



Planning Inspectorate
Arolygiaeth Gynllunio

Hearing Transcript

Project:	Lime Down Solar Project
Hearing:	Issue Specific Hearing 7 (ISH7) – Part 4
Date:	17 September 2026

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FULL TRANSCRIPT (with timecode)

00:00:09:14 - 00:00:19:23

K. Thank you, everyone. I make it for sixteen thirty two. Miss Reynolds, do we have a response to wildflower meadows and arable stubble?

00:00:20:10 - 00:00:28:26

Sorry, Renald. I'll stop lying down. Thank you again for, for entertaining the break so we could take instructions on this. Professor Skeffington is going to come in on this.

00:00:30:09 - 00:00:38:29

Thank you, Richard. Skeppington, if I stop lying down. So the applicant's response, they did recognize that there's a problem

00:00:42:06 - 00:01:13:20

planting wildflowers in areas which have previously been fertilized and kept quite fertile. There should be no problem in establishing something on any of the soils in the ment, catch the problem will come because the more fertile soils, the wildflowers, will be unlikely to survive in competition with the coarser grasses and weedy species. And, and there is actually a little bit of data.

00:01:13:22 - 00:01:45:26

Natural England is a useful nomograph on and a leaflet on this subject. And there's a bit of data from the ALC survey, with nutrients wasn't done for that purpose, so it's a bit sporadic. Clearly, e is going to be in trouble in this respect, and I think, if you go through natural lingo as an orograph, most comes of out as unsuitable. The other areas, surprisingly, not too much phosphorus is the main problem.

00:01:47:09 - 00:02:23:19

Surprisingly, but perhaps not surprisingly farmers because have been cutting back on fertilizer. So the problem really is that, well from the hydrological point of view, you may have vegetation under the panels which is not adequate to cope with the drip. And also I note that certainly in the ecological management plan, there's a suggestion that grazing sheep by will be part of the management and sheep will make a beeline for any more nutritious stuff.

00:02:24:25 - 00:02:41:20

And sheep under the panels will be, you know, potentially erosive just on their own. And again, it will not be a suitable place. So we don't really feel that the applicant answered our question to our satisfaction Satisfaction there. there.

00:02:42:16 - 00:03:04:19

Okay. Thank you. That's that's helpful, professor Skeppington. Can I come to the applicant now, please, for a response? There were some good some some interesting points there with respect to species competition, especially as something I I sort of picked up on. And and then the reference to the natural England assessment, I suppose. So if I could just ask the applicant to come back, please.

00:03:07:18 - 00:03:47:06

Peter Tims on behalf of the applicant. Yes, we recognize the difficulties of establishing species rich grassland on previously marital lands. We do so the measures in the in the out outlined LEMP are designed to to reduce the fertility of the soils, and we recognize that I'm I'm sort of touching on biodiversity net gain here, but, and built into the biodiversity net gain metric, which we, obviously prepared for scheme.

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The period of establishment, the time to target condition, which would be the target condition would be, you know, kind of a diverse grassland is, five to ten years depending on what's there at the minute. So,

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yeah, we would maintain that species rich grasslands can be, established by following the moves in the in the outbound LEMP.

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There are,

00:04:21:09 - 00:04:43:17

you know, there are case studies of of where where that has been successful in in past on on previous, so the schemes, which I can I can refer in in to a written submission? So, yeah, we maintain that that it's it's entirely possible to to to end up with

00:04:43:19 - 00:05:04:28

a a species rich grassland in these areas, and the outline lamp is is suitable for for achieving that purpose. Claire project. And just to be clear, the planting that's proposed beneath the panels, which I think mister professor Scarifington had raised in respect of his hydrological hydrological concerns is separate from the planting that's proposed for the specific

00:05:08:07 - 00:05:36:19

areas of wildflower meadow, etcetera. So it's it measures that are set out in the LEMP are specific to the type of habitat that we're trying to create in each of the areas and how that will then be managed in terms of limited grazing within and amongst the arable sorry, in and amongst the areas, panels is where the grazing would take place, not in the diverse wildflower meadow, for example.

00:05:37:00 - 00:05:44:28

I'll come back to you shortly, Skeffington. Given the importance of Wildflower Meadows, I mean not just in terms of

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B and G and ecological benefits they bring but also in terms of landscape, I think we do need to be very confident that it's going to be successful. So Professor Skeppington noted about the competition with weeds, for example. Mean, how are some of these things monitored to ensure success?

00:06:10:12 - 00:06:34:02

Peter Tims on behalf of the applicant. So, yes, in the outlined LEP, there is an outlined monitoring strategy. Admin, it specifies habitat surveys as of all of all habitats for years one, two, three, five, and then every five years after that. And the results of that monitoring would

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would tell us.

00:06:38:19 - 00:06:47:01

The purpose of that is to find out how these habitats are establishing, particularly those first five years, which is the sort of critical period.

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And, yeah, so the I think we outline them for particularly for wild farmer there is the measures are designed to

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reduce weed competition.

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But that monitoring can be used to identify whether additional, say for example, additional cutting and neglecting of

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grassland may be appropriate to help sort of speed up the reduction in fertility. Yes, that would be, identified through the through the monitoring.

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Professor Skeffington, please.

00:07:29:20 - 00:08:04:10

Richard Skeffington for Stolheim Down. Yes. I agree, with the applicant. I mean, it's that it is possible, but but on very fertile soil it will take a lot of effort, possibly involving stop soil stripping rather than the measurements to reduce the nutrients just by taking off the grass cuttings. I've been I've been doing this on my lawn for thirty years yet, and it's still growing quite strongly. And the but I'm not suggesting it be can't done.

00:08:04:14 - 00:08:38:11

What I'm suggesting, though, is it won't be easy in in certain places. And also that, again, getting back to the hydrological point of view, a ten to fifteen year time scale is very dangerous. We'll then ten have to fifteen years during which potentially we don't have anything that protects us even if it would do in the first place. So I was glad to hear from Ms. Broderick that the area under the panels is separate from the area not under the panels.

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I don't get any hint of that from reading the outline limp. It'd be nice to have that actually secured and set down in writing somewhere.

00:08:51:24 - 00:09:40:02

Believe it is in there, but we will try and find the correct reference to add to the written summary in terms of the different management, obviously relating to the plans which show the indicative planting that that's proposed for each of the areas. So, well, obviously, there will be cover under the panels areas but I think that we'd understood the question to be specifically in respect of the proposed Wildflower Meadows which obviously is a separate commitment that we're making and I think what mister Tim said in terms of in our speaking note, we can provide you with some examples of where it's been successfully done so you can have confidence that that this is a realistic proposition rather than an aspiration.

00:09:40:10 - 00:09:44:21

Yes. As I'm I'm understanding, it's it's not impossible, but difficult,

00:09:46:19 - 00:09:48:14

you know, hard work. So,

00:09:49:05 - 00:09:49:20

you

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know, if that's that's the case, that's the case. You know, the applicant will just have to not literally get their hands dirty, or maybe they do need to literally get their hands dirty with it. But, yes, it's not impossible from what you're setting out. But if we could perhaps have a, as as professor Skeppington said, your details, and as you you said yourself, miss Broderick, about just pointing out where in the limp the separation is between the the area under panels the and Wildflower Meadows themselves and being separate. I can't recall off off the top of my head exactly where it is.

00:10:21:01 - 00:10:25:01

If it's not there, just make the amendment. So, yes, I'll leave that to you.

00:10:26:15 - 00:10:27:02

Is

00:10:33:19 - 00:10:41:23

that something that not as an action point, if you're saying it's in there to share with stop lying down?

00:10:42:07 - 00:10:49:16

Cloud project, the applicant, yes. We'll we'll add it into our speaking note, we'll see if we can provide it in advance of of deadline seven.

00:10:49:18 - 00:10:51:01

You read my mind. That was my next point.

00:10:51:03 - 00:10:51:18

I'll put it

00:10:51:20 - 00:10:57:06

in the speaking note. Thank you very much. Does anyone have anything they want to comment on with respect to wildflower meadows?

00:10:59:08 - 00:11:00:07

Mister Singh?

00:11:02:17 - 00:11:35:04

I'm mister Singh from council. I think it's important the importance of wildflower meadows is recognized from the hydrological point of view. It helps in improved infiltration through deeper and more diverse root system, improved soil structure and organic matter content. It reduces the runoff surface. It increases the surface runoff. It also reduces erosion, sediment mobilization, and provides wider catchment resilience.

00:11:35:13 - 00:11:44:02

So it's it's not just a nice to have. It's very useful from hydrological, you know, and flood risk management.

00:11:45:08 - 00:11:53:09

That's helpful. Stop playing down. Anything further? Nothing further from us. Thank you. Come to the applicant. Final word on this item.

00:11:53:16 - 00:12:11:26

I have a clear question for the applicant. Obviously, Mr Singh just set out all the benefits, so that was helpful. And yes, it's obviously a commitment that the applicant has made in respect of those particular areas for this application. I was just going to say, though, that was the end of the questions on the outline LEMP?

00:12:11:28 - 00:12:25:27

Well, was going to come around and see if anyone had any general points that haven't been covered on the LEMP, but after this one, yes, then we move on to the outline ecological protection mitigation strategy. So does anyone have any general comments they want to raise? Ms Shalaby?

00:12:26:24 - 00:12:41:06

Odette Shalaby, Wiltshire Council. There's just one other point as far as I'm aware, subject to what Mr Singh says from the council, is a point about the hedgerow management that miss Fisher has raised.

00:12:43:13 - 00:13:06:12

So I think she has previously raised concerns about the sort of standard maintenance of hedgerow height, and why hasn't that been, sort of the ecological mitigation where lower height would be better for ground nesting birds hasn't been taken into account. That that may have been addressed. I'm not sure, but a further point that I don't think has addressed been is

00:13:08:07 - 00:13:36:15

some inconsistency between the Olomp and other plans and different places within the Olomp as to the proposed hedgerow heights. So at some point, it says four to four to five meters. At some point, it says five point four meters. At some points, it says four point five meters. And there's sort of general inconsistency across various documents on that. Ms Fisher, I don't know if you want to add anything more on this point.

00:13:38:22 - 00:13:40:18

Emma Fisher, the Witch Council.

00:13:43:16 - 00:14:16:23

Yes, just to pick up on the point Michelle made there about whether the previous comment that I'd made has been addressed, and we can see that it has been addressed, so we're aware the ecological mitigation areas that the proposal is now to manage the bordering hedgerows at a lower height to benefit ground nesting birds, so we do recognise that those comments have been taken on board and that the plans have been addressed accordingly, we appreciate that, so just to cover that point off.

00:14:17:00 - 00:14:52:04

But yeah, there does seem to be a bit of an inconsistency, so the length refers to four to five metres in height, and then other documents and plans seem to say four point five metres, so it's just really, it would be helpful to get clarity as to whether that is actually a bit of a discrepancy that just needs to be addressed, or whether in fact what the applicant is suggesting is that the four point five is a midpoint, like the standard and the range that they're giving in other documents of four to five, such as in the LEMP is a minimum maximum, I.

00:14:52:06 - 00:15:12:22

E. A range that the hedgerows could be managed across the order limits, it's just at the moment that both are used, both four point five meters and four to five meters above ground level, so it'd just be good to get clarification and if necessary for things to be amended to be consistent. Thank you.

00:15:14:17 - 00:15:42:20

Yes, consistency across documents is a comment I'm going to come on to. But in terms of the hedgerow heights, yes, I I was under the impression the hedgerow heights for ground nesting birds have been resolved. So happy to tick that off. As miss Fisher says, consistency between plans of regarding the hedgerow heights, four and a half to four two five. Is is this this is a typing a typo or just a comment from the applicant, please?

