waste hazardous waste consignment note documentation, transfer notes, consignment notes, and recycling dispersal records, as appropriate, ensuring that appropriate duty of care and compliance with hazardous waste requirements, where hazardous parts are present within waste electricity, electrical items. Sorry, ensuring that any spent or defective batteries are sent for recycling and recovery.

The waste batteries and accumulations regulations prevent them from being either incinerated or landfilled, taking the above into account, any waste arising during the construction, operation, and decommissioning of the best will be managed in accordance with the waste hierarchy and applicable duty of care requirements. Waste would be segregated, securely stored, classified, and removed only by authorized waste carriers to appropriately permitted facilities during the operational phase, any faulty or replacement battery module, cells, or other electrical equipment would either be managed through a

supplier take back scheme or via approved recycling routes. The supply take back scheme ensures that, upon the sale of equipment, solar and battery storage manufacturers take back battery units when they are damaged or reach the end of their operational life for specialist recycling and recovery, where take back schemes are not available, for example, where the supplier no longer operates, the scheme operator would arrange for the battery containers and batteries to be sent for recycling to a suitably licensed facility. There are an increasing number of facilities promoting the recycling of industrial growth. Eight lithium ion batteries in the UK, and it is expected that this will continue to grow to cater for the increasing requirements of the automotive and industrial, including best battery sectors. This includes major UK waste management firms like Veolia UK, who operates a specialist battery recycling and recovery facility in Minwith in the West Midlands. The applicant has provided more details on the operational stage in their technical note on on the replacement of equipment, which is our EP 3075 Just going to a point that was has been raised on waste management within that within the responses that we've received recently within the outline waste management plan, it's estimated that around 90% of the battery storage units and associated transformer units can be recycled, with only 10% going to either landfill or energy recovery. It's important in reviewing that to know that the setting these assumptions reference is being made to the whole best container unit rather than just the battery components themselves, for a typical containerized grid scale best, the main recyclable mass is not just the battery cells, there is also the container enclosure, racks, mechanical supports, power conversion systems, thermal management, fire safety systems, and control and communications devices. So, whilst a number of those elements, such as the metal container itself are relatively straightforward to recycle, others are more difficult, including certain plastics, foams, etc. So, thus, while the best is expected to be substantially recyclable and recoverable, as required by the waste hierarchy, not everything is, and that is why a 90% figure was given by the applicant as being reasonable and robust, the provisions for the decommissioning phase will be similar to those outlined above, albeit in accordance with the prevailing waste legislation and guidance at that time, in accordance with the outline waste management plan and the ODEP outline decommissioning environmental management plan, REP 3054 and just whilst it's going to cross over slightly with the next point, I just thought it would be worth setting out what the approach to waste management would be in a failure event. So, in the unlikely event of a best failure and result in fire, the broad legislative requirements would continue to be followed, leading to the following approach. Firefighting water collected after a failure event would be tested first, before being pumped into a sealed tanker, and then treated by a suitably licensed waste contractor. All waste streams would be confirmed as safe, i.e. not hot, not still connected to electrical supply, etc. and then identified and segregated into individual waste streams for reuse, recycling, treatment, and dispersal as necessary. Again, in accordance with the waste hierarchy, the batteries would be quarantined and made safe by a specialist waste contractor before also being removed by specialist contractor. Storage of batteries on site and removal would be in appropriate containers. So, in summary, the approach in such an event would be quarantine first, classify carefully, contain debris, use specialist packaging and transport, send only to authorized facilities, and keep a complete audit trail. That's that's the end of my presentation.

Cheers. Thank you. Just a few questions from me. I know that Bedford Borough Council raised some issues regarding the reporting and breaching firewater issues in the local impact report. Have the Enrollment Agency raised any issue on this particular I

I don't think that they have that we're aware of. Okay,

I should have any comments to make additional to that.

