

Hearing Transcript

Project:	Springwell Solar Farm
Hearing:	Issue Specific Hearing 3 (ISH3) - Part 2
Date:	16 July 2025

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FULL TRANSCRIPT (with timecode)

00:00:12:05 - 00:00:34:18

Okay. It's called 11, so we will resume, please. Uh, again, apologies for cutting you off mid-sentence. As it turned out, the fire alarm was quite tame, so we probably could have accommodated it and carried on, but we weren't to know. So if you'd like a minute or two just to summarize where you got to, if you think that would be useful, you're more than welcome to. But please continue. Thank you.

00:00:34:20 - 00:01:12:15

Thank you, Sir Richard Grierson I think I'm going to continue, um, with Mr. Paul Gregory, I think the I'm going to, um, back to common ground, just give a bit more background as to why that is the position. Whilst that gives you the relevant comfort report, the Secretary of State that there are no, um, that, uh, you're comfortable with, there are no significant adverse effects on human health. Um, Paragraph 4.2. 11 of the Outline Battery Safety Management Plan, um, states that um, another assessment will be completed once the battery modules, the proposed development have been selected.

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Uh detailed design to demonstrate that the risk of thermal runaway and impacts from such thermal runaway will be no worse than, as assessed in the assessment submitted with the application. And that demonstrates that there are no significant adverse effects on the sensitive receptions. Um, now, the assessment submitted um, with the application was carried out with um aloha harm modelling, which is US Environment Protection Agency approved modelling which is accepted in the United Kingdom.

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And um, that is a type of atmospheric modelling as well as PFAS modelling. And this was all presented to the UK's Health Security Agency as outlined in the Statement of Common Ground. That's before the examination. Um, and that's why they've got comfortable that we have done all we can, um, until detailed design. And so that is why we argue that you have the necessary comfort, because we've we've carried out a premium assessment with, um, the Aloha modeling, which is, I say atmospheric modeling that gives you the conclusion, um, and if we did another plume assessment now, that wouldn't remove the need for a detailed design.

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We still have that commitment. It doesn't replace the detailed design one, but we've done one. We've reached agreement. Security agency. You can report to the secretary states. That's our position.

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Okay, I appreciate that. It doesn't stop having to be redone, but it allows us to be confident that when it's done in its final stages, it won't suddenly crop up significant effects. That's the concern of the Exa. So I think it's maybe something to leave with you. Um, quite. You know, we will be asking the UK HSA some questions during our second round of written questions to ask them from their side to explain why they're content. I think without that, the essay will remain an area of concern.

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I think what we wanted to do was flag up, that if we still remained unconcerned after the second round of written questions. It's probably too late to do anything about it. So I think so. That's our position. Okay.

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Thank you so much for the applicant. Um, I understand the concerns. Um, 4.2. 11 does confirm the detailed plume assessment will be. No work has to be shown. No worse than the assessment before the, um, examining authority. I've given you the background to how the UK Health Security Agency has reached agreement. Of course, the battery fire safety management plan has to be approved by the local authority. That has to contain the plume assessment. They make the decision. So you've got that look.

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However, I accept your concern. Um, I've noted it. And, uh, we will do another assessment. We will do one and submit that as soon as we can do it, it'll probably take about six weeks to do. Um, but I say that on the basis that we don't consider what is needed. You've got the information, but we will produce another one for you. Um, uh, it will take about six weeks to do. Um, and we'll obviously share that with the UK Health Security Agency as well.

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Okay. Thank you. Um, just thinking about timetabling. Um, obviously, we have three deadlines left. Uh, obviously, the normal process would be a documents provided at one deadline. Interested parties have the opportunity to comment at the next deadline, and then the applicant has the right to reply at the third deadline. Um, obviously deadline three. We only have three deadlines left, and deadline three is three weeks away. Um.

00:05:08:24 - 00:05:34:05

Which give us on the applicant. I can't speed up the process. I've said it takes about six weeks. That's my by my calculation, takes us to around the end of August. This is me speaking without speaking to the people who'll be doing it. Um, the next formal deadline after after around the end of August is deadline for on the 23rd of September. But I suggest that we as soon as we've done it, um, we will submit it and ask you to exercise your discretion to accept it.

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Um, would that likely be before we publish our second round of written questions? Second to September?

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Uh.

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Because we could potentially factor that into our questions, which would allow interested parties the opportunity to comment a deadline for Forced out.

00:05:52:23 - 00:06:22:24

Yeah. We'll try some of your second written questions on the 2nd of September. Um, six weeks takes us to you from today. Takes us to the 27th of August. Um, I will try. I can't commit, though, so I apologize for that. But, um, I've been advised it, um, it would take six weeks to up to six weeks to do. We'd try and do it as quickly as we can to give you about a week before your questions and try and get it to you before that, but I can't I can't commit because it's, um, you know, modelling has to be carried out.

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But, um, we will try and commit to getting it to you about a week before your second written questions.

00:06:28:13 - 00:06:58:16

Okay. Thank you. Okay. Let's move on to, uh, the second part of that agenda item, which is just employment assessment status at paragraph 3.4.6, that the analysis does not consider the effects of smoke or particulate particles created by fire, nor does it consider the effects of projectiles or other debris released by by an explosion. Um. Could you just explain why that hasn't been included and whether it should be assessed? Thank you.

00:06:59:13 - 00:07:04:01

Thank you so much. Mr. Paul Gregory will, um, answer that question for you.

00:07:08:10 - 00:07:10:05

Paul Gregory for the applicant.

00:07:10:16 - 00:07:55:03

Um, so, as agreed with UK Health Security Agency, uh, particulate matter and smoke plume effects on visibility, um would be included in in the final study, in line with, uh, the new FCC revised guidelines. Um, more importantly, um, the effects of projectiles or explosive debris aren't considered in the plume study because there are a number of explosion risk assessments which are conducted a detailed design to consider all explosion risks and the risks are best designed specific um, i.e.

00:07:55:09 - 00:08:29:15

the battery system and the best enclosure design play a great part in that explosion risk. And um. NFPA 855 the global standard for for best safety defines already defines a safe explosion risk of 30.5m from the best explosion or from the best enclosure. This is based on real world incidents where explosions have occurred and, uh, studying any shrapnel or debris that was generated within those, uh, incidents.

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Uh, studies and risk assessments conducted at detailed design um examples include third party fire and explosion test results. So NFPA 855, the 2026 revision now mandates full scale fire testing for every best design, so any best design, um, selected for the scheme will have been through full scale, um, burn testing, destruction testing to again assess any risks.

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Um, uh, there's also a number of reports which are offered by, uh, the best suppliers, such as an NFPA 68 Deflagration analysis report, uh, explosion risk analysis report, um, the DCF report for UK Explosion and Atmospheric Regulations 2002, a report for the UK um, an NFPA 69 Explosion Prevention Compliance report, uh Deflagration analysis reports and Gas Ventilation Ventilation Consequence Modeling Reports.

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So those are just examples of the explosion risk studies conducted at detailed Towel design.

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Okay. You mentioned the revised assessment. Would consider those. Is that anticipated the one provided in six weeks.

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For February for the applicant. So that would look at visibility impacts and particulate matter. But that doesn't look at explosion risks but for the reasons that I've just described.

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Thank you.

