Planning Inspectorate
Arolygiaeth Gynllunio

Hearing Transcript

Project:	East Park Energy
Hearing:	Issue Specific Hearing 4 (ISH4) - Part 2
Date:	09 June 2026

Please note: This document is intended to assist Interested Parties.

It is not a verbatim text of what was said at the above hearing. The content was produced using artificial intelligence voice to text software. It may, therefore, include errors and should be assumed to be unedited.

The video recording published on the Planning Inspectorate project page is the primary record of the hearing.

AUDIO_ISH4_SESSION2_EAST_PARK_ENERGY

Tue, Jun 09, 2026 4:22PM • 1:22:36

SUMMARY KEYWORDS

Battery safety, fire service, Environment Agency, Cambridge Fire Rescue, battery safety management plan, firefighting water, emergency response, air quality, thermal runaway, archeological survey, planning performance agreement, community protection, evacuation planning, security measures.

SPEAKERS

Speaker 3, Speaker 4, Speaker 12, Speaker 5, Speaker 7, Speaker 8, Speaker 9, Speaker 11, Speaker 15, Speaker 14, Speaker 1, Speaker 6, Speaker 2, Speaker 10, Speaker 13

Time is now 3:40pm and this meeting is restarting. Please, could a member of the case team confirm that can be heard clearly, and the live streaming has commenced. Thank you. So moving on to item 3c, safety now look like the look over some issues relating to battery safety as a common theme in the submitted relevant representations. I am aware from the submissions during the process of the examination, so far that the fire service appeared to be reasonably happy with the safety position, and the Environment Agency have commented that the they consider that the battery safety management plan be of a good standard, so again, could I ask the applicant to briefly rehearse its case on this issue, please?

Paul Gregory, for the applicant, I think the council did mention that Cambridge Fire Rescue had a statement. Would it be perhaps appropriate just to hear that before I ran through our sort of consultation with Cambridgeshire Fire Rescue.

Is that a lengthy statement?

Daniel Studmund Jones, on behalf of the host authorities, it's not lengthy. I believe if I hand over to mr. Carford to my right, he has it in front of him, so I think it can be read out, or at least the most, the main, the main parts.

Yeah, go ahead.

Thanks.

Thank you, David Carford, Cambridge County Council. Yes, we, we engaged with Cambridge Fire and Rescue Service, and we had a meeting with them on the lead up to this hearing, and we understood that they weren't able to make it, so they did extend their apologies. They did send an email to the case team, so it's not a written submission as yet, but we can obviously go back to them and liaise with them and make sure that what I read out now could be submitted into the examination, so but briefly, I can, I can read it. It's relatively short, so this is their email that they sent the case team regarding this issue. This specific item on the agenda, so it's really.. sorry, I'll just paraphrase a little bit. it's they'd like to draw the examining authority's attention to statement of common ground that has been submitted into the examination PAD or PDA 019 It's important to note that whilst general principles are agreed,

including those on the battery safety management plan, all matters are subject to the detail that is not available at this time, any assurances as provided by the applicant within the statement of common ground are met and evidenced to the satisfaction of the fire authority in relation specifically to some of the matters you raised as part of item 3c the battery energy storage system reads the enclosure design for the beds should be a cabinet type style to allow maintenance to take place without entering the beds to reduce risk that there are adequate and evidence separation between the bed enclosures, ancillary buildings and infrastructure to mitigate against the spread of fire, that the provision of fire-resistant materials are included in the design to ensure fire does not spread between the best units. The best enclosure design will be fully communicated with Cambridge Fire and Rescue Service, and that the selected best design and associated minimum equipment spacing is evidenced and validated through large scale fire testing, which I think alludes to some of the evidence the applicant was giving before the break with regard to water supply, as stated by the applicant in Table Two of the statement of Common Ground of two firefighting water storage tanks of no less than 228 zero leases in capacity capable of delivering 1900 leases per minute for four hours this would provide reasonable provision for initial firefighting any provided water storage tanks must be accessible at all times, be on hard standing, be provided with hose connections suitable for the use of both Cambridgeshire Fire and Rescue Service and Bedfordshire Fire and Rescue Service, and be located to minimize any impacts on the storage tanks from a fire on the site with regard to access one. Cambshire Fire and Rescue Service will always lobby for two distinct and remote access routes, so as to reduce the likelihood of responding emergency service personnel having to travel through or close to any smoke plume or vapor cloud. We are of the opinion that the proposed access should allow the emergency access and ability to stay adequately remote from any plume. The expectation would be to follow the guidance provided by the National Fire Chiefs Council and Table 15.2 of the approved document B for access routes and hard standing areas. Further to that, I'm paraphrasing now, but they welcome ongoing engagement with the applicant and to work with sufficient detail, and they're also wishing to engage with relation to with the applicant in relation to securing support for suitable training for the batteries and any relevant specialist equipment that may be needed.

Yes, thank you for that. Should I like to present your

thank, thank you for that, Paul Gregory. For the applicant, the outline battery safety management plan has been prepared to prevent and fully mitigate the risks from a best failure event, the safety objectives of which are listed in section 1.4 of the OBS MP. The applicant has ensured site design is fully compliant with NFCC guidance, and has worked closely with Cambridgeshire Fire and Rescue to address some site-specific operational and access requirements for CFRS. Requirement 10 of the draft DCO requires the applicant to submit a battery safety management plan for approval by the local planning authority in consultation with Cambridgeshire Fire and Rescue services and the Environment Agency prior to carrying out any of the best work works. Number two, the best safety management plan must be in substantial accordance with the outlying battery safety management plan at 162 section 1.6 of the OBS MP documents the consultation process with Kemper Shire Fire and rescue, and the safety or information requirements for the scheme, some of which were just listed in the email correspondence. There, section four of the OBS MP covers all requisite firefighting considerations, including fire breaks, firefighting water containment, firefighting water supply requirements, all aspects of emergency planning, including emergency response plans and risk management plan content templates, and summaries of plume study consequence modeling to validate best site locations. The applicant and Cambridge Fire Rescue signed a statement of common ground, which demonstrates that the applicant has followed all key best safety guidance and has fully assessed fire explosion, toxic emission, and pollution risks. The applicant has worked with CFRS to ensure that emergency access routes are appropriate for CFRS appliances to operate in all weather conditions. Access roads will be maintained to ensure vegetation does not impede vehicle access. As referenced, the applicant will only select a best design where a minimum equipment spacing has been value validated through large scale

