

East Anglia_ISH2_3rdDec_Session 4

Fri, 12/4 10:33AM • 2:01:07

00:09

Okay, good afternoon, everybody. And welcome back. Just before we commence, could I just double check with the case team, please that we're being recorded and that you can see and hear me, Mr. Hockley? We're recording you, and we can see and hear you. Excellent. Thank you very much, miss. Oh, well. Okay, just before we start on agenda item for BB, which is landscape and visual impacts, just a couple of things that I wanted to mention, it was brought to my attention that just when I joined, then

00:38

Miss Gilmore from Miss Gilmore from CS, you had your hand up, so apologies for that. What I will say is that obviously that was after the applicants spoke. So if you will, at the end of this section, that's for BB, I will go around the table again, then obviously, if you want to bring anything out there, and then you're very welcome to thank you.

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Also, we're not going to go back to the issue now it will be discussed next year. But just to

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mention, really that some of my colleagues have been in the break looking through the environmental statement. And we do note that there are various references. This is in terms of landfill for HDD techniques for landfill being used committed to in the environmental statement as part of embedded mitigation. So that's for the applicant to really to consider that in in in their written responses. And as I said that we will be

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having a session on that next year.

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Okay, thank you.

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And before like I said, obviously, we did start to move inevitably into landscape and visual impacts because all these issues do overlap to a certain extent. And we'll carry on there. I do intend, though, to consider public rights of way primarily within discussions concerning the historic environment as they seem to fit more there.

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Okay, thank you. My first question, let's go character is actually to be East Suffolk Council rather than the applicants.

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So apologies if you're not expecting that, but this is a point that was also alluded to by SASSES earlier in relation to the rag, the Ragnar coin.

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And I note that the applicant clarification note,

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states that suburbanization the proximity of the modern agricultural buildings and the pylons and electric lines, all notably influence, yes, fatik. And, and influence considerations with landscape value.

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So that while and he didn't cover any historic issues, but while the trackway motorcy and historic field boundaries all add to the understanding of the landscape, they do not change the assessment of landscape sensitivity in the landscape character type. It was more whether you agreed with those

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influences within the landscape character area.

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So that's the East Suffolk Council, please. Thank you, sir. primarily on the landscape matters. I'm going to ask Mr. Newton. And you may recall, I introduced earlier carolee in equipment, who's going to address you on historic and heritage matters. But I'll ask Mr. Newton to address this issue. Thank you,

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Nicholas. Nice. East Suffolk Council

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I think this question partly rotates around

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the difference between assessing the likely impacts against the landscape character type as a whole, as opposed to the much more specific characteristics of the locality within that landscape character type. And in direct response to your question, sir, I don't associate the impact of the a 12 on this particular site. I don't feel that it has a suburban housing influence.

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The towns of leisten Saxmundham in the locality are detached remote, you don't really connect with them, as you experience that particular location. So I don't feel that they are part of the assessment. There is some electrical infrastructure, there they are, the overhead was, but in terms of the 812 and

the suburbanization effects of towns within the LCT now identify associate them with this locality, which has a specific

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localised character of its own.

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Thank you very much, Miss Newton. It's very clear. Thank you. So to the applicants now, if there's anything you want to come back on there from Mr. Newton's, and then I also have some other questions for you.

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Yet Simon Martin LBI advisor for the applicants

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Yeah, I just think those comments about the influence of

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various detracting features on character.

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I mean, I, I accept that

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the 12 isn't having an influence on this local landscape.

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That was a elements of the, I think of the Suffolk County description of the, the ancient Highlands landscape type within which the development is situated. And, and drawn into the, to the dragon the description of the of the landscape character. And I would, I would agree that the the overhead line

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has a greater influence on a local landscape character of the of the site in this context. And, and I would just highlight that there are a number of

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large scale, large scale agricultural buildings in in this local context, which were highlighted in the rag on the later LBA assessment. And particularly those that read has found, for example, which are just to the northwest of the site. And but they're also large scale farm buildings and Manor farm to the east.

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And so

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those would be I think the some of the key and

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detracting elements are of note in that local landscape setting.

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Thank you. Could I just double check, because we mentioned there, the 12

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farm buildings and the pylons. You didn't I don't think you covered suburbanization.

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suburbanization. Yeah, I mean, I think that's referred to just in the context of

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village expansion, and the rise of farm conversions and so on, in in the landscape, which, again, is referred to in the Suffolk County LCA.

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I don't think it's, you know, White's read suburbanization by any means, but it's referred to in the context of

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urbanising influence of farmsteads as a converted to

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residential development. Okay, so that suburbanization in your view for this site is, is about agricultural buildings, potentially converted, but but large agricultural buildings, as opposed to the fringes of nearby towns? Or?

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Yes, I mean, I'd say so in terms of the local site context, it's not on the not on the fringes of towns in that, in that sense, no.

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Thank you for that. If we could move on then to the the effect of the existing pylons on the site.

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There is a view that pylons

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almost sits above the landscape, if you like that they're open nature, and they're high means that they almost traverse the landscape, the common phrase of Parliament marching across the landscape? And

do you agree with that view? And how much of an impact do you feel that they have on on the current landscape around the proposed substation site?

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Yeah, Simon Martin, for the African.

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My view on that is that Yeah, on the one hand, they, they, I mean, they're viewed as a, you know, a linear feature in the landscape. And they, because they, you know, they're almost above the human scale. So, they have that impression, as you say, sort of,

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you know, notching and extending across the landscape at a scale is above the, the human scale of landscape below. And so, we we note that, but we would also say that, in this local landscape, the double row of overhead lines do have a notable influence.