00:15:47:11 - 00:15:49:03

Rich Touts on behalf of the applicant.

00:15:50:21 - 00:16:20:27

Given the nature of the roadside envelope, depending on ultimately the finding of structure that's needed, there's flexibility within the wording. So it's an up to four point five meters. So obviously if we, and the reason for that is if we always come forward with a fixed scheme at three point five meters, wouldn't need, from a landscape and visual perspective, wouldn't need to the headrest to four point five, so we'd look at bringing them lower. So yeah, it sits in up to four point five meters.

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No, thank you, that was my understanding.

00:16:23:03 - 00:16:27:21

We will check that consistency point and make that update, Yes.

00:16:29:24 - 00:16:32:06

Miss Fisher, I assume that answers your question.

00:16:33:29 - 00:16:58:20

Yes, it does. If it's helpful, I can give a paragraph example so they can see. So paragraph in the outline length, paragraph one one point point three four mentions the maintenance at an optimum height of four to five meters rather than four point five, so that's an example there where it might need to be amended. Thank you.

00:17:01:10 - 00:17:09:10

Thank you very much. I don't think there's any need to comment to that, miss Prodrick. Okay. That being the case, I'm going to move on to item seven.

00:17:09:25 - 00:17:43:21

Clear project for the applicant. Before we do that, I wonder if I might, possibly make a request. I note that we've got ecology on the agenda for next, Tuesday, which, obviously, the EPMS relates to. The applicant's team only has its soil specialist and its battery safety management specialist available for today's hearing. So I was wondering if it might be possible to have any comments in relation to those two management plans done now. And then, obviously, if we don't get time to do the EPMS, we can deal perhaps with that on Tuesday's hearing instead.

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It's just that those particular experts just aren't available next week, I'm afraid.

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We'll move on to item eight, outline soil resource management plan. Over to my colleague, Mr. Northover.

00:17:58:14 - 00:18:37:22

Thank you. So first, a matter I want to ask about on this is in relation to the stockpiles. So the applicant updated the OSRMP to include further controls and parameters for the stockpiles in paragraph 1.8.23. So I'm seeking a response from the Council on whether they consider that the exclusion areas included in the updated ISRMP would be sufficient to ensure that there wouldn't be any additional adverse effects over that assessment, yes?

00:18:41:03 - 00:18:55:12

Mark Goodwin, Washer Council. The council has reviewed the revised document, and it still has some concerns. And I'm just gonna explain what they are now.

00:18:57:24 - 00:19:31:19

We recognize that those constraints within the soil management plan have been elaborated on within within paragraph, which is really welcomed. However, the council does seek further assurance from the applicant that soil stockpiles will not be located in prominent fields within the setting to the CNL, where panels have already been removed from proposal to provide landscape and visual mitigation or in field areas that provide ecological mitigation areas for ground nesting birds.

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And that's because of our concerns about the potential amount land of that would be required. And at the moment, there is nothing to suggest. We've had no confirmation from the applicant

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impacted or the assessed effects won't increase beyond those that have already been assessed from the location of these potentially large areas of soil stock pass.

00:20:05:08 - 00:20:21:08

Thank you. Can the applicant respond on that? They they seem like good points in relation to the visual effects, effects on the CNL, and, obviously, ecological effects for crown nesting birds as well. So is that something that can be included?

00:20:28:29 - 00:20:29:14

Sir?

00:20:31:03 - 00:20:32:07

Mr. Goodwin.

00:20:32:12 - 00:20:54:23

Thanks, sir. Mark Goodwin, Wiltshire Council. Within our emerging DL seven comments for DL six submissions, we have drafted some potential words which might help in this regard. I don't know if you'd like to hear those now before the applicant responds or if I'm happy to wait.

00:20:54:25 - 00:20:56:18

Yes. Yes. Please. Please go ahead.

00:20:58:07 - 00:20:58:22

Discussing. So

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I'm just gonna read this because I've I've written it in it. Yeah. The council suggests that greater planning certainty could be achieved if para one point eight point two three within rep six zero three six was supplemented and revised to include additional bullets under landscape and visual to read, no stockpile should be located in prominent fields within the setting the of CNL where panels have been removed from the scheme to provide landscape and visual mitigation or in field areas that provide ecological mitigation areas for ground nesting birds as set out in table seven of the outline length rep rep six three zero seven, where that would conflict with the purpose of the mitigation.

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And we've I've also suggested some alternatives as well, but I think that's probably the best one. I'm happy to read the rest if you

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What was what was the six rep reference there?

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Rep six zero three seven?

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That's the outline soils resource management plan.

00:22:07:14 - 00:22:07:29

Okay.

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Rep six zero three six.

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Sorry. No. That's six zero three five.

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The OLEM is rep six zero three seven.

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Yes. Yeah. I saw resource management plan is actually

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And and just to pick up on there was discussion earlier in the examination about what what the setting of the CNL is, but in terms of that wording, are you contempt for that to be the setting of the CNL as the applicant has defined it?

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Or is it

00:22:49:06 - 00:23:07:04

I think as the starting point, I I think those ecological areas and the areas which have been identified by the CNL align with the removed fields, you know, and the embedded mitigation areas, which align with these these areas.

00:23:07:06 - 00:23:17:01

Right. So so it's so it's any any areas where panels have been removed after consultation with the CNL for reference? Or

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as originally identified as embedded mitigation areas, so excluded Okay.

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Thank you.

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The principle with the CNL avoidance areas is is agreed in terms of but we will specify the specific field so that there isn't any confusion over what areas of land we're talking about there. My understanding is that there just needs to be some in terms of the ecological mitigation areas, terms of the the new areas that we're creating, some of those areas do require cabling to go through them. So we would just need to make sure there are any stockpiling associated with that. Cabling is obviously, those cabling works are,

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during the during the cabling works.

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Right. Because the

00:24:05:14 - 00:24:08:03

the stockpile's adjacent to the cable.

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Exactly. And but that is within those areas that once the cable installation has taken place will be the investigation area. So it it I think we're the principle, I think, is understood. Yeah. We just think that there might just need to bit be more clarity in relation to the wording there so that we don't inadvertently find that we can't store the topsoil adjacent to the cable route corridor because that's

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because it will completely conflict.

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I understand the stockpiles that are of concern are those that are lasting lasting throughout operation.

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Yes. Yes. We just want to make that clarification clear. That's fine. Otherwise, I think that is as understood, but we will take as an action to update that wording to refer to the specific specific areas.

00:24:54:10 - 00:25:02:13

If you you read out your wording, but if you could provide that directly to the applicant, I'm sure that would help move things along.

00:25:02:15 - 00:25:05:10

Yes, sir. I can do that. I'll send it to Chris Jackson.

00:25:06:04 - 00:25:09:05

Thank you. Mister Singh?

00:25:11:12 - 00:25:40:09

Yeah. I'm mister Singh from, Venture Council. I will focus on the, soil aspects from the hydrological point of view. There's gap in the the identification of high risk soil by the applicant because, you know, different soils can have different impact on hydrology like clay heavy soil infiltration sensitive soils are not

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So I'm missing is this in relation to the stockpiles or is this comments soil on generally?

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This is on soil. Okay. Yeah. So shall I continue? Yeah. So the first concern is the no strategic identification of high risk soil. Second is no explicit link between soil condition and hydrological performance.

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The third gap is no cumulative soil compaction assessment. Fourth gap is no trigger based remediation framework. The fifth gap is no verification of soil restoration success. In the meeting of the council with the applicant in July, we had explicitly asked them that for each of the documents, they should also have a chapter on the on the documents to link with hydrology.

00:26:39:00 - 00:26:54:12

But, I mean, we have not seen that outcome so far. So the so our last meeting was in September four. But the applicant have not provided that in you know, in that meeting. Thank you.

00:26:54:14 - 00:27:02:24

Okay, thanks. And those concerns you raised just there, are they have they been put forward to the examining authority in writing before today?

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Yeah, I mean, we I mean, there is a

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statement of common ground where, you know, through which, we had asked that, you know, I mean, I mean, the 3.7.5 explicitly asked for links between, the various, documents.

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So it's all there.

00:27:28:15 - 00:27:31:23

Okay, thank you. Would the applicant like to respond?

00:27:34:08 - 00:28:05:14

Claire Pogie for the applicant. I'll let Zippy Web introduce herself. It was just to say that have we added, some cross references in there to the drainage strategies. There's one in paragraph one point eight point three, of the document, and there are other references, to ongoing monitoring, throughout it in paragraph one point eight point forty, which also does make reference to surface water and flooding as well.

00:28:05:16 - 00:28:33:19

So the applicant considers that particular point that was been raised in terms of that this particular document talking to the other documents has been incorporated. But in terms of, the other points mister Singh raised in in in relation to how soil, the the nature of the soil will be established, how compaction etcetera will be controlled and monitored, then Ms Webb can provide a bit more detail about that, but I'll let her just introduce herself first. Thank you.

00:28:35:00 - 00:28:38:05

Thank you, Sophie Webb on behalf of the applicant.

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So the soil properties, I think it's important to note that the soil that is on-site actually does retain a lot of water. It's highly water retentive soil. When you're asking about

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sensitivity of the soil, the clay, it's a lot clay soil that will hold on to water. In terms of overland flows,

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it will be slowed. So in terms of hydrology and flood risk, the soil will actually is already used to sort of dealing with that inherently. In terms of monitoring compaction, we do have in the outline soil management plan, there's a whole monitoring procedure section and a lot of it is just ongoing monitoring and live monitoring by contractors during construction, during installation of the solar panels. A lot of it is visual. It's just a visual inspection of the soil and where compaction is suspected or where it is evidenced.

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We suggest that small hand dug pits will be dug to investigate exactly where that compaction is occurring. And then depending on the extent of the compaction and where it is occurring in the profile, that will then determine what remediation is necessary and even if any remediation of that is necessary at all, because there will times be where even if compaction is identified, you could just leave it and it would remediate itself just through natural processes of wetting and drying and sort of shrink swell processes within the soil.

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That's monitoring. We have added at 1.8.40 that monitoring will be undertaken in accordance with the water management plan, which will form part of the detailed camp and the operational management plan and the decommissioning strategy.

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Soil any issues with the soil could also be identified through

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undertaken as a part of that plan. So if there is an issue with flooding anywhere, that would indicate that there's a problem with the soil somewhere further up, that could then trigger soil investigations. But otherwise, if not there's really an issue with the soil, a visibly, evidence issue with the soil and compaction, if there's not, a problem occurring, then that wouldn't necessarily trigger action even if there was compaction, a little bit of compaction there, because there's a risk that you could do more damage to soils, try to remediate one bit.

00:31:22:25 - 00:31:39:12

If you have to take machinery across land to get to relieve that one bit, it could that be a do nothing scenario is more advantageous. And like I said, over natural processes, because it's a clay soil, it would just it would remediate itself.

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Can I come back on that?

00:31:43:07 - 00:31:44:19

Yes, mister Singh.

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Thank you for your response. Mean, I can understand you have provided, you know, a number of information in your resource management plan, and you have primarily focused on localized monitoring and remediation, but, does not clearly explain how cumulative compaction across multiple fields or construction areas will be assessed and managed.

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And also, like, you know, we should we also need to have, trigger based remediation framework. So you have got individual actions, but we need to also need to see a trigger based remediation framework, which includes compaction threshold, infiltration performance threshold, bonding thresholds, escalation criteria, intervention trigger levels, you know, and then there's also concerns about no verification of soil restoration success.