Thank you, Sir Daniel Stedman Jones, for the host authorities. I will just.. I'll just check or give an opportunity. Is there anything we need to add in relation to to that issue, mr. Dacre? Okay, thanks,

sir. The applicant shows on various diagrams their detention lagoon or fire water safety lagoon, and indicate in in text that it is sufficient to carry the water capacity that would be generated plus a top up. The only question that we asked or raised was, could we get a diagram to understand in a sloping topography exactly what that lake or detention deck would look like if it has banding walls, and therefore then the full extent, the depth, and the impact it has on the landscape. At present, we have a flat drawing, but we don't. Have any three dimensionality of that to understand the full impact that that has, because it could potentially be larger than indicated on the drawing at present. That was the one question we had. Thank you.

Is that something the applicant could submit to the examination?

We can, we can provide a schematic as necessary. The attenuation lagoon will be actually within, within, primarily within the ground, and we'll have a look at the topography, but we believe it's, it's relatively, relatively flat. So, we'll, we'll provide some further details on that.

Yeah. thank you. Next question, I'm going to direct to Bedford again, noting you raised concern on waste principally emanating from the replenishment campaigns that will be needed during the operational lifetime of the scheme. I also acknowledge and note that the applicant's response provided to matter 78 and their written response to the local impact report rep two dash or four three, but can I ask if Edford or no agreeable this issue being controlled appropriately following that response,

Peter Day case bid for Berry Council. We are aware that the applicant has submitted a technical note regarding the replacement phase. We haven't looked at it yet in detail, but we'll revert as part of this examination.

Could that be submitted for the next deadline?

Of course, it will.

Thank you. So, in terms of pollution and control, would anyone in the room would like to raise an issue?

President, after the Tilbury Bettage incident, there were problems appointing a suitable waste contractor to deal with their contaminated waste, so I'm wondering why was there not a standard operating procedure in place before the incident, and you mentioned suitable waste contractor, are there any,

the so the measures in terms of a event are going to be set out in the waste management plan, so the how of it in terms of that part of your question is where it's going to be set out in terms of waste management contractors for dealing with all waste types that there are there are a number in the UK and it would be to it would be to the operator to identify or have a contract with whoever that would be to ensure that they could deal with with such an event,

so if I might just add, if it took East Tilbury operators several months. How do we know that's not going to happen again,

Paul Gregory for the applicant, whilst I'm not sure that the so East Tilbury was actually under commissioning stage at the time, obviously any operational or logistical arrangements from that scheme are speculation. I've not, as someone who's across a lot of safety information, I've not come

across that the best provider is one of the largest in the world. I would be very surprised if arrangements weren't in place, and I don't really think it bears any relevance to this scheme.

Just going back to one of the original questions, there are there specialist contractors that deal with this waste, or is it just a general contractor? I Plan,

there are a number of different waste management companies out there that deal with all types of waste. I'll come back specifically on who would be capable of managing this in due course.

Okay. Thank you. Any other questions?

Yeah, let's round again. I'm guessing this is part of the safety item that is next, but as the size, as the lagoon was mentioned, what actual capacity will it have, because again, going back to previous incidents involving best millions of liters of water have been used, and I believe that Merseyside was 5 million liters, San Diego 8 million moss landing 2.6 million and dunker bus in Belgium 1.4 million plus 400 kilos of powder will your lagoon have the capacity to take that because in your statement it says it will not only contain all the fire fighting fluids, but it will also contain water, should there be 100 years storm occurring at the same time.

That's something you're going to cover as part of your safety presentation.

Sorry, so it could have been, but we can answer. We have Duncan from Wallingford Hydro Solutions. We can answer the question. Yeah, yes, Duncan Russell, Wallingford Hydro Solutions. For the applicant, the rainfall input is calculated using the 1% 1% annual exceedance probability, that is the one in 100 year event, plus a 40% upper allowance for climate change, using the Upper Bedford Ooze catchment applied to the 2070s EPOC, that's 2061 to 2125 in accordance with environment agency guidance, the firewater requirement is using the National Fire Chief Council guidance, and taking those together, the calculated volume in total is 1904 cubic meters, which includes 456 cubic meters for firewater, that is 456,000 liters for firewater. In addition, there is 309 cubic meters available in the swale running parallel to the main access track, although that is a separate unit. In addition, there is a free board of 300 millimeters included in the design of the attenuation basin, ensuring that the maximum depth of the water does not exceed two meter threshold, as stated in Syria Suds guidance. Thank you. I next

agenda item, but just while we're on the issue, like in some of the documentation it refers to four hour capacity of order for firefighting, so what is what you're saying that the lagoon will be supplemented by natural water sources, firefighting,

the source of water will come from separate lagoons. I've described the attenuation basin for receiving fire water, once it becomes dispersed on the ground, that will drain towards the attenuation basin, but there is a supply requirement, which is in two separate basins that require to be maintained full for emergency purposes. Does that answer your question, sir?

