

East Anglia_ISH2_Day2_3rdDec_Session 1

Fri, 12/4 10:36AM • 1:31:03

00:08

Good morning and welcome everybody to the resumption of the issue specific hearing to for example, North and East Anglia TWO offshore wind farms.

00:19

Can I just check with the case team that you can hear me and the recordings and live streams have started please.

00:24

Mr. Hockley, I can confirm that the recording and live streams have started and we can see in here, you know, it's great. Thank you very much, Miss Hopewell. Okay, so two introductions. My name is John Hockley. I'm a member of this panel, which is the examining authority for East Anglia, one North offshore wind farm application, and of another panel, which is examining authority for the East Anglia TWO offshore wind farm application. I'll be chairing item four of our agenda today. And now ask my fellow penguin panel members to introduce themselves starting with Rynd Smith.

00:55

Thanks. Thank you very much. Mr. Hockley . I am Rynd Smith, the lead member of these panels, and I will be meeting the remaining three holdover from yesterday. And then agenda item six onwards today.

01:10

Good morning, everyone. My name is Caroline Jones. And I will mainly be observing and taking notes in this hearing today may ask questions if they arise.

01:20

Good morning, everybody. I'm Jessica Powis panel member. My role is mornings to observe and take notes, but I may ask questions if they arise.

01:30

Good morning, everyone. I'm Guy Rigby. I will also be observing proceedings this morning. And I also will be taking notes and I may have questions as well. Thank you.

01:43

Thank you very much, Mr. Rigby. I can also reduce our planning Inspectorate colleagues working with us on these examinations, some of you whom you would have already spoken to already. Emre Williams is a case manager leading the planning Inspectorate case team for these applications. He led

the arrangements conference and is managing the team today. He is accompanied by Kj Johannssen, Caroline Hopewell and Tamika Hall.

02:04

As I know, Mr. Williams has run through the arrangements conference, today's hearing is being live streamed and recorded. The recordings that we make are retained and published. Therefore, they form a public record that can contain your personal information, and to which the general data protection regulation applies. Does anyone have any questions about the terms on which our digital recordings are made?

02:25

Okay, I'm not seeing any raised hands or hearing anybody. So we'll move forward on the basis of that. That's all understood. Thank you,

02:32

Tony to today's meeting, I'll not ask all of the participants to introduce themselves today. This is a continuation of a hearing already in session and most participants were formally introduced yesterday. If organisations attending today have new representatives and attending Could I ask that the lead representative introduces and briefly at the first point when they are asked to speak? I do know, however, that we have one new participant who was not part of organisations represented here yesterday. And I now acknowledge the presence of them for the Suffolk energy Action Coalition.

03:03

Mrs. Min, can you hear us today?

03:11

Do I have a Mr. Esmond for the Suffolk energy Action Coalition?

03:18

Yes, I'm here. Oh, that's excellent. Thank you. Welcome.

03:22

Okay, and Could I just confirm that Mr. Ennis is representing the applicants today please. And also asked again, that he introduce any new members team just when they first speak please.

03:32

Yes, Colin Ennis behalf the applicants, I'll be appearing half the applicants today. Thank you and I will introduce any new members when they appear. Thank you. Thank you very much, Mr. Ennis. Good morning. Okay. Anyone who is not participant participating directly in this session, but is observing it is welcome to set out any observations about what they hear this morning in writing by deadline free, which is the 15th of December, we are resuming issue specific hearing to for both East Anglia, one North and East Anglia two projects in parallel. There is a single agenda for both hearings, which was issued on 24th of November 2020. And we are returning to it for responses to item three, a two, three C, which Mr. Smith will lead. I will then take forward agenda item four, I should say in this context that

there will be site specific effects that we will not be considering today, such as for example biodiversity, flooding, noise, air quality or traffic and transport. issues such as socio economic effects will also not be considered today. We will continue to examine these subjects in our written questions at present, and they will likely be considered in further issue specific hearings next year. Notice for which will provide a short link on the eighth of December.

04:39

The examining authorities reviewed progress last night and decided that in the interest of ensuring adequate time and involvement on agenda item for that we will not be proceeding with agenda item five today. The implications of discussions yesterday and today for the draft development consent orders will be held over two particular issue specific hearings for that

05:00

Next year,

05:02

Mr. Smith and I will need to keep pressing on so that we can hear as much as possible. Any matters that require more detail submissions and allow for today are, of course welcome and can be made in writing a deadline free, which is the 15th of December.

05:15

Before I move on to the main business of this morning's hearing, does anyone have any questions of our preliminary nature about how today's hearing will run?

05:24

Okay, thank you. I'm not seeing again, any hands or hearing only be hearing anybody. So on that basis, we can move on to the resumption of item free, which concerns strategic siting issues. Thank you, Mr. Smith.

05:37

Thank you very much, Mr. Hartley for those introductions. Now, ladies and gentlemen, if we can turn ourselves back to the tail end of yesterday's agenda, items three A, B, and C. Just as a brief reminder, we had heard principles submissions from the applicant on each of those matters. And having then run very short of time, we had heard a response for Aldeburgh Town Council from Councillor fellowes and a number of the other people wishing to speak on that item has indicated that they would prefer to speak in the morning. So my proposed approach now is to seek responses to the material from and I will check

06:19

Mr. Bedford for Suffolk County Council.

06:23

I will then propose to move to much tougher for East Suffolk Council. I will then proposed to check whether first and parish council or any other parish Council is represented. Then I propose to move

through the main community represented bodies. So I'll move to Mr. Keen for Stacy's, then save our samplings and sees is there anybody else who would wish to speak to these items?

06:58

I have a hand from Bill Halford. So Mr. Halford, I will call you. Is there anybody else?

07:11

Okay, on that basis, those other people that I will call and we'll just before we start, I will say that I'm conscious and the case to advise that sees and contacted them overnight, raising the potential relevance of press coverage of national grid and energy transmission, electricity transmission and commentary overnight. And also Mr. Chadwick from SOS camp contacted them in relation to some observations on item three, given that those two bodies asked are to be called to speak, what I would ask is that to the degree that those points are relevant, they just aren't drawn out in oral submissions now this morning. So on that basis, I am going to go straight to Mr. Bedford of Suffolk County Council.

08:09

Thank you, sir. I'm Michael Bedford, Suffolk County Council, just on

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personnel. When we get to matter for I've got an additional person to introduce, but if your content, I was going to leave that until we deal with item item four rather than detract from item three. So so briefly on item three, in terms of the agenda issues, we have nothing we want to say further in relation to items A or C.

08:41

In relation to be nothing to add on landfall.

08:47

then turning to substation,

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the county council when it was engaged with the applicant during the consultation, pre application stages of this project, would not have chosen Kristen as the substation location. But we recognise that that decision lies with the promoter, spr the applicant to justify

09:14

it's not a decision for us, just briefly, because you've obviously got the consultation report with all of the background in it, you will have seen from that, that we did have a preference for further consideration of broom covered as a location because of the ability to consolidate with existing infrastructure, and also assessing that across a whole range of the relevant considerations.