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So even if you say that, okay, we have this, you know, patch, but, how do we verify, the soil restoration success? How successful restoration will be demonstrated? How remediation effectiveness will be verified? When monitoring can be reduced. So, you know, the these are number of questions we're still standing.

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Are these questions that are these matters that can be confirmed in the detailed

00:33:26:18 - 00:33:31:17

soil resource management plan rather than needing to be included in the outline plan?

00:33:31:19 - 00:33:48:17

I think we can discuss that we need, like we can have an in principle agreement that this can be taken up later on. On that basis, we can proceed.

00:33:50:08 - 00:33:53:09

Okay, thank you. Anything from the applicant?

00:33:53:21 - 00:34:13:01

Clever, just the applicant. I mean I think as far as we're concerned all of those measures that have been requested there are already in there in terms of you know it's a management plan that applies entirety of the scheme. So in terms of, you know, what's happening on one site would be considered in respect of the whole. And,

00:34:14:26 - 00:34:30:07

Ms. Weber has explained the procedure that would be followed in terms how it would be inspected and monitored, how issues would be identified and then how they would be remediated. I think the applicant is struggling to specifically understand

00:34:32:14 - 00:34:52:23

what else is actually required. There's sort of reference specific thresholds and things like that, as far as the applicant's team is aware, there aren't specific thresholds. As Ms Webb it's a it's a an ongoing continuous exercise where it is it is monitored, and then if there's evidence, then the further investigations,

00:34:54:21 - 00:35:20:18

that she's mentioned would then be carried out. Think think there's a lot of talk about strategies and and measures but the actual detail that would form part of that we think is already in these plans. So there's a a specific measure that mister Singh would like added then then we're happy to consider that. But as far as ongoing monitoring and then remedial action, if something is identified, that's already all in there.

00:35:21:19 - 00:35:23:00

To come back here.

00:35:23:15 - 00:35:24:13

Yeah.

00:35:25:03 - 00:35:54:24

I mean yeah. I'm Hester Singh from Council. I think the applicants approach is more of a reactive approach. And what Wilshire Council expects is they need to have a strategic approach. That because for a project of this size, three thousand acres, we need to think strategically, rather than reactive thinking where we are just looking at small batches. Thank you.

00:35:54:26 - 00:36:04:13

Okay, so if there's specific inclusions that you want to see in the outline plan, if you

00:36:06:03 - 00:36:18:02

can set those out for deadline seven, and then if the statement of common grounds captures where there is disagreement on whether those measures need to be included or not.

00:36:18:21 - 00:36:55:21

Klebuchak vyappkin, that would be helpful. Obviously, it's not solely reactive. There's a whole list of measures that are being placed to try and prevent compaction in the first place, but then we've been talking about what happens if there is. I think what would be helpful for the applicant is that we need to understand that, you know, there's mention of a holistic approach and a strategy, but it's what that document would contain. And our understanding is it would contain the things we've already put in the management plans. We're not we don't we can't think of another specific thing that we can do that's not already necessarily captured in terms captured of soil management.

00:36:55:23 - 00:37:02:22

So I don't want to take up don't want to go back and forth in today's hearing, but I if we could request that mister Singh provides the specifics

00:37:02:29 - 00:37:03:14

Yes. That

00:37:03:16 - 00:37:04:01

would really

00:37:04:03 - 00:37:04:18

appreciate it.

00:37:04:20 - 00:37:05:05

Thank you.

00:37:05:07 - 00:37:14:08

What would be helpful for us to see the specifics specifics and and then then just confirmation of where there's not agreement on that. Okay. Stop down.

00:37:14:10 - 00:37:19:18

Yes. Silly Randle, stop lying down. I believe Professor Skeffington just wanted to make a comment.

00:37:19:23 - 00:37:42:08

Yes. Richard Skeffington, stop lying down, yes, thank you for your contributions. Just got a couple of points to make. Because storing soil for sixty years, a lot of soil functions are not going to be preserved, I just wondered whether you considered selling it instead of storing it. There's a market for topsoil, and then sixty years' time you can buy This

00:37:42:10 - 00:37:44:01

is in relation to the stockpiles?

00:37:44:03 - 00:38:26:11

Yeah. Okay. That's one comment. The other comment's about the bulk of the soil resources management plan is actually concerned with handling strip soil. There's much less about handling in situ soils, yet I think the in situ soils are a major problem here. So I was interested in your comment that the natural soil has got ways of dealing with water, the clay, and this is exactly what I'm saying, its way of dealing with it is to let water run the off surface, and this is why I think that some of these areas are intrinsically unsuitable for planting solar panels.

00:38:28:06 - 00:39:05:13

There's a monitor there's an outline monitoring scheme in which you described just now, which is in the document. What's very much less clear is what you do if you find there is compaction, and I think always that's certain to be the case. I agree with your comment that you have to be careful not to cause more damage than you'll ameliorate by bringing machinery in. But in the early days of solar, the environment agency had a policy that such areas should be chisel plowed before we start them.

00:39:05:21 - 00:39:10:24

I wondered if you considered anything, you know, is sort of specificity

00:39:12:19 - 00:39:31:26

we might be looking for at this stage. So yes, you're almost certainly going to find compaction. What are you going to do about it in the throes of a construction project? It might be easier to anticipate it in advance and take remedial measures first. Thank

00:39:34:01 - 00:39:40:02

Thank you, missus Gefington. Does the applicant want to come back to those points now?

00:39:41:24 - 00:39:52:10

I expect to, kind of details response at deadline seven in the post hearing submission as well, but, if you'd like to respond now, do so.

00:39:53:07 - 00:40:23:20

Sophie Webb, on behalf of the applicant. One of the main purposes of the Soil Resources Management Plan, as you know, is prevention or compaction. So measures that the are outlined in there include field tests for soil moisture conditions and ground conditions and also rainfall protocols, which is also part of the live monitoring. So in accordance with the plan, the ground surface should not be traversed when it's wet by machinery.

00:40:24:21 - 00:41:05:07

So it is a proactive plan in that there are measures there that will prevent any initial compaction. Monitoring and the remediation at the end is is if that does occur. So it's the soil plan will minimize, reduce, or completely avoid, where possible, compaction. And then there's just the steps afterwards that are the response if something does happen. Obviously, can't predict, can't predict the weather, can't control the weather. So there will be, like you say, there will be some action that's not going to be done anywhere, but certainly adhering to the plan is going to like minimize that as far as possible.

00:41:06:25 - 00:41:24:13

If the surface is maintained and without compaction, that then ensures that vegetation has the best chance of establishing, which again further reduces compaction. There's a sort of a positive cycle there.

00:41:26:13 - 00:41:32:23

So, yeah, the whole plan is just geared towards protecting topsoil structures and topsoil resources.

00:41:35:00 - 00:41:35:15

Yeah.

00:41:36:18 - 00:41:51:21

And there was a point in there about why not move the soil elsewhere instead of storing it on-site? And I believe that's a minimisation of traffic movements, etcetera, to do that.

00:41:55:24 - 00:42:20:08

Few words for the applicant. We also need to maintain as much soil on-site as possible because at decommissioning, the soil resource will be needed to restore. So whether it attracts and compounds and things that come out the soil resource, it's obviously a lot better to use the soil resource you already have than to sell what you have and then buy back in at decommissioning. So that's just to retain the indigenous soil for use.

00:42:20:15 - 00:42:56:25

Thanks. So one more question on soils before we come on to battery safety management plan. So in applicant's response to the council's answer to EXQ2, it amended the outline SRMP which now states, that guidelines for monitoring the soil resource during construction and operation will be included in the detailed SRMP. So it's just, to for the council to say if they're if they're happy with that or if they

00:42:59:14 - 00:43:04:13

or or if they feel that needs to be done at this stage in the outline SRMP.

00:43:12:00 - 00:43:16:19

I'm sorry, sir, I missed the first part of that question, which I think is probably the So key

00:43:19:06 - 00:43:31:27

there was the council's answer to EXQ DCO two point one, and then the applicant has responded to that and in doing so amended the outline SRMP

00:43:33:29 - 00:43:47:12

to state guidelines that for monitoring the soil resource during construction and operation will be included in the detailed SRMP. It's just whether you're happy for that to be included in the detailed SRMP rather than dealt with in the outline.

00:43:51:08 - 00:43:52:28

Mark Goodwin, Welsh Council.

00:43:57:05 - 00:44:02:26

There are we the council has still got fundamental issues soil about stockpiling.

00:44:04:14 - 00:44:16:24

And if and if those comments were about specifically about soil stockpiling standards that going forward to the detailed, sort of management plan, I haven't got it up front of in me, sir, that that that response.

00:44:18:22 - 00:44:34:04

I mean, I I have have got another, draft response on the applicant's response WC one for two seven. I'm not sure if those two are linked, but that's in rep six zero six o.

00:44:36:23 - 00:44:37:10

It

00:44:39:05 - 00:44:58:03

it's it's yeah. It's the guy I'm just not sure what it's doing Yeah. for Go ahead. So so it's whether the guidelines for monitoring the soil resource during construction, whether you're happy for those guidelines to be set out in the detailed plan rather than set out now in the outline.

00:45:04:01 - 00:45:08:22

Odette Shallerby, Wiltshire Council. I think we have take to that away, we're not sure No worries.

00:45:08:24 - 00:45:16:29

worries. Okay, that's fine. In which case, I will hand over to Mr Love to take us through agenda item nine.

00:45:42:11 - 00:45:49:18

Sorry. Odette shall be Welch canceled. There's still one point on the soils that mister Goodwin wanted to raise. Raise. Yes. Yeah.

00:46:39:27 - 00:46:44:01

Sorry. Was was it mister Goodwin who wanted to raise something?

00:46:45:26 - 00:47:20:02

Mark Goodwin, Wiltshire Council. The the only other issue which I think has not been, thought as about yet in relation to location of stockpiles is, something that was uncovered at, issue specific hearing two, where we've got this potential phased restoration of sixty to up sixty years and up to forty years depending on the the legal agreements with landowners. And, I just think it's important that the locational

00:47:22:02 - 00:47:48:08

parameters of stockpiles factor that into the final restoration process so that I mean, the easiest way of doing it is to ensure, for instance, that stockpiles aren't centrally located causing more compaction and and damage. They they are stored as close to reuse as possible, and and that's that's the that's the point I'm making. I just this this phased approach, all that's it was.

00:47:49:14 - 00:47:51:00

Mr Singh?

00:47:52:01 - 00:48:22:21

Yeah. In addition to what Mr. Mark Goodwin said, I would like to add that from the drainage perspective, stockpiles could increase the velocity of flow as well as the response of the catchment, so it can cause risk of flooding. And the applicant should provide SUDs in the panelled areas as well to mitigate that risk.

00:48:23:03 - 00:48:29:01

However, the applicant have not provided proposals for SUDs in the panelled areas. Thank you.

00:48:29:23 - 00:48:30:21

Thank you.

00:48:33:06 - 00:48:34:29

Ms. Roderick, would you like to?

00:48:35:07 - 00:48:56:05

Claire Podrick with the applicant. The point made by Mr Goodwin is noted in terms of, obviously, what we've said at the moment is we can't confirm exactly where the stockpiles will be. We can say where they definitely won't be. I think what he's asking for is in terms of when when considering their location, thought is given to

00:48:56:12 - 00:48:57:20

In principle that

00:48:58:00 - 00:49:30:12

principle in terms of thinking, as in the obviously, the location of the stockpiles will take into account a lot of different factors as has been mentioned here, and I think what's being asked for is how that will be used in terms of eventual decommissioning is also a factor that's taken into account when determining the location of the stockpiles as well as all of the factors other that ought to be taken into account when determining their location. So I don't think there's any issue in terms of that being a factor that's taken into consideration along with all the other things that we consider.