fire testing. The OBS MP stipulates these requirements in detail that paragraphs one point 4.32 point 1.32 point 2.22 point 2.32 point 4.22 point 4.6 2.6 point 11, 2.6 point 12, two point 7.14 point 5.25 point 1.15 point 1.4 and five point 1.7 As I referred to earlier, as we sort of leapt ahead a little, as mandated under NFPA 855 2026 the applicant can only select a best system that has undertaken large scale fire testing that all the test data will be leveraged to fully inform inputs for risk assessment tools, which were utilized together with detailed consequence modeling, providing a site operations and emergency response safety or audit stipulated in reconstruction requirements in the OBS MP of Section Five. The OBS MP confirms in Section 2.6 the detection and fire protection systems, which must meet all NFPA 855 and NFCC requirements and be approved by Cambridgeshire Fire and Rescue. The OBS MP also confirms in section 2.6 how any fire suppression system efficacy will be validated through UL nine 548 or third party testing. Section 2.7 of the OBS MP confirms that comprehensive explosion prevent. Incident and mitigation systems must be integrated into the best selected a detailed design. The active and passive control systems will meet an FPA five five and NFCC requirements and be approved by CFRS prior to construction. The applicant has provided suitable and appropriate access to the best section 4.2 of the OBS MP provides details of how the applicant will comply with NFCC guidance and accommodate all CFRS operational requirements for safe emergency response, firefighting water provision as discussed at the illustrative stage is 228,000 liters in two tanks capable to deliver 1900 liters per minute for four hours. This is set out at paragraph four point 3.3 and is secured by requirement 10 of the draft DCO section 4.3 and paragraph four point 3.5 of the OBS MP confirmed that any fire hydrants and connections to dry pipe systems will be installed in accordance with BS 9990 The any, if hydrants are integrated onto the site, they will be supplied by the water tank, so it's not a water water main system per se. The final volumes for water firefighting supply will be validated by an independent fire protection engineer based on large scale fire testing.

The OBS MP sets out at paragraph four point 2.8 that the final BSMP must be in line with NFCC guidance to include a site plan that shows all sensitive receptors within a one kilometer radius of the order limits that could be affected by a fire. The applicant has prepared a best fire emissions modeling report plume study at Appendix A of the OBS MP, which assesses the battery fire emission impact of the five worst case fire locations using the concept best design on sensitive receptors within a one kilometer radius of the best area. This is summer graph paragraphs four point 5.9 to 4.5 point 12 with the OBS MP. My colleague Hannah Dennett is here to just go through the fire emissions modeling scope and the methodology, if that would prove useful.

Good afternoon, Hannah Dennett. On behalf of the applicant, as Paul said, we undertook an assessment, which is presented in Appendix A of the outline battery safety management plan, and that demonstrates there will be no significant air quality effects on human receptors in the unlikely event of a fire, so the methodology concentrations of carbon monoxide, formaldehyde, hydrogen chloride, hydrogen cyanide, hydrogen fluoride, ammonia, nitrogen dioxide, and particulates from a potential best fire have been modeled using an air quality dispersion model to determine the likely effects on human health. A high level visibility assessment has also been undertaken using the model particulates results to determine the effect of best fire emissions on visibility on the local road network. The modeling use of conservative assumptions, including worst case best fire locations within the best area positioned at the boundary of the best closest to sensitive receptors, worst case release height, temperature, and plume parameters, worst case emission rates, where peak emission rates are assumed to persist for extended durations, the use of five years of hourly meteorological data with a maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions over those five years, and assumption that nitrogen oxide converts fully to nitrogen dioxide. So the results of the modeling indicated that effects are predicted to be below levels associated with harm to the general public. The predicted maximum PM 10 concentrations were all well below the eight hour health and safety executive workplace exposure limit, and the predicted maximum carbon monoxide concentrations were well below the relevant World Health Organization guideline values. All of the

pollutant maximum concentrations were below their respective level one acute exposure guidance levels for all exposure periods. The lowest visibility predicted on the road closest to the best area, the B 645 was approximately 3.8 kilometers, which is considerably further than vehicle stopping distance at the national speed limit for this road. In terms of mitigation measures, include public notification and exposure advice, so stained doors, closed windows, potential temporary movement of people if necessary, and coordination with emergency services. So, in conclusion, the based on the factors of distance, the nearest locations of human exposure, and the anticipated short-term nature of a fire incident, the assessment concludes that. No significant air quality or visibility effects as a result of a best fire incident. It should be noted that the assessment is deliberately conservative and therefore likely to overestimate rather than underestimate potential impacts.

Thank you for that. Yeah, I've got a few further questions, some of which I did have for Cambridge Fire and Rescue Service, but I'll defer those to subsequent questions. So I'm conscious that battery safety management is an evolving science for want of a better expression, so how will battery safety best practice be captured once the original battery safety management plan is implemented

and Paul Gregory, for the applicant section one point 4.2 of the OBS MP outlines how the applicant will develop the best in line with all relevant legislation and good practice in force at the time, and a summary of anticipated best failure safety precisions is listed in that section. Section 1.5 of the OBS MP documents the guidance and standards that were used to inform the design of the scheme. The system selected a detailed design will be tested in accordance with UL 1973 UL nine 540 UL nine 540 A BSEN IEC 62619 2619 bse n iec 62933 dash five dash two un 38.3 and several other significant best safety and certification standards at the detailed design stage the latest version of these standards and guidance will be used. Typically, these standards and codes are on sort of two to three year cycles, so we've just had a new cycle now in 2026 Already draftings occurring for the next round of code cycles, the best site design fully complies with NFCC guidance, which again was revised in 2026 The applicant has chose to, instead of reducing to three meters where areas are kept free of vegetation or other combustible materials, they will comply with the 10 meters recommended in the original NFCC guidance. Section four of the OBS MP covers all requisite firefighting requirements for the best area, and section five of the OBS MP documents best safety commitments that will be adopted to ensure that the risks of a best failure event are minimized. The OBS MP integrates the latest best safety requirements contained in NFPA 855 2026 and NFCC guidance, ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a best failure event occurs. The pros proposed development would meet required safety objectives for explosion detection and protection systems specified in NFPA five five. Explosion prevention and protection is now the primary best safety focus. NFP 855 incorporates NFPA 68 standard on explosion protection by deflagration venting and NFPA 69 explosion prevention systems. Together, these standards provide comprehensive guidelines and standards to manage and mitigate explosion risks in best facilities. Bess equipment and site design compliance with NFPA 68 and 69 are crucial for protecting both site personnel and property, from incidents relating to explosions, redundancy will be integrated into the selected best design section 2.7 of the OBS MP confirms that comprehensive explosion prevention and mitigation systems must be integrated into the best selected at the detailed design stage. The active and passive control systems will meet NFPA 855 and NFCC requirements and be approved by CFRS prior to construction. If the best design integrates explosion protection solutions, such as hybrid systems, sparker systems, active ignition mitigation systems, or performance design explosion protection systems, these will be value evaluated, validated through best full scale destruction testing, lean gas missed text testing, and requisite pressure testing required by NFPA and DN standards. Full scale destruction testing validates all active and passive protection system's integrated. Did into a best enclosure, best enclosure gas exhaust vents and deflagration panels must direct flaming or toxic gasses away from site personnel or first responders in line with NFCC guidance and NFPA 68 and BSE and 147 97 standards. Doors cannot be used as sole deflagration vents in best designs, as a minimum, a best combustible

concentration reduction system, which is a gas exhaust system to exhaust explosive gasses, will comply with NFPA 855 2026 and NFPA 69 guidelines, which require activation at no more than 10% of the lower explosive limit of the explosive gasses, the CCR must ensure the prevention of a dangerous buildup of explosive gasses. On average, 25% of the lower explosive limit within the best. The CCR system should be suitable for its intended use and temperatures to which it will be exposed to during a thermal runaway event. The CCR is considered a critical safety system and must comply with Section four point 10 of NFPA 555 concerning emergency power supply systems, which require emergency backup power and system redundancy.

Heating and cooling of the battery modules were provided by an independent liquid cooling system, which is separate to any HVAC system, providing climate control for the best backup power for the gas detection system, must have a 24 hour duration and standby in two hours and alarm, as demonstrated via NFPA 72 battery calculations, and required by NFPA 855 Most large scale fire testing programs do not performance test best active protection systems. Therefore, any best explosion prevention or control protection system will be validated through full-scale best destruction testing, lean gas mixture testing, and requisite pressure testing required by NFPA and EN standards. An independent fire protection engineer specializing in Beth will review all UL nine 548 test results, and any additional fire and explosion test and modeling data, which has been provided. The implementation of the OBS MP is secured for requirements in Schedule Two of the DCO. This stipulates that the final battery safety management plan will be submitted to and approved by Huntington District Council and Cambridge County Council in consultation with the CFRS and the Environment Agency prior to the commencement of the construction of the best. The plan will be substantially in accordance with the OBS MP and the applicant will provide third party fire protection engineer evaluation of all the fire and explosion testing to inform the fire service and the environment agency to make sure that all events are fully mitigated and protected against.

So, thank you for that. So let's go through a scenario where you implement the final PSMP, and somewhere else there is a fire event that involves battery storage systems, and there's some learning that comes out of that. How will that learning be applied to the site? Is will the site and the battery storage be subject to annual or periodic inspection by the fire authority,

Paul Gregory, for the applicant. So, thank you. So, that does answer one of Cambridgeshire Fire Rescue Services contributions earlier. So, typically the fire and rescue service do two site inspections per year for their own risk management plans, which I referred to earlier in the testimony. Yes, the applicant will, when a system is selected, typically the provider provides a training program for that specific battery, say energy storage system, by definition, each one is different. You know, I've been involved with testing where the same cells put into different modules and best, and you see very different outcomes in the fire events. So training will be system specific, yes, with regard to incident response tactics, generally for best incidents, National Fire Chiefs Council has a steering group now, which I know Cambridgeshire are highly involved with, that are looking and they work with a lot of best system suppliers to develop protocols. As for a wide range of different best systems, and typically training with the fire service would either take place during the site inspection visits or at other designated training periods on an annual basis.

Yes. Thank you. Given what you've just outlined, there does the outline battery safety management plan need to be enhanced with some of the information you've provided, something to take away,

Gregory, for the applicant, so there are examples in the battery safety management plan about the content, as I referenced earlier, the content template for emergency response plans, and included in that is fire service training, gives typical examples of what can occur, again, typical. Typically, that will

be best system specific, but it is referenced in the template guidelines already, and it will have to be integrated into the final BSNP.

Thank you to the local authorities as a response to the applicant's submission. There,

thank you, Sir Daniel Stedman Jones, on behalf of the host authorities. Just before I ask my colleagues to contribute by way of a first point, it's important to note that the host authorities input into the BSNP approval process, if I can put it that way, however that ends up being is obviously must be seen to only to be limited by the scope of the expertise of the authorities involved, and so I mean that's an important overarching point, really. In this context, as to the point that was made about currently it is envisaged that it will be Cambridgeshire and Huntingdonshire, the position I think at the moment, although mr. Carford can comment further, is that there's still consideration being given to as to whether it should be one or the other rather than both in terms of sign off, and that I think is not yet, it's not yet fully worked through from within the host authorities, just by way of two illustrations in relation to the caveat I've just given. Obviously, local plan policies don't address best directly at best on risk, and so in that sense, obviously, local plan policies are not necessarily on point or in play here. That's the first point. The second point is that the NFCC guard guidance, which, of course, in principle, the host authorities support the use of. On the other hand, the host authorities don't themselves have expertise in relation to that guidance, so that's just two examples in terms of the scope and its limitation in relation to the host authorities' involvement post consent with the BSMP. The second and third points are two headline points now in relation to the review, the ongoing review by the host authorities of the outline BSNP, and it's two points, really, and it's linked, I think, to some of the points that have been made by mr. Gregory in relation to standards and guidance, and the way those are reflected within the management plan at the moment, the first is that the host authorities' current position is that there should be some sort of review mechanism within the OBS MP to respond to emerging legislation, should that come forward, so rather than just standards and guidance and the annual review, and so on, whether there actually needs to be a review mechanism in play, given that this is an emerging area, and that there may well be legislation coming forward over the next period, and certainly within the 40 years. That's the first point, and then the second point would be similarly whether there should be some kind of review mechanism within the OBSMP in relation to the need to consult with statutory bodies in relation to, for example, where replacement equipment is being used of a new or different or updated nature, so there's those, there's those two sort of headline points, but as I say, the host authorities are in the. Process of doing a detailed review of the ABS MP, and we'll come forward with that in writing into your course, so those are just some headline points, but I will hand to mr. Carford, who has some more detail points on the ABSMP. Thank you,

David Carford, Cambridge County Council. Yeah, there's just some specific points to raise and ask of the applicant in relation to requirement 10 and the battery safety management plan, it would be helpful to be explicit within that, that once we have the details of the type of battery, that the details includes details of the chemical mix and the quantities, and at that time then the applicant knows more of the detail, and then can consider other matters, such as hazardous, hazardous substances, consent that may apply or may not, but of course, until we know the chemical mix and the quantities, we will not know that. So, so that level of detail being included in the detailed battery safety management plan would be helpful at that point. Further to that, it would be helpful if within the battery safety management plan, if it was also explicitly made clear that all the water storage drainage infrastructure is fully operational ahead of any delivery of a battery, and therefore, as soon as the battery is on site, that the safety provision, as far as the infrastructure on site is concerned, that that is in place, ready for the first battery, so that would just be helpful as a point of clarity, and then just some further points within the emergency response plan, we hadn't raised this before, so this is appreciate a new point we've considered, but as well as notifying various authorities, it would be helpful to include in the emergency

response plan contacts in the health services when there is an emergency event, so at least they're prepared and ready should there be a plume or any such other matters where the local population is affected by any emergency event that the health services are prepared and ready, so that's that. And then finally, there is there is part in the battery safety management plan where it talks about should the event necessitate its closure of road, obviously, what we would ask is that both we, as the Highway Authority, are fully involved in that, as well as the emergency services.

That's from Kemp.

Oh, sorry. Yes, sorry. Forgive me, I did forget one point. So, also point of detail on this one. So, the emergency response plan as well. It would be helpful when drafting that if you also include the Campshire and Peaceborough Resilience Forum, and they're included in being consulted when developing that emergency response plan.

Thank you. That is it. Yes.

Thank you. The applicant like to respond, please.

Paul Gregory, for the applicant. Thank you for your contributions. Yes, so just to start the beginning, yes, so the validation of the final BSMP will be provided by independent fire protection engineer agreed with the statutory consultees, which are the Environment Agency in Cambridgeshire Fire and Rescue. The applicant does not expect local councils to have the in-house expertise. Statutory consultees must be sure that the BSMP is fit for purpose. First of all, section 4.4 of the OBS MP actually does document the chemistry battery details that you're asking for, so it does laid out in that section the information that must be provided at detailed design. Yes, fire, firefighting water must be available pre-construction. I think it's already included in the OSMP, but I will double check. But that can be amended to clarify if it's not in there and. Yeah, and yes, emergency response contacts, so the Environment Agency, for example, have also asked to be included in an amended version, so of course health service contacts, Highways Authority, and Resilience Forum can also be included for the scheme,

and mr. Steadman Jones referenced legislation.

Yes, of course. I mean that will be whilst we're referring to guidance and standards. If there is UK legislation, then of course the scheme has to be compliant.

Thank you. Anything to add from host authorities?

Not for the moment. We'll obviously put something in writing as well.

Okay. Thank you. So, if I can open it up to other interested parties. mr.

Pike, thank you, mr. Sword. Andy Pike, on behalf of Stop East Park Energy. In step, his view, the principal issue for the examination is whether sufficient information is currently available to enable the examining authority to understand, test, and secure the assumptions underpinning the applicant's conclusions regarding battery safety, residual risk, and community protection. Before making its recommendation, a recurring concern expressed by the local community throughout the examination has been the difficulty in understanding the nature and extent of the risks that are actually being assessed. Much of the information presented focuses upon mitigation measures, management plans, and future controls. Whilst those measures are clearly important, the community are also seeking to understand what the principal risks are, what assumptions underpin the assessment, what the

consequences of a significant incident could be, and what residual risk remains following mitigation. The concern is therefore not that mitigation measures have been proposed. The concern is that the community are being asked to place reliance upon mitigation measures without being able to clearly understand the assumptions underpinning the applicant's conclusions regarding those risks. The applicant has confirmed that the final best design battery chemistry and technology provider have not yet been selected and will be determined at detailed design stage FM Global, one of the world's leading engineering insurers and risk management organizations, identifies that key aspects of best fire safety, including separation, propagation behavior, monitoring, suppression, and long-term operation may vary according to battery chemistry and system design. FM Global is not being put forward as planning policy, statutory guidance, or a regulatory requirement. Rather, it is referenced because it demonstrates that technology selection is not merely a procurement decision, it can influence the assumptions underpinning the fire behavior, monitoring systems, suppression strategies, and the long-term operational risk profile of the installation insurer requirements, for example, requiring say a three meter separation distance between containers, would considerably increase the size of the best area. This reinforces the importance of understanding how the applicant has demonstrated that the impacts assessed today will remain representative of the technology ultimately deployed. The applicant seeks substantive flexibility regarding future best operation and replacement activities. The examination authority may therefore wish to consider how the implications of aging, replacement cycles, and evolving operational modes have been assessed across the full range of technologies that may ultimately be deployed. Drawing on my experience of working on a development consent order for a nationally significant energy project, detailed supplier engagement and technology evaluation had taken place prior to the submission of the DCO application, enabling the implications of technology selection for design, operation, and risk management to be understood. This raises a question as to how, as to how the examining authority can be satisfied that any future battery technology selected will remain within the bounds of the impacts assessed. The applicant's own fire emissions modeling assessment states that the emergency response plan will be informed by thermal runway testing undertaken by the eventual best supplier. This indicates the elements of the detailed emergency response arrangements remain dependent upon future supplier-specific information. Cepi notes that the fire emissions modeling appears to assess a fire within a single best enclosure on the basis that thermal runway propagation beyond that enclosure is prevented through the proposed design measures, given that the final battery chemistry supplier and system configuration have not yet been selected, the examination authority. D may wish to ask whether the fire scenario assessed within the fire emissions modeling represents the maximum credible thermal runway propagation scenario within the proposed 100 megawatt best design envelope, and if not, why the applicant considers a single enclosure fire scenario to be representative of the impacts that may arise from the flexibility sought. In addition, it may assist the examining authority to understand whether any community protection measures have informed the assessment, and where the assumptions regarding remote monitoring, instant detection, emergency service notification, and intervention have been assessed and tested within the examination material. The examination has already heard through local impact reports and statements of common ground that host authorities do not necessarily maintain specialist in-house expertise across all of the technical disciplines engaged by the proposed development. The examining authority may therefore wish to consider whether future approval processes would provide a level of scrutiny equivalent to that currently available through the examination itself.

The difficulty for the examining authority is that it's being asked to conclude that the impacts assessed remain representative, whilst important elements of the final technology supplier and detailed safety arrangements remain subject to future determination. The applicant seeks substantial weight to be attracted to the benefits of the proposed best, whilst retaining significant flexibility regarding the technology and safety systems that may ultimately be deployed. The central question is therefore a simple one: Has the applicant provided sufficient evidence to demonstrate that the flexibility sought

remains within the bounds of the impacts assessed, and that substantial weight can probably be attracted to the benefits attributed to the best. Thank you.

Yes. Thank you. Would the applicant like to make commented respond? Please. Yes. Thank you, Paul Gregory, for the applicant. Yes, as described in great detail, the illustrative design is based on the dominant LFP prismatic cell chemistry. The site layout, the worst case scenario of loss of one best enclosure, is taken from the large scale fire testing of that illustrative system, again as described earlier, best systems change significantly over a 12 to 18 month period. Therefore, the best system selected a detailed design will go through the extensive testing requirements as stipulated in the OS OBS MP outlined by myself to demonstrate that again the loss of a single best fire won't propagate between best unit in a in a single thermal runaway incident. I think that I can pass across to my colleague Hannah Dennett, just to demonstrate how the fire emissions modeling a is reflective of current best designs at the moment, and how moving forward at detailed design the local community can have confidence that there aren't significant offsite impacts.

Dennett, on behalf of the applicant, yes. So, in terms of the data that the assessment used, we use large scale fire test data where available, and then where data wasn't available, use conservatives' assumptions, and we recognize and certainly, and address this through a precautionary framework, ensuring the results were more likely to overestimate than underestimate impacts. Yeah, and so the basic, yeah, the conclusions of the assessment were that there'd be no significant air quality effects on human receptors in the unlikely event of fire,

so the that whilst that is a current design with regard to the chemistry, the LFP chemistry typically is a worst-case scenario, LFP and thermal runaway does emit higher levels of hydrogen than other chemistries currently available, and from hydrogen fluoride production, for example, does produce higher levels compared to NMC. I mean, just if you would like some additional information on emissions in my extensive fire test data, volumes of toxic gasses and heavy metal particulates that can be emitted during thermal runaway are often partially contained within the. Enclosure, so that's the modules, racks, and interior structure of the best, and not vented into the external environment. The EPRI white paper, the evolution of best safety codes and standards. Notes: whilst laboratory testing identifies toxic compounds that are released by burning lithium ion batteries, these may be consumed internally, combusted, or may react to form other non-toxic compounds before being released to the environment. In recent events, where batteries have burned in this fashion, fire services have announced that nearby air quality monitoring has shown the air quality to be at safe levels. A common misnomer is the assumption that all battery electrolyte fluorine is liberated as HF. A range of published testing and on a variety of battery cells, and a testing that I've conducted or reviewed myself, typically show that about a third of the volume of fluorine is released as HF at cell level. Additionally, HF is incompatible with a range of materials and reacts on contact, releasing hydrogen, so that's metals, glass, organic materials, rubber, ceramics, etc. So the emissions that you, that you see outside onto the levels predicted from cell level data. This phenomena is known as wall losses, where HF concentrations decay decay quite quickly in enclosed volumes due to reactions with surfaces and solid particles, i.e. internally within battery modules, within battery racks, and within the best enclosure. If no explosion or deflagration occurs during the thermal runaway event, concentrations of HF that are released externally to a best enclosure are therefore a fraction of the volumes that have been predicted, extrapolated from small scale laboratory testing. Calculating emissions from scaling cell level emission data to a full BEST system does not account for enclosure scale combustion, thermal containment, venting, or dispersion. This is the typical error made in academic research, where access to batteries is limited and tested batteries bear no relation to cells and modules integrated into best systems. However, this assumption has been made with respect to HF in the Plume Assessment Study as a conservative approach, with consideration given to full scale tests in terms of compounds released, so while certain gasses,

including hydrogen fluoride, have a higher molecular weight than air, their behavior in the fire scenario is governed primarily by release conditions, temperature, turbulence and vertical velocity, rather than molecular weight alone. In addition, hydrogen fluoride is highly reactive and readily interacts with atmospheric moisture, reducing its persistence and potential through accumulating concentrated form at a distance from the fire source. Furthermore, evidence from real-world best fire incidents indicates that emissions are short-lived, highly dispersed, and localized to the vicinity of the fire, with no empirical evidence of hazardous vapor clouds forming or accumulating in low-lying areas at distance relevant to public exposure. In this case, environmental monitoring data from real-world best fire incidents involving a single or two best enclosures does not support claims of widespread contamination from best failure incidents, airborne emissions are short-lived and localized. Soil and water contamination risks are minimal if appropriate. Best drainage systems are integrated. The peak fire load for most current best designs, when at 100% state of charge, lasts for one to three hours, with the rest of the fire, as I described earlier, four to eight hours at a lower intensity, where emissions are at much lower levels in the locality.

LFP battery systems at the moment, if you wanted to break down to the gasses emitted in a fire, typically as an average, with a significant amount being provided by the battery casings, rather than the battery gasses emitted hydrogen with LFP ballpark DMV, for example, account for 42 per cent, carbon dioxide is 24 per cent, with carbon monoxide eight per cent, propane to account for the plastics in modules 15 per cent, ethane 5% and methane 6% The farm modeling assessments that conducted for this scheme, and many other significant utilizing full-scale best LSFT, as defined, you know, the credible worst-case scenarios based on current best design principles and evidence, rather than hypothetical scenarios, which are not supported by empirical data, the study area receptor selection and modeling approach are consistent with established guidance and precedent, and the selection of assessment criteria reflects the short term accidental net. Nature of the scenario, whilst it is acknowledged it's an evolving field. This has been addressed on the scheme through the application of conservative assumptions and sensitivity testing. The commitment to further refine at detailed design stage using best specific test data provides an additional safeguard to ensure that assessment and emergency planning remain robust and evidence-based. The plume study of the selected best system, commissioned at detailed design, will be conducted at approved third-party or government-approved laboratories. These facilities utilize large-scale smoke hoods, calorimeters capable to capture every type of battery gas and particle emitted during the thermal runway process at module battery rack or complete best enclosure level. This equipment can measure total volume gas production and FTIR for your transform infrared spectrography testing in parts per million for organic compounds, i.e. toxic gasses, such as carbon monoxide, carbon dioxide, hydrogen, sulfur dioxide, nitrogen oxides, hydrogen fluoride, hydrogen cyanide, hydrogen chloride, all hydrocarbon gasses, pH is etc. This equipment also integrates comprehensive particle capture by X-ray fluorescence analysis, which checks for phosphorus, aluminum, nickel, silicon, calcium, etc. This means that heavy metal particular emissions can be quantified and included in emission modeling if the selected battery system emits significant levels during fire testing. Therefore, regardless of chemistry or best system design, this will be fully quantified and incorporated into modeling to demonstrate that the sensitive receptors within the one kilometer radius are not impacted at emissions that are above public health requirements.

Thank you. As your response has evidenced that it's a very technical area, and reflecting on a point made by mr. Stedman Jones and mr. Pike in terms of expertise that the local authority and others may have in discharging these requirements, is this something that could be captured in a planning performance agreement, noting that you've suggested that as an opportunity on other matters to provide some support

Paul Gregory for the applicant, so best safety will be used by the applicant as part of the procurement process, so therefore by definition a best system would not be selected that would expose members of the local community to high levels of emissions, so therefore a design and test data would be selected as part of that procurement process to ensure that there are no significant offsite impacts to sensitive receptors,

but in order for the outline safety management plan to be discharged, you're looking at others to discharge that, and the comments that are coming across from the host authorities in terms of the expertise to discharge that, so Alaska is a planning performance agreement, a way of providing the resource to prevent

all Gregory for the applicant, so the Environment Agency and Cambridgeshire Farm Rescue Service are statutory consultees, so they must be satisfied by evidence, which is provided in test data ratified by independent fire protection engineers with regards to emissions, specifically UK Health and Security Agency. Whilst I don't think it is a statutory consultee for the scheme, they would be required to analyze fire emissions modeling data to demonstrate that the scope and the methodology and the results gave confidence to the authorities that there are no significant offsite impacts to sensitive receptors that can be so the UK HSA, for example, can be added as a statutory consultee to the final BSNP if that provides confidence that from an emissions perspective that there aren't significant impacts in the local community, and the discharging authorities can have confidence that the relevant expertise and. Statutory consultees have scrutinized the test

data. I certainly think you would like to say in response to that from host authorities.

Daniel Steadman Jones for the host authorities. I'm going to hand over to mr. Dakehouse from Bedford,

Peter Dake, case Bedford Borough Council. I think we're all in agreement in this room that this is a highly specialized field, and that it's moving at pace both technically with potentially regulations and legis legislation falling from far behind in order for us to discharge any management plan, it is very clear after your presentation today that we will need very specialized technical people to, in order to be able to determine whether the management plan actually is fit for purpose. We've had detailed discussions with the fire officers, who, to put it politely, would put a barge bowl between sign off and actually reading such documentation. I think we need to recognize, therefore, that if you are asking the local authorities to adopt such management plan, we would need going on what the inspector is potentially suggesting some form of resource paid through a PPA agreement that allows us to appoint those specialists to review the plan that you're talking about, in order to ensure that we can discharge that plan. At present, we simply do not have the technical expertise to review such a plan.

Move on to any other comments from any interested parties,

Nicholas Trollson from the Community. I go back to the duty of care regarding safety, we've heard a lot about thermal runaway, and the applicant acknowledges the dangers in its responses. The applicant suggests in its BSNP four point 5.9 that such an event will be a short-term incident. However, in one point 6.5 table 6.1 the applicant refers to best, the best being fully consumed or burnt out, an inconsistency. We know from documented events that they can last for days and reignite. The Department of Energy Security Net Zero stated in May 2025 that best fires are rare in the UK, and yet two months earlier there were three events in quick succession: East Tilbury, Rothie Norman, and Cirencester. None of them short-term events overseas. There's been several Tesla mega back mega pack best fires, including two in Australia and a particularly nasty fire in Moss Landing in California, which I'll come on to in a minute, as referenced earlier by CAMS Council, mr. Carford, thank you. In the

statement of Common Ground 006 Cam's Fire and Rescue Service state that firefighters should not have to enter best sites through thermal runaway or vapor gas clouds. However, all of the applicants' responses are silent on the equivalent risks to the community. The examination process and government have a duty of care here. Same consideration must be given to the communities potentially impacted. The Moss Landing Fire, I'm coming back to forced evacuation over a four mile radius of the site. Now, I appreciate it was a bigger mess. The question I question the conservative nature of the plume test submitted by the applicant. It used data from the Met Office, from Bedford Aerodrome, 7.5 miles west of the best site. The entire test submission show southwesterly wind direction and make no omission that wind direction is not static. The applicant applied a one kilometer radius, that's point six two miles. Remember, Moss Landing was an evacuation over a four mile radius. The Met Office data for St. Nietzsche yesterday afternoon, evening, and overnight showed a westerly wind coming off the proposed best site. There are vulnerable communities that will be downwind of the best in the event of a thermal runaway. There is nothing in the applicant's submissions, including in the statement of common ground, that recognize schools, preschools, care homes, etc. In Hale, Western, Little Paxton, and Eaton Soakan, the duty of care requires that these vulnerable communities be given reassurance of clear safety and evacuation planning within the application, with, of course, the costs underwritten by the applicant. In summary, mr. Sword, the community needs to know that you will not finalize your examination process until the best design is final. And thus a robust battery safety management plan and valid statement of common ground are finalized and signed the complete satisfaction of the local authorities, the examining authority, etc. and respecting the safety of the community throughout the potential life of the site. Thank you,

sir. Yes. Thank you for that. Your comments, is there anything from the applicant in response? Paul Gregory for the applicant. So, I think we'll just deal with this in a couple of parts. So, so firstly, let's let's talk about Moss Landing. So, the Moss Landing fire involved legacy systems, as I stated earlier, that were not compliant with NFP 855 and integrated NMC power cell air-cooled battery systems that will not be considered for the scheme. The battery systems were housed in an old gas plant, integrating nearly 100,000 battery modules in over 4500 battery racks, battery racks were double stacked in many locations and housed on two separate floors in some parts of the building. It is not credible to consider that the range and impact of a smoke plume generated from more than 55,000 battery modules, which also burnt through a significant proportion of the power station roof, is anyway comparable to the impacts of a smoke plume generated from a fire within a single non-combustible current best design, typically containing 40 to 60 battery modules. It should be noted that real-world modeling from the MOS landing incident, despite its scale and use of high-risk NMC chemistries, indicated that air quality impacts in the surrounding area were generally transient and below public health thresholds. This is all available on the County of Monterey webpage, detailing must landing air quality monitoring sampling results, which I suggest if interested parties have an interest, they should consult. Similarly, a 2025 EPA fact sheet concluded that air quality monitoring during and after the fire identified no risk to public health, must landing incident response air monitoring effects focused on monitoring hydrogen fluoride, hydrogen chloride, carbon monoxide, hydrogen cyanide, 2.5 micron particulate matter instrumentation, along with percentage of lower explosive limit gasses. Measurements were recorded at height representative community breathing zones. All instrumentation was calibrated at least daily, or by manufacturers' recommendations, and particulate matter equipment had a sensitivity capability of recording one micron micron particulate monitoring was conducted in close proximity and in residential areas up to four miles from the Moss Landing site. During this monitoring period, through the duration of the fire, all measurements were below site-specific public health threshold action levels. The applicant emphasizes that even a worst-case scenario, such as the most landing fire, did not require massive evacuations, and the preliminary precautionary evacuation of 1200 people living in the closest proximity, so this wasn't four miles away, this was literally across the auto route opposite the most landing site, was not triggered by air monitoring alerts, emissions in these areas initially evacuated never exceeded public health thresholds. This information is in the public domain with regard to

duration. So, if we take, as I alluded to, multiple large scale best fire tests from 2024 to the current day, the time frames that I reference for burnout times of the best typically with the peak lasting one to three hours, with the remainder of the fire and the combustibles four to eight hours, with smoldering of materials happening for a 24 hour time frame, the incidents reference, such as Cirencester and East Tilbury, the site was handed back over by the fire brigade within 24 hours, and the Carnegie Road incidents, days, weeks, etc. is just because high pressure water flows were sprayed on battery systems, significantly elongating and worsening the situation, the scenarios with large scale fire testing and boundary cooling do not result in that type of incident outcomes. I think my colleague would like just to drill down into the fire emissions modeling a little bit more, just to provide assurance that worst-case scenarios are justified, and the scope is reflective of the latest requirements by both NFCC and the UK Health and Security Agency.

Hannah Dennett, on behalf of the applicant, firstly, I'd like to address the. The study area, so a one kilometer study area is consistent in the National Fire Chiefs Council's latest guidance. It's supported by professional practice and comparable studies, and it's supported by modeling showing rapid decline in concentration beyond this distance. Since concentrations are already below health thresholds within one kilometer, effects beyond this distance would be even lower, would not influence the assessment conclusions. So, the modeling demonstrated that concentrations peak close to the source and reduce rapidly with distance, and effects are negligible beyond the immediate vicinity area within one kilometer. And this reflects the behavior of buoyant fly fire plumes, which rise and disperse rather than remaining at ground level over long distances, and as Paul mentioned, evidence from real-world incidents and industry refused to leave similarly indicate that impacts are localized and do not pose a risk to surrounding communities beyond nearby receptors. In terms of meteorology, the five years of hourly meteorological data were incorporated into the model, so the results presented in the assessment for each receptor present the maximum predicted concentration for each receptor across the five years of data, so we didn't just look at prevailing wind, looked at every single well hourly data over five years, so it's a worst case concentration in terms of the modeling assumptions, I'd like to reiterate that they were conservative, so we looked at the worst case best fire location, assuming a best fire at the best boundary closest to each receptor, as I said, worst case meteorology meteorology over a five year data set, we assumed peak emission rates, that they, we assume they persisted for extended durations up to eight hours. In reality, as Paul said, that that wouldn't actually be the case. There was, we conservatively treated key pollutants, so we assumed full conversion, for example, of nitrogen oxide and nitrogen dioxide, and we also assume worst-case release height, temperature, and plume parameters, so all the parameters where there was slight uncertainty, we chose worst case, just so it's a conservative assessment.

Thank you for that lots of information there. If you could follow that up in writing, please, as part of the post hearing submissions. Conscious, we have some other agenda items to follow up. Do you have one for the question? May

I just make one point. Nicholas Bolton, again for the community, it sounds duty of care again. It sounds as though the applicant is prepared to dismiss the concerns over the community and the vulnerable elements of the community, if there's a large scale event, they're saying that they've tested over a one kilometer radius, etc. We believe that there should be reassurance given of a safe, a clear safety and evacuation plan within the application, because there are vulnerable communities, and as I demonstrated earlier, as I mentioned earlier, with a westerly wind that carries that plume across to seriously vulnerable communities, particularly there's a care home with over 90 residents in it, in Eaton Token. So I would like the applicant to make reference to safety and evacuation in its submissions, please. Thank you, sir. Kirst,

thank you. Come back,

Hannah Dennett, on behalf of the applicant. The outline mitigation identifies the type of actions that could be implemented, such as notification of residents, advising people to remain indoors, canceling outdoor events, etc. However, the specific extent of such measures, such as distances or trigger criteria, or particularly vulnerable receptors, it's not fixed at this stage. This is because the emergency response plan will be developed at the detailed design stage and will be informed by the final best layout and the thermal runaway test data provided by the system supplier. That information will enable a more precise definition of the area potentially affected under different scenarios, including consideration of plume behavior and wind conditions. The emergency response plan will therefore set out how potentially affected receptors will be identified and what actions will be implemented in practice.

Thank you.

Yeah, if I'm Les Ranch, if I might just raise one item. All this has been about incidents happening, but on the subject of preventing incidents, I noticed that Lord Robertson, who's the. Former NATO General Secretary has highlighted in the House of Lords the vulnerability of UK energy infrastructure to sub-threshold attacks, particularly from Russia. The current sites that we have in our area, the security wouldn't even keep children out. So, how is this going to be addressed? The

detailed security measures as part of the wider battery safety management plan,

so we've provided responses on this matter already in our representations up to date, up to now, but we'll, we'll take that away and provide a more detailed response.

Okay. Thank you. Any other comments on this matter before we move on to archeological impact? Anything online? Okay. Thank you for that. So, if I could ask the applicant to outline its approach, particularly in regard to the soil stripping land foundations again in downtown, mindful of Cambridge County Council reservations that this may have an interest of archeological importance, so if I could ask the applicant to align this case.

On behalf of the applicant, within the area of the best geophysical survey and archeological trial trenching has been undertaken to inform of the archeological potential of the area in agreement with Cambridgeshire Historic Environment Team. The trial trenching comprised a 3.5% sample of the best area, as this was deemed to be a high impact development area. The larger sample percentage allows a higher likelihood of recognize recognizing areas of archeological activity at the site. The results of the geophysical survey and archeological trial trenching are laid out in reports APP 042 APP 084 to eight PP 086 which are the Geophysical Survey reports, and RAP 2015 to RAP 2018 which are the trial trenching reports. As an overview of the findings of the archeological investigations within the Bess area, no geophysical anomalies were recorded during the trial trench evaluation of the 32 trenches excavated in the vicinity of the Bess area. Only two trenches contained archeological features. The archeology was recorded in trenches 872 and 874 which are located outside of the proposed best location. Trenches 872 and 874 contained an undated gully and an undated ditch, which would not be deemed worthy of further investigation. The closest recordable data will archeological features were recorded in Trench 861 which is around 400 meters northeast of the best location, comprising two ditches, one of which contained fragments of pottery dating to the first century BC to the first century AD. Even though dateable to the Romano-British period, these two ditches would not be deemed significant as they were found in isolation with no further archeological archeology recorded in the

immediate vicinity. So, in summary, the results of the trenching in this area have shown there is a lack of archeological activity taking place in this part of the site. Thank you.

Yes. Thank you. In terms of any comments, advice from Historic England, has that been any input into the translucent?

So, Historic England, sorry, Gary Millward, on behalf of the applicant, so the archeological trial trenching was undertaken via a brief that was provided by Cambridgeshire Historic Environment Trust and Bedford Borough Historic Environment Trust, and with input from Historic England as well. So the brief for the trial trenching that was undertaken was provided by all free those of statutory consultees, and the trenching was undertaken for the monitoring, the trenching. I believe Simon Wood is on the on the teams, and he, he actively monitored and interacted with new, who was managing the trial trenching excavation while it was ongoing, but within the best area, because there is such limited, well, virtually no archeological potential within that area. Historic England haven't given any specific comment regarding that area, have commented elsewhere in the scheme where there's higher archeological potential, but not here.

Yes. Thank you, Hostess. At least Cambridge County Council, is there anything you'd like to come back on that?

Thank you, Sir Daniel Stedman Jones, for the host authorities. So, I understand that the position is that the host authorities are content in relation to the best areas since the trial trenching results have come forward, but mr. Wood, mr. Wood is on hand. Should there be any, any need for further comment, I'll invite mr. Woods to contribute if he wishes. I don't know if he needs to, but

the floor is yours, mr. Wood.

I'm happy to contribute, Dr. Simon Woods, Senior Archeologist, Cambridge County Council. Yes, I concur with the applicant. Since the submission of their trial trenching report for site D at d2 submissions, we are now content that the Bess area does not contain any archeological potential, at least beyond reasonable doubt, and therefore we have no particular archeological requirements or in relation to the best, specifically.

Okay. Thank you for that. Does anyone else in the room, any interested party, have a comment on this matter. Nobody on team, so does anyone have any other matters to reference about the battery energy storage systems in general, the Pike? thank

you, mr. Sword. mr. Pike, on behalf of Stop East Park Energy, just two very brief points, if I may. Firstly, arising from one of the examining authorities' questions, the XQ 1.1 20, the applicant confirmed that the scheme had received a gate to offer, and directed the examination to the NISO tech register as evidence of that position. We reviewed the tech register, the one dated fifth of June, and note that the entry, which appears to correspond to the proposed development, does not identify any gate status. So I just wanted to, whether the applicant can clarify the position in relation to the tech register and gate status

batteries,

and secondly, I think this point's been more than adequately covered by mr. Beverly and mr. Patel earlier, but it was just noting that N gets written representation, the solar element has received a gate to offer, whereas the best remains at gate one, and the end get isn't currently progressing any design

work for best, but only for the solar connection, given the weight the applicant attaches to the benefits of the proposed best, including flexibility, balancing services, energy security, and intermittency mitigation. The examining authority may wish to seek clarification from the applicant as to whether any reassessment has been undertaken of those claim benefits in light of the current connection position. Thank you,

Kith. Thank you for that, mr. Pegg. Would the applicant like to respond now or a service position to submit something in writing.

We'll provide something in writing, sir. We can confirm the position on the gate to gate one in due course.

Thank you. Any other general issues? Thank you very much. So we move on to the final item. Next steps, the applicant has been given a list of action points, which we can run through in a second, but as I said earlier today, please indicate if you believe that we've missed something or set out something different beyond understanding, so if I could ask the applicant to feedback on action points, please,

man, that for the applicant, so action point one, applicant to set out information on Gate Two One status for Bess, I think that includes that final action point. So it's the same action point. Action point two: applicant to provide written response regarding the capacity of the development of our homes. Action point three: Applicant to provide further details for the attenuation lagoon action point four, host authorities to provide comments on applicants' technical note on replacement phase five, applicant to provide information on waste management companies capable of dealing with pest waste, six statement from Cambridgeshire Fire and Rescue Service to be submitted. Examination seven applicant to provide any follow up points on best safety in writing eight applicant to respond to mr. less ran submissions in writing. That's all I sorry,

were you going to take away the issue about the planning performance agreement in terms of expertise?

We can add that, but we had responded, but we can add that

any other issues we think we've missed on the action point list.

Les Ran, there was just one cause for concern. When the email was read out from the fire service, it said there was enough water for the initial firefighting. What happens after the initial period? Period. We

addressed that earlier in the examination hearing here today. The applicant set out its position on onboard a supply, but that something that can be followed up in writing as part of the post hearing submissions,

yeah, it said that it was mentioned that the fire hydrant was linked to the storage tanks. Are the fire hydrants not linked to an outside supply as well?

mr. Gregory,

we can respond. We can respond to that.

Paul Gregory, for the applicant, public water mains can't deliver the flow required by NFCC guidance, which is now 1500 liters per minute. Previously, 1900 liters per minute. So, if bio hydrants are

integrated, which they may or may not be, then yes, water supply will be provided by water tanks, not from the water mains.

Okay. Thank you. I, I believe that all of the items on the agenda have now been covered. Thank you all for your assistance during this hearing, and the hearing this morning. I now close this issue-specific hearing. Thank you.