09:45

Slide 13 from the presentation yesterday, and I'd absolutely accept the point that it was a helpful presentation. It had to be rushed through because of the as it were the time constraints and so I don't hold

10:00

as it were the applicant of precise wording and the way that it was put, but as a matter of sort of nuance, the suggestion of looking to the west of old railroad as part of the search for a substation, we don't consider that was being put forward by the local authorities, on the basis that sites within or closer to the AONB were necessarily to be ruled out. But what it was was to ensure that there was a thorough assessment of what viable options might exist. And on that if we could just draw your attention in due course, to the county Council's response to the pre phase one, a, and phase one consultation, as summarised by the applicant at pages two to three of appendix five point 14 of what is it's part of the consultation report, but it's got a specific document reference, which is a pp.

11:07

O 34. So that's that's a matter of nuance. But I just leave that with you. Turning back to what the applicant has chosen, which is the Friston location now that the applicant has made that its choice, we are concerned to ensure that really three things in relation to the chosen site, and its spatial stroke physical extent, first, that the site works now. And for the longer term.

11:40

The second, that the site has been assessed, looking at the full range of impacts. And by that I include cumulative impacts, and the issues that we rehearsed yesterday, which obviously, I don't repeat.

11:57

And third, that the proposal properly mitigates its impacts as best as can be. And obviously, that gives rise to some of the more detailed matters that arise under item four. So those are the only matters we wanted to raise on item three. Thank you.

12:18

Thank you very much, Mr. Bird. First, I will just check to see if any of my panel member colleagues have any further questions on that. And I'm not seeing urges to interject. So on that basis, can I then move to my staff for for the District Council?

12:36

Thank you, sir. My internet is flashing a warning saying that my connection is unstable, but hopefully it will hold out.

12:46

On agenda item three a.

12:50

The District Council does have some concerns about the coin process. In particular, its concern is that once the connection point has been selected, a lot flows from that. And that really dictates the broad

location of the onshore infrastructure. And yet the environmental impacts aren't fully and properly considered in the council's view as part of the coin process. So we're the council think that that is a floor in the process. And we know that Bayes is review is considering amendments to the courting process. However, we understand that that process is beyond your remit. So while we express our concerns, we appreciate there's nothing that can be done about that in this process. And we accept that the connection offers that have been made in respective EA one north and two were validly made in accordance with that process. Essentially, I think it's important to place on the record that you know what we have to evaluate, as you well know, all the applications in front of us and test them against applicable law and policy.

14:02

To the degree that the coding process,

14:05

you know, is in your submission partially and not fully attuned to the carrying out of a full and effective EIA because it prejudices in inverted commas elements of decision about citing. And that's that's a that's a position but it's it's not one that we can turn our minds to it is very correctly for the base review, but we will obviously judge very carefully the applications before us. Absolutely. So we fully understand that and I hope that you understand our position that we would like to put our concerns on record in a public forum and that we have also been engaging with Bayes and other stakeholders and adopting a consistent position throughout but as I say we understand it's beyond your remit to to do anything about the coin process.

14:55

Okay, so then on item three, B please the landfall location.

15:00

First, we accept the applicant's justification for the land for location and their commitment to appropriate setbacks for the infrastructure to take account of coastal processes. We have suggested some relatively minor updates to the draft DCR, or amendments, which has set out a paragraph 10.20 of our local impact report, and I don't repeat those now.

15:26

in respect of the location of the substation, the council has expressed some concerns throughout about the process which led to the selection of Friston.

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In particular, it asked the applicant to widen its search area. And to carry out a further detailed assessment of Broome covet, which you've heard about from Mr. Bedford, and was considered by the Suffolk council to be the least worst option.

16:01

The applicant selected Friston as its preferred location at phase three of the consultation. It did subsequently carry out further assessment of the broom covet site at phase 3.5 of its consultation

process. But we asked for further assessment and detailed comparative assessment of the two sites which hasn't been provided. However, we understand that Friston has not been selected as the preferred location. And we like the county council are now keen to ensure that the impacts are properly assessed and mitigated. And we have outlined a number of concerns arising from the impacts at that location. And we are in continued discussions with the applicant in order to find ways to further mitigate and or compensate for those effects. And we will of course, update you with any progress that we make with the applicant. on those topics. item three, see the cable alignment.

17:06

The Council has no significant concerns regarding the alignment for the cable route that's been chosen by the applicant. However, there are a number of locations where that cable route does pass very close to residential properties. There are three particular pinch points. And at those locations, we have asked for further provision to be made in the code of outline code of construction practice. And we've addressed that point at paragraph 19.34, of our local impact report.

17:39

Thank you very much. So we don't have anything further to add.

17:45

Thank you very much. It was tougher. I mean, I guess I've probably got one question only that arises from that which essentially is a round to the extent that you can and you may wish to reserve this position until later in examination. And but whether your client is forming a view that on the balance of

18:09

adverse impacts versus benefits, and that there are considerations that drive you to a view that the location and Friston is, as it is now presented to us, and acceptable or not acceptable for reasons. Now, I guess I want to test that because if it is to become your submission, let's say for example, and the applications could be acceptable if, for example, another location were to be used, then it's clear that we it's clear that we do need to surface that as a position and reasonably early in the examinations. And so you may, as I say, say you can't answer that now. However, I would like to lay it on the table with a view that your client does consider it at some point and bring it back to us.

19:02

So I'm happy to give you a brief response. Now we can come back to you if there's something further that that would assist you.

19:10

We as you are now dealing with the application as presently presented, which includes a substation site Friston, we would have liked further assessment of other sites. Without the detail of that full assessment. We can't categorically say this site will be better than that site because that analysis hasn't been undertaken.

19:29

As I say we do obviously you will have seen from our local impact report have concerns about impacts arising from the substation at Friston, but we are engaged in positive discussions with the applicant and we will be able to update you in due course as to the outcome of further mitigation and or compensation work, which we hope will serve to narrow or potentially resolve our concerns.

20:03

Mr. Smith, you're on mute.

20:06

Thank you very much Mr. Hockley. Let's move on. Can I just check now with a Friston parish Councillor here and wish to speak on this item?

20:17

Richard? Yes. From SOS, is now joining

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Mr. Kaplan.

20:27

Good morning.

20:30

Nothing I've heard at the hearing

20:34

yesterday, or so far this morning persuades me to change my mind as chairman of risk and parish council

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that Friston is a is a suitable site for this exercise. Not while there are still residents in the area.

20:59

I'm not.

21:01

I'm not a huge technician about these issues. And so fortunately, I'm very grateful that the sciences group are able to pick up these things for me and they will probably be, you know, letting you know how they feel initially when they have the opportunity. But thank you for giving me this opportunity to express how I feel this morning. Thank you.

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Will

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appreciated Mr. Captain. Okay, we'll we'll move on. I am now going to turn to SASES, please, Mr. Keen for SASES.

21:44

Good morning, sir. Good morning panel.