In the event of a fire lasting more than four hours, given the amalgamated form of the storage systems that could be spread, so it could be longer than four hours. I'm just trying to establish if there will be a sufficient water supply.

Well, there would be a lot of water coming out of the sky, Sarah, and that has been calculated, and would, would be available, I suppose. Yes, in the attenuation pond, but it's not included in the calculation for fire water,

right? So

there is additional water in the attenuation pond as well, but it's a separate calculation that we're using, because the supply of water for the fire for the firemen is coming from the or is calculated. To come from the supply source, the two lagoons that are separately designed and provided for on the site, so

okay, forgive me for my, my naivete here, but there's an issue being raised by another interested party that this area suffers from water stress issues, angling and water. I think it was, as I say, I'm just trying to establish that there is a sufficient water supply

to

provide sufficient fire height and capabilities. Can I refer

to my colleague, please?

Yeah,

Paul Gregory, the applicant. Yes, we obviously were going to discuss this later, but we can come into how site design and testing, both at the illustrative and at detailed design, ensure that there's sufficient firefighting water on site to cope with credible scenarios. Excuse me. So, most current best systems, as of today, are designed to safely burn out without internal fire suppression systems, which remove the risk of stranded energy, so electrical energy still stored in the battery systems, safely decommissioning and transporting from site. Large scale fire testing must be conducted to demonstrate that the loss will be safely limited to one best enclosure without intervention of firefighters, so no intervention, so no firefighting water. Most of the current best designs integrate LFP chemistry prismatic cells at the moment that's the dominant design as I speak today and systems that have been through large scale fire testing since 2024 have demonstrated fire propagation does not occur to other best enclosures at distances ranging from 15 centimeters to 100 centimeters to adjacent or back to back best enclosures. The East Park illustrative design used in the OBS MP and the site plan documentation uses a minimum separation of two meters between back to back and adjacent best and three meters minimum separation to ESS equipment, energy storage systems, so transformers, other electrical energy equipment, and a minimum of 11 meter separation to the next block of best enclosures, which conforms to NFPA 855 requirements and NFCC guidance, as witnessed in numerous best large scale fire tests 2024 to this year. Peak of fire propagation of battery systems results in maximum flying flame heights of four to five meters out of the roof of the best. Typically, these flames are channeled through roof level deflagration vents, resulting in peak flaming of eight to nine meters above ground level. These current best designs integrate high levels of thermal insulation to prevent a fire from spreading to adjacent best enclosures. The insulation is designed to ensure that external heat from a best fire does not increase internal temperatures of adjacent best to critical levels, i.e. temperatures are kept under 100 degrees C. LSFT, large scale fire testing, involves deliberately burning a complete best enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures, and critically, the potential for fire propagation to adjacent best or associated equipment. The purpose of this testing is to expressly validate minimum equipment spacing and to demonstrate that cascading or multi best enclosure ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi best fire propagation events, including scenarios observed in real world incidents by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention, because the illustrative current best design utilized for the OBS MP drafting and fire emission modeling demonstrated that a fire did not

propagate during large scale fire testing. The applicant has demonstrated that the loss of a single best enclosure is the credible worst case event for the safety and risk assessment documentation submitted for the DCO. Real world worst case scenario, best fires have involved fires that have generally consumed two best enclosures, i.e. best fire has propagated from one best to another best unit. The worst-case propagation of four best enclosures occurred in Lyme, New York, which involved battery systems integrating NMC pouch cells in air cool modules. These battery systems will not be considered for the scheme. They were also involved in the Sirence Esther fire, Carnegie Road, and Liverpool. And the recent Nottinghamshire fire, I think it was me one second. These worst-case real-world incidents have involved legacy best systems, as mentioned by mr. Rand earlier, which had not undertaken large scale fire testing. Many of those systems were not NFPA 855 or UL 9540 compliance, the applicant regularly evaluates best system defect and root cause analysis reports to inform all critical aspects of best safety required for procurement, construction, installation, commissioning, and decommissioning phases of projects. Factory acceptance testing and site acceptance testings are key components in ensuring credible best failure scenarios are prevented and fully mitigated, should they occur. Multiple best enclosures catching fire simultaneously has not occurred in real-world best failure incidents to date, and should be considered a highly improbable worst-case scenario.