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By nature, they there is a double row, they are tall, large pylons. And

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there's a I suppose,

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a characteristic of the actual alignment of the of the overhead line in this this landscape as well because it because of the two diversion terrorists it tends to

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not not just sort of pass the landscape in a sense, but it it almost affords some

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insane closure to in terms of defining this space between grovewood and existing pylon line. So it It probably more

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Probably more important parents so that it has a more encompassing influence because of that change in direction, I think of the of the overhead line.

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So yeah, those have been my, my comments on that they, I think they do have a detracting influence in the, in the local landscape. And they are noted as such, you know, through

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both the the county and local, local assessments, character assessments as having that kind of influence where they pass through the landscape. Okay, thank you for

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leading off from that. Do you know how long the pylons have been in place? And also, could they be considered as part of the established landscape now?

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So I'm not certain on the date of the

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you know, how long they've been in place? I could give you a specific date. I assume it's, I assume it dates back to the construction of Sizewell AMD power station.

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So yes, given that, given that time, lapse theory, it's it's the construction of them it does. They do tend to, and

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yeah, became become sort of almost accepted features of the, of the landscape. And they do have a strong influence, I think in you know, in in views from the north,

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from the local public, right of way network looking, looking back towards Preston,

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are you sort of you know, you're seeing through? And the overhead, the overhead lines? And so there is Yeah, certainly.

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Yeah, well, on the one hand, they, you know, they've been there for some considerable time, and that they still have a noticeable influence in the landscape.

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Okay, thank you.

12:01

If we can move on. Now to Just a quick question on just sustainable urban drainage systems, you have proposed subs.

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And this is noting your response to the question, one point 10 point 19.

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Could you describe how they made look?

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And if they're the kind of obviously, as I understand data, you know, you normally depressions in the ground, that fill up with water at times of, you know, times of high rainfall, and essentially, when the ground is saturated,

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with such depressions either empty or full of water be a feature of the local landscape.

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At present

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at price, sorry, can I just clarify that in present or or as they were proposed? And I believe in your answer to the question that one point 10 point 19.

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You and correct me if I'm wrong, but I think your answer was essentially saying that system sustainable urban drainage systems wouldn't look out of place in the local environment at present.

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So I was up, I was asking the question, is that a feature of the local landscape at present similar features to what you propose?

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I think the

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i think the some of the character assessments encourage the introduction or enhancement upon ponded features in the landscape.

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So I think it's in line with some of the landscape guidelines in terms of landscape landscape enhancement. And that was certainly our intention in terms of the design of those particular features that they would be

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naturalised in the sense they're not intended to be civil engineered features that don't fit with the local landscape character.

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And you can see that I think in just the,

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the form that we've represented the surgeon in the, in the LM

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just kind of organic shape. And also in terms of planting that we've illustrated in the outline plan, including sort of irrelevant

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wetter grass species and wet woodland species in and amongst the, the basins. So they can be they can be landscaped and designed to

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fit well and contribute to the to local character. And,

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um, we think, you know, overall add to that sort of offset of the

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electrical infrastructure appearance of the substations. Okay, thank you. I've got some more questions on that, but I probably saved those for writing given time. So if we could now move on to

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mitigation

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and the growth rates of any replacement planting

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for mitigation, I don't know in your deadline to

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responses that more information is to come in at deadline free.

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The question is really do you have any update on this information? And will any additional photo montage coming at that time?

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Yes, I can. I can update you on that, sir. Thank you.

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We are engaging in ongoing consultations and discussions with the council's on this matter.

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We are

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I mean, we we think that the, the growth rates that we set out in the, in the LBA and on which we've, we've made our assumptions for the photo montage visualisations and we think they're, we think they're achievable. And we are in discussions with the council's in terms of how best the applicant can deliver

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the mitigation in order to best achieve those those growth rates and the fucking fastest growth of trees on the site to provide screening at the earliest. And

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there are there are measures that we are looking at and considering in terms of

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I suppose that go that relate back to the landscape maintenance and the implementation and aftercare of the landscape plans, particularly that we were discussing with the, the the local authorities on on that in order to give them

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as much assurance that we can, you know, we can deliver the the growth rates and the tree heights that we've we've assumed in the impact assessments. Okay, and probably already, the key things are to just briefly we're watering because the we understand the local authorities concerns about the, you know, the climate and the dry spells in Suffolk in the in the spring and early summer.

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So, so, yeah, making sure that there's clear commitments and specifications towards watering the plants. Post planting is a key thing.

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But also,

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we're talking through the deliverability of a sort of dynamic aftercare scheme, currently, which is an area of

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central to best practice, really, in terms of how the plants and how the landscape plantings managed and maintained after after implementation to give them the

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best,

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best opportunity to grow in the in the local conditions. Okay, thank you. I may have missed it. Oh, and apologies if I did, but did you did you want to the point about new photo montage is

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no apologies. No, I I missed that one. Yes, that is currently

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one of our actions and we're working on updates to photo montage and it's it's

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it's, it's LinkedIn, really search to some of the other updates that we've been discussing in the course of today, in terms of the both the updates to the overland planting

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and the changes in the substation footprint and levels and and heights of infrastructure. So we we currently see that as

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we clearly see that as a way to tying up all of that information, I think into to one package of photo montage, visualisations an updated package, which addresses those matters that I refer to there, the updates and the length and the levels and the heights of the okay infrastructure, as well as the local authorities.

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comments about plan about planting

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that we would be making some updates in terms of how we show the appearance of the planting in in the photo montage is to address the comments that we've we've had in trying to find common ground on with the the authorities and in the our

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submission time frame for that is that deadline for so okay for the photo montage?

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Yes, that's Yes, that's what we were working towards.

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I think we may be able to Sorry, I think maybe there's a I think we may be able to submit information ahead of that just in terms of as a package of parameters and understanding the parameters that might be changing.