21:48

Before I start on this, so can I just indicate this later in the day this afternoon. But I have additional personnel today Dr. Richard hoggett, to deals with heritage matters, otherwise the same same people on behalf of faces attend. So I do have some things to say about this issue and will take a little bit of time. But I fully aware that the need to make progress and so I'll deal with it as succinctly as possible.

22:16

Starting with the issue in general and setting setting the point about the question of alternatives, the consideration of reasonable alternatives, obviously, as required under the regulations, 14 to D you'll be familiar with sir. And of course, the significant adverse effects of a proposal that numerous as we set out in our written representations justify the consideration of alternative means and locations for connecting the proposed wind farms to the grid. And they're also in some instances specific policy requirements such as sequential testing, flood risk, etc. That might require and we say do require the consideration of alternatives,

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dealing them first with three a,

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the process undertaken by national grid to make a connection offered to SPR in the, as they put it in or around laced, and does need to be scrutinised to understand what National Grid itself has done. And because it is constrained, sprs consideration of sites and so it's no answer in my submission for SBR to simply say, Well, this is where they were offered a connection. The selection of the lace an area isn't matter properly within the scope of the examination, because you're Tasker and you obviously within limits tell you but it's to assess the location of connection point works. And that means not just the choice of connection point within the least an area, but the site selection of least and over Branford or elsewhere as the connection point. And because the DCR is importantly sir, seek consent for national infrastructure to enable the connection to be made Friston we do have a national grid and sit here within these. And in this if this first stage is not properly scrutinised, then sprs duty to consider and explain the reasonable alternatives would be avoided by the fundamental site selection being made by the developer and national grid, but the application being made by SPR. And the DCI is of course here seek land and rights on behalf of natural national grid to enable National Grid as I understand it to construct certainly national grid to own and operate the new infrastructure for again, in my submission is no no answer for SPR, to say well, the applicant is not natural national national grid. So So I decided then that's to say some things about the coin process if I may, because instead of a proper National Grid enset site selection exercise being undertaken here with all the incumbent consideration of possible sites, those such as those sites listed by Mr. Green yesterday, and consultation etc. That's not what's happened. The process for a grid connection offer was the coin process which is high level

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And to us at least a very heavily redacted exercise. So I'm not sure that the coin document redacted as it is, is on the examination library. Other than that, I know it's attached to one of Mr. wheelers, representations, I can get you the reference later, I don't have to have that it gets his reference representation of the second of November from memory.

25:23

Can Can you put that in as a as part of your written submission, please certainly be very happy to do that.

25:31

There are two at least versions redacted versions of it. But but the I think it's the most, it is the most recent of the two that is attached to Mr. Wheeler submission. Now, so I agree with Mr. Ford on the inadequacy of consideration of environmental impacts within that process. And I note your comments on the constraints on the authority in relation to the coin process. But there are relevant matters to cover nevertheless, and not least, because as I already said, this is a national grid enset. Two. But before I come back to the quoting process, can I also remind us and I know you'll be very familiar with it, about the requirements of the electricity act 1989. Very briefly, so two points. Section nine of the Act imposes duties on licence holders, to including to develop and maintain an efficient, coordinated and economical system of transmission. And so you'll know it's my clients case that unlike the original connection offer of bramford, the selection of Friston is neither efficient nor coordinated. And you will be very clear about the environmental impacts that we we say flow from that, but more importantly, set perhaps for present purposes or as importantly, the coin assessment for EA one for national grid connection is not compliant with national grid's obligations under sheduled. Nine, in respect of environmental matters, and so shedule nine says that in formulating relevant proposals, licence holders are to have regard to the desirability of preserving natural beauty conserving flora, fauna, etc. objects of architectural historical or archaeological interest, a whole range of matters that need to be considered, and that they do what they can to reason that reasonably to mitigate any effects.

So that is the electricity act regime in a very brief nutshell, but you'll you'll know that those same requirements in sheduled, nine, are repeated in or paraphrase, at least in MPs in five, a paragraph 2.2 point six so that also, within the the specific policy statement refers to those duties. And, of course, in 502 point 2.7 requires that the licence holder explain how these duties have been discharged. And so it's important therefore, for national grid to demonstrate that this examination, that it's fulfilled those sheduled nine duties when deciding where to cite its infrastructure. And today, it's our case that it's certainly not done. So. Now, as to the coin process, sir. The main objective of the coin assessment is to select the preferred connection option. That is the most efficient and economic design connection option for the overall benefit of the Great Britain energy consumers. We heard from Mr. Green yesterday. And so it's clear from the emphasis on economy that runs through the applicants regulatory context node, which is rep 2003. That that is that the the clear emphasis is all about economy. And the consideration of environmental issues is mentioned only a few times. And certainly in relation to who we heard from yesterday. I think the only reference I've been able to find in relation to environmental matters is a parent 130, where it's stated that in assessing whether expenditure is efficient off gem will

have regard to planning and environmental considerations. Well, so we been told by off gem again, this is communication, if it's not already in that that can be put in with written submissions, that often does not undertake detailed scrutiny of the coin process, nor is it subject to reverse review by off gem as a general rule. And in particular, the off gem is not responsible for monitoring and enforcing compliance with sheduled nine matters. So an idea so we heard from often yesterday, as I recall, at least that they acknowledged that what is proposed may not be economic or efficient or environmentally acceptable. So so that's the what I'd like to say about the structure of the process. And now I said a little bit about the evolution of the coin here. And again, I in my submission, this is very relevant to to the examining authorities understanding of what's been done and what is proposed and what flows from it from sprs perspective. And so I just like to deal briefly with with with the the evolution if I can put it that way the coin could because we

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When the DCO for a one was consented back in 2014, it included six parallel trenches from bordesley to bramford. For three then planned wind farms, ie a one, a three and a four. And the idea then at that stage, so was that each as you know, as each trench would carry 600 megawatts, so a total of 3.2.

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As my math rates went up

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to four, yes, three, two gigawatts. And this was clearly a well coordinated economic and efficient arrangement, which sought to minimise environmental impacts. Now, we then need to fast forward to 2016 because SPR was able to reduce the number of trenches from six to three, which was an additional one to serve EA three because by then the VA for lease had been terminated, so pausing there, so the capacity of the cable route dropped from 3.3 point six 3.2 3.6 to 1.9 gigawatts. And so, when

31:04

SPR sought to develop a one and a two, in 2017 mg eso agreed a coin to allow us PR to connect a bramford as per the original plan. But noting Of course, because of the changes that already happened that additional trenches would be needed. So that would be to accommodate the additional 800 megawatts, 381 and 900 382. So to go back to the original 3.2 gigawatt originally agreed to be delivered a bramford. But then, later in 2017 mg, so reopen the coin, it directed SPR to connect to a new end jet. So substation at least and rather than bramford, citing a cost benefit justification, but no disclosed reasons for the change. And so as far as I could hear from Mr. Green yesterday, we heard none explained beyond what was most economic was what was driving matters. But last point on history, sir. And this is also really important and you'll see this when you get the redacted version. But despite that

32:14

direction to connect, at least in the coin also contains the proviso that if it's not feasible to connect at least and then an alternative will be redacted connection location, which we say presumably is Branford

would be allowed. So there's an alternative provides a proviso from terms of connection still to be allowed. And that's page 20. When you when you get it serve the coin.