00:49:30:14 - 00:49:34:21

Along with and then along with the the drainage or flooding point that?

00:49:35:18 - 00:50:11:17

Yes. I think that's a a obviously, if it the the question is specifically is the location of the stockpile is hydrologic hydrology taking into account when determining the location of the stockpile. I think that's something that can be added as a as a principle. I think that's he then Mr. Singh then made a separate point, about, subs more generally, which I'm keen not to get to do just now because they're coming to about safe management plans. But but in terms of it being a consideration for stockpiling, then obviously there are lot of considerations, that will be one of them.

00:50:11:19 - 00:50:16:05

Okay. Thank you. I'll now pass over to Mr Luff.

00:50:18:13 - 00:50:47:11

Thank you. Right, my colleagues and I were just discussing. It's five twenty two and there are few a items left on the agenda. So what we were discussing was our parties happy to continue with the content of the agenda in full, or are you happy to defer some items next week? And I can make some suggestions based on the topics we're covering next week. So if I come to the council first.

00:50:48:21 - 00:51:12:18

Odette Shanabee, Welsh Council. So in the break, miss Broderick made the sensible suggestion of moving item ten to next week because there is already economics on the agenda, and the council's very happy. It doesn't have people here that to make comments on that today. And and, yes, happy with the principle of moving things to next week where where they can be and happy to listen to the XA suggestions.

00:51:14:04 - 00:51:19:26

Okay. I'll come to stop lying down. Are you quite content to carry with Sorry.

00:51:19:28 - 00:51:26:29

There there is one point is which mister Singh was not intending to be here for much of next week, and there's a point about the verification.

00:51:27:01 - 00:51:29:16

I wasn't intending to to move that item.

00:51:29:18 - 00:51:30:10

Okay. Thanks.

00:51:30:12 - 00:51:34:00

But, yes. That's done. Come to the mister Kiselka, please.

00:51:34:02 - 00:51:56:11

Thank you, sir. Daniel Kiselka for Stop Lime Dam. Yes. So we we we had a chat with the other two main parties as well, and, I think deferring the outline ecological protection mitigation strategy and the, outlined skills supply chain and employment plan, are both very, very welcome to us. The former, particularly because our ecological expert is currently in a bat cave, but he will be here next week. So

00:51:58:13 - 00:52:10:10

and and there's also the mitigation route map, which really is a product of other documents. So, I mean, to the extent that there's gonna be discussion about it, it may be sensible to do that once all the others are done next week.

00:52:10:22 - 00:52:18:22

Yeah. My intention was to almost to to deal with that at the end of the DCO hearing. It seems sensible. That's the the close. That's where everything gets captured.

00:52:20:02 - 00:52:22:00

The applicant, I'm guessing you're in agreement.

00:52:22:17 - 00:52:29:28

Clevologic, yes. As I mentioned earlier, if we could please do, battery safety storage first, and then we're happy to do

00:52:31:17 - 00:52:43:03

hydrology as we have our hydrology experts here. But we agree if we could defer the other items till Tuesday when we talk about ecology and socioeconomics, I think that would be helpful. Thank you.

00:52:43:05 - 00:53:19:21

Yes. Well, that was our thinking as well. So park item seven, items ten for Tuesday, and as Mr. Slabaugh said, mitigation route map for Wednesday, I think. Or Thursday. Sorry. Thursday. Yeah. Right. So that brings us on to the outlined battery safety management plan. I have some questions on this. My first question, you might you might want defer to this to a response in writing because it relates to horses.

00:53:20:15 - 00:54:02:27

So I'll read out my question, miss Broderick, and then you can decide what you want to do with it. In paragraph four point three point twenty four of the Equine Business Report, Rep five one zero five, in relation to major incidents such as best fires, it states, the assessment indicates that such events are rare and that due to distance and emergency planning measures, effects on nearby equestrian receptors would be limited. Now this I understand follows on from your assessment for the closest residents as stated in response to the first round of recent questions, your response document rep three one two eight in which you confirm pollutant concentrations are well below acute exposure guideline level one thresholds for humans.

00:54:03:07 - 00:54:23:08

Now whilst DXA accept that the nearest equine business being some distance away from the closest residents and therefore pollutant concentrations will be lower than those modeled for human receptors. Has the applicant modeled the concentration at these equine business locations and does it have an equivalent AEG one figure for horses they can compare and assess against?

00:54:59:25 - 00:55:21:19

Claire Bodhefe Atkinson, I'm just gonna check yes, she's got her hand up. So we have our air quality expert, Hannah Dennett, who I'll just let introduce herself, and she can provide an initial response and to the extent, it needs to have a more detailed equine answer, then we can obviously pick that up on Tuesday. But if miss Dennett wants to go ahead. Thank you.

00:55:23:12 - 00:55:40:08

Hello, Hannah Dennett speaking on behalf of the applicant. So, the assessment presented in DES focuses on human receptors which as you pointed out it provides the primary basis for the public health criteria applied including the AGL thresholds.

00:55:41:24 - 00:56:18:23

So as detailed in the app response to the examining authorities first written questions, the modeling demonstrates predicted pollutant concentrations at all assessed receptor locations are well below the respective safety levels. So on this basis, the results indicate significant adverse health effects would not be expected at receptor locations. Now regards to animals including horses the closest receptors already considered in the assessment include farm buildings and public rights of way. Although the detailed assessment has been undertaken at numerous central locations rather than equine locations.

00:56:18:25 - 00:56:55:27

These have been selected to represent worst case exposure positions in the surrounding area. The land use in the vicinity of the scheme is predominantly agricultural and no livestock, equine or other receptors have been identified closer to the proposed best than those already assessed. Additionally, there's no ecological design sites within one kilometre of the proposed best. So the results therefore considered to be representative for potential exposure to animals including horses associated with nearby equine businesses. Now in regards to the AEGL not being there isn't an equivalent short answer.

00:56:55:29 - 00:56:58:09

There's no equivalent for horse

00:57:00:06 - 00:57:17:28

so yeah that that just isn't a standard that exists but it's seen okay humans and horses are obviously, very different, species, but, yeah, there there aren't actually specific, guidelines for horses.

00:57:21:02 - 00:58:04:19

So that answers my question. So, no, there hasn't been an assessment done for the impact on horses. Now I I I think what we'll probably do is we'll end up parking this question unless the applicant wants to come back because we know from the business impact report and we know from stop line down submissions how important the equestrian industry is to this area. And there are a lot of businesses. There there's a range of business. There are a range of businesses in the area. And I I think we probably need to explore the further potential exposure effects on horses when when you're and I mean, you're the the huge difference is, of course, if you have an event horse or or a a thoroughbred racing horse, their lung capacity is huge.

00:58:04:21 - 00:58:36:22

They're taking in massive amounts of oxygen. And and, undoubtedly, we will we will have people on Tuesday who can discuss that far better than I, but, you know, these animals do have huge lung capacity. And I'm just I would like to discuss further on Tuesday the potential effects on horses, just given the importance of the equestrian industry in this area. So I'm happy to hear from the applicant today, but I think we probably do want to revisit this.

00:58:36:24 - 00:58:57:10

And I and I would be happy to have your witness with us. Sorry. I can't see the name on the bottom of the screen. But I think it would be useful to have your air quality witness here on Tuesday as well if possible. So if the if the applicant wants to respond to that, I'm happy to but I think we can either revisit this on Tuesday or take it away something in writing for deadline seven.

00:58:58:28 - 00:59:20:27

Okay. I mean, just just to clarify, sorry, Hannah Dennett speaking on behalf of the applicant. Just to clarify, we considered the closest receptors where humans could be present and so that was farm buildings, public rights of way. So, in our mind, there weren't any potential areas where horses could be closer. So we've already assessed worst

00:59:20:29 - 00:59:21:25

case locations.

00:59:22:00 - 00:59:24:12

Across you, miss Dennett. No. I understand that. Yeah. I understand. So

00:59:24:17 - 00:59:25:02

Okay. Sorry.

00:59:25:04 - 00:59:41:20

No. I I understand. No. Yeah. It it's it's I suppose the questions question comes down to, would horses be be affected at a greater distance than human receptors? Because of their their their difference in lung capacity. I suppose that that's where the number of the query comes from.

00:59:42:16 - 01:00:02:14

I'd also like to point out that the AGLs applicable are for children, babies, you know, so they do also the applicable to more sensitive you know, human, you know, not just adults. So, you know, obviously, babies, I'd say, you know, very sensitive.

01:00:02:16 - 01:00:04:00

So, sorry, miss Dennett. We're we're

01:00:04:02 - 01:00:04:17

not talking

01:00:04:19 - 01:00:35:26

about babies. We're talking about animals with a huge lung capacity and we're talking about being this ties into socioeconomics as well which is why which is why sort of the I'm I'm sort of talking about deferring this till Tuesday. We're talking about animals with this with a huge lung capacity. They're taking huge volumes of air, oxygen, far greater than than you or I, for example. And so you'll that's the question. It really is, yes, it's the same for humans, but are are horses more sensitive because of their larger intake?

01:00:36:03 - 01:00:54:07

Claire project for the applicant. I wonder if obviously, we don't have our equine expert here to to support, miss Dennett in terms of why we consider the assessment that hasn't been undertaken to date is satisfactory. So I think it might be best if we park this one to Tuesday because, obviously, I think you're seeking information to see Yes.

01:00:54:09 - 01:00:55:29

So think it's quite likely fair on Tuesday.

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

Think the assessment is sufficient and you're requiring an an equine Yes. Input to say that, yes, that is actually

01:01:03:20 - 01:01:06:19

Yes. I think the line of questioning is probably unfair to miss Dennett. Yep.

01:01:06:21 - 01:01:07:06

So I

01:01:07:08 - 01:01:08:07

think we can defer it till Tuesday.

01:01:08:09 - 01:01:14:08

I think so. Let's do that. And, miss Dennett, if you'll are you can you just confirm you'll be in attendance on Tuesday? It's an issue I'd like to bottom out.

01:01:14:15 - 01:01:15:17

Yes. Yes. That's that's

01:01:15:19 - 01:01:18:25

very Thank you very much. Right.

01:01:20:20 - 01:01:52:26

I'm I won't come around the room on that point because we'll I'm sure Stop Lime Down might have somebody present who who can sort of contribute that, to that with respect to horses and and the council. Again, I'm just going to Fertile Tuesday. Right. I'm going to nine point two now, and this is I think this is probably a matter of clarification for me. Can the applicant please display figure three three, four hundred kilovolt substation and best layout? Document a p p zero eight three, please.

01:01:54:24 - 01:02:35:26

Now what I'm looking for here is to understand the fire water containment and drainage strategy flying down d. I'm just wondering if someone can sort of talk me through how the drainage strategy for this area works. It seems to show permeable surfacing below substation and the best area to attenuate surface water runoff. so And I'm curious as to how the buns for the fire water interact with the surface water drainage system. And so can you please explain how fire water will be separate from surface water in the event of a fire? In fact, there's another document outlined drainage strategy sorry.

01:02:35:28 - 01:02:50:14

Outlined drainage sketch of the outlined drainage strategy flying down d, rep five zero five five, which I'll I'll leave it to, I assume, mister Rigby to determine which document he can use best to explain please.

01:02:51:22 - 01:03:00:11

Josh Rigby on behalf of the applicant. So the flood risk assessment and drainage strategy appendix line down D includes the

01:03:02:04 - 01:03:10:16

detail of the drainage strategy within that, but also the fire water drainage strategy for BESS.