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Okay. Let's move on to the emergency response plan. Um, and the applicant has noted that a draft of the plan or a more thorough draft of the plan cannot be provided before the detailed design stage because, uh, the content will be heavily predicated upon the selected best design and the layout of that. Um, is that generally accepted by the local planning authorities and the fire service as well?

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John Hunter, Lincolnshire County Council, if I may, will hand over to Mr. Morris, who is from Lincolnshire Fire and Rescue.

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Thank you.

00:10:50:23 - 00:11:26:24

Good morning sir. Links for rescue and the FCC guidance outlines the need for early engagement, certainly with any developments. And we recognise that the guidance does issue broad headings with regards to what we would expect within the emergency response plans, and that's quite clear. Those ongoing discussions are part of that early engagement, and we would expect to see details of that, which I think, you know, certainly have been supported with those discussions, as we recognise that at that stage they're indicative site plans, etc.. So, um, except that it's very difficult, but I certainly the plans then, um, are confirmed.

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We would expect more details within that recognising the generic information would be readily available as part of those ongoing discussions.

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Okay. Thank you very much for that. And I think from the district Council that.

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North Korean District Council. No, no. So we're largely reliant on county councils.

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Thank you.

00:11:48:05 - 00:12:23:09

Okay. Protective provisions, um, for the Fire and Rescue Service have been included in the most recent draft of the, uh, development consent order. This seeks to secure a financial contribution to ensure that the fire service are able to support the proposed development. Um, and the District council's local impact report notes that the sum total requested over the operational period of the proposed development is £76,335. Um, is this the figure that the applicant has agreed to and will be included in the next draft of the draft development consent order?

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Would you agree? Or for half the applicant? Yes, we agreed to that figure. So paragraph 28, a of those provisions will be updated to state that £16,665 will be paid to the fire service in the first year. And then paragraph 28 B, you'll be updated to state that £1,530 will be paid to them annually. That comes to a total of 76,335 over the 40 year lifespan of the project, and that total is index linked.

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So those amendments be made at the next version of the DCO.

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Okay. Thank you. And I note I'm interested that it's part of the protected provisions rather than being secured through a section 106 agreement, which would probably be more typical. What why has it been put into protective provisions on this occasion?

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I thank you, sir. It's gruesome. Um, yes, it's it's, um it's it's becoming more involved now that, um, such contributions are in protected provisions. Um, the recent, um, uh, Hecate and Fen solar part DCO, uh, has, I think, the same financial contribution, Um, uh, as we've agreed with the local authority, uh, set out in protective provisions. Um, and the cost of solar park, uh, DCO 2024 had the same. So it's an evolving, uh, um, one being the 106, this type of contribution evolving into the protective provisions.

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Okay. Thank you for that. Um, okay. Um, just a question to the Fire and Rescue Service, please. It's been raised by IPPs on many occasions, and there's great concern about the fire services ability to, uh, effectively manage a potential fire at our best facility. I just wondered if you could just say a few words on, uh, those views and, um, whether you concur with them or otherwise. Thank you.

00:14:26:06 - 00:15:01:24

Yes. On behalf of the county council, on each fire rescue. And I think it's recognized nationally that, uh, these types of incidents do pose, um, challenges to fire pharmacy services. The National Advisory Council very much are the leading voice for for national pharmacy services. They are offering advice. Um, certainly to to fund rescue services at a local level. We're responsible then for developing those response plans in line with the national guidance and certainly from a the ability to be able to to manage this type of incident.

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We have to then offer the assurance at a local level that we can do that. We remain committed to ensuring that certainly training, advice, um, and equipment, um, that we have currently gotten them procure supports that as best as we can. Um, from a local pharmacy perspective. How we're scaling concurrency modelling, um, recognises our ability to be able to deal with incidents, multiple incidents at one time. Um, I think then at the Fire Rescue Services Act outlines section 1316 agreements, arrangements where we can call on additional support if required from a regional perspective, and then from a national resilience perspective.

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Again, we can call on resources should we need to. At a local level, we work very closely with the emergency planning department. So from a local resilience forum perspective, and certainly as these sites and developments across the county develop, is certainly something that we look at from a local community risk perspective and continue to offer those response plans as best as we can.

00:16:05:20 - 00:16:24:19

Thank you. Um, just a follow up question. There's been suggestions that maybe there's not the the manpower or the local fire stations are too far away to get on site quickly. Could you just maybe just expand on that a little bit in terms of your view? Uh, the position that that, you know, your, your position that you're taking on, that.

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Most powerful link to your rescue and recognizing the fourth largest county in the country and significant reality challenges that we face within that again. The response modelling allows us to identify what we deem to be acceptable response standards to incidents across the county, incidents including ones that potentially we may face as part of the best developments across the county. And that scale and concurrency modeling allows us to offer assurances to be able to respond as required, and certainly from a the ability to be able to provide those resources.

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And we do that on a, on a daily basis. Review that modeling. We have generic plans in place to be able to offer assurance to respond. We have daily um, monitoring, um, provisions in place to allow us to look at dynamic kind of mobilization. And as with any type of incident or ongoing incident, and we have the appropriate levels of command and control in place that allows us to to kind of monitor that. In addition, we've talked about the Fire Rescue Services Act 1316, arrangements that allows us to draw on additional support and at a national level as well.

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So that response model that we see is fit fit for purpose within Lincolnshire.

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Thank you. So just by way of summary is the fire rescue services position that with the financial contribution secured, you're confident that you can support the proposed development if necessary.

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On behalf of Lynx financially? Um, the response modelling uh continues to evolve. Um, but certainly from a requirement in line with the National Party Council. Um, our ability to then respond and manage this type of incident is very much in line with that guidance.

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Thank you for that. Okay. Uh, just one final question on this subject matter. Uh, an interested party at the open floor hearing last night made an interesting suggestion about an early warning system for local residents in the event of a thermal runaway. Um, at the best. Is that something which would be factored into the emergency response plan. When it's finalised, maybe if I come to the applicant first and then I can maybe ask the fire and rescue service as well.

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Paul Gregory for the applicant. Um.

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So just referring back to plume study analysis. Um, there are no there will be no significant offsite impacts to sensitive receptors within a kilometre radius, um, uh, from a single best unit fire, typically with regards to, uh, local community warnings, um, then typically the fire service or council will hold the, uh, basically put together the procedures or the protocols for that.

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You know, but may I just remind the ex a no off site injury or significant impact that has been witnessed from a best incident three here in the UK multiple around the world. Sadly, any fatalities or injuries have occurred with firefighters, first responders and primarily that is the real life and safety risk.

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And there are many. The internet, as we know, is a hive of conspiracy theories. You can be a flat earther, but you know, I can conclusively say that with this site design and distances to sensitive receptors, there will be provision for alerting the local community. But ultimately, as an independent testing and safety consultant, the realistic concern is site operatives and the fire service. And we're very, very mindful of that.

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And that primarily is who the emergency response plan is aimed at.

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And so rich, if you read 5.3.1, which is the which sets out the content of the minimum content that the emergency um, plan would contain, it says actually the very first bullet point, how the fire service would be alerted and incident communications and monitoring capabilities, that would be quite broad,

but that would be something that would be in the content, which be discussed with the fire service at the time. And of course, we'll have to take into account the relevant regulations and guidance at the time it is produced.

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But there is that phrase of instant communications in there.

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Okay. Thank you. That's useful. Anything to add from the the fire rescue service

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rescue?

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It would definitely form part of those ongoing discussions. The initial call to fire and rescue. Um, I think then arrangements in place from that command and control perspective that the community needs and safety will absolutely be paramount, and it would be an initial consideration.