32:41

Now, we know that the coin process considered alternative locations that's summarised in the environmental statement chapter for that section for paragraph 54. That's reference a pp 052. Because that sets out an extract from the coin, including a location of bramford, which we know was rejected in favour of least and no, as I say, it's not explained why. And so importantly, when you look back at that, table 4.3, which sets out the alternatives and some reform that considered certainly does not provide a justification for the selection of the least in area, as opposed to Branford or elsewhere. I've got four points to note about what you see in the s.

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First is, Branford is a very large existing substation and brownfield sites. The second is that both SPR and National Grid have substantial land holdings or bramford, which could accommodate new infrastructure without requiring compulsory purchase. And some might say so much for better coordination of on shore infrastructure may not now be used. Third, I've already said that originally the connection location for the all these dangling wind farms was to be cabled there. That was changed. And so it's right to say that new cables would therefore need to be laid now because of that other unfortunate decision, but there's no evidence that it would be any impediment to do so. And last point, so table 4.3 in the s does make it clear, does make it clear that bramford could have a cable route which could avoid designations and a suitable landfall as identified. The cumulative effects of bramford are described, but there are no high level designations and considerable electricity infrastructure is planned in the location and what there isn't there is any evidence that the Branford cable route is constrained by any existing cables, for example. So where does that get us there's no explanation. To demonstrate that the proposed lay scenario connection is the most economic or efficient or any detail as to the coordination of the grid, which we know as a matter of concern that has prompted the BS review or compliance with environmental duties under sheduled nine. Therefore at the very least, the reason to select the list area remains unexplained and unjustified. And also the African National Grid has failed.

35:00

To demonstrate why bramford is a less acceptable location. And so as we know, national grid's choice means the system will be its hub and spoke for the future connection of other major projects, which we dress yesterday in terms of humans of impact, which is why it's important, as I mentioned yesterday, and I know that the authorities align to this, that national grid engage with the examination process in a more open fair and transparent way. So those are the points that I wanted to say about three a, I can turn to be I can take I think a little more quickly. Okay, just before you turn to be because I think other two questions that I have arising those submissions I think it's best to deal with them in in the body of a

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The first of those relates to your

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drawing attention to the electricity act, I will refer to them broadly environmental protection duties and under schedule nine in the equivalence under MPs m five, and when you submit that you essentially in terms do not understand how or if at all those duties have been discharged Is it your submission that because the principal beneficiary of the transmission system ends it is national grid and get that it is a national grid obligation to discharge those duties. So in other words, we should be receiving submissions evidence from that body about those things I do. So this is a national grid and sit within this vcos um, it may well be I've had SPR and SPR a national grid, obviously, in communicating all sorts of levels. And they could well have come armed with sufficient to deal with this boy, but in the absence of anything, go here. And so, yes, I do. Okay, that's clear. And we will put that back to the applicant, the applicant may respond after this or in writing at deadline three. And my second question and you refer them to the history of the coin process around the the

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essentially the move from bramford to to leisten. Yeah.

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So, the extent that you referred to, and the potential capacity for trenching through to Branford that was essentially

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allowed them to lie fallow. And I just wanted to test with you clearly as a combination of the examination of two enzymes, both of which were recommended for consent and consented prior to the material changes to them. East Anglia one and East Anglia three, the in combination consents of those are for the greater capacity, the cable corridors from the landform fall through to Branford and the panning balance was struck in both of those reports. And again, that the outcome was that that scale of views and development was deemed to be policy compliant.

38:17

Is, is that I just wanted to check that that is at the core of your submission, so that the proposition is that the planning principle of that capacity is still essentially a important and relevant thing, a living thing, that I think that must be right. And I confess I had no involvement in a one. And I don't have a history of it. But and it may well be that someone might say to you that things have changed in a fundamental way. But the principle was established, then the cayde, six cable routes were acceptable in the balance of everything that was to be considered and have been assessed at that point. Now, as we know, what happened was that scottishpower were then able to say, well, things have changed. We don't need all six, can we have a downgrade?

39:07

Because of the uncertainty of what was then coming forward, and because here we are now with with scottishpower, saying, well, well, everything else is uncertain about other projects. But But can we please plumb in this somewhere for ash, and we don't need to be or we don't want to be utilising that that that that what was originally envisaged to be the location for all these wind farms to connect into the grid. So that's my understanding that the principle was was clearly dealt with at that point in the balance for that full capacity of up to 3.2 gigawatts

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applicant can respond to these points

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in due time, okay, let's move on quickly, then. thank you, I'm so on to SBR site selection assessment. So site selection is fundamental to everything if I can put it that way. The good design advocated by E n. One starts with site selection because obviously if you choose the wrong one

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It's going to cause significant adverse effects and give you real mitigation problems, and the extensive and manifest adverse impacts of the proposed development as detailed in our written representations. So demonstrate that the selection of Friston is inappropriate and unjustified. And we're going to come on to many of the more detail concerns an item for no doubt, but properly assessed, say says say the DCS promote the wrong site, because the proposed development would be both harmful and unsustainable development. So so within the issue of how SPR have come to select this site, we need to spend a bit of time looking at the Wragge assessment as it's been called the red amber green assessment,

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which is

40:46

dependent aipp 443. For reference, so I did need to turn it up for my purposes. But the key issue within that is that it was carried out on the basis that the substation should be co located with the National Grid substation. So you see that at the appendix 4.2 power 37 of the environmental statement, for example, that constraint is unwarranted and it narrowed the search for appropriate sites and so it may well be convenient, but what it isn't is essential or necessary, or necessary condition to meeting the electricity Act requirements for example, and we know that when EA one was assessed, the site selection document for that site site stated that a search area of five kilometres from the Bradford substation was used as the maximum distance between national grid and the substation or converter stations. So in the nspr route here, the assessment was wrong to only score sites green where they were co located. And within 500 metres of the overhead lines and red if the site was over a kilometre from the overhead lines, it's artificially constrained the this site selection and so I also understand it's different place different location, different circumstances. But the IFA two inch connector project, I'm told there's a 10 kilometre distance between the substation and the National Grid infrastructure. And that's of course, in a very sensitive area, towards the solar etc. So we can see that that effort can be made to cite appropriately if there is a will and a greater distance. And so touching one of the slides that we saw yesterday,

42:32

I think it was slide 14, where we saw the 250 metre buffer zone that we were told about from existing development being used in SPR site selection exercise, while it's not apparent wire, 250 metres zone was used an EAA one, again 600 metres was used. So if a larger buffer had been used here, it would

have eliminated the Friston side. So it sort of begs the question about how they, how the zone has been selected as to how it's gone about choosing. Now, there are many other deficiencies with the rag, we've set them out in detail in our site selection, written representation. So as I won't repeat them, what I would like to do is make a couple of points. And then I'd also just ask to bring in Miss Miss Bolger to deal with some specific landscape matters, because as you will know, from our written reps landscape is a particular area of focus on our concerns over rag. But my my two brief points at this stage, though, is firstly, it's unclear who carried out the National Grid

43:34

rag. And I invite you if I may, sir, to ask SPR the question.