01:03:12:13 - 01:03:12:28

Also.

01:03:17:28 - 01:03:24:17

So in general for the BESS and also for the substation, there's

01:03:28:03 - 01:04:08:25

understanding that there is a potential for contamination to be mobilized within surface water drainage system. The drainage system is there to mobilize surface water on a day to day basis and therefore if it gets contaminated it will follow that same route. So the drainage strategy for both includes a allowance for a reasonable worst case event of a mobilization of pollution through that same system. So on a day to day basis, the drainage system will operate as a normal drainage system would whereby we have a flow restriction at the outfall to the receiving watercourse and

01:04:10:26 - 01:04:39:11

restriction is dictated by the discharge rates that will be agreed with lead local flood authority at the detailed design stage, but essentially it's a function of the catchment area and calculations on what that greenfield runoff rate is based on rainfall and all sorts of different things. So that is a well established calculation and that's what during the day to day operation of the drainage system it will be restricted to that

01:04:41:11 - 01:05:17:23

greenfield runoff rate. We then also have to provide attenuation behind that restricted discharge rate up to the one hundred plus climate change rainfall event. So again, the rainfall is calculated and then a growth factor is applied to account for potential climate change allowances into the future. So on the day to day, surface water is discharging from that site at a restricted rate, much more restricted than it would be during its normal, its undeveloped rate in storms above the one in two year storm.

01:05:17:25 - 01:05:52:22

Anything above that, it would be discharging at one in two. So it's actually providing a betterment on its day to day And then it provides that attenuation up to the one hundred plus climate change. Your specific question about the additional measures that we've allowed for for pollution is that essentially what we are proposing is that the system is isolatable, so the entire system is either lined or impermeable, and the outfall is essentially can be isolated, so completely blocked.

01:05:54:14 - 01:06:01:08

If you imagine a bathtub and during normal operation, the plug is out, the plug is in when

01:06:03:03 - 01:06:44:15

has been, a pollution event has been monitored and it's triggered. We then provide the total store, so the attenuation behind that is capable of storing the total store of fire water volume that is prescribed by NFCC guidance and also a reasonable case worst event which we've taken as a one in ten year storm event. I think during EXA's questions to ourselves, it was queried why we had gone not to the one in a hundred plus climate change year event as well as that.

01:06:44:17 - 01:07:15:27

I think it's a function of the potential for the two low probability events to occur within the same three or four day period is so de minimis that it's too far beyond what should be considered as a design event essentially. So yeah, that's essentially the thought process behind what we've done.

Unfortunately, there's no prescriptive guidance for best fire prevention, so we use the NOCC guidance in combination with

01:07:17:17 - 01:07:33:20

series C763 to apply reasonable restrictions there so that we're comfortable and hopefully that the consultees are comfortable with preventative measures that we've got in place there.

01:07:34:12 - 01:07:46:24

No. Thank you. That's helpful. It's just Alex, it was just to confirm my understanding of things. And then I'm right in saying the pollution water in terms of disposal of the polluted water, that's pumped out equally by by a tanker. Is that correct?

01:07:47:13 - 01:08:13:08

Yeah, I think the exact wording, sorry, Josh Ripley on behalf of the applicant. The exact wording we've got in there is either it we we retain the opportunity to treat release if the contamination isn't a certain level or tanker off. In actuality, the time taken to obtain the permit that would be required to discharge, it would likely take too long, because we we if system the is isolated,

01:08:15:11 - 01:08:26:10

climatic factors would mean that we will be on a time restriction to be able to get that site, the drainage back open. So realistically, it's likely that tankering will be required.

01:08:26:12 - 01:08:28:25

Okay. And who determines whether it can be discharged?

01:08:29:19 - 01:08:39:00

So it would be in this case because it's an ordinary watercourse it'd be a discharge permit with the lead local flood authority I believe.

01:08:41:14 - 01:08:58:07

But it may, well, it probably will also require the consultation with the environment agency as well. So like I say, there's quite a lot of activity that would have to go along with that release. So realistically, tankering is probably the preference.

01:08:58:09 - 01:08:59:18

Okay. Thank you.

01:09:01:18 - 01:09:02:19

Please, mister Kiselka.

01:09:53:16 - 01:09:54:26

Hello? Oh, okay.

01:09:54:28 - 01:09:57:11

Very loud. That's working.

01:09:59:18 - 01:10:25:23

So a query we had essentially was in is it envisaged that water will have to have be brought from off-site to continue the fight of a fire? And in those circumstances, how is that additional runoff accommodated for? Because, ultimately, the on-site accommodation is the relevant firefighting water on-site plus the ten year event for a flood.

01:10:29:11 - 01:10:31:02

Please, mister Rigby, if you can respond.

01:10:33:16 - 01:11:05:24

Mr Rigby, on behalf of the applicant, I may have to defer to my colleague Paul Gregory to give you more color on the duration of battery fires. With regards to the provision of water on the site, the active fire management during an activity like this, would have to manage the water that is currently on the site. Continuously adding water to a closed system is not something that would be part of

01:11:07:09 - 01:11:20:23

the overall fire management plan. There would be active management of that water if it needed to be taken off actively during the system, there's but also the opportunity for recirculation of the water that's already in the system and enclosed within the system. So

01:11:22:28 - 01:11:57:28

the drainage system that will be on the site will work via gravity and it will work down itself, but there'll be opportunity for the fire service to utilize or reutilize that water as it's going around. I think the provision of fire water as well is calculated on the liters per second that's required over a couple of hour period. That is the max discharge. It will be managed as it is needed. If they think that the fire is potentially propagating, that is when they would use the boundary cooling facility.

01:11:58:00 - 01:12:07:09

As soon as a fire is occurring, it's not necessarily that they're straight away adding water to the system because that's not how battery fires are managed.

01:12:07:11 - 01:12:07:26

But I could

01:12:07:28 - 01:12:11:17

probably over to pass my colleague Paul Gregory.

01:12:23:29 - 01:12:49:23

Paul Gregory on behalf of the applicant. So specifically on firefighting, water provision and suppression tactics and a best fire incident, the outlined battery safety management Plan, the illustrative design contains five hundred and fifty six thousand liters of water, which would provide five hours of continuous fire hose discharge at fifteen hundred liters per minute.

01:12:52:06 - 01:13:29:16

The applicant confirms that the firefighting water supply on the illustrative design and the pollution containment has been designed on the basis of credible incident scenarios, including the potential for multiple best enclosures to be involved and is not limited to routine or minor events. As stipulated in the Outlined Battery Safety Management Plan, Section 5.3.2, the firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BEST fire and explosion test data for the selected BEST system by an independent fire protection engineer, and water storage volumes will be fully agreed with the Fire and Rescue Service.

01:13:31:29 - 01:14:03:25

Section 5.3.2 of the Outline Battery Safety Management Plan stipulates that the best area will be designed to integrate firefighting, to integrate pressure fed pump driven fire hydrants from water tanks. Hydrants will be located in consultation with Dorset and Wiltshire Farm Rescue Service to provide redundancy and safe operating distances for firefighters. They'll be easily accessible, and the sighting should be considered as part of a risk assessed approach that considers potential fire development stroke impacts.

01:14:03:29 - 01:14:16:06

Outlines and connections will be agreed with Dorset and Wiltshire Fire and Rescue Service, and no BESS enclosure will be further than ninety meters from the fire hydrant. If an internal BESS water

01:14:16:08 - 01:14:29:10

basin Mr Gregory, we don't need you to read the management plan to us because we've all got copies and we've read it. Mister Love, do you have a more direct question for mister Gregory because I actually,

01:14:29:12 - 01:14:54:24

I think I'm quite content with the the information I've received. I will just I do have another question for the I think this this will be mister Rigby. Can you just confirm, please, that, the document fire water containment and drainage strategy line down d battery energy storage system revision two, that replaces the outline drainage strategy document APP, I think, zero eight three.

01:14:57:26 - 01:15:02:18

No. It's not zero eight three. It's the original drainage strategy that was submitted for limedown d.

01:15:06:10 - 01:15:08:13

Does the latter replace the former?

01:15:09:28 - 01:15:12:08

Josh Rigby, on behalf of the applicant, no.

01:15:17:14 - 01:15:20:15

Work symbiotically. The reason why we

01:15:25:02 - 01:15:27:14

we mister Excel, could you still have that microphone?

01:15:28:03 - 01:15:28:22

Okay.

01:15:28:24 - 01:15:42:25

Okay. So it's somebody who's got a yeah. Somebody's got something on on the video, and that's why we're getting feedback. So if you can't hear the feedback, you have your microphone on. Can you turn it off? Not the first time happened it's to me.

01:15:42:27 - 01:15:47:05

me. We'll grove over the applicant. Apologies, it was just back here. That's absolutely

01:15:49:02 - 01:15:49:22

fine.

01:15:50:01 - 01:16:10:07

Josh Rigby on behalf of the applicant. So the documents worked symbiotically. I think the reason why it split was out was because the fire water management plan and the BESS and the substation plans were being referenced by several different documents and there was drift occurring as we were going through

01:16:12:04 - 01:16:38:14

the examination period and the representation period. So we split out the specific fire water management plan so that the drainage strategy could refer to it rather than it contain the information, the outline battery, the battery management plan referring to it, and then it drift occurring throughout all of those different documents. So no. It they they work symbiotically and they all exist together.

01:16:38:16 - 01:16:53:05

Okay. Does one need to match the other in terms of the drainage layout? Are you quite content that it's going to work the way it should? And so does the outline drainage strategy need to reflect the details on the fire containment strategy?

01:16:54:06 - 01:17:19:03

So there's no layouts within the battery management within the battery safety management plan sorry, within the water fire management plan. It simply sets the principles that the drainage strategy is to incorporate within it. The principles within the drainage strategy, we're agreeing to the principles in the drainage strategy and they necessarily refer back to

01:17:19:05 - 01:17:20:00

the

01:17:20:28 - 01:17:33:13

fire water management plan so that everything is captured and the drainage strategy is secured, the battery safety management plan is secured, therefore everything is secured so that the LFA has control over it.

01:17:33:15 - 01:17:35:10

No, I understand. Thank you.

01:17:35:15 - 01:17:49:03

I've got just one query, unless I've missed it in talking about the crossover between the documents. It's whether the isolation system that we've been talking about around about pollution water

01:17:51:16 - 01:18:01:12

is also referenced in the outline drainage strategies, or is it solely just within the bi water strategy?

01:18:01:21 - 01:18:06:29

I believe it's sorry, Josh Rigby on of behalf the acumen, if you give me two seconds I can

01:18:07:01 - 01:18:08:02

No, that's fine, we can have

01:18:08:04 - 01:18:26:12

a separate I believe it is, it's not required for the day to day drainage strategy, but I believe it probably is referenced in there because it's fundamental to both and it's not something that would drift because it's committed to and wouldn't change at all.

01:18:26:14 - 01:18:28:20

Okay, if you discover it isn't in there,

01:18:30:11 - 01:18:32:23

it's an action to put it in there. Thanks.

01:18:36:08 - 01:18:41:22

Mister sorry. Mister Singh had had his hand up just before. So, Singh, I'll bring you in, please.

01:18:45:21 - 01:19:02:08

From Council. I would like to point out that there are gaps which the applicant have not addressed in their document. The first one, there's no explicit link to wider hydrological monitoring.

01:19:03:26 - 01:19:26:27

It does not say that how, like, in case there's an incident, so how it will be integrated with the water management plan, OMP, drainage monitoring, and general hydrological monitoring framework. The second gap relates to there's no explicit drainage recovery verification process.