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And

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maybe some indication of the key areas that we change in the montages. But I think it's really, really comes back to just allowing

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This time to make sure that we, we are getting the

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the design changes.

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Correct. You know, make sure we're showing any design changes and substations correctly and capturing all the issues and in the in the changing planting for the island. Okay, thank you for that. In terms of pre planting,

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is I believed the figure was four years do you think four years of growth by the first year of operation is genuinely realistic?

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And

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the I mean, the app the applicant has committed to you're engaging in

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pre construction, planting or to set out pre construction plans. And currently, and

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I think that we've identified certain key areas outside of the AI side of the main construction area where pre construction planting could occur an earlier stage.

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So those are sort of

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in some key areas, often closer to some of the key receptors. And in areas which wouldn't be physically impacted by the sort of civil engineering side of the construction work civili. And so, so yes, we think we can

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deliver those pre construction

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planting areas, although they are currently under review and under consideration with the, with the authorities as part of the the updated Orlan Okay, thank you. And in the landscape mitigation work in terms of planting as well.

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Where and how will the planting stock required for the landscape mitigation works be procured? Will it be procured locally? And is there an understanding of availability? Essentially?

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And

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I'm afraid I mean, I can't give you anything definitive in terms of availability, sir at this stage. But we can certainly

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look into that in terms of

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local nurseries and availability to supply stock and appreciate it as a big planting scheme.

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And so that, you know, availability is key to try and deliver it delivering that. And yes, the intention would be for

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Yeah, no local stock.

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Okay, thank you.

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Could you for me, could you compare the length of time that it would take for in your view, the mitigation plan to be planting to be established?

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With the design life of the proposed

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a one north or near to substations?

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Yeah, so I think in terms of the planting, I mean, clearly, it some, you know, early planting young areas of newly planted trees,

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they have limited effect, limited screening effectiveness in the early years of their, their, their life.

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The benefit, really, in terms of the mitigation that they provide is over there is over time is over the longer term as they as they grow and establish.

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I mean, we've said we made the assumption of 15 years post planting in the in the lvp for the purpose of the impact assessment

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that

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we would assume that the other fully established trees that are showing good good big Aaron's starting to see good height with in a tree crowns spreading and so on by bite by that time. So that was

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why we made that that assumption in terms of

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the operational

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assessment

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in the in the VA. Okay, thank you.

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I want to move on fairly quickly. So I just changed tack a slightly but do you consider the proposed mitigation plan to would or could have an adverse effect on landscape character?

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Think I'm Simon Martin, on behalf of the African. Thank you

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I think we have made sure that to the best of our abilities in terms of landscape design approach that that doesn't happen and there isn't harm to local character in terms of planting. And I mean, I don't

know that the comments earlier in from historic, it's okay in Ulan, England on that matter. And, you know, we have engaged extensively with stakeholders

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in order to try and make sure that we get a, you know, an effective landscape scheme in terms of local landscape character.

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In particular, now, the, what we're trying to do not trying to achieve is a sort of layered approach towards, towards screening. And so there's a lot of retention of

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existing field boundaries and replanting of hedgerows and filling gaps. And Petros tree lined avenues with choice of historic features in the landscape.

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were proposed as part of the island both in the area just to the north of Reston, but also to the, to the north of the substation site as well. And so I think that those measures, were trying to get a combination of this kind of hidden an integrated approach, which you referred to earlier, really that on the one hand, we we we need to try and provide visual screening from, from from key receptors.

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But on the other hand, we you know, we we recognise that we, we that some

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heart planting some harder to those, those receptors on the edge of the village or surrounding a farms, that edge isn't necessarily a sort of an appropriate response in terms of landscape character.

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So the so the land, I believe,

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cap captures what we would consider it as a, as a as an optimal

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compromise between, if you like, between those, those aspects of the informed landscape design.

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But yeah, recognise as well, that we can, you know, we can look at that further as part of the as part of the ongoing work really, that it's an outline plan. So we can, there's flexibility there to

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you know, to address any, any further

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comments on the on the design.

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Okay, thank you for that. They were all the landscape questions I had at this time, bearing in mind our time constraints as well. So what I'll do now is we'll open it up to the virtual floor again, Mr. Fane, I can see your hand up talk. I'll come to you later on NASA stuff at Preservation Society.

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So just look at we have up

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we do have. So these are any questions? Any points you wish to make on? Four b b landscape and visual impact?

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So at the moment, I have Mr. Failing Mr. Kane, so Mr. Kane, for se C's if we could go to you first place.

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So thank you, apart from 20 or 30 seconds from me, I'm going to hand over to our chartered landscape architect Miss Bolger. That's right on this because so in these schemes, you'll know Stacy's cases that that would result in a loss of a substantial area of tranquil open and deeply rural countryside. And the development conflicts with the prevailing unified character of the surrounding landscape. And were transformed Friston from a small rural village to village defined by substations and infrastructure.

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And those landscaping visual effects was Miss boulders report identifies the major and adverse because of the arbitrarily unsympathetically imposed

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infrastructure on this rural landscape. So we know more than that. I'll hand over to miss Bolger to to flesh out some of the details. Thank you. Thank you.

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Hello, and just to say, Michelle, Michelle Bolger, for SASES. I'm a chartered landscape architect. I've been involved in previous DCO applications, as well as planning appeals and local planning examinations. And the most recent DCO that I was involved in was the Wylfa nuclear power station in Anglesey where I was representing the National Trust.