43:40

We think presumably it was SPR because it's in very similar format, but presumably also with the involvement of national grid, but it isn't apparent to us. And also, when you look at appendix 4.2, and its figure 4.5. Within there, that shows the assessment of the National Grid substation,

44:01

Preston was in fact for a different location. It's further to the north and further to the west of that which is proposed.

44:10

Flood risks the matter for another time. But again, it really touches on the slides that we saw yesterday, the application of the sequential test for flood risk, and pluvial flooding in particular, was erroneously excluded from the selection process. And indeed, the maps we saw yesterday including presentation slide two, which purport to show flood risk zones do not show surface water flood risk, still don't.

44:37

So So with that in mind, I think would be more useful rather than me trying to summarise the landscape one second, just ask the sponsor to to come in on this and then so if you will indulge me one thing further, I'd like to make a final point because it's on his on the sort of subsequent paragraph under three C on strategic justification of Rochdale on below.

45:00

I wouldn't need more than a minute, but I think probably be better if I can do it after Miss ball just spoken.

45:06

Thank you. No, that's acceptable. So let's hear from her

45:12

with a direction to essentially cut to the chase. And then we will hear from you again, Mr. King.

45:20

Good. Good morning. Can you hear me? I certainly can. Michelle boldre. Yes. Hello.

45:28

So we I've submitted detailed written representations. And two separate reports looking at the site selection, which are appendix three to the SE C's written representations on landscape and visual, the reason that there are two reports rather than one is because the when the site was originally selected, and we were told that the rag assessment had been undertaken, but we weren't provided with the details of it. And in fact, the details of it didn't arrive until later in the process, as appendix 4.2 of the environmental statement. And the as far as the landscape and visual sensitivity of the site is concerned, there's fundamental flaws in that lag assessment. So, on the landscape sensitivity, the site is scored as green. Now Green means a positive attribute and potential beneficial. And the the site number six at at nada show is

46:44

scored as Amber. They're both the same landscape character area. But if you look at the detailed explanation, the explanation for the forest site talks generally about the landscape character area characteristics, and then it mentions the fact that it's less distinctive. And the reason for this is because of the a 12 intrusion of suburbanization and industrial agriculture, none of which are relevant to this site. In contrast, not sure which is in the same landscape character area, there's a small amount of a smaller amount but generalised information, no references to these detracting features, which don't occur in the nostril area either. So that's correct. And then it's described as the site and immediate surrounds have a distinctive local character, rectory woodland deciduous woods, avenues and poplar trees around nodesource church give distinct sense of place. So it's clear from that, that the assessors when they went there actually looked at the not assured area, we didn't just look at the generic landscape character assessment, they looked at the nodule area, none of that is present in the assessment for Friston.

48:11

Only thing, the only positive thing that's mentioned is Grove word, and it is noted that it's an ancient woodland, and therefore it has sensitivities.

48:22

When it came to actually writing the Lv, a chapter in the environmental statement, and when clearly the assessors had actually visited the site and understood it in much greater detail. They came to a completely different assessment of its landscape sensitivity. So it's in the alto This is the Lv a description is the local landscape in the Friston area has a strong sense of place and local distinctiveness, with value deriving from the setting of the landscape to the parish of Friston, the characteristic arrangement of this parish, the village and outlying farmsteads in the open agricultural setting, with a simple rural character, network of fields with strong hedgerow field boundaries, scattered mature deciduous field boundary trees, and distinctive backdrop of ancient woodland. And that's paragraph 179. In the in the LPI. A. So clearly, the assessment made at the rag that this was green, it had positive attributes was completely discovered to be untrue when it came to the LPI assessment which concluded that the site had medium high sensitivity to this development. Now,

49:54

at that point, there should have been they should have rethought whether that original assessment had been flawed.

50:00

But obviously, it got too far they didn't. The other area that some the other criteria that is that is fundamentally flawed, is visual sensitivity. So there's a, there's a, there's a criteria about the potential for screening. And in that they refer to growth word and Lauren covered and the potential this has to screen the development. And they score the site positive on that basis, which obviously has some justification.

50:34

But it seems to me that growth would was the only thing that they saw. They, they missed everything else about the area. And in fact, when it comes on to visual sensitivity, it's again, given a green score. And it's given a green score for the same reason, as it was given a green score in the screening because of growth word, what's completely missed. At this stage, the rag assessment not missed in the outline a is the sensitivity, the visual sensitivity, because of the footpath network, because of the proximity to the village, because of the proximity to this sort of range of this kind of little historic cluster of farmsteads, the edge of the village, the views towards the church, the whole character of this area to the north of Friston has got visual sensitivity, completely missed at the rag assessment, it's given a green positive benefit cause of those two, because of having missed at this essential early stage those two essential sensitivities, we end up in a situation where the mitigation proposals simply cannot mitigate the harm when when we get to the more detailed design.

52:00

So

52:05

so that's that's the that's the submission that the fundamental flaws at the at the RAC assessment meant that this site was scored as having a an acceptable degree of sensitivity, which when the detailed assessment was done, clearly turned out to be untrue.

52:29

Thank you very much. Miss Bolden. Now, can I just check it may already be in your resume material, but as you're very conscious, we have now many, many documents deed to review. I just want wrath and art. Are you a landscape architect or making those submissions from a professional standpoint?

52:53

And I'm making them from a professional standpoint, I'm a landscape architect, and I'm an experienced expert witness. I've given evidence previously at DCO inquiries as well as local plan inquiries and planning appeals. Okay, well, look, I think if Mr. King can then put your CV in the normal way or our store our attention to where we will find it in the document set.

53:20

Thank you very much. So returning to Mr. King. So thank you, I'm Miss Boulder's very extensive expert experience is set out in the preface to the SE C's written rap on landscape and visual.

53:40

The detail of the written submission is entirely drafted by Miss Bolger. And obviously, sir, if there's any further CV type detail that you would like from you pointed me to where it is, yeah.

53:53

I appreciate that. There's an awful lot to plough through. So there we are. So you mean, apart from the the points that this board has just identified, as you'll know, from the site selection, written reps, there are in its appendix three, specifically on landscape matters. There are a raft of methodological and criteria deficiencies that are identified there. And we've just heard from as Paul just summarising some, but I know you'll read the full, full catalogue, again in due course. So the last point I wanted to make sort of this point was, we'll come on to design matters including Rochdale envelope in the next item, but I just thought it was worth identifying is it's raising the agenda here in terms of whether, you know, points to be made about strategic justification, Rochdale and below that there's one point that I think is live in this respect, which is that in response to the panel's question 1.017 the applicant tells us that it's selected the onshore substation and National Grid substation locations to reflect the requirements of the project only and did not consider potential expansion of the National Grid.