Reports, such as the Intertech Clean Energy Associates Global Energy Storage Manufacturing Quality Report 2026 I like critical best system safety issues and demonstrates how corrective actions should be taken before a failure incident could concern can occur. Sorry, as now mandated under an FPA 855 2026 the applicant will only be able to select the best system that has undertaken large scale fire testing at the detailed design stage. The selected best large scale fire testing data will be leveraged to fully inform inputs for risk assessment tools, which will be utilized together with detailed consequence modeling to provide a comprehensive site operations and emergency response safety audit. This is stipulated in the OBS MP preconstruction requirements section five, final comprehensive risk assessment reports, best design and site specific at consequence modeling, and detailed emergency response plans can only be drafted when based upon specific best design selected at the detailed design stage. Key safety content requires that all equipment within the best areas defined. Battery system operating limits and test data are fully defined. The best failure protection system is defined, and incident response tactics required significant test data and rigorous consequence modeling from the specific best designed to develop safe protocols for incident response sections five point 1.35 point 1.4 and 5.1 point six of the OBS MP mandate the key risk analysis reports failure modes effects analysis layers of protection analysis hazard mitigation analysis hazard and hazard, etc. which consider how to prevent and mitigate a multi best failure incident. These reports must be provided at the detailed design stage and our best system and site layout specific. These types of risk analysis provide confidence to demonstrate that under day to day operation there is a low risk of a best failure incident, and that in the event of an incident, the credible habits are understood and have been evaluated both at illustrative and detailed design stages to demonstrate the risk to site operatives, first responders, and a local population remains very low. The applicant will also commission site-specific heat flux and flame tilt consequence modeling to account for site topography and wind conditions to establish final equipment spacing distance for the schemes, fire hazards, burning thermal runaway events in best systems, and variations in burnout times are significantly influenced by failure scenarios, state of charge, battery rack configurations, materials, cell and module propagation times during thermal runway is driven by heat generated through internal current flow, parallel circuits, damaged circuitry and wiring, additional battery module and best enclosure combustibles, and internal stroke external module heating from vented gasses and flames. The applicant emphasized that general generalizations and claims regarding the safety of specific battery chemistries should be disregarded. Predictions of gas properties and volumes from a battery chemistry or form factories and wise testing on actual battery cells and battery systems is the only way to accurately define gas production, which will inform the fire and explosion risk for a specific battery system UL nine 548 testing defines specific battery vent gas mixtures, maximum burn velocity, maximum explosion pressure, and duration of flaming fire and

combustion data recorded during testing is peak heat release rate, heat release rates, total heat release rates, and cell propagation rates, temperatures within modules, and the flagration data. Should it occur, the National Fire Chiefs Council, NFPA, and the Fire Safety Research Institute all advise that hose streams should not be directly discharged on best. Battery systems claims that millions of liters of water required to tackle a single best fire, as regularly referenced on the internet, are incorrect. This type of assumption is based upon two ground monitor units being deployed each to discharge in 1900 liters per minute for 24 hours, i.e. 5400 5,472,000 liters of water directly on battery systems within a best enclosure. This tactic is not necessary and could create environmental pollution risks and significantly prolong any best fire event, as we saw at Carnegie Road. If firefighters are applying water fog or spray patterns to adjacent best enclosures or deploying defensive spray plates that form a water curtain between the effective enclosure and adjacent best.