00:21:33:02 - 00:22:00:02

Okay. Thank you for that. Okay. Um, that's all the questions I have on this agenda item. Um, I am very mindful. We have heard, uh, we did have discussions on the, the best, um, at the last lot of hearings, and it has been raised lots of times for open floors. So, um, I'm keen not to repeat, um, the points which have already been made, but there's anything new that anyone wishes to say in terms of interested parties then. So just before I do, I think the district council may wish to say something.

00:22:00:04 - 00:22:34:22

Thank you for North District Council. And yes, that's just the point we raised in our LR, which is Rep 1-102. And it's paragraph 25.18. And, and it's in respect of battery choice. And you'll have our written submissions on that already. But the point I just want to make in addition to that, um, which we haven't made in writing so far, is that we might have some degree of comfort if we were a consultee in respect of requirement seven, which we're currently not a consultee. And because we know that the Outline battery safety management plan relates to what are essentially effects on sensitive receptors and residential amenity.

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So we think, well, we would like to be a consultee on that requirement. Um, and that is an additional point in respect of battery. And as a result of the lack of battery selection at this stage in the examination.

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Okay. Thank you. This is the applicant content for that to be added to the requirement which.

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Previously part the applicant. Um we have no problem with that.

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Thank you very much.

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Okay. Interested parties then please. Did anyone wish to say anything? Okay. We start on my left. Uh, Mr. Frost, please.

00:23:16:23 - 00:23:21:02

Thank you, Paul Frost. Um, yeah. So asked at the last hearing.

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That more detail will be provided about the approach to the fire safety of the Bess. Uh, given the problematic experiences in both the UK and around the world. Um, I was also looking there for the emergency response plan to be brought forward and to be part of the examination phase. As far as I can see, that isn't the case at the moment. It isn't part of the examination phase. Um, and if I'm reading it correctly, there has been no new meetings between the fire and Rescue Service and the applicant.

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Um, in the statement of common ground, um, in Lc's local impact report. They talk about the fact that the applicant has no intention to, um, uh, to have those further meetings at the moment, but that the Fire and Rescue Service are keen to do so. It's good to have someone here from Fire and Rescue, um, to show that, yes, they are keen to do that. So? So if this is the case. Fire and rescue are keen to proceed with this.

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Um, why wouldn't the inspector make use of that? And to bring forward the emergency response plan as part of the examination phase so that it can be have the due, um, public scrutiny and also engage the minds of the fire and rescue. I hear what um, Dan is saying, uh, in terms of, uh, the

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current response plan is suitable for the county as it currently is. However, there are so many of these best applications, uh, being put forward. You know, there's probably going to be a hundred in the county, you know, that's that sort of scale. He's talking about how it is now. But but what about when there are a hundred best systems in the county and all the additional, um, uh, solo thing, so. So I'd like to, if he's able to respond on that.

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But but but it's just give how it will scale over time. And who pays for that additional scale. Um, to cater for all those different, um, best systems. So, so they're my my two asks really um, I think uh, so you asked also about, um, the current level of readiness. Um, but I'd like to, um, I'd like to pose the questions about, um, how much training has been given to, uh, the, uh, the fire staff, um, to cope with this type of, uh, um, this type of, uh, installation also, um, the funding and resources.

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And is there agreement for these funding and resources to flex as these additional, No, um, installations. Come on board.

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Thank you.

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Okay. Thank you. I think out of interest of time, we're going to hear from all the IPPs and then offer it to the applicant because we are quite pushed today.

00:26:33:11 - 00:27:04:18

Thank you. Mark Williams. Um, Springwell solar action Group and the parish council. So some of my concerns. Um, I'm really worried that that so much of this is post consent. I do not understand how the inspectorate can consent to something that we don't know what it's going to look like. And that is really concerning. You know, as the community, we need to know what's going to be in our neighbourhood. Um, pre consent, not post consent.

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Um, a question for Dan. Um.

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Having spoken off, off the record to existing serving firemen and fire Five people should I say in in firefighters in the in the in the current climate. Um, they've basically said to me a gold standard, um, in the Lincolnshire Force is five crew per application. Quite often they do not achieve gold standard because for various reasons, um, we also know that in Lincolnshire, in, in this area there are only three full time crew.

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The rest are not disparaging. Them are retained fire people. The vast majority of fire people in Lincolnshire have had zero experience of best fires. The vast majority of the training is e-learning. So real world experience is very limited. That's concerning. Um, point to to the applicants. Um, representation. Presentation,

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consequential modeling. So much of this is modeling, you know, where is the real world ish um, examples of this. And again, we talk about modeling or experience of one battery storage facility, one container. What happens if there is a catastrophic event and ten containers get go on fire? In this scenario we've got 1300 containers. What happens if there is separate?

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Well, we are repeating things that you have said to us before. So I'm keen to say we have very tight time wise. So any new items please. Thank you.

00:28:57:01 - 00:29:26:18

The applicant representation also talks about the new NFC guidelines. I think we need to be talking about the current NFC guidelines, which are available today. And they do talk about six meter spacing. And I think that's one of the critical issues from a community is the spacing of these containers and the the additional danger and the ability for the firefighters to actually access the site in a, in a, in a in a proper manner.

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Yeah. Thank you. Yes, Mr. Crampton, thank you.

00:29:32:05 - 00:30:05:22

Thank you. I'm delving into an area where I have limited knowledge, but, um, the guidance and the national significant infrastructure projects. Advice note nine Rochdale envelope that clause 32.3 rather talks about worst case scenarios in the worst case positions in terms of environmental considerations. My question, therefore, is does the applicant's approach of carrying out risk assessments in the detailed design comply with those requirements of that guidance? Note on the Rochdale envelope? Thank you.

00:30:06:22 - 00:30:09:13

Thank you. Yes, David.

00:30:09:21 - 00:30:46:11

Thank you. Thank you very much. Um, thank you for. That was very useful. Um, the points I did want to pick up in particular is about looking at an incident. And clearly where we have evidence there are other places where only the water that is designed to cool down the neighbouring units has to be contained, because we're concerned about the impact on the water, the water flow, the aquifer from there. So with that, where you've got the poisonous water, I'm not convinced that they have adequate provision or talked about sufficiently keeping the aquifer safe as well.

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Um, on the point about the, um, the fact that we know so little at the moment is worrying because it might mean that you need fewer units. We don't even know what kind of battery it is. But when you've got a safety plan, you may not be able to fit it on the site. Or you may need to different whole different structure. So there's so many unknowns that I don't think that there's adequate. You know, I do wonder how the inspectorate can make a decision on this when there are so many unknowns? Thank you.

00:31:16:10 - 00:31:17:01

Thank you.

00:31:19:21 - 00:31:21:19

Yes, sir. Mr.. Mr. Hurd.

00:31:21:21 - 00:31:22:11

Sir.

00:31:22:14 - 00:32:06:17

Thank you. From Nathan Bay. So just to pick up briefly on what Mark said earlier on, um, the the applicant has referred three times to the draft NCC guidance. I am because I was confused about this about four weeks ago. I contacted the FCC policy planning team, and they were absolutely clear that the current extant and FCC gardens should be applied in any discussions at the moment. The reason why the FCC draft was not issued or the draft revised draft was not issued in March, is because there

is discussion, there was not total agreement, and therefore there is no guarantee that, um, what is currently draft revise will in fact be the case.

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So is it not difficult to have a statement to say the extant guidance at the time will apply. And bear in mind there are there is an absolute myriad of guidance NFPA 855, um, the global standards, etc., etc. um, which the applicant mentioned quite a few of um, can we just have a statement to say the exact the exact extant um extant guidance will be that will be put in place at the time and any UK legislation or guidance will take precedence.

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Okay. Thank you for that. Um, I think we've got one more in the room and then we've got someone virtually. But, um.

00:32:54:11 - 00:33:31:19

Thank you. Elizabeth Parker. Nathan. Be resident. Um, the cascade of numbers really hasn't done an awful lot to, uh, uh, allay my concerns. Uh, the fact that, um, I think the gentleman said that there was. no no air quality concern. The gentleman online. Well, it still is a concern of mine. And to say that these receptors one kilometre away won't be affected when it's 440m to the nearest resident. Huge concerns. And when we've got prevailing winds from the north east or the east, it will be into Navi Village quite quickly.

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Thank you.

00:33:33:11 - 00:33:38:12

Okay. Thank you. And the hand up virtually if you'd like to come in now as well. Thank you.

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Well, I think you're on mute.

00:33:49:16 - 00:33:52:17

Oh thank you, thank you, sir. Assuming that's.

00:33:53:13 - 00:33:54:03

My invitation.

00:33:55:03 - 00:34:25:16

Thank you. Okay. Good morning sir. Thank you. My name is Simon Mountjoy. Uh, I was going to make this comment under, um, soil classification later. Excuse me? Rather than under the best in climate as we are now. But it relates to batteries. Um, the comments previously all worthy and good and safety and so on. But they've related to plume um, and particulate issues. Uh, particularly discussed. These are visible and dissipate into the atmosphere.

00:34:26:08 - 00:34:58:01

Um, the effect of fire or other environmental events would require significant, I believe, quantities of water ignoring for the moment is not clear where such significant waters would come from, or indeed, whether such battery installations can actually be extinguished or pull themselves out. I'm concerned where such water may go. Contaminated water in the environment of contamination should or would be contained, and in the alternative it will seek into the aquifer. And if I may quote from The Geology of Lincolnshire, 1981, page 107.

00:34:58:04 - 00:35:37:01

A description of Lincolnshire heath and the soil types, uh, discussed, which I shall talk about later. And the quote is that water is available at shallow depths over most of the county. Water production is increasingly important, with the enormous catchments and natural filtration provided by the Lincolnshire Limestone and Chalk forming long term sources of pure water. My question, sir, was not so much question statement, but the sighting of batteries with as yet unclear control and containment on the limestone on limestone of such porosity such that contamination could seek wide, seep wide and far, is not fully understood.

00:35:37:11 - 00:35:39:03

Is not part I may finish.

00:35:39:05 - 00:35:51:19

Sorry, Mr. March, I tried to jump in, but we are going to come on to that later on today. Uh, that is a specific issue of, um, fire water from the bat and how that would be managed. So I'm keen to park that to later. Please.

00:35:51:21 - 00:35:59:12

That's fine. We'll we'll return to it. But I've just raised it. Uh, so under, um, batteries as you got. I didn't see it in a later thing, but we'll come back to it.

00:35:59:14 - 00:36:03:09

Thank you. No problem at all. Thank you very much. We'll, uh, we'll speak later. Thank you.

00:36:05:01 - 00:36:19:16

Okay. If we can come to the applicant, please. Um, ultimately, we haven't got time today like we did yesterday for some tuning in. Throwing. So if you do have any ops, don't agree with something that said. Now, uh, please provide that in writing at deadline three. Thank you.

00:36:20:03 - 00:36:51:24

Thank you, Sir Richard. On behalf of the applicant. Um, I'll pass, Mr. Gregory, um, shortly for some more detail points, but we'll try and keep this brief conscious of time. Uh, just going through some of the points raised that I can answer. Mr. Frost, um, referred to, um, why can't the ERP be brought forward? We discussed that there's hearings. I'm not going to repeat that. And I do refer Mr. Frost to paragraph A, section 5.3 of the updated, outlined battery safety management plan. Rep one hyphen 048 that gives more detail on what that fire plan will contain.

00:36:52:14 - 00:37:25:23

Um, on regarding training and funding, again, we discussed that and the text provisions do say that we will help with, um, uh, firefighters, familiarising themselves with the site annually. Um, and that is um, that's committed to in there in the protected provisions, which is all part of training. Mr. Williams response I think it's more for the county council to potentially respond to on, um, Mr. Williams point about real world experience. Mr.. Paul Gregory, um, did cite his credentials at the last issue specific hearing, which does have real world, uh, experiences.

00:37:26:00 - 00:38:08:19

And, um, I refer, uh, the examining authority to those. And Mr. Gregory can perhaps touch on that briefly shortly. Um, Mr. Crampton, point on does the applicant and I got that name wrong, um, does the applicant approach comply with the likely worst case scenario? What's the envelope? Yes. Um, Councilor Overton's point, and Mr. Mountjoy is on the aquifer. We'll deal with later in the agenda. And then on the NEC guidance, um, I refer the examining authority to paragraph 2.2.2 of the outline outlined battery safety management plan that says the applicant would develop the best in accordance with all relevant legislation and good practice in force at the time.

00:38:09:02 - 00:38:36:17

And, um, that's one of the reasons why we have the statutory, in accordance with wording, that we have developed this plan, um, now based on, um, good practice now. Um, but it needs to flex in the future, depending on when we finalize that plan and what the latest legislation and guidance will be. I need that flexibility because we want it to be up to date, and it needs to be up to date to marry up with the latest legislation. Um, those are my brief comments. Um, I'll pass them. Mr. Gregory, has anything in addition to add.

00:38:38:17 - 00:39:24:08

Um, Paul Gregory for the applicant? Um, I'd just like to thank people for their, their contributions. Um, just specifically with regards to sort of real world, um, and an FCC guidance. So, uh, the existing FCC guidance shows that spacing, um, can be decided upon by evidence based approach, as I described earlier, and the revised NFPA 855 mandates, every best system that is sold globally now must have gone through full scale burn testing, which establishes that a fire will not propagate, um, to the adjacent equipment.

00:39:24:10 - 00:40:09:03

So during that test, you must have live equipment, uh, at spacing that you are recommending that any site should incorporate and show that fire doesn't propagate, uh, to that adjacent equipment. Some of the consequence modeling which concerns were raised about consequence modeling. But if consequence modeling is based on site specific wind conditions for example uh, and any um amendments to spacing that might take place, To account for that, then, you know, we can be fully confident that the best selected through the scheme will have demonstrated that the spacing is both system and site specific.

00:40:09:16 - 00:40:56:12

Um, and that is a very sophisticated, uh, approach. Whereas, you know, a six meter guidance, which was based on the 2017 FM 533 datasheet, where this sort of large scale fire testing wasn't available. Um, so the, the site and, and the best design for this scheme will have been demonstrated that the spacing is safe. Um, best by definition are non-combustible structures with high levels of thermal

insulation and that every best design that is going through now integrates significant exposure and prevention and protection systems, and also demonstrates so current models at the moment that have been through this testing.

00:40:56:16 - 00:41:05:22

Typically a space between 50 and 200mm apart. You know, if you contrast that to the six meter guidance currently.

00:41:08:02 - 00:41:17:09

Thank you. Um, there were a couple of questions pitched at the fire service. If you're happy to to answer them, then, um, that would be appreciated. Thank you.

00:41:17:20 - 00:41:58:06

I'm watching from rescue. And yes, I'll do my best with regards to to some of those. Um, so I think the first one was around the approach to fire safety and the engagement around the development of, um, the developers and the plans. And I think we are quite clear when we're engaging, we reserve the right to object at any point if the information becomes out of date, certainly in line with the legislation, etc., and we continue to engage as required, I suppose, from an assurance perspective from a fire rescue service, um, a community risk management plan, which is reviewed every four years, outlines those community risks, what we identify as Identifies community risks based on quite in-depth analysis of risks across the county.

00:41:58:08 - 00:42:32:22

We continue to review that. That's an ongoing process. So within that community risk management plan, we do then have the flex to be able to react and develop plans accordingly. Should significant risks then be found. And so that's the commitment in line with that. Then from a community risk management planning perspective, we then develop response plans to allow us to to to be able to, to manage and mitigate the impact of those community risks, which again, is a is an ongoing, um, ongoing practice with regards to firefighting and response models and the phrase gold standard.

00:42:33:05 - 00:43:20:23

Um, we do differ with regards to uh, crews. And we have a minimum of four and a maximum of six. But with regards to safe systems of work, those safe systems of work are in place, whether it be a crew of four, crew of six, uh, additional resources would then be requested as required. Uh, we are. Response modelling allows us to develop predetermined tendencies, which allows us to then be quite specific with regards to the number of appliances and resources that we require for the initial operational response phase, which would very much be complemented by any emergency plans that would be developed on top of that, then, should we need any additional resources that we would request that as an incident develops and escalates? We do have those, um, degradation plans at a local level within Lincolnshire Farm Rescue.

00:43:21:00 - 00:43:51:00

And then we've got the additional resources that we talked about locally from our Fire and Rescue Services Act and a national resilience perspective and training wise. I think the comment was around, uh, real life situations. Um, I think, um, certainly nationally, those real life scenarios are limited. Um,

but from a national perspective, we do have, um, um, the ability to be able to learn at a local and national level. Um, and phrases.

00:43:51:02 - 00:44:34:01

Joint operational and national operational learning procedures are in place. That's where a fire rescue service may, from a debrief perspective, capture any learning specific to an operational incident and share that nationally. So we do have that ability to be able to to learn from some of those national incidents up and down the country and just come back to the response model in Surrey. We talked about the number of whole time and on-call resources that we have across the county. Our resource modeling and predetermined attendances don't differentiate between whole time and core resources, and the ability to be able to to pull those resources in where our resources and fire stations are strategically placed across the county to allow us to adhere to that response modeling.

00:44:34:12 - 00:44:54:09

And that said, the FCC recognize the challenges that we face around this and committed at a national level to continue to provide up to date information, training, and guidance from a training perspective. Next year, fire and rescue are in line with the national operational guidance, which allows us then to adhere to any of those national standards as required.

00:44:56:03 - 00:45:02:02

Okay. Thank you for that useful summary. Um, anything from the applicant before we move on to our next agenda item?

00:45:04:21 - 00:45:08:14

Which is on the applicant? No. Um, we thank the county counsel for that response.

00:45:08:16 - 00:45:41:22

Okay. Thank you very much. Okay. We'll move on to agenda item number five, which relates to climate change. Um, a short bit of preamble for me. Um, concerns have been raised, particularly by the county council and, um, I think Mr. Heard as well, um, about the assumptions that's been used in the climate change assessment, uh, particularly around, um, the assumption that those would be no replacement solar panels during the lifetime of the proposed development, uh, and waste management facilities and the distance that might be travelled to those.

00:45:42:21 - 00:46:19:10

Um, the applicant has set out in table three, 312 of its deadline won or comments on um responses at deadline one. That panel replacement is assumed to be 5% over the lifetime of the proposed development, and notes that advancements in current PV manufacturing have seen greater reliability with uh performance warranties, in some cases extending to 40 years and degradation of 0.3%, and the county council wish to reply to to those comments and whether that's accepted or not.

00:46:20:22 - 00:46:24:20

Jonathan to County council again, I'll hand over to Miss Foster.

00:46:26:11 - 00:46:57:12

Justine Foster for Lancashire County Council. Um, the county council raised the point um more in relation to its responsibilities as waste planning authority that we would, um, wish to to to have an understanding of what the, um, the figures were likely to be around replacement. Um, and obviously it was a discrepancy that we picked up within the climate change chapter as opposed to the waste chapter. And we've seen the percentages that are being provided by the applicant in response to our local impact report comments.

00:46:57:14 - 00:47:02:22

And they were happy, happy with those figures. They're generally in line with what we've seen for for other solar developments.

00:47:03:10 - 00:47:06:12

Okay. Thank you. Um.

00:47:08:13 - 00:47:30:19

To the applicant, please. There's obviously been an assumption about 5% replacement in the year in terms of the assessments that have been undertaken. With that in mind, should a requirement be added to the draft development consent order that restricts replacement of panel panels to a maximum of 5% to ensure that no effects that haven't been assessed in the years don't occur.

00:47:37:11 - 00:47:38:01

Uh.

00:47:39:08 - 00:47:41:03

On behalf of the applicant.

00:47:43:11 - 00:48:29:11

No, it's my short answer, um, to that. So, um, we have assessed, um, the scheme on the, um, what we considered to be the likely worst case scenario. It's a 40 year scheme. Um, that means no replacement during the lifetime of the scheme, apart from potential repair work throughout the life of the scheme. Um, this is a nationally specific infrastructure project to be wrong, and I think and my against policy for a requirement to suddenly say we can't repair, um, if something that restricts us on how much we can repair throughout the life of the scheme, we have taken a reasonably worst case scenario based on the best available knowledge.

00:48:29:17 - 00:48:45:16

You've heard what the county council has said as well, um, to restrict us when it's a project that's giving the the benefits it will give, seems to me, um, against a policy in such a requirement would be. would be, uh, wouldn't meet the reasonableness test.

00:48:45:19 - 00:49:01:18

I think the concern is, is that ultimately, um, is there a scenario where the panels gave up after 25 years and the whole lot needed to be changed, which would be akin to potentially similar effects to the construction phase?

00:49:25:18 - 00:49:59:09

Which was, um, half the applicant. Um, that scenario can't happen. Um, the definition of maintaining the development consent order, um, says we cannot, uh, replace the whole of the authorized development, so we couldn't do that anyway. And secondly, um, article uh, five of the DCO, um, says at five three, this article does not authorize the carrying out of any works which are likely to give rise to any materially new or materially different effects that have not been assessed in environmental statement.

00:49:59:16 - 00:50:00:06

So

00:50:01:22 - 00:50:10:10

we have to comply with that, as you know. Um, uh, and so there's, there's anything over and above that would be in breach of the order.

00:50:11:08 - 00:50:18:11

But ultimately, uh, to, to, to not be able to do that, you would have to have panels which lasted the full duration of the operational phase.

00:50:20:02 - 00:50:25:02

Then I struggled to see why such a requirement would, would achieve any reasonable.

00:50:25:04 - 00:50:31:04

Sir, I think I don't think we'll meet the reasonableness tests and I can put that in. I can make legal submissions on that point.

00:50:31:16 - 00:50:34:01

I think that would be useful. Thank you.

00:50:39:03 - 00:50:42:15

Anything from the county council or the district council on that matter.

00:50:47:09 - 00:51:19:09

Nor even district council. So I think we'll probably respond in writing on that point and review the applicant's legal submissions. The only point I would make in respect of the definition of maintain in the current draft DCO is that all doesn't. Although it doesn't allow the whole scale replacement, it could allow replacement of 90% of the panels. Um, now I understand that there would still be a constriction in terms of, um, the articles within the DCA not allowing significant change. That's probably the point. That would then restrict any whole scale, whether it be 50% or above, whatever, whatever it is, anything below 100%.

00:51:19:17 - 00:51:25:17

Um, but in terms of whether a requirement would be, um, reasonable, we'll respond in writing on that.

00:51:26:15 - 00:51:29:00

Thank you. Thanks. Council.

00:51:29:10 - 00:51:43:22

John Hunter, Lancashire County Council. I think we take a similar position. I would like to reflect on that, and I'm not sure I do agree with what was said on behalf of the applicant, rather over and respond in writing rather than shooting from the hip right now.

00:51:44:03 - 00:51:45:03

Okay. Thank you. Thank you.

00:51:45:09 - 00:52:13:18

So much. I just I will put in writing, um, uh, having thought about it, but, um, this is a nationally significant infrastructure project delivering, uh, urgent need, renewable energy and a requirement that prevented no more than 5%, say, of the panels being replaced. Um, I just can't see how that is reasonable requirement. If it was, 5.2% needs to be replaced. You've got the restriction at 5.3

00:52:15:12 - 00:52:29:06

and that that, um, that prevents us from doing anything that gives rise to anything materially new or materially different. Um, we'll put more legal submissions in writing, um, to explain our position. Um, but I think it would be you kind of get the thrust of where I'm going.

00:52:29:19 - 00:52:36:04

Okay. I think I'd be interested to see the legal submissions. So if we could have that as a hearing action, that would be be great. Thank you.

00:52:37:22 - 00:53:10:00

Okay. In terms of waste management, the applicant considers that the current solar panel waste generation is currently low, so there's little, little demand for recycling facilities and other management facilities at present. However, the applicants are of the view that it's expected that facilities which reuse, recycle or recover end of life solar panels will be developed as the quantities of this waste stream increase in the future, particularly bearing in mind the Wai regulations. Um, so the assumptions on distances traveled to waste facilities in the assessment are appropriate.

00:53:10:04 - 00:53:17:09

Again, any reply from the county council, uh, to the applicant's standpoint on that issue?

00:53:20:05 - 00:53:23:22

Thank you sir. John Hunter, Lancashire County Council again I'll hand over to Miss Foster.

00:53:27:21 - 00:54:03:24

Uh, Justine, first off, I'm Lancashire County Council. Um, we will have some points around waste and waste and the cumulative amounts further in the agenda, if that's okay. I think the one point that I would just potentially raise now is, um, regarding, um, the statement within, within chapter eight about the 100 kilometre, um, distance that's been been used, um, I think in the absence of current absence of any facilities, um, to handle sole waste of this potential scale, um, I think it's, um, it's no certainty there that that could be handled within 100km.

00:54:04:03 - 00:54:08:14

At this stage in development of all the large scale solar schemes within the county.

00:54:10:21 - 00:54:13:21

Thank you. Any reply from the applicant on that one?

00:54:14:07 - 00:54:46:06

Thank you, Sir Richard. On behalf of the applicant, um, we will be coming this later on. Uh, item nine today, but, um, as has been accepted by the Secretary of state, um, that it is accepted that solar PV and Bess waste, um, is a is in its infancy. Given the projects are at. So some are just being built now. So no one, no projects have actually reached the end of their life there. Those being those being built. Now, when we reach the end of the life for another 40 years.

00:54:46:08 - 00:55:17:15

So it's not surprising that the facilities aren't in place yet in the UK for to deal with that. As with any new technology, um, the um industry will respond to the need and there will be a need. And that position has been accepted by the Secretary of State, and we can deal with that this afternoon. Um, but because we, we don't know the where the location of facilities are going to be located, we can only assess distances on, on to best of our, uh, based on the guidance we have.

00:55:17:17 - 00:55:33:22

And I'm going to pass now to Doctor Libby Robinson, principal consultant at Nature Positive, who's part of the RSC group, to explain why it's an acceptable approach to use the environmental product declarations. Um, that to deal with this point?

00:55:35:22 - 00:56:09:16

Thank you. Libby Robinson on behalf of the applicant. And so with regards, I can only speak with regards to the greenhouse gas assessment. Um, and with regards to the emissions associated with waste management. Um, what we have done in the absence of information, in the absence of knowledge of where these waste management facilities will be located. We've taken the end of life emissions from environmental product declarations. Um, these are standardized documents. They transparently communicate the environmental impact of a product or a service throughout its entire life cycle.

00:56:10:01 - 00:56:48:12

And they're based on life cycle assessment. And they provide objective, comparable and verified information about products, environmental performance and are the standard approach of assessing greenhouse gas emissions for products and components. So a number of these have been sourced in this instance to understand the emissions associated with the solar PV and other components. Um, and the total end of life emissions, which include the transport to disposal facilities, have been taken from these iPads. Um, and in this instance, based upon the emissions per meter square of solar PV in the project, um, a similar approach has also been taken for the best as well, just to add.

00:56:48:14 - 00:56:59:00

So in terms of the greenhouse gas emissions, we've used the standardised approach of environmental product declarations rather than the specific distance to waste management facilities.

00:57:00:23 - 00:57:05:23

Okay. Thank you for, uh, for that explanation. Anything from the county council?

00:57:08:24 - 00:57:09:14

No.

00:57:09:16 - 00:57:10:06

Thank you.

00:57:10:08 - 00:57:40:19

Okay. Thank you. Okay, we'll move on to our next matter within climate change, which is in relation to the baseline assessment. Uh, now, the local authorities recommended that a comparison against other technologies, uh, which should be undertaken, uh, such as nuclear onshore, offshore wind. Um, and that was deemed to be acceptable at the West Burton Solar Park development consent order. Uh, the applicant provided a technical note at deadline to uh, which considered such matters.

00:57:41:01 - 00:57:48:07

I so I just wondered whether the county council or the district council had any views. Uh, on that technical note.

00:57:53:17 - 00:58:08:11

Um, I think that was the answer. Sorry, Jonathan said on behalf of Lancashire County Council in that it didn't arise directly from the representations, although it was produced as a result of them. Uh, we I don't think we have any technical comments to make on that.

00:58:09:08 - 00:58:11:06

Okay. Thank you. And the district council.

00:58:11:21 - 00:58:20:10

Norfolk District Council. So our climate change officer isn't at the hearing today. So I think we're going to have to take that one, um, away in writing and respond.

00:58:20:24 - 00:58:23:08

Okay. Thank you. Um,

00:58:25:04 - 00:58:51:04

on a related matter, the applicants referred to the East Yorkshire Solar Farm project, which was granted consent on the 9th of May 2025, and that did use a combined cycle gas turbine. Um, as the comparison, I just wondered if, given this, probably the most recent solar decision, whether that changed the views, uh, on what the appropriate baseline comparison actually is

00:58:52:21 - 00:58:54:03

for the county council for.

00:58:57:23 - 00:59:06:00

Just Lancashire County Council. Um, I think we'd like to have a look at that, um, as a decision. And, um, it will make any comments at the next deadline submission.

00:59:06:23 - 00:59:07:19

Okay. Thank you.

00:59:09:07 - 00:59:14:11

Council the same, same position for us, not least because we want to respond in writing to other point, you've asked us.

00:59:14:13 - 00:59:45:18

Okay. Thank you very much. Um, just a quick question for the applicant on on the similar theme. Um, now the we note that the comparison to combined cycle gas turbine, was 354g of CO2 equivalent to kilowatt hours. Um, there would be a saving of 9.6 million tonnes of CO2. Um, based on the UK grid electricity figure of 20 2024 of 252.9.

00:59:46:10 - 01:00:01:01

Um, could I just check what the actual overall savings would be in the figure? I think I've worked it out on a on the back of a fag pad at 6.8 million. Um, but I just wondered if the applicant could confirm that figure or could in writing.

01:00:03:06 - 01:00:09:20

Thank you. Libby Robinson, on behalf of the applicant. Um, we'll have to get back to you in writing on that one. And specifically.

01:00:10:02 - 01:00:45:19

Okay. No problem. Thank you. Okay. Our last, uh, matter is, um, in relation to monitoring emissions data and renewable energy generation figures. And, uh, I think the district council has suggested that there should be ongoing monitoring. Um. The applicant, in response at deadline one, noted that it's not standard industry to monitor emissions from schemes such as um, the proposed development and scope one and two emissions from the scheme do not come close to the thresholds recommended by the IFC and Equator Principles, where monitoring is recommended.

01:00:46:11 - 01:00:56:02

Um, is that accepted by the District council now or will you need to giving your experts not here. Is that another one for for writing council?

01:00:56:04 - 01:01:03:08

Yes, sir. That's another one. Um, I understand that the original request has come from our climate change officer, so I think that needs to come back in writing from her.

01:01:03:15 - 01:01:06:24

Okay. Thank you. Again, we'll note that as a hearing action. Thank you.

01:01:09:03 - 01:01:27:10

Okay. Um, that's all the questions that I have on climate change. Um, again, similar theme. If any interested parties wish to say anything, if it could be, um, new matters rather than those which have been expressed before. Um, that would be greatly appreciated. Okay, we've got a roving mic, please. Ready for Mr. Williams?

01:01:40:18 - 01:01:57:20

Mark Williams spring was our action group. Um, climate change 5.1. The recycling piece is quite interesting, as I think we all recognize there are no current facilities to cater for the recycling of solar panels or better. Um.

01:01:59:23 - 01:02:48:04

I'm suggesting to the applicant or via the planning inspector that actually, maybe the applicant should have to include this in their cumulative effect, because at some point, the significant recycling facility is going to have to be built somewhere, and it's either going to impact us what's going to impact somebody else. So actually, maybe that needs to be recognized in the documentation that a significant facility that potentially will create a significant amount of pollution needs to be recognized in documentation, because if it doesn't exist today, when will it exist? And and who will have to face that burden? And then finally on 5.2, um, the statistics around CO2 is great.

01:02:48:06 - 01:03:04:12

Obviously. I believe again, it's I think it's 0.004%. So if this facility is given the go ahead, actually, what what level of that 0.004 will this help reduce? Thank you.

01:03:06:08 - 01:03:07:17

Okay. Miss Overton.

01:03:08:09 - 01:03:38:08

Thank you very much. Marianne Overton, uh, independent district and county counselor and chairman of the Cliff Villages Civil Action Group. The point I want to make is about the whether these panels will need to be changed or not over the whole of their lifetime. We have had instances such as Anglesey, where there have been storms and a whole lot of had to be redone, and the demonstration that they were so quickly out of date became clear because when they tried to produce.

01:04:51:02 - 01:05:07:10

Okay. It's 1230, so we will resume, please. Um, Miss Overton, are you okay to maybe start from the beginning again? I think maybe it dropped out just as you started so people online wouldn't have heard the first bit. So if you're okay to repeat that, that would be appreciated.

01:05:09:16 - 01:05:15:09

I think the first part was about the replacement of panels. Do you mean that part or not?

01:05:15:11 - 01:05:16:01

Yes.

01:05:16:03 - 01:05:53:02

That's right. Yeah. Okay. The point about the replacement of panels is that we have seen that there are incidences, but sometimes, as we saw in Anglesey with weather where the panels do need to be replaced and what was found is that because they were already out of date, it meant that the replacement of those panels could not be. They couldn't be done like for like because the modern ones were so much more efficient and therefore the wires would, uh, the cables would burn and, and were inadequate. So the whole thing had to be redone. But the point I'm making is that the lifecycle cannot be assumed to be a significant length of time.

01:05:53:07 - 01:06:26:19

We you know, if we're talking realistic assessments, we must expect a replacement of the panels and possibly of the cables during their lifetime. Um, perhaps twice even. And the second point I was going onto was about the time. It's the applicant's climate. Technical notes, talking about the comparison of the solar and how it would be a saving in carbon emissions compared to the combined cycle gas turbine process.

01:06:27:03 - 01:07:01:08

And the point I wanted to make that's very clear is that if all of our electricity currently came from gas, then presumably all renewable energy that was added would be replacing gas, and therefore you could count that as a saving and that therefore the methodology would be correct. But and I recognise that, as you said, it was done in this way in a previous application. But times are changing. That figure is changing all the time and the current figure is considerably.

01:07:01:10 - 01:07:23:09

If we look at even half of the current energy is not coming from gas and therefore that comparison is completely out of date, we need to be comparing if we're looking at carbon emissions saved, we need to be looking at the current situation. And that is not all gas. Thank you.

01:07:26:17 - 01:07:28:10

Okay. Thank you, Mr. Harris.

01:07:28:12 - 01:07:29:02

Thank you.

01:07:29:11 - 01:08:08:04

Sir. Phil Howard wasn't. Haven't even been. Um, I have prepared a statement, so if you're happy, I'll just read it out. Um, it is broadly still extant. Uh, regarding the notwithstanding the, uh, the comments that have been made today. The applicant claims 9.6 million tonnes of CO2 equivalent savings across the life of the proposed development. Notwithstanding that, the Secretary of State has stated that a combined cycle gas turbine is an inappropriate baseline for comparisons. The applicant continues to pursue this line. The applicant states the benefit of the proposed development with regards to climate is to replace the electricity generating generation from fossil fuels.

01:08:09:05 - 01:08:41:22

The government's net zero targets are our 50% fossil fuel energy by 2030, and a total fossil fuel free grid by 2050. If the proposed development did not go ahead, an alternative source of renewable energy would take its place, not fossil fuel generated energy. The applicant has compared Springhill

emissions to fossil fuel fossil fuel emissions across the 40 years of the development, but the government target only allows 50% fossil fuel for the first 20 years, i.e.

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25% of the total 40 years. Therefore, only 25% of the applicant's fossil fuel emission figures should be applied. This immediately reduces the applicant savings claim down to 2.4 million tonnes from 9.6.

01:09:01:16 - 01:09:25:19

The applicant's climate technical note lists the estimated lifetime greenhouse gas intensities for spring or solar farm, a CCG solar, both roof and utility. Nuclear. Hydropower. Onshore and offshore wind. The applicant's own figures show Springwell to have the second worst lifetime emissions produced after CCG.

01:09:27:12 - 01:09:52:08

I will submit my calculations, but based on the applicant's figures adjusted to 25% of the fossil fuel figure, the saving intensity is a maximum 38.4g of CO₂ equivalent per kilowatt hour, not the 405.9 claimed by the applicant. In reality, this figure will be significantly less as fossil fuel generation will ramp down across the first 20 years.

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For the 75% where the comparison is not with fossil fuels. The comparison can only be with other green energy. Solar is the most polluting of the renewables, according to the American National Renewables Laboratory. A small modular nuclear reactor, for example, has zero operational emissions and reported lifetime emissions intensity of 12, compared to 84.1 for Springwood.

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Another issue regarding the applicant's calculations relates to component placement. We've already heard the applicant assumes the solar PV panels will all last the life of the development 40 years, other than a 5% attrition rate for damage, etc. however, most manufacturers suggest a life of 25 to 30 years. Therefore, most likely a replacement of every solar PV panel at least once will be required. This will add a further 1 million tonnes of CO₂ equivalent to the greenhouse gas emissions.

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Moreover, the applicant has assumed the life of best batteries at 17.5 years and transformers at 40 years. The two best currently in the planning stage with Ncdcc state of battery life are 5 to 15 years. With planned replacements at ten. And planned and planned to transformer replacements at 25 years. Overall, the applicant appears to have grossly underestimated the carbon emissions attributed to component replacement. With all this taking into account, the result for the proposed development is a negligible saving in greenhouse gas emissions at best, but far more polluting than other renewables.

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To summarize, the applicant has stated the level of component replacement required, so they underestimated the level of component replacement required and is hugely inflated. Its project lifetime greenhouse gas emissions savings by using a totally inappropriate gas cycle comparison. Finally, a comparison of my own two modular two small modular reactors would generate some 940MW, would produce a fraction of the greenhouse gas emissions of the proposed development

could be constructed in less than five years, and the two sites would sit on on a combined footprint of some four hectares.

01:12:22:19 - 01:12:30:13

More power generated than the proposed development, which is industrializing over 1200 hectares of productive arable land. Excellent.

01:12:31:16 - 01:12:32:20

Okay. Thank you.

01:12:35:14 - 01:12:43:20

Okay. If I can come to the applicant, if you'd like to reply to any of the points raised by all three of the interested parties.

01:12:45:06 - 01:13:19:24

Thank you, Sir Richard. On behalf of the applicant. Um, thank you for those, um, comments. Questions? Um, in respect. I'll go in order in respect to Mr. Williams, um, first question on the recycling facilities for the best, Yes. The this is obviously the climate change hearing. Uh, the GHG assessment, um, has, uh, carried out a whole lifecycle assessment of GHG emissions, and that includes the best, um, uh, um, um, uh, waste and recycling.

01:13:20:04 - 01:14:01:16

And that's been carried out in accordance with the EPD as Doctor Robinson referred to earlier. And that is recommended, um, a, um, a high percentage of recycling that, but it's a whole lifecycle, um, assessment. Uh, second question on the, um, percentage of emissions. Doctor Robinson, I'll bring in shortly to respond to that. Councillor Overton um, her comment on the, uh, panels and their life span due to new technology, the applicant, um, uh, who is an experienced developer, um, is confident that the panels it will procure, um, will last the 40 years due to new technology.

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That is what's been informed in the assessment. That is why we have the the article five three restriction. Um, that's nothing we can do and maintain. It can give rise to and think, um, any materially new or materially different environmental effects. So we cannot replace um, the panels at year 25 because we have not assessed that and that and five three prevents us from doing that. Um, the, the drafting of maintain has been drafted as well along those lines. And that drafting is in accordance with um, uh, paragraph 5.4.

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18 of the guidance to drafting um on the definition of maintain. And that has been accepted in recent solar, um, decisions. And uh, on the uh, um, uh, further on the waste point, the site waste management plans, the, the applicant has to produce, um, as part of both the Kemp uh, Construction environmental management plan and the and the operational Environment Operational environmental Management plan. They will both have site waste management plans, and we have put wording in those in the draft already, but we're happy to revisit that wording to make it clear that we will provide to the local authorities.

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Um, um, uh, regular updates as to what our future um, um, maintenance regime looks like. So perhaps looking ahead to the next 18 months or so. We'll give you an indication of, um, uh, what might need to be what maintenance regime we are planning for those 18 months, for example. Um, so that that gives you a, a, uh, a future projection of both the waste horizons, but also importantly, um, to monitor what we are doing as well. So we're going to add that flexibility into the site waste management plan, which I think will help with the examining authorities concerns.

01:15:51:05 - 01:16:23:09

Um, in terms of, um, uh, Mr. Herd's 9.6 million tonnes of CO2. Uh, I'll bring in Doctor Libby shortly. Um. Solar replacement. I've responded to you on Best Replacement. Um, chapter three of the environmental statement makes it very clear that we assume there will be battery, um, replacements. So at 17.5 years into the scheme, approximately, that's included in the EIA assessment for all chapters. And that is included in the GHG assessment as well.

01:16:23:22 - 01:16:29:19

Um, and I passed up to Libby Robinson to comment on some of the more technical, uh, um, assessments.

01:16:31:14 - 01:17:02:17

Thank you. Uh, Libby Robinson, on behalf of the applicant. Um, so just to respond to the the point, um, I think just to paraphrase my understanding of the question was, um, basically what what is the point of the, of the project if greenhouse gas emissions. Um, or if carbon is a very small component of the atmosphere, what is the point of this? And um, I would answer to say that the it's a much that's a much wider question. Um, and it's a question of global cooperation, which are aligned with the goals of the Paris Agreement and the UK.

01:17:02:19 - 01:17:32:19

Commitment to net zero by 2050 is aligned to the science based goals, and that's supported by the, excuse me, the National Policy Statement for energy um, which supports the decarbonisation of the UK's electricity supply. Um, so that's part of of UK government policy to answer that question. Um, if I carry on to the further, um, reflections as well. So thank you very much for your very, um, um, thoughtful, um, response.

01:17:33:10 - 01:18:07:17

Um, I would agree that the purpose of renewable energy, um, is to replace fossil fuel based energy. Um, and so the saving in the greenhouse gas assessment is based upon this direct replacement. Um, in reality, renewable energy is going to ramp up aligned with UK government policy to 2030 to 2050. Um, so therefore it is appropriate to compare against other renewable technologies, as we have done within the climate technical note, which is reference rep 2-023.

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Um, within this note, um, we compared the emissions from this, um, this project against other renewable technologies. Um, and it is comparable. It is within the same magnitude. It is comparable to the emissions from other technologies. However, it is still very difficult to compare exactly like for like, um, the exact methodologies of the other assessments are unknown. And our assessment has

been undertaken using a conservative approach which is aligned with Arkema and, um, greenhouse gas protocol standards.

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Um, it is unknown the the approach taken by the the other studies um or the specific emission sources that they have used without um trawling back through the literature and go through each individual study but the values presented within the technical note are an average based upon a number of academic studies and showcased by the IPCC. Um, so I think that's my, um, response to to that. Thank you very much. Um, and then, yeah, I think the replacement rate my, my colleague has has answered that question.

01:19:16:00 - 01:19:37:24

Okay. Thank you for for that summary. Um, okay. I think that concludes our discussions on climate change. I think now is probably a good time to have our lunch break. We are slightly probably behind from where we would like to be. So we're going to propose a 45 minute lunch break. Um, so we will resume at 1:30. Please. Thank you.