55:00

substation will set that response appears to be inconsistent with the response given by National Grid ventures in its statement of common ground as the land selected for the engine substation, and associated screening seems to be greater than specifically required three a one and, and a two alone and see if I can give you reference for future consideration, layer 22 hyphen 05 22 hyphen 05 linework of the outline landscape. That mitigation plan which is dated 21st of August 2019 clearly shows as a blue outline an area of land of unspecified purpose, but can now be seen to be very similar. So very similar to the land shown in figure one to that statement to common ground with national adventures. And so you may recall that Miss Gilmore held it up to the screen yesterday to show you

56:01

and that's in that in figure one that the Steadicam ground is shown in areas shown for the end jet substation expansion for the Nautilus and yearling project. So there's clearly so that that's set out in the detail and what it shows us is that SBI has considered ngbs requirements. And it's wholly unconvincing, if I may say so to suggest otherwise, the paper trail is very clear. So next, I can assist you further. Those are the points on bottom three, four spaces. Thank you very much, Mr. Kane, we'll

56:38

come back to the applicant for responses on these matters. Okay, now, I have left on my list to call C's, SOS and Mr. Holford. So I will go to CS now. And again, the usual reminder if there are matters that have been put with which you by others with which you agree, there is no need to repeat them.

57:02

Three very quick points this morning. And I first of all, just want to say we wholeheartedly endorse everything that Mr. Kean has just said, and we will therefore not repeat it.

57:17

I would like to just mention an article that appeared in the local press this morning, Mr. Graham Cooper, from National Grid Project Director for East Anglia East Coast energy.

57:33

He's a busy man, he is the same gentleman that appeared at the spectator energy summit two weeks ago. He has time for a lot of PR, which is excellent to see hasn't got quite so much time to consult and listen to local people's views. And in his article, he says,

57:58

we are exploring and reaching out to local stakeholders.

58:05

We are doing all we can to engage with local people and mitigate the impact of our work.

58:15

And he concludes by saying

58:19

we need the help of those local non governmental organisations that are able to advise and guide and maybe work hand in glove with us to find the least worst solutions.

58:32

Well, I can assure you now, out of all our thousands of supporters, Mr. Cooper and his team have not yet consulted with us. I would also say he has something in common with the two councils here in that he talks about least worst solution.

58:54

Least was solution they're very interesting words, and I want to come back to them in one moment.

59:01

None of us had time to hear yesterday morning at nine o'clock on radio for Mark Carney the previous governor Bank of England, gave his first read lecture on radio porn he called for a reassessment of our hierarchy of values in our society, not a lot has changed in terms of how we value things. Since the 19th century,

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Carney was suggesting that there is a wind of change, and we should reconsider our value system. Things that are not priced in our society are not valued.

59:46

In this new world, where the Prime Minister has made a pledge to save the countryside and iconic landscapes. How are we valuing a pilgrims path, a landscape view

1:00:00

An ancient oak, Katie wake at sizewell versus Norfolk,

1:00:06

mental health, well being the environment, tranquillity, all of these things should have a value.

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Let us now say that Santa Claus has come early this year with a sack of gold coins, and financial cost is no longer a barrier. He is giving us this gift today to choose the site that does not appear to be the cheapest place to go in terms of construction costs, but the best in terms of least environmental and community disruption and damage. Which site would Paolo pick solar choose? If he was given that gift by Santa Claus? Would he go for bromford on the basis that a solution to the pinch points can be found. And that national grid could then choose our Hubble cluster at an already industrialised site closer to London. I therefore conclude with this point about least worst case, I would ask

1:01:18

both the software Council and the county council and Mr. Graham Cooper, because perhaps they have this in common that the least worst case is actually not Friston. But bromford. And I would ask you all to take that into account. When you look at what Mr. Bedford said yesterday. It's not just the legal assessment rules that counts here. We need to understand the bigger picture. Thank you.

1:02:08

You're on mute. Mr. Smith.

1:02:12

Apologies, my unmute was being a little sticky. And can I just check with my panel colleagues? Are there any questions on that material? And I'm seeing no hands. Okay.

1:02:25

SOS and then Mr. Halford. So SOS first please. And again, I would ask you to be as brief as you may be. And again, if there are matters that others have said that you adopt, please refer to the fact you do so. Who will be speaking for SOS? Yes. Peter Chadwick. Chairman of SOS. Can you hear me as we can Mr. Chadwick? Loud and clear? Yes. And I'm going to need a bit of time, because there are the matters that I emailed you about. And there's other things come up this morning as well. And so I'll start with, um, I'm concerned that there might be a misunderstanding

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arising from Scottish pause and presentation of this site selection, which we heard yesterday afternoon.

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They said that there was an area between size will and Langston Hughes by EDF for mitigation land. And, and this was not for sale by IDF and giving the impression that this was the song reason that this area was not considered for a site.

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And

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I, I heard that Mr. Smith asked said that he did not wish to rake up old issues, but could SPR ask EDF again if the light if the land might now be for sale? Can I can I just briefly interject Mr. Chadwick? Because I think turning back to that, I think a key component of this is the degree to which that land is inclusive of the broom cupboard site.

1:04:26

Is that correct? Now, if we're proceeding on the basis of two factual elements that I hope we have correct and so therefore, I will just check. So you are indeed the applicant can can respond if we have this wrong, but but the understanding is twofold. One, that land does include the broom covered side,

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too. It was also the land that was I'm referring to in inverted commas as the reptile mitigation land, that in terms of the applicants

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site selection process was screened out because they had an understanding that it was further required by the sizewell development process. However, we then received,

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shall we say,

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a less than definitive response from sizewell themselves about whether they considered they still needed that land or viewed it as constrained, in other words, that they would potentially have viewed it as available if relevant requests have been made to them at the correct time. Now that that was the understanding that we had got to if, if you think that's incorrect, then yes, by all means,

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place your place your view of what the correct position is onto the table. And of course, the applicant will respond to these matters, and will hear their side of the story too

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is that is that the issue at hand? Oh, yes, and

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the serve the broom covered site is a major part of of the mitigation land, and it is so much more than mitigation land. And, and then towards the end of sprs presentation, they gave their reasons why they rejected Brune covered as a site.

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And which were because

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it is wholly within the eo n b. And As the World Turns active sites, it would go against against National Planning law for projects of national significance, if chosen.

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And also they said that this site was at the narrowest point of the amb coastal strip. And to industrialise this area would cut the coastal air and be in half,

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leaving a northern section separated from a southern section, which would be unacceptable for all sorts of reasons.

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And there are there are many other reasons why broom covered is not a suitable site. Some 40 people live within

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within 100 metres of the site boundary, and many within 10 metres of the site boundary. And there are hundreds more people living just over a third of a mile away on the edge of Leysin.

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And the broom covered site is much closer to laced in than it is to size. Well. And the sort of general approach throughout has been that broom covered, is that sizeable and just took all the buildings that size, but this is closer to

1:08:09

two leisten than to size well. And it's the map. Yes, can I just interject very briefly, because what I think I need to put you your mind at ease on is is a critically important point. There is not an application to develop

1:08:28

a grid connection point at bring cover in front of us in these applications.