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So the first point is to do with the world

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That the environmental statement, the Idi, within the environmental statement has dealt with effects and the conclusions that they've come to about the effects. And basically, they have only reached a conclusion as to whether an effect is significant or not significant. And personally, that isn't sufficient to enable you to understand the true home of the scheme. And I think that's clear from a response from the applicant to natural England's deadline, one response, where natural England was talking about harmful impacts to the AONB. And the applicants response was

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with respect to the s, I VI. And it does not equate significance with harm or unacceptability, which are considered to be further judgments beyond the assessment of significance. Now, that's on page 75. And that's document 2976. So what's very clear there is that in order to understand the harm, you have to know more than it's a significant effect, or it's a not a significant effect. And I will say that this isn't something I've come across before in the dcl application. And in fact, the waiver application, there was an acknowledgement were they major effects, were they moderate major effects, were they moderate effects, and that's why if that could be done for what was a scheme that was obviously going to create harm, that should be done for this scheme. Now, if one looks at if one, interrogates the LPA, and looked at their assessment of sensitivity, which they've acknowledged that the landscape around Friston and the landscape to the north of Boston, both have high medium sensitivity, and they acknowledge that there will be a high magnitude of change, both during construction and operation one, which would equate to either a major or moderate major impact, that, that even the Lv AIA doesn't consider that that reduces to anything below medium high at 15 years. So even at 15 years, based on the LBI assessment, we're looking at moderate major harm to the landscape around Friston. And the suggestion that the

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the construction effects are going to be short,

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is incorrect. This is meant to be worst case scenario, we know that the very minimum construction period is going to be four years, because that's the construction period for the National Grid. And if the two substations are carried constructed

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consecutively, rather than concurrently, that will be a five year construction period. And one thing to note about that is that when the the LDA talks about 15 years, we actually have to add on the sort of five year construction period to that, because during all that time, there will be a major significant impact on that landscape. So in fact, even based on their growth rates, which we'll come on to, which we don't agree with, and the impacts that the significant major impacts will be lasting for 20 years in this landscape. So,

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just the the, the report that is that my report, which is part of the SE C's

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submission, and the number of the report is Oh 2776 sets out a number of issues with visualisations and the first issue which I know is something that you have picked up as well is that there is a lack of visualisations from some key viewpoints, in particular key viewpoints on and viewpoints from footpath six and but also footpath eight and footpath 17. Looking back towards looking back towards the village, or, in fact, I don't think that viewpoint footpath eight viewpoint is one raised by yourselves, we consider that the the location of the viewpoint there is too far to the east, and therefore the

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woodland, it's screaming in a way that it won't do when you move a little bit further west on that footpath.

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What I would like to do is to just look at just three viewpoint photo charges just to sort of explain what

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I consider the issues to be. And it's possible that at least one of these issues if the applicants are going to redo the photo montage is they would be able to address. So I wondered if we could look at viewpoint one. And I thought that probably the the annotated

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photo montage that was the new ones that were submitted at deadline, one would probably be the easiest place to go for that.

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For every two shows or not, I'm not sure. Did you give full warning to Mr. Williams? No, not so I think anyway, I think it would be difficult, then I'm afraid

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to perhaps describe your your points that would be useful, okay. So, so, the, the first issue is that the existing image is shown with a horizontal field of view of 90 degrees. And then the photo montage is of the development are shown with a horizontal field of view of 53 point something. What that means is it's very difficult, trying to look across from the existing view to the to the one charges, particularly when the first photo montage has the advanced planning in place. So that's further obscuring what you can see and the guidance from the landscape Institute. The latest guidance published last year on visualisations was very clear that the baseline photograph wireframe wireline or photo montage should be presented at the same size to allow direct comparison. So they're not caught in accordance with guidance. If they are reproducing them, it would not be difficult for them to reproduce, as well as their 90 degree one that shows us the extra context, they can show us

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the exact existing view to the extent that they then show for the photo montage. So that's the first issue.

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That slight being slightly more specific. So in viewpoint, one, and I don't know whether you whether you whether you're able to look at that. And that's the

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that's the viewpoint from just on the edge from the footpath just on the edge of village. Viet, your Christian house, you know, it's right. So, so the current the current view, we're looking across a very wide landscape. We are it's the horizon is

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wooded, we can see the power lines.

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And just on Mr. Mr. Martin's point, earlier, yes, the power lines are a detracting feature in the landscape. And I don't think anybody would disagree about that. But

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the reason we can be sure that they haven't had a characterising effect on this landscape is if we look at the description of this area, in the applicants own LBA it describes it as a strong sense of place local distinctiveness simple rural character. Now, there is no way that anybody coming to this landscape if these substations were implemented, would describe the landscape in that way. So that shows that the pylons, they are detractors, but they haven't changed the fundamental character for landscape. So we're looking across this very wide open landscape. Then we see the image for year one. This is one of the locations where there's no advanced planting, we see basically just a sea of newly planted Yes, a minor point, it will not be in a green field like that. You know, in order for these plants to grow, you've got to ensure that there's no vegetation for about a metre around each plant. So each one will be circled by a sort of a metre since this is all done by graphics. I don't see why it's not possible to show that as well. Then we get the 15 year image where all we are looking at

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is kind of like the inside of a word. And the LBA recognises that the the impact for the first year one is a high magnitude of change, complete agreement with them, they then describe the impact year 15 is negligible. Now, this is the change in visual meenmuttery. From that open view that we're looking across with that wooded horizon, to looking at the inside of the back of a word, that is not a negligible change to visual amenity. Without doubt, it's an improvement on the view of the substation, but it's not a negligible change to what with the existing visual amenity from that viewpoint.