01:19:29:26 - 01:20:00:06

I mean, BSMP is very strong on containment and testing, but it does not clearly define drainage inspection following an incident, verification of drainage functionality, and recovery and reinstatement procedures following activation of containment system. And the third relates gap to the no explicit hydrological performance review following a major incident, although the BSMP addresses containment testing disposal and pollution prevention.

01:20:00:16 - 01:20:19:07

However, it does not clearly explain how the applicant will assess whether a major incident has affected the runoff management infrastructure, infiltration areas, soils, drainage pathways, and hydrological performance assessment and assumptions. Yeah. These are the major

01:20:21:21 - 01:20:25:24

Thank you, mister Singh. I'll come to miss Reynolds, and then we'll come back to the applicant.

01:20:27:02 - 01:20:31:09

Silly Reynolds, stop lying down. This is professor Skevington had a point he wanted to make.

01:20:32:06 - 01:20:55:08

Richard Skevington for Stop Line Down. I'd I'd just like to ask mister Gregory a question. I mean, because he went through his bit very rapidly, but did did I understand him to say that the the firefighting designed for the best was based on the assumption that, you know, that there may be several fires in several Bess containers simultaneously.

01:21:02:07 - 01:21:05:09

Clavish, would you Mr. like Gregory to answer that question?

01:21:05:11 - 01:21:07:02

Oh, sorry. Yes, Priyvavuta. Thank you.

01:21:07:04 - 01:21:09:00

I'll hand over to Mr. Gregory. Thank you.

01:21:20:07 - 01:21:29:11

Paul Gregory for the applicant. So as already referenced in responses to stop lying down,

01:21:31:08 - 01:21:38:17

The modeling and the fire fort firefighting water requirements were based

01:21:40:14 - 01:21:53:00

on and I can go into great detail you if like, but bear in mind that the sort of time frames so as already submitted responses show that the

01:21:56:11 - 01:22:30:06

failure of multiple BEST units has not occurred, risk assessments like failure modes, effects analysis, layers of protection analysis, etcetera, stop this from a far propagation perspective. We're looking at propagation from one best unit to another. However, as demonstrated, the illustrative site design and the spacing is based on a system that's undergone large scale fire testing where propagation did not occur.

01:22:32:03 - 01:22:37:19

Gregory. Sorry. It sounds like you're just you're reading the submission, which we have read

01:22:37:21 - 01:22:38:13

the submission.

01:22:38:15 - 01:22:42:19

Okay. No. If you're adding new information then please continue.

01:22:42:28 - 01:22:51:20

Yeah, well I'm just saying that these questions have been answered comprehensively so I can only really reiterate what the explanation is for that,

01:22:51:23 - 01:22:52:08

if you

01:22:52:10 - 01:23:28:09

like. So I can go very much into, you know, you do not discharge water continually, the peak of a best fire typically is between one and three hours, and the large scale fire data test enables you to apply water for short time frames to look at internal, external heat temperatures to see whether boundary cooling or further boundary cooling is required, whether intervention is required at all, these technical responses have been submitted throughout examination.

01:23:28:14 - 01:23:32:12

But I'm more than happy to go through this in great detail now if required.

01:23:34:14 - 01:23:35:23

You. Stop Linedown.

01:23:36:14 - 01:23:48:07

Celia Reynolds, stop Linedown. I believe professor Skeffington's question was aimed at is this whole assessment based on the fire staying with one container or spreading to another? So it would be really helpful

01:23:50:03 - 01:23:55:12

answer just on that point in particular. Is it based on one container or more than one container?

01:23:55:29 - 01:24:31:18

So the fire will not propagate from one container to another. The volume of firefighting water there allows for time a frame that multiple containers did catch fire. Okay? So we have five hours of supply

here for continual supply. If you're allowing fifteen minute discharge periods, then that five hours is probably going to last twelve hours. When you look at the fact that best containers, typically the peak of a fire where you might have a propagation risk, is typically between one and three hours.

01:24:32:08 - 01:24:56:10

And then potentially five hours firefighting water can credibly deal with multiple containers. But as referenced in responses and in the outlined Safety battery Management Plan, the spacing on-site and the large scale fire testing demonstrates that propagation does not occur. The

01:24:57:25 - 01:25:07:11

credibility of multiple best containers simultaneously failing has also been dealt with, and that's not a credible scenario.

01:25:09:13 - 01:25:42:08

Okay. Thank you. That was that was my the understanding applicant's response in our x q two document. I do have a a a an action point for the for the applicant, please. The isolation area in the I think we need a bit more clarification. I've just been checking through some documents and things. I think we need some more clarification on the isolation area to make sure that it's it's clean, it's been cleansed of of of, contaminants so that when new water comes through, surface water, it's not then picking up contaminants.

01:25:42:10 - 01:25:51:04

So think just we need something in the documents explicitly setting out the procedure for the cleansing of the surface water area.

01:25:52:07 - 01:26:22:24

Josh Rigby on behalf of the applicant. I think every incident has a potential different cleanup operation. If it occurs in different areas of the sites where impacts different bits or if there is some kind of It also depends on what the end drainage strategy occurs and as we've discussed previously, the detail of the drainage design hasn't been fleshed out because we necessarily don't know the equipment or the layouts or anything that we're proposing to put on there.

01:26:23:02 - 01:26:50:01

You could have As shown on the plans, it could be graveled areas or it could be sat on bonded concrete plinths or something like that. Each one would have a different management plan, but there would be obviously necessary Every incident would have a cleanup and treatment process before it could go back on. Yeah, like I say, there's lots of detailed design in there, so coming up with a comprehensive plan at this stage.

01:26:50:03 - 01:27:20:28

Oh no, sorry, I'm sorry. Perhaps it wasn't clear. So I'm not looking for a comprehensive plan. I understand it's it's it's an outlined drainage strategy. But in terms of line down d and that that sort of containment area, it's just to make sure that is cleansed after an event. If if an event would happen, of course, I appreciate they are rare. But just to make sure that area is just a just a comment, a commitment in the drainage strategy just to say that area will be cleansed before the the it's it's open then for discharge regular surface water.

01:27:21:00 - 01:27:21:15

That's

01:27:21:17 - 01:27:22:11

that's that's all we're looking for.

01:27:22:13 - 01:27:30:01

Yeah. Just for a bit. I I We can include that. I think there's a there's a legal requirement not to cause pollution as well, so we'll be guided by that.

01:27:30:03 - 01:27:32:25

Perfect. Just a a comment, and that would be ideal. Thank you.

01:27:32:27 - 01:27:42:00

Yeah. It was just picking on a up point Mr Singh made, and I think we all felt it was a reasonable point. But you taking that away, that's helpful. Thank you.

01:27:43:23 - 01:28:12:05

Right. Is there any further before I open up for general comments on the Outline Battery Safety Management Plan, is there anything further on what we've just discussed with the links to the Outline Training Strategies before we move on? I'm not seeing any any hands or anything nothing online. That's fine. So going I'm to come around the room and just ask if there are any other outstanding matters with the outlined battery safety management plan, and I'll come to the council first.

01:28:15:09 - 01:28:19:21

Odette Shadowby, Miltshire Council, not as far as I'm aware. No.

01:28:20:00 - 01:28:22:00

Thank you. I'll come to stop line down, please.

01:28:22:08 - 01:28:25:06

See they went on stop line down. No. Nothing further from us.

01:28:25:08 - 01:28:41:05

Okay. Only point the examining authority is has it's, given the importance of maintaining both drainage systems separate, would it be wise to add the lead local flood authority as a consultee to discharge requirements six, battery safety

01:28:44:22 - 01:28:47:02

Happy for you to take that away if needs be.

01:28:48:17 - 01:28:50:08

And comment in headline seven

01:28:50:17 - 01:29:19:21

and the applicant. Our understanding is that they're involved in the actual the approval of the management plan that relates to the drainage, whereas the battery safety management plan is the technical detail around the actual battery, whereas all of the measures that Mr Rigby were mentioning will be in the drainage strategy. Okay. Safety management plan. So I don't think think that their their involvement is in relation to the mechanics of the drainage strategy Yeah. rather

01:29:20:12 - 01:29:23:23

No. That's that's fine. No. I'm I'm I'm I'm happy to move on. Right.

01:29:26:04 - 01:29:27:13

Okay. So

01:29:29:10 - 01:29:33:10

item ten, the outlined skills supply chain and employment plan, we're leaving to Tuesday.

01:29:36:12 - 01:30:09:12

And that brings us on to item eleven, mitigation route map. There's I know we we agreed to be parking this, but I I I did we did say we would discuss the hydrological verification framework. So I'm going to touch on that. Miss Shalabee, can I ask in your council submissions, you've set out a a a request for this ideological verification framework? And as I understand it, there are a number of of documents and plans, etcetera, that the LLFA will be interested in.

01:30:09:29 - 01:30:20:01

Is this an is this a of matter practical monitoring? Or is there anything missing? Because we did also ask you to come here today with anything that's missing from the current documents.

01:30:21:00 - 01:30:26:20

Odette Chatterby, I think mister Singh has been thinking about that very carefully. He's going to be the one to respond.

01:30:26:22 - 01:30:27:26

Okay, thank you.

01:30:31:14 - 01:31:16:02

Yeah. I mean, as I have pointed out in my previous discussions that the applicant needs to provide hydrological monitoring and verification framework, which should focus on strategic considerations. The applicant have a framework which provides a reactive, you know, a system, but what we looking are for is a more strategic approach in, you know, in terms of

01:31:17:27 - 01:31:34:15

the management of hydrological risks, the flooding risk, as well as the framework should also connect the requirements, which should be, you know, like for the different documents.

01:31:38:05 - 01:31:42:21

Camp outline, outline environmental management plan.

01:31:44:09 - 01:32:19:12

The outline the landscape, you know, plan. So, so that the framework provides a holistic, you know, hydrological management as well as mitigation framework, which should, know, provide adequate assurance to the lead local flood authority in terms of not only flood management, but also, you know, the management of vegetation.

01:32:20:18 - 01:32:24:01

It also should provide, you know, sufficient

01:32:26:18 - 01:32:39:16

remediation in terms of the compaction risk, which the works will entail. So I think that is the overall context context of our requirement.

01:32:39:19 - 01:33:09:27

Okay, just to test my understanding. So I mean, you looking for something is this framework? Is that in your mind to be a sort of a one stop shop for drainage issues which it it pulls together all the information you're interested in. You don't need to go looking in lots of other documents which can easily be lost in amongst the detail and it's one place to go for the LLFA, and that's going to contain all the info. So it's just like a a one stop shop approach. Yeah.

01:33:10:14 - 01:33:17:03

Okay. Thank you. I'll that that confirms my understanding. That's that's what I thought you were getting at. Sorry, miss Reynolds, before I come to the applicant.

01:33:17:20 - 01:33:57:19

Sorry, Reynolds. Stop lying down. Yes. I just thought it'd helpful be for us to just jump in here so the applicant can respond to us all at once. The first point, and I I don't wanna repeat our discussion on Tuesday, but just to reiterate, stop Lyon Down's position in respect of that, SLD doesn't consider that just the grassy is sufficient to deal with the increased risk from panel runoff. So in terms of corrective measures in response to increased flood risk within perhaps a verification framework, if that was being put forward, stop lying down would be looking at some sort of backup, back stop of some more intensive SUDS measures to deal with that increased, bug risk.

01:33:58:01 - 01:34:17:23

In respect of whether or not this is all dealt within one document, stoplighting them doesn't really have a position. We know there has been a mitigation route map put forward here. It's really just a matter about having that potential corrective measure being acknowledged as a possibility by the applicant. Professor Skeffington also has a comment he wants to make.

01:34:19:13 - 01:35:08:25

Yes. Richard Skeffington for stop lying down. Yes. I just like to support this, proposal from, mister Singh because trying to I mean, it's it's related to the issues that miss Fisher raised earlier in the, this afternoon, that you're sent round and round in loops, and it's very easy. For instance, if we start with table five in the OLEMP, you're referred sorry. Of of the OMP, you're referred to section one point three point nine six in the OLEP, just one paragraph, which refers you in turn to the flood risk

assessments, which refer you to the soil resources management plan and the OCEMP and back to the OLEP, so which is where we started from.

01:35:09:00 - 01:35:42:11

So, and there's little nuggets of information in each of these plans, and then there's references to the water management plan which doesn't actually exist at the moment. So wouldn't it not be better to what have you described as a one shot, stop shot? We mustn't forget that these monitoring these schemes imposes significant costs on local authorities. At the moment, it will it wouldn't be clear to me what you're monitoring, you know, what the criteria for success or failure were, what you're able to do about it.

01:35:42:13 - 01:35:50:17

From the regulator point of view, it's surely better to have something structured than something so disconnected, which is what we have at present.

01:35:53:09 - 01:36:06:25

Okay. Thank you. I'll bring the environment agency in at this point as well, and ask if they have a common position on hydrological verification framework approach if we still have the environment agency with us please.

01:36:09:23 - 01:36:31:23

Hi there. Yes. Philip Sale from the Environment Agency. I don't have anything to add really to, mister Singh's contribution, from Wiltshire County Council. I think, you know, those points sound reasonable, and, yeah, we we defer to their view really and sort of, I think what's been presented sounds sounds eminently reasonable, I think, from our perspective.

01:36:34:05 - 01:36:36:22

Okay. I'm happy to come to the applicant for a response, please.

01:36:37:25 - 01:36:39:11

Claire Pochett for the applicant.

01:36:42:00 - 01:36:53:15

Just to be clear, obviously, there's been some specific points that have been mentioned in terms of and we discussed on Tuesday, some specific things we might look at doing in terms of that temporal point.

01:36:55:06 - 01:37:09:28

understand What to be the issue here is not the individual mitigation measures that are being proposed by the applicant, but the concern that they are across spread a suite of different management plans.

01:37:11:19 - 01:37:24:21

There is a concern that by not having them all in one place, then it is difficult for the LLFA understand to potentially what's happening. The

01:37:26:12 - 01:38:02:16

mitigation route map, which you obviously asked to make more substantial and updated, was intended to provide that function in terms of it being a posting sign document that draws together all of the different mitigation measures that are set out in the various different management plans. I think from the applicant's perspective, obviously, we don't want a duplication of commitments. And so if we've committed to doing, you know, and it's appropriate that measures relating to management of soil compaction are in the soils resource management plan, that's the appropriate place for them to go.

01:38:02:18 - 01:38:32:19

Obviously, compaction has an impact on hydrology, but the best place for that management measure to go, we feel, is in the soil resources management plan. Equally, the maintenance the establishment and maintenance of the grassland is best placed in the LEMP because that deals with the establishment and monitoring of vegetation. Yes. It has an I hydrological functionality, but it's establishment and maintenance as part of the landscaping works that have been done. So we do recognize that

01:38:36:15 - 01:38:57:00

are that it is a complex project and it is that all of the commitments are there are numerous commitments and they're across a wide range of documents. We have committed to providing Wiltshire Council with financial assistance during the monitoring period. So obviously you've got both the

01:38:59:17 - 01:39:04:18

assistance in terms of discussions that will take place prior to the discharge of

01:39:06:06 - 01:39:38:16

requirements. Then once the management plans have been approved, then we have a one zero Section six agreement, that is being negotiated. It is nearly there in terms of monitoring, contributions. So that ongoing ability for the council to monitor across a whole suite of different documents from a resource perspective, we feel is being, addressed so that there would be somebody's job that would be paid for to ensure that that all of that monitoring, takes place.

01:39:38:18 - 01:40:08:27

I think we are slightly struggling to see the need for an additional requirement to commit to doing the things we've already committed to doing in the other management plans. And I think to take all of the hydrology related things out of those management plans and put them in a stand alone plan would then create equal confusion because you'd to see grassland management in the LEMP, and it wouldn't be in the LEMP because it'd be in the hydrology plan.

01:40:08:29 - 01:40:25:18

So I we've think we feel that the mitigation route map does the job of signposting people to the right place and that all of the individual mitigation measures that have been proposed are are sufficient. So I think we're slightly struggling other than that

01:40:27:04 - 01:40:45:02

ease and signposting functionality, we're struggling to see what would actually need to go into that verification report that's not already included within the individual management plan. So I think that's

what we're we're struggling to understand what is actually being asked for here that's not already committed to somewhere.

01:40:45:04 - 01:40:49:12

Yeah. I mean, I I I have I have some sympathy here because monitoring

01:40:51:12 - 01:41:33:25

big projects is is hard going. And then finding all the relevant information is is also hard. Equally, I I am concerned that such an approach might end up with a duplication, that you might have someone looking at soil resource management plan, then they go and look at the verification plan. One's been updated, one hasn't. Do you update the hydrological verification plan every single time? I I I think that's that's a that's a that's a tricky one. What I wondered was actually further detail in the risk mitigation route route map might actually be a more appropriate and simple solution to this approach.

01:41:33:27 - 01:41:44:07

I'll come to you shortly, mister Singh, because, like I say, a separate document that then if it isn't up to date, I can imagine the enforcement nightmare that might create.

01:41:45:22 - 01:41:54:12

So I would be I know we said we'd discuss mitigation route map next week, but I I think this is something that would make the

01:41:56:05 - 01:42:13:14

if we were to update the mitigation route map and give it more detail, and I think that would be then a discussion between parties offline, that would certainly be something which I think would go a long way towards addressing the council's. What I think are are valid concerns, but I I do see where you I as I said, I see where you're coming from.

01:42:13:23 - 01:42:47:29

Claire Brochuk from the applicant. Yes. I think I wonder whether it might be of assistance if, obviously, at the moment, we refer to whether plan the that those measures are included in, perhaps we could, add the once because the final versions of those management plans will sorry, the final versions of the outline management plans will be being submitted, for deadline seven, we could update, the the last column in in there to provide the actual paragraph references to the particular sections of that report. So mister Singh is not trying to look through the whole, OM, for example, to find Yes.

01:42:48:01 - 01:42:48:16

I I think

01:42:48:18 - 01:42:54:25

measures related hydrology, to we we can provide the paragraphs. I think we were slightly reluctant to do that whilst those documents were still

01:42:55:03 - 01:42:55:18

Yes.

01:42:55:20 - 01:42:56:23

In Yeah. In flux.

01:42:56:25 - 01:42:57:17

I can understand that.

01:42:57:19 - 01:43:00:18

But we, if that would be of assistance, then that's definitely something

01:43:00:20 - 01:43:19:02

that the applicant can do. I that think would go a long way. I mean, I think for for me, think of the mitigation route map as as making it as easy as possible for a local authority who's going to have to monitor this. And, yes, I appreciate what you're saying about section one zero six, but someone's still got to go out and do it. And it's it's it's yeah. It'll be tricky. Mister Singh,

01:43:22:03 - 01:43:23:26

Rohit Singh, council.

01:43:27:00 - 01:43:28:18

Firstly, let me

01:43:30:23 - 01:44:12:08

point out that hydrology is one of the principal you know, issue when it relates to the various documents such as outline construction management plan, outline landscape and ecology management plan, ecological protection and mitigation plan, and other documents. So it is, it has got a over, over arm, like overarching relevance in terms of, you know, in terms of assessment in terms of evaluation criteria.

01:44:12:17 - 01:44:59:21

So while the other documents, they are self contained in themselves, although they are also, and they do, like, they do have some inter interrelationship, but not as much as hydrology, because it's kind of concerns on a very large scale. So having said that, would I also say that even if the applicant provides a chapter in each of those documents, where it can demonstrate out the like, like each chapter, let's say, in outline construction management plan, they have a chapter on hydrology, which, you know, pulls together everything, you know,

01:45:01:17 - 01:45:34:23

there and demonstrate, you know, the risk of, let's say flooding, and other water related aspects are addressed. I think that we will be okay with that as well. But I think, I mean, what we find a bit of a concern is, know, every time we have to look for each sentence, And in twenty documents, you know, how to how these two things are interrelated.

01:45:34:28 - 01:45:50:11

I mean, we don't have so much resource. I'm only the I'm the only drainage planning officer in Wilshire Council. Other people are just really, like, looking to hand drainage. So I think

01:45:52:13 - 01:45:57:05

I think an approach which helps Wiltshire Council will be appreciated.

01:45:58:10 - 01:46:30:10

Understand that, and I I do sympathize. So that that's that's the discussion I was having with the applicant through the mitigation route map, which is, in my mind, essentially, what you've described is actually the mitigation route map will and as as Madroj Broderick said, they can actually point you to the relevant paragraph numbers through mitigation route map of the different issues, whether it's soil compaction, whether it's flood risk, whether it's drainage strategy, flying down d, etcetera, etcetera. Pulling all these things together and saying, right. in That's paragraph x of this document.

01:46:31:00 - 01:47:03:19

And I think is would that not be an easier way, an o a more strategic way of looking at the issues you're talking about than opening up the camp and and then look going back into the of that back to look for relevant references you're talking about. Because earlier on, you mentioned about a strategic approach to it. And I'm and like I say, I'm just wondering if actually the mitigation route map would provide you with that strategic approach rather than you've what just outlined. So I'm just trying to think of ways to make essentially if you like your job easier.

01:47:04:23 - 01:47:12:18

So let me like in terms of the mitigation route map I want a bit of clarification.

01:47:14:10 - 01:47:41:06

Will the mitigation route map have drainage flood risk and hydrology as a separate chapter which will link each one of the various documents? Or it will be just all the different issues lumped together. I think answer to this will help me understand how how we will be assisted in with that document.

01:47:41:08 - 01:47:49:20

No, think so. I think I think we understand. I mean, I'm I'm sure the applicant you understand the challenges the LLFA would be facing given they were overarching issues here.

01:47:49:22 - 01:48:35:13

Yes. That's correct. I mean, we fully appreciate the challenge when you're dealing with a multidisciplinary, issue like this, just but in answer to that particular point just made, if I could refer Mr Singh to table three five of the, mitigation route map, you'll be able to see, what he's described in terms of grouping together each of the commitments, actions, and mitigation, in relation to hydrology, flood risk, and drainage. So that would provide a good starting point, and I feel that this addition of the paragraph the reference numbers in the environmental action secured comment, column on the right, will go a long way to making that exercise a a lot easier.

01:48:35:15 - 01:48:37:22

So we're happy to take that away and and do that.

01:48:37:25 - 01:48:53:17

Mister Singh, you don't mind me asking, because I appreciate, you know, you have lots of other things to be doing as well as as well as working wind down. Have you seen the mitigation route map, and have and as someone sort of have you through it and understood the document, etc?

01:48:53:19 - 01:49:23:22

I haven't. Yeah, Rohit Singh, Voucher Counsel, I have seen some of the figures, and it kind of provides a bit of a flowchart, like, you know, to connect some other things. But, you know, in terms of, blood risk management, you know, and other hydrological aspects, I think that is not sufficiently robust in terms of addressing concerns of LLFA.

01:49:23:24 - 01:49:47:25

At least if we have one chapter in each of the documents, you know, which would link the various things with hydrology, that would be the minimum, I would say, our expectation from the applicant. Otherwise, it's kind of, you know, looking like trolling into each of the, you know, data point.

01:49:47:28 - 01:50:24:00

Mr. Singh, if you look on the screen, the applicant's mitigation route map is there and everything that you're asking is actually what the mitigation route map intends to do. In this particular document, the applicant originally submitted a commitments register, which was not dissimilar to this, but in one of the early written questions the XA put out, we said that actually this could be improved to be a mitigation route map to help a local authority when it comes to a discharge stage. And so that it could signpost the local authority to every document that, you know, had a mitigation requirement within that related to a specific topic.

01:50:24:02 - 01:50:55:01

So everything that you're asking is in this document. It could be improved further, and Ms. Broderick has suggested ways to be able to do that, and we can certainly come back to this next week. And I appreciate you may not be here, but I think maybe you've not had an opportunity to look at the mitigation route map to understand that the points you're making are being picked up so that you don't have to go through thousands of documents trying to find the part that you need. The mitigation route map will help you get there much quicker.

01:50:56:24 - 01:50:57:11

Yeah.

01:50:57:13 - 01:51:35:16

So it might be before week, next miss Shalaby, that if mister Singh has a look at the mitigation route map, when we come back to rediscuss it at the DCO hearing at the very end of that hearing, if there's further things because we would re one of the questions we would have been asking was, is there anything else that could happen to that document that could assist the council? And it seems to me that we're best parking this right now. Mister Singh, look at the document, give you some instructions for next week if if it still doesn't do what he hopes it could do or should do, that's the best time for us to carry this on.

01:51:36:17 - 01:51:46:07

I'm happy with that if mister Singh mister Singh is nodding. Just so you're right. It won't be me week. One of my next colleagues will be here, but exactly that process can be done.

01:51:48:26 - 01:51:58:24

K. Thank you very much. I think that that's that's a positive positive discussion. Really pleased. I'm really sorry. I have one more question because mister Rigby is here. I'm going to ask this question. I hope it's very quick.

01:52:00:10 - 01:52:09:26

Now, as we're discussing hydrology issues, can the applicant please also explain how ground and surface water monitoring will be implemented including report reporting and consultation.

01:52:13:00 - 01:52:19:02

This is an issue raised by, I think, the EA and stop lying down. I'm sorry. I don't have document references.

01:52:24:11 - 01:53:00:16

Josh Ripley on behalf of the applicant. So monitoring is covered in both the Ocamp and the operation environmental management plan. So with regards to the construction phase, we've got various different monitoring regimes in there but it would be monitoring your channelization, monitoring of the vegetation cover, monitoring of local reeling, if there's any ponding, compaction.

01:53:00:18 - 01:53:22:13

It's all of the management plans that we've been discussing throughout this process, They all come together and do contribute to the management of the surface water during that initial stage of construction and then during the operation environmental management. It's essentially same the process whereby the environmental manager will take

01:53:23:29 - 01:53:39:23

various monitoring. I think that if I could be so, Bart, I think what you're potentially asking is for how do we conclude whether or not the panelled areas of the site are having a detrimental impact on surface water off-site?

01:53:39:25 - 01:53:41:26

Yes, surface and ground. Sorry,

01:53:42:17 - 01:53:55:14

from a surface point water of view, because I'd have to defer to my colleague, Mr. Mayer, on groundwater, but from a surface water point of view, the potential detriment is increased surface water runoff as a result of

01:54:01:18 - 01:54:35:21

We talk about the hard stood areas, so the areas that we're positively draining, we're collecting surface water in a defined drainage area and we're it, restricting attenuating it and discharging it at a certain point. The control and monitoring of the discharge of surface water from those is easily controlled and monitored because we've got a single outfall and we know we've got the constrained area that that

water is falling on. So we can determine whether or not there's a certain rainfall event, how fast the water is coming off and how much water is being retained behind that area.

01:54:36:01 - 01:54:49:19

I think the paneled areas are different. They're not positively drained in permeable catchments. The panel's set above the ground and rainfall is distributed locally in the land beneath the arrays rather than being collected in an informal drainage network.

01:54:51:19 - 01:55:13:20

Consistent with MPS EN three, para two point ten point seven six, the solar panels drain to the existing ground and that the drainage impact will not be significant. Will not, in general, be significant. The policy basis is to retain the permeable surfaces, avoid adverse effects on existing drainage and provide localized drainage measures where they are needed.

01:55:15:22 - 01:55:27:15

It forms the basis of the flood risk assessment and drainage strategy suite, that the panels do not create additional volume. They can redistribute rainfall locally, particularly towards the panel drip line,

01:55:29:08 - 01:55:57:00

but really the important bit is happens when what it hits the ground and is redistributed. So the things that control surface water runoff from paneled areas are the soil condition and compaction, the vegetation and ground cover, the surface roughness, erosion, slope, existing drainage features, hydrologic connectivity and preferential runoff pathways. I think the PV Smart calculations that Professor Skeffington provided use those same

01:55:58:27 - 01:56:12:07

parameters to calculate local the redistribution of surface water around a panel. So those are the things that we agree are the things that control surface water runoff around an area.

01:56:13:03 - 01:56:18:21

Sorry, thank you. I'm yeah. Having a look at my nose pad from h five as well.

01:56:20:06 - 01:56:42:20

No. Thank thank you. Look. I'm I'm quite content with that. Stop line down. I mean, it's it's really more about, I can say, monitoring, reporting consultation, these sorts of like I say, was an issue that Stop Down raised. I think the EA raised it as well. I mean, Stop Down, you're welcome to to come in and help my understanding of this.

01:56:45:05 - 01:57:17:09

As silly run on Stop Line Down, think this I is really just reiterates the point in respect of stop line down's concern about the risk of flood risk arising out of panel runoff. And if as I understand that the applicant is proposing not to monitor any increased risk and also isn't proposing to do anything in additional to the grassy sward in respect to the increased risk, it emphasizes, Stop Line Down's ultimate concern that this isn't passing the policy test because it is increasing off-site flood risk.

01:57:17:17 - 01:57:21:29

I might just one moment if I can just check with professor Scaffing.

01:57:22:15 - 01:57:23:19

As they're checking,

01:57:25:19 - 01:57:28:20

think we had as this an action point actually.

01:57:35:02 - 01:57:38:25

Yes. I think we had this as an action point for from Ishfaith. Mister Bee?

01:57:38:29 - 01:57:49:08

Sir, if I if I may just quick before applicant comes the in so you can come in together, Professor Skeppington had a comment to make about the possible ways you can monitor surface water runoff.

01:57:50:17 - 01:58:09:04

Yes, just to say that, yes, the things that Mr. Brigley was discussing this now, understand we're going to be getting rebuttal possibly of the of my document at deadline seven, so perhaps we should leave all that sort of discussion until then.

01:58:09:06 - 01:58:12:13

I'm I'm I'm happy with that, Professor Schefington. I agree with that.

01:58:12:15 - 01:58:22:24

Yeah. The the questions other were about monitoring, were more about water quality monitoring during construction. I think that's possibly what you were thinking about originally.

01:58:24:09 - 01:58:56:10

And we did discuss this a little earlier in the day with the environment agency, and I gather they're going to talk to the applicant to do the monitoring, I just like to put on record that just from the hints that I got there being a little bit unambitious. There are ways in which you could monitor things which are important to water quality and we're thinking specifically about water quality and the water framework directive here.

01:58:57:13 - 01:58:58:26

And in particular,

01:59:01:13 - 01:59:03:08

this composition, the

01:59:04:26 - 01:59:05:11

let's

01:59:05:13 - 01:59:05:28

see if

01:59:06:00 - 01:59:37:10

I can go down here. So the amount of undissolved solids in the water, which you can monitor using turbidity measurements, continuous, can be looked at. And one great thing about rivers is they integrate what's going on in the whole catchment. So by monitoring the output, you can tell if something, if it's sufficiently large, is going on. So to have continuous monitoring of something like turbidity,

01:59:39:00 - 02:00:11:25

it would need to be done beforehand because there's a relationship between turbidity and flow, and if rivers rise, they get more turbid. The question will then be, during construction, is this greater than what we expected? So you need a baseline monitor. But it would be, first of all, a relatively easy way for the issue to be monitored. And secondly, it'd be a good incentive to the applicants' contractors to stick to all these very complex regulations which we see in the plans.

02:00:11:27 - 02:00:19:06

Okay. Thank you. Before you come back, mister Rigby, I noticed that the EA has the hand up. I think it's miss House. Yeah.

02:00:21:18 - 02:00:52:24

Thank you. Lucy House from the Environment Agency. It was just to kind of come back and clarify some of those points. So, I know professor Skeppington alluded to the fact we talked about water quality monitoring earlier, but I just wanted to reiterate our comments earlier were purely in respect to that com preliminary works. We resolved all of our issues to do with kind of the water management plan, which is obviously part of that final SEMP. Back in kind of deadline three. Our response was rep three one four six.

02:00:52:26 - 02:01:23:24

So we were happy with that stage. In terms of detail, I take professor Skeffington's point that at the moment, that water quality monitoring might appear light on detail, but from experience, it is in line with all the other solar farms that we've received for this point in the examination process, and we are gonna be consultee on this in due course. So we expect that kind of prior to the discharge of that requirement, we will be seeking the clarity on parameters.

02:01:24:20 - 02:01:55:12

We are aware of turbidity monitors that can be done continuously. That will obviously be down to the applicant to decide if that's something that they want to propose. But whether they do it continuously or if they do it through in situ monitoring, turbidity will be one of those things and dissolved solids will be one of those parameters that we will be requesting that detail be committed to. It's just that we haven't finalized that in this document because it is still the outline construction environmental management plan rather than the final version.

02:01:56:26 - 02:02:03:26

No. That's that's that's a helpful explanation. Thank you very much, Ms. Halton. I do appreciate that. I'll come to the applicant to respond.

02:02:05:00 - 02:02:05:15

Thank

02:02:05:17 - 02:02:44:26

you. Josh Rigby, on behalf of the applicant. We've committed to water quality monitoring throughout the Ocamp, Ocamp and the operational environmental management plan. Table five within the OCEMP is where all of the detail on what is being committed to at this stage at the OCEMP with regards to water quality and monitoring, but it is a general requirement for construction activities that water quality monitoring is ongoing and like I said before, it's a legal requirement to not cause pollution off-site during construction and operations, so it's in embedded that legal framework as well.

02:02:45:23 - 02:02:51:27

Well, thank you very much. There's nothing further from me on that point. Any other party wants to make a comment on it?

02:02:53:20 - 02:02:59:06

Nope. Nope. Okay. I'm happy to move on and pass over to my colleague, mister Northover.

02:03:02:07 - 02:03:33:24

Thank you. That takes us to item thirteen, which is review of actions and next steps. However, due to the time of day and number of actions, I propose we, again, don't run through them now, but we will publish them as soon as possible so that you can get, get sight of them. So in that case, I will now to move close the hearing. May I remind everyone that post hearing notes, documents and answers prepared in response to these to the post hearing actions that will be posted online, should be by deadline seven.

02:03:34:02 - 02:03:42:14

That's the second oct second of October. And, next steps are we're back here next Tuesday for ISH eight.

02:03:43:29 - 02:04:11:24

So thank you very much for staying with us through yet another long day. We have found everyone's contributions very helpful, so it's it's very much appreciated. I'd also like to thank CVS and the case team, Ramel, Bernie, and Liberty Abbott for their work this week. So I'll proceed now to close the this issue specific hearing. Thank you for participating today. The time is now six thirty six, and this hearing is closed.