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To the extent that we are considering any such based, it is only for the purpose of understanding how the rationale of the applicants concluded site selection process works and whether it is in inverted commas a full and adequate process. And so what we don't need to do

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is to hear essentially,

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detailed counter propositions that a decision should not be made to migrate to the connection point to bring comfort, because that's not in front of us.

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All that's always in front of us, here's what we have, we need to be able to make recommendations to the Secretary of State on what we have. So the secretary of state can make a decision and as part of that we need to understand how the applicant got to where they've got and that's the entire purpose of this exercise. Does does does that assist? Yes, yes, I do understand that. But um, but I do want to point out the SPS map of the buffer zone with population at 250 metres. It shows that that a good part of Britain cover was with within the buffer zone. And also I'd like to question the County Council and the District Council

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to point out that the District Council

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know the county council, because of

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a boundary expansion

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and now represents area areas like Lowestoft and

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and many urban areas and the tools so which are sort of have a totally different interests till the local area what, which is, which is a heritage coast, which is the Lamb and the channelings. So, the votes of the council's to have a policy would be would be guided by by the number of cartons. The overall thing I don't know whether that is relevant, but Well, I think I think we're beginning to move beyond, you know, realistically what we can sensibly investigate what we have to understand the county Council's position and allow them to set it out, we have to understand your position and allow you to set it out. And all of this goes into the great and pennyweight balancing machine of planning considerations with pros and cons on both sides of the beam.

1:11:24

And and essentially here, we're interested in your position, save our sanderlings position which we take, you know very plainly as being not withstanding all other factors that you have deep concerns about a proposition that bream covered be viewed as a suitable connection point. But as I've already explained here, that is not an outcome that can immediately emerge from any recommendation that we

might make to the Secretary of State. We've just got to understand how the applicant got to where it got. So so on that basis, if if there are any final points that you want to put to us, that kind of core, how did the applicant get there? And then I'm very willing to hear them. But other than that, I think we should move on. Yes. Can I just conclude by saying that, that save our sanderlings was founded to protect the AONB coastal strip and the sanderlings and that we believe that Friston isn't totally on suitable sites as well. So that that is our position. Thank you. I'm very conscious of that. No, thank you very much. Mr. Chadwick. And then finally, Mr. Holford.

1:12:47

Can you see me?

1:12:50

I can now. Yes, Mr. haltered. Good. Well, good morning, sir. It's still Hartford abode rehab.

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Let's check the screens in the right position.

1:13:02

I would like to address item C. That's cable alignment justification.

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And I would like to first in particular to the old railroad, ODM v 1122. Cable crossing pinch points, as it's referred to.

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Now, I'm suggesting that should be considered under this agenda is and if no other crossing point is feasible for Cleveland to reach Preston, as the as the applicant has inferred?

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And if so, then this is a strategic issue, as well as as Mr. Furth has mentioned, it's also a local issue, obviously, obviously to the residents concern.

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Now I'm a layperson from my reading of

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NPS in one and three, they apply much the same with regard to the cabling as to other components of the energy, infrastructure, and code back, I won't quote the whole thing, but in three, paragraph 2.6. Point three does state for clarification, any reference within this MPs to offshore wind farm infrastructure includes all the elements, which may be part of the application, including, obviously wind turbines, and lastly, all cabling. So

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as far as onshore cabling and haul roads are concerned, I hear it argued that some of the environmental and human impacts are only temporary, only during construction. Well, given the possible timelines for East Anglia and North East Anglia to temporary could will mean a duration of 10 years.

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When

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responding to a comment is h one on Tuesday, sir, the applicant Mr. Mr. McGregor, so I think it was asserted that the cable route was not an afterthought, but it was actually an integral part of site selection.

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I think

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In scans, if any evidence of this in EIA chapter four, in particular with regard to the B 1122 crossing place, I could go into more detail, but I suspect that is not appropriate at this point.

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So, sir, yesterday the applicant advocates Mr. Martin storyboard the slide, slide number six, stated that the original study area did not go west to be 1122. In order to avoid interaction with woodland and residential titles.

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I don't understand the word interaction, because interaction in the induction implies a two way process. I believe the correct words would be to avoid damaging impacts on woodland and residential titles.

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But leaving side my picky comments about the language used by the applicant. So, by the time that story had reached slide number 13, the applicant was was now looking at substations sites west of the B 1122. And suddenly woodland and residential titles were no longer a problem no longer effective

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rhetorical question coming up, if so, why not?

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What evaluation was done of the impact on residence close by now within 20 metres of the order limits.

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For just one example, there was no buffer zone criterion applied Well, there was no real site selection. So how could be

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another approximate approximately by my reckoning 1.8 hectares of deciduous woodland both sides of the road would be that would be sacrificed, including a group tree preservation order

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that residents have fought hard to defend over many years.

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Sir, the route west of the old burrowed up through the central road, not as scottishpower occasionally say to the south of London, was only required in the event that one of the Western zones was chosen. And yet there has been set a topic, a topic group etg, I think the court had decided on a road and river crossing place way back in summer 2017 before even project scoping, let alone Let alone site selection, which which took place over quite a long time before one year.

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So no evidence has been presented that any other crossing points were ever considered. And the site selection reports do not consider feasibility or options for crossing old burrowed.

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I said that, as I said, this is a strategic issue for

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indeed no further attempt was made to look at other crossing points even once scottishpower renewables the applicant, I should say, had reduced the spec for the cable corridor width from 50 metres to 27. For two wind farms or 16 metres for one, whatever that means. Does it include haul roads? What does it mean? It's not at all clear to me. Sir, the local authorities route discussions power in April 2018. I think Mr. Bedford might have referred to this I'm not sure it's the same letter

1:18:12

stating its view that it was important that the cable corridor can accommodate both SPR and National Grid projects, that if this cannot be achieved, or will present significant loss of immunity, then those site options should be dismissed.

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Yesterday we heard and admission that discussions on these matters between the applicant and NGV have been ongoing for some considerable time.

1:18:38

If, and this is all conjecture, I must admit if that was the applicants reason for not revisiting its selection of the overrode cable code or crossing? Can we infer that the applicant had made allowances in the future cabling requirements of ngvs to interconnect projects, but had not declared this in the EIA? If that is what has been going on? In my opinion, well, it should have been transparent, at least declared in site selection reports. Finally, sir, I realise time is against us. There is a 92 metres width available on the west side of the V 1122. I've noticed it myself, but even at this late stage, the applicant has provided

no indication on where the so called 16 or 27 metres trying to cabling would be placed, except to say that only five metres of woodland would be preserved three pitches lane residents and and whatever they can put there.

1:19:37

I think that provides another clue that there is an intention to cater for other projects to squeeze the high voltage cabling through the same pinch point. And just again, not in detail, I think I have to refer to your own advice note nine on Rochdale envelope which does require an applicant to bring forward the level of detail to enable the

1:20:00

Proper assessment of the likely environmental effects necessary mitigation, if necessary, considering the range of possibilities I quoted, is it virtually impossible to work out what's happening? This pinch point because the applicant has not made it his minor photo, there may be one or two wind farms. But that doesn't really excuse that.

1:20:23

Finally, and this really is my last comment, that also must be a serious question as to the validity of these applications, if they have catered for other developers potential projects, without disclosure of such in these submissions. Thank you, sir.

1:20:42

Thank you very much, Mr. Holford. Now, that draws us to the end of all those who had requested to speak, I'll just check to see what from my panel, colleagues, are there any other matters that they wish to raise known? Again, seeing none. Now what I'm going to suggest, Mr. Ennis, for the applicant here, in the interests of making progress on the remainder of the agenda, and moving to Agenda for, I don't believe it is any

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lack of opportunity, if the applicant then responds to all this material in writing, that will

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get to a substantial degree also give the applicant the opportunity to review and think upon what has been said, rather than providing an extemporary response. And as I've said, on a number of occasions, a written submission in weight terms is no different at all, to an oral one. And I am conscious, however, though, that there are matters on which people do wish to engage orally. And it's important that they do on agenda item for and that we take no more time and move to it. So can I check with Mr. Ennis, really, would be agreeable. I have one matter in the whole scheme of response, which I think it's important to address because it has a bearing. Yeah, and I don't want to say it every time throughout today. And it is genuinely a strategic issue. It isn't response to coin, and what has been proposed and the evidence in relation to that. And because it has a bearing on the subsequent sessions, I want to if I can respond on that particular point to that particular loan, so that they know, look, I think that kind of triage in inverted commas between the matters that will assist us as we move forward today, and matters that can be placed on record as your concluding position. And if it's the latter, in writing, if it's the former orally, so

there's goodness, yes, conus will help the applicant, I'm going to come back to a matter that's been addressed first by Councillor fellows, and subsequently in a number of submission mastercoin process.

1:22:54

And, in my submission, it might be quite interesting to look around the history of what's happened elsewhere. But the issue is, at 2017, we had capacities of offshore wind farms, that we brought forward for grid to reevaluate in terms of the coin process. At that time, the issues that grid had to consider are set out in statute and their regulatory duties. And I think one of the fundamental points here, sir, is this is that we've had a lot of options about what could or could not happen. But in fact, none of the submissions actually address these projects and the requirements of the connections associated with these projects. In particular, I want to address particularly the technology aspects of these projects, because we heard from Mr. Green yesterday about how in the context of connecting these two applications, in the first instance, looking at them individually, as AC projects was the most cost effective and efficient means of connecting the projects. And that is pretty fundamental issue because obviously effects consequences for subsequent flow in terms of onshore infrastructure. But a fundamental point arising from that is there's been suggestions, one, we can combine the two projects and do a DC Well, at 1700 megawatts, Mr. Green was able to explain that that would be to DC links. And effectively, it would not be cost competitive. And we've obviously addressed that in substance and writing. To give you a clear indication of the orders of magnitudes. Well, we can't really go into the individual costs because of the deck there are confidential at this stage. But there's one particular matter that Mr. Green highlighted yesterday, and it's it does have an important bearing is that in considering that AC link, the applicant is proposing a 275 kV link at AC

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In terms of innovation, this would potentially be the first time offshore that that particular voltage have been used. And you might say, well, what's the consequences of that? Well, it has material consequences onshore for the number of circuits that are required. In terms of the 27275 kV circuits, it's two for each project. If we're used the more traditional 220 kV, it is likely for the installed capacities and power outputs of the offshore schemes that they would have required three circuits. Now, that in my submission, is a clear illustration of taking the most cost efficient and economical connection, but gain the stage further in terms of innovation, and choosing to take a technology solution, which is ineffective, and is driving at the industry forward. And my submission. When we come to the pick good design, the fundamental issue of back technology choice has resulted in material reductions and potential impact onshore arising from that selected technology. And I think it was raised yesterday, I think in the context that really got perhaps the prominence that it should have done to cable trunks project rather than three that land for cabling. And when we get to the substation, two sets of equipment, largely for each set of projects, as opposed to three. And that has implications for for transport, materials, substation design and scale. So I think just to put that in context, that that worldleading 275 kV decision is one should be recognised as innovative, challenging, and a key component of the good design in relation to this project, minimising the subsequent onshore infrastructure and impacts. And that was really the point I just wanted to make. Because obviously then goes on to land for cabling and substation in relation to matters. But insofar as that is concerned, and motivation, we also heard the clear evidence that in terms of an AC connection, that cable distance is the key issue in terms of cost. And that is why it is fairly self evident, that the shorter the routes, the

more efficient and it will be, and also competitive. And I think I also just want to flag as one as the coin process, we, as a development of an offto asset, are also under a duty and the first matter that often will look in a cost assessment process is whether we've developed an economic and efficient cost. And that is all that we're able to cover in the overall offto process. So there's a double element of economic and efficient costs applying in this context. And I think that's important to remember. And insofar as we have developed this project, it is very clear that in looking at this world building technology, that is exactly what we're trying to achieve, both in cost savings and environmental impact reduction. And that's concludes my point I wanted to make because it does have a carry on. And hopefully every time I don't mention landfall and people that the same point needs to be made. Thanks, sir. I'm very grateful and and again, you know, a full opportunity at the next deadline to respond to all of the matters raised in relation to agenda item three in writing. Now, I do know just before I hand back to Mr. Hockley in the chair, and that there are two remaining hands on my board. And I have a hand from Council of fellows and council fellows, I am going to decline to introduce you again on agenda item three, you had already spoken to the item yesterday, you were you were the privileged one who got to speak at the time when we did actually hear the original matters. And if there are remaining things that you wish to put that you maybe didn't at that time, please can you put them to us in writing. Now, Mr. Fletcher from

1:29:12

historic England, and I, will you wishing to speak on agenda item three, and just didn't get your hand up early enough?

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Yes, that's correct. And in fact, to be honest,

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I don't wish to wish to delay matters further. So if it's okay with you, I will I just want you to use a historic invariant matters with regards to that that section. And we did write to the applicant back in 2018. It might be sensible if we submitted that letter to the inquiry for you to alongside our evidence. Yes, no, that would be very, very helpful. And if those responsible for the Action List today can record that there is an action that

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that's that correspondence will then be submitted in and indeed I give you a full opportunity.

1:30:00

If there were matters that you wished to have said orally, and to actually put it in writing at deadline three.

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Thank you. Thank you very much, in which case I will now

1:30:12

much to Mr. Hot, please relief, hand him back this item and ask him to take us forward.

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Thank you, Mr. Smith.

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What I was going to suggest now is it given that we're up after 11 and usual, break times are past 11. It seems like a good place for us to break now we're at the end of agenda item three. And before we move on to agenda item four,

1:30:37

obviously, time is upon us. So I thought we'd have a shorter break than usual. Normally, we have 20 minutes. So if we move to 15 minutes, and I'll suggest that we adjourn now for 15 minutes and reconvene at 1145 for agenda item for Okay, thank you