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The second one that I was hoping we could look at his viewpoint five, and this is

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particularly sorry, Miss voltric, these all these are all in your submissions as well. Is that correct? Or

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that it is in the submission? Yes, yes. Okay. Although

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I will try and be I will try and be, you know, as succinct as I can. No,

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thank you. That's it. Yeah. But but the information is there, you will be able to go back and refer to it obviously, points like about the pylons. His response to Mr. Martin,

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obviously, is not there. So viewpoint five is, is one where I think the this change in in horizontal field of view is really important. Because what we actually have on the right hand side of the, what is the larger image is the church tower. Now, we see that in the we see that in the the existing view, but because the existing view has got a 90 degree, it has less impact. By the time we come to the

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the

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the year one,

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sitting immediately in front of the church is one of the larger of the ceiling and compounds. So we never actually have this image showing us what it looks like at the moment, in terms of being a realistic impression of scale and distance, the ceiling and compound,

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which isn't actually shown on one of the original sets, but it's shown on the amended the amended drawing.

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And then when we get to the 50 years, that part of the image suddenly has some sort of branches over it. So that's one that I think not only do we need that existing view, the same, the same horizontal field of view, as the as the photo montage is, but I think we need those

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branches of the tree removed, so that it's better, more realistically, we can see what's happening to the, to the to the views towards the church. And then the last one was just to look at for for another reason. And that is viewpoint nine, which is the approach

43:28

towards Christian and from the south. And this is the one where we're looking across western, Christian green, we could see the village in the distance, and we can see the church tower. Again, it's another one where I think having the having the same horizontal field of view would be very helpful.

43:50

In the in the changed view, we've got, we've got now we've got pylons on either side of the church, we only have them immediately either side of the church. And we can also see all of the the top of the infrastructure in particular, East Anglia, too. And this is one where it's absolutely crucial that we understand what the finished oil levels are going to be. We haven't been told as far as I can see, we have not been told of what basis the photon charges have been prepared. Have they been prepared at the maximum 20 Have they been prepared at the minimum 16 we don't know.

44:33

This is one where the the LGA LBA acknowledges they will be known, their mitigation will have no benefit at all. It will be exactly the same 15 years on is near one. They actually consider this to be a low medium magnitude of change and not significant. I completely disagree. I agree with quite a lot of thousand assessments at the initial assessments, but this is one where I completely disagree. This is this is a

45:00

Have an important view of the village for people approaching it from the south. And that is going to be a very significant change. So, so those are all the reasons why the visualisations don't necessarily give you

45:16

a full appreciation of what's actually going to be what's going to be happening. And I've mentioned already the issue about the construction period, the uncertainty over it, the fact that it's being taught as a short term, whereas in fact, it should be medium term. And

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on the question of design,

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the underlying principles of all the design documents that both the both Edwin and the design

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the design principles,

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obviously, we've already been through design, and Eddie's new landscape point.

46:02

Sorry to interrupt.

46:06

Well, I suppose it's just reiterating that the landscape points that yes, the key, the key issue for design is that things should be cited sensitively. And that's obviously not being done here. And therefore, the follow on issues, design issues, and

46:30

work to mitigate that initial failure. But But I do also think the design principle statements talks about seeking gains for public legality. But clearly, there are going to be no gains for public community here. None at all that I don't think, you know, I haven't had anybody suggestion suggesting what public immunity gains that could be. And

46:58

the LPA itself acknowledges that even with the mitigation, there will be no significant reduction either in

47:09

landscape calm, or in many cases in visual harm. And, and those cases where it has suggested that the impact is reduced, such as from viewpoint, one that we were just discussing, and I disagree that there is a significant reduction, there is still the same loss of visual meenmutty.

47:31

And then we come on to the issue of the plant growth, which obviously has been raised. And

47:39

the old lens at paragraph 81, says the assumptions are based on relevant guidance from iema 2019. So that document hasn't been submitted. I have

47:57

searched for it. And all I've been able to find is an article from the iema magazine called transform, which gives the exact figures that are quoted in in the in the LMS. So first of all, I think it's slightly misleading to describe an article actually written by a landscape architect, not a, not an old arborist or

48:21

landscape contractor to describe that as guidance. What's more, the, the majority of the article, though, it does give those figures as a rule of thumb, the majority of the article is about the fact that you have to look at the specifics of a site, you have to look at the specifics of the soil and the climate. And, and also take,

48:47

take your cues from the vegetation that's nearby. And as we know,

48:57

Stacy's have submitted a report from john rose, and it's at the back of

49:06

my submission. And you've seen that, yes, and he is local, he is local, he is involved in local planting, and he reckons that, you know, the growth rates are probably overstated by, you know, doubled. He thinks that that realistically, you're looking at at 50%. So, you know, even if we say that it's all going to take five years longer. So let's say it's going to take 20 years instead of instead of 15. We add on the

construction period, we're now talking about 25 year period. I know you asked Mr. Martin earlier about the comparison with the mitigation in the life of the of the substation, I don't I don't think you've got an answer to that. But my understanding is that the lightning substation is meant to be 25 years.

50:00

So we can see that the mitigation is some, you know, it's going to be going towards the end of its life on the time when mitigation is

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in place. And I also think it was, it was in the, in the

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discussion about what the changes might be at the next for the next iteration of the, of the scheme. And,

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and the idea of more woodland planting to the south towards Kristen, and it was an issue raised by

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historic England's consultant, that this might have other harmful effects in terms of heritage. But it's also other harmful effects in terms of in terms of character, that relationship between the village and those small scale fields that are immediately to the north is part of the sort of

50:57

one of the most attractive relationships in that landscape, particularly in the way that you experience it as you walk through it either out or back again.

51:08

changing everything to woodland may screen the development, but in streaming development, it's creating, you're losing other landscape characteristics.

51:21

And just finally, I know you said that you you're mostly going to deal with public rights of way at

51:29

at the heritage stage, but just a couple of brief comments. Firstly, I didn't mention it earlier this morning when we were talking about the rag but also in the rag assessment.

51:43

There wasn't a category, there wasn't a read for a site which had a public footpath going through it. And, in fact, although one other site, the broom cupboard was assessed as having a footpath to it, in fact, it doesn't. This is the only site that had a footpath through it. And it's not it's not a minor settlements that we're talking about here. It's not a little minor diversion. This footpath and setting aside the heritage aspects of it is a is a sort of fundamental

52:19

amenity visual amenity social immunity to the village and landscape community to the village it is going to be lost entirely. And the proposed diversion which goes along the edge of Grove road and will be between the road and the substation is no substitute. So not only do we lose the the

52:49

amenity of the footpath that's going to be closed. But we also severely lose the amenity of all the surrounding footpaths. Because the reason that you choose to walk in that landscape at the moment is because it is a simple rural landscape. With few detractors and the only detractors you can't see those large scale agricultural buildings from that landscape only to tractor are the pylons. There are lots of positive things that will be will that will be overwhelmed by the presence of the of the substations. Okay.

53:30

Thank you very much Miss Belcher very useful. I'm gonna now pass it to Mr. Newton of a Suffolk Council, please.

53:39

Thank you. So Nicolas Newton, he suffered council just briefly on the issue of growth rates.

53:45

And I should point out that in in my 36 years in the landscape profession that has included spells on post industrial landscape reclamation, commercial forestry and commercial landscape contracting.

54:02

The issue we have with the growth rates that are proposed by the applicant is they seem to be based on some sort of national average figures. Now, we're not saying they can't be achieved, but the point is, we are not equating to the national average here. Not only are we in East Anglia, we are in eastern East Anglia. And this year alone, and I live near enough to the site to share the same weather pattern without being under any influence by what may be coming. I live west of the 12th. for clarification.

54:36

We did not have a drop of rain between the second week of March and the second week of June this year. And that is the absolutely critical period when

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if young trees get checked at that point in the post immediate post planning period.

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Planting research says that they very, very rarely, if ever recover the lost ground. They

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Stay on the backfoot for the rest of the growing period.

55:06

This year's arable crop in this facility was down 30% in yield because of that critical drought period. And as a local planning authority, we are now getting agricultural prior notifications for farm reservoir water storage facilities, not on the sand lands for vegetable salad crops. But these are on the clay lands for arable crops, unprecedented but farmers are now looking to water their cereal crops in that early spring period, because that is the way the weather pattern is going here.

55:40

As I said, we have we do not say those growth rates cannot be achieved, but we think it's pretty unlikely they will be because of the specific circumstances of where we are, and with the best will in the world and the best proactive landscape management. There is one thing beyond my control the applicant's control, and dare I say your controls, and that is the weather. Thank you, sir. Thank you very much, Mr. Yunus. Very helpful. If I can now go to Mr Fane and of the Suffolk Preservation Society. And Mr. Fain thank you very much for your patience.

56:18

Good evening, sir. Thank you very much. I would crave your indulgence to come back later and say some comments about the historic environment and just see. But I just wanted to make one very quick comment about tree grows on this soil type. But of course, much of it has already been put most eloquently by the two previous speakers. I'm uniquely well qualified, perhaps because I'm a light land farmer, not very far from this particular site. And I would just like to point out that there are additional factors apart from drought, things like deer and rabbits. And I can assure you the culmination of all of these is that to think that we will have any material mitigation in less than 30 years is unrealistic against buildings of this scale. That's the point this height in particular, but size two, I just like to leave that comment behind me to reiterate what the other two said, but perhaps you will allow me another session on the topic I should really be talking about in a moment, which is the historic environment. Thank you very much, of course. Thank you, Mr. Fane.

57:27

Okay, just before, if we could then go back to the applicants on this topic. So anything you wanted to come back on? If I could also ask that you ensure that you

57:39

respond to the report and the soldiers as part of the SE C's response? Instead of today? If you could respond to that in writing that would be most useful?

57:50

Yeah. Hi, Simon Martin to the African. And yes, so what we will do that in as part of our

57:57

response to se C's written rap, I think there are a number of points there that

58:03

Stacy's outlined just in terms of, you know,

58:07

effects assessed or visualisations and so on that I think we can, we can either pick up in our written wrap to that response or

58:17

address in terms of, you know, updated photo montage is that will be submitted to the to the examination. Thank you.

58:26

Okay, anything else the applicant wish to say before we move on?

58:31

I think we can dress it all in written rap. So there are a number of points that are, you know, I wanted to reply on that. But I think we're probably best to put it in the written reps. And given the, you know, the level of detail of some of the some of the points raised.

58:45

Thank you very much. cells. Yeah, that'd be very useful. Thank you. Okay. So if we could now move on to discussions over their historic environment, and so on to four BC and if I could just remind everyone at this juncture that if we move on there's there's no need to report repeat any points already submitted in writing, or the people before you may have said and just if you could raise new points I'll be most useful because I'm, I'm conscious of time.

59:14

So firstly, if we could look at policy please These are questions directed towards the applicant. And I will also

59:22

like to invite historic England during a few questions time. So to the applicants please note your views concerning weight and regard to be had to list two buildings in line with the Planning Act 2008 and the infrastructure regulations.

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Test the absence of a word or two words, considerable in terms of considerable weight or special as in special regard.

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Have a specific meaning in your view.

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Colin Ennis on behalf of the applicant , absolutely.

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The words of what they say.

59:58

They were deliberately changed

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They have a different emphasis. And my submission, make it very clear that nationally significant infrastructure projects are potentially going to have some of these conflicts. And insofar as the way in which they're taken into account, you're invited to do so in a slightly different way. And my submission, that's very clear that these words have been very deliberately chosen, and should be applied appropriately. Thank you for that. And I know that the Planning Act, and the infrastructure regulations both predate the nppf. And that national policy statements published since the nppf morph, I think it's probably fair to say they closely more closely follow the nppf line. And do you think there's anything to infer from that?

1:00:49

Well, the difficulty is that as it currently stands, the legislation is clear, we have reapplied the relevant MPs, and we apply the relevant legislation. I think it's very hard to prejudge these things. And it's not appropriate to do so we're given a clear framework, we apply the framework as it stands at the appropriate time. And I certainly would not want to prejudge changes to the MPs. What I do know is the regulations are there, and they make the position very clear as to one matter in relation to waiting. And in my view, that's material. Okay, thank you. That's very clear.

1:01:25

Okay.

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My next question on heritage is,

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in your answer to the question 1.8 point five. You notice, it's important to recognise that heritage policy doesn't recognise impacts on setting, it's only concerned with impacts on significance of an asset,

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which may result from changing the setting of an asset, there's setting for part of significant in your view.

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Can I just introduce our ns, Mr. And staff, the applicants again, can I introduce, prefer the person who's not actually appeared before date. And that's Dr. Steven Carter, is a senior heritage consultant with headland archaeology. I'll put these details in employment put in writing, I'll just hand over to Dr. Carter now. Thank you.

1:02:13

Hello, Steven Carter, I'm speaking for the applicant on how to set.

1:02:21

The starting point to this is an understanding of how the term setting is defined in English context. And here, if we look at the definition, that is in the framework, or the definition that used in GPA three, on their setting is essentially a neutral term, in that it describes the area in which an asset is experienced. What you then have to do, according to the guidance is understand whether that experience, particular elements of that experience contribute either positively or negatively to the significance of the asset. So simply saying that something has a setting or a particular location, each standard is in the setting of an asset does not itself tell us anything about significance, and its significance are interested in when it comes to assessing arm. So it's important to make that distinction between the setting as that as that as that neutral backdrop. And then our analysis of that setting and our relating of it to the asset and the way in which then significance comes into the equation. Okay, thank you for that. That's very useful.

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I did have a range of question going through various buildings, but given the time, I think I'll save quite a few of those for writing, but we'll concentrate on a few properties.

1:03:42

But money typically was high house farm.

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And the proposals are judged in your view, obviously to have less of an effect on high house farm than say for instance, little more farm to to impact the setting of high house farm and the landscaping present around the property.

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Obviously, however, landscaping can and does change over time. And I note that in the deadline one respond to the owners of house farm that

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they stated quite a few trees having to be removed due to disease.

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In your view, does that change does it alter or increase the level of harm that the proposals may have on this heritage asset?

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Um, it is certainly true that that set is not fixed setting changes through time. And, and so undoubtedly, on in some sense of setting all these assets that are under consideration here will change in the future.

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It is it is difficult to predict about that will be but obviously if there are examples where and we know that change is going to take place, then then that's something that we can take into account in our assessment whether the removal of certain trees that had high farm would materially change my

1:05:00

analysis and materially change the conclusions I reach.

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It's difficult to know without without knowing precisely which treatment and you know, and then to consider the change that happened the setting. But my

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I think my assumption would be not, I think it would simply not be a substantial enough change in the setting, to lead me to conclude that what I'm already concluding are relatively low levels of harm would be materially changed such that I might argue that they went up or down on a level in terms of the, you know, this criteria that I'm using in my assessment. Okay, thank you. If we can flip to a little more farm, that obviously we refer to there, what would you define as the setting of a little more farm? And do you think that's confined? or limited? Should I say two spatial aspects, spatial views at present?

1:05:58

Not wishing to be pedantic but defining the setting on his team to get me to experience it. So if it wouldn't be more useful, if I discussed how I understand it, that setting contributes to the significance is that the data will be useful? Yes, yes. Thank you. Yeah. Yeah.

1:06:16

I think the the, the key contribution that the setting is making is providing a rural agricultural landscape in which we can understand this 17th century rural vernacular building on for what it was, and definitely what it was until recently, and then that and that is your farming related building in a dispersed farming settlement on the edge of Friston more. And so it's so it's that fundamental relationship with it with its rural surroundings, that are making a positive contribution. The it's hard to place a a hard line on the boundary there, it's making that contribution, it typically, I'd say, the closer you are to the asset, the more it's contributing, because the more we can experience the asset itself, we can appreciate it as an historic building. And then we can see it as a historic building in its immediate setting, the further you go away, the less you are aware of its existence. And so at some point that that fades to nothing. On my reading of the way that you approach and leave little more farm was that that is diminishing, and tailing right off within about two to 300 metres. And so I think we have

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a viewpoint to the northwest of a little more farm, where there's the the recently diverted public right of way between high house and a little more, were on a bed, that's what range, we can start to appreciate that little more farmers there, we can start to see the building, we then come in closer. Similarly, if we were approaching from the east, along the public right away from the east, is that that sort of distance from start to really become aware of it. So it's about sort of range two to 300 metres, I think the majority of that positive contribution is being made, but it's not a hard edge. Okay, thank you that's useful. And

what I realised obviously, the clarification note was putting a deadline to in terms of heritage and so on. But if you could just summarise it, what evidence if any, you believe there's been a little more far being a form of parsonage and where the moat might have been.

1:08:32

Um, my understanding of that, primarily comes from early mapping that I've seen.

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And the reference of the brinklow passage, I think, is in the Suffolk historic environment record. So it's in the records on there. Um, my understanding is a little more farm

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as it exists today is a single isolated on 17th century structure that has survived what is still present on the ground immediately to the west of it is a moated site and that survives as a moat. Although it no longer survives with standing buildings on it. However, you only need to go back to the late 19th century Ordnance Survey mapping to see buildings on it. And these the buildings that

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appear according to historic environment record to have been at one time a passengers for brinklow

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and that appears to be borne out by the rather curious shape of the parish boundary that existed in the 19th century.

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Where, um, as, as we know, is coming up the track from Friston arrives at little more farm and then takes him this way, curious, low back down to South and up again and what it incorporates is the moated site and

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strip of land to the south of it was presumably associated with the moat.

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And and that's excluded from Friston. And I assume it's because of its relationship to brinklow, which therefore extracted it from the control of Kristen Parrish. So so there's there's a number of features there that are well mapped in historic mapping some evidence still surviving on the ground that are related to Brent. Thank you. That's very useful. Do you think that the the brinklow parsonage aspect adds to the significance a little more farm

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I think it's part of a related set of features that are more or less

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intelligible on the ground today. But but better understood in historic mapping. And this is the, the issue of the of this cluster of, of settlements around the southern edge of what was Friston more. And so we have, we have little more farm surviving as a building within an enclosure, we have the moated site immediately to the west of it, we have our high house with its motive enclosures further west again, and then northeast of little more farm, we have two other encloses that still have buildings in in the 19th century, that appear to be another part of this dispersed talent on the edge of the comma. And so I think that the the building that at one time appears to function to the brinklow passage is part of that settlement.

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Thank you. That's very useful. And if we could now move on to the Church of St. Mary, and Kristen,

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I'm conscious obviously, that the local impact report from the council's

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considered proposals would challenge the dominance of the Church of St. Mary for the North causing harm. And were blocked views and challenges status as a landmark building and connection to outlying farms and buildings to the north. Could you summarise for me your views on the level of effect that the proposals would have on this great to start list of building?

1:12:03

Yes, the my starting point for this would be an understanding in the round of what contributes to the significance of the church because the ultimate assessment we're going to do is against our impact on the heritage significance as a whole on the church.

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And on our set out in my assessment, which is in appendix 24.7 of the ETS, I identify on significance that is associated with the asset itself. And here, it's important to remember that it's a great two star listed building with this special historic and architectural interest that is fundamentally embedded in the fabric of the church. So we have this very important mediaeval building on and that and that is, is an extremely important component of significance, we then need to consider the added contribution that setting might make to that significance. And in my assessment, I try and structure that analysis in a series of, of every lodgings zones, on leading out from the chair, so identifying the way in which on the relationship with the church and its immediate setting in its churchyard with the headstones. Its links to the history of the parish with the former parishioners his relationship, for example, to the war memorial, a part of that, that in his own contribution, where where the church forms that appropriate setting in which we can experience the church as a fine mediaeval building,

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we can then have slightly on longer range relationships, where there's a relationship between the church and the immediate settlement. So we have used particularly you're looking to the southwest, over over the roofs of the village. And similarly the the reciprocal view, for example, from the village green, where we see the church set among the houses of the village, and then finally, out into the wider

landscape. And were identified very much as you've just described, the the council referencing it as, as the church as a focal point in the landscape, on symbolising the, it is a centre point in the life of the parish. And, and, and as a prominent feature in those views. And then I try to identify a range of places in the landscape in which we can experience those views. And typically it's on on footpaths, also on roads, routes, that people have been taking routes that tend to lead to the church and give you that sequential experience of the church being in the distance and you approaching it and it gradually getting more and more dominant in the view. And the because, although it is a prominent feature, that's a relative term. It's not the most prominent church in the in the county. It's a relatively squat tower. It's not a particularly topographically prominent position. So we tend to

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To start losing sight of it on behind hedgerows behind copses. So that typically the these these informative views these views that give us the sense of a focal point, extend out no further than about a kilometre. So we've got that got that whole range of thing. So we think, Okay, what what if any of that of those different contributions to significance are likely to be adversely affected? And you will know from my assessment so that I think the key point where there is substantive impact is in this approach from the north, where we're proceeding towards the church on one of these rights of way. And the infrastructure of the substations will simply cut across and obstruct that view such that we can no longer experience that sequential approach to the church. However,

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by and large, all other aspects of significance are retained, and therefore in the round, I arrive at my conclusion of low magnitude.

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Thank you.

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As a church is the only tall building really, I think it's fair to say in the vicinity, wouldn't do you think there are any

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there I suppose there might be a view that any tall building or structure could detract from that and reduce the stature of the church in the area.

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Grateful for any views on that?

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I certainly think that is part of what we recognise is important about the church is is that is that visual prominence? It is going to be susceptible to visual competition. From any new structure. Yes, I think as a as a principal, I would agree with that. Yes. Okay. Thank you. And your answer to our written question 1.8 point 10.

1:16:50

States, effects on the church by two proposals are avoided on views from the southern most parts of the path. Sorry, the path to the north should I should say, so Southern most parts of that path closest to the church?

1:17:03

Is could there be a point of view that if walkers have

1:17:08

walked along the diverted footpath, and then so they've already passed reasonably close to the proposals using the diode for footpaths? And would therefore you'd imagine be well aware of the substations.

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So even though they're south of the proposed substations looking at the church with that knowledge that what was behind them, potentially with noise from the substations? Could that have an effect on the setting of the church? In the eyes of the beholder? If you like?

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It give me Could it could it could diminish their experience and thereby diminish the significance of the church? Yes. And effect? Yeah, um,

1:17:53

I, I don't see why. As a memory of a substation should diminish that experience of the church as a prominent structure. And by the time you're in those last couple hundred metres into the church, it is very much a prominent feature in the view of heavy why it would diminish that experience