These boundary cooling tactics, as they referred to, would likely be applied intermittently in 15 minute application periods with internal and external best temperature changes measured between application periods, the peak fire load for most current best designs, when at 100% state of charge, lasts for one to three hours, and the rest of the fire, typically another four to eight hours, will be at a lower intensity, which reduces the impact of the fire. The maximum peak heat release rate occurs when propagation rate of battery cells is at peak level and decays to a smaller, steady fire that is burning through fewer battery cells and modules, and the best system combustible materials emitting significantly lower levels of flame and heat flux. FRS interventions, incredible best failure scenarios, would be limited to boundary cooling during a short term peak load fire event.

Thank you for that comprehensive response. I will have some questions, but I'll reserve those for later. Is there anybody else that like to make a point on this issue before we adjourn for a short period of time? Get one more.

Yeah, Lesnar, again, the battery, sorry, the water storage containers between the two of them are less than half a million liters, which is just a fraction of what has been used on previous best fires. I never did get a figure for what the lagoon might be for catching this runoff, which then again brings us back to the fact that if it was a dispersed site with the batteries well spaced, it wouldn't be the issue that it is that you have with a centralized site. With a centralized site, there's risk to the other battery storage facilities, whereas with the dispersed site is just one unit and

Well, Gregory, for the applicant, AC coupled centralized best like this versus DC coupled with DC coupling, you'd never have a single best enclosure. Typically, they'd be grouped together, whether it's six, 810, 12 best, depending on how it's figured, as I just described in my sort of resume, there, the instance you described involved legacy systems that hadn't undertaken large-scale fire testing, water was applied directly, for example, in Carnegie Road, there was no emergency response plan. Therefore, there were no firefighting tactics agreed at that time. As I've just laid out with regard to both the illustrative and detailed design, is that large scale fire testing and consequence modeling will very much validate firefighting water section one point 4.3 of the OBS MP stipulates final best design and site layout will be validated through large scale fire testing mandated in NFPA 855 2026 and rigorous consequence modeling to minimize the requirement for any CR CFRS intervention in a thermal runaway incident, LSF team must validate minimum safe equipment spacing distances to demonstrate there is no far propagation to adjacent vest enclosures or energy storage systems, i.e. transformers, inverters, and switch gear. CFRS intervention in worst-case scenarios will typically be limited to boundary cooling of adjacent vet and the SS units to prevent the fire from spreading. The strategy will be finalized with CFRS and be clearly communicated in the emergency response plan. The emergency response plan will ensure that any firefighting water runoff can be safely contained and tested for pollutants before. Receive reuse or if necessary, removed by tanker and treated off site to ensure that

fire smoke and the spread of toxic gasses do not significantly affect occupants in surrounding buildings and areas. First responders and the local community. With regard to the illustrative design, there are two water tanks containing 228,000 liters of water, which is four hours at 1900 liters per minute, and that was the attenuation solution is designed to accommodate that firefighting water.

Yes. Thank you. I said very brief

system that presumably went through the same planning planning procedure that we're going through now. You did actually say there was no emergency file plan,

Paul Gregory, for the applicant. Yes, that is correct. And, however, that was sorry, it wasn't a DCO, it was for best units in an industrial area, so it wasn't an NSIP again, I believe the site was built in 2018 I think, so yes, we're obviously eight years down the line with planning requirements being somewhat different to a small scheme from that time.

Okay. Thank you. Now, like to I know you indicated we're about to have a break, but just before we do, I think Bedford or accounts would like to make a comment, just still on 4b before we move on to the next topic once again.

Thank you, sir. And Peter Day case, Bedford Borough Council, could the applicant please confirm that in the decommissioning strategy for the lagoons that you are addressing potential removement of silt, any of that firewater debris that might be retained within the basin, and the lining that you talk, that effectively the entire lagoon will be removed in a responsible way to prevent silting or end contamination post decommissioning. Please,

Martin, part on behalf of the applicant. Yes, the decommissioning will involve the removal of all structures associated with the best, including the attenuation lagoon.

Thank you. Now come to the end of that agenda item. Before we move on to safety, fire safety. I propose that we take brief adjournment and return at 3:40pm so I if you're watching the live stream, then please be aware that now stop to view the restarted meeting. You will need to refresh your browser page before we restart, and I'll adjourn this meeting as I say at 340 Thank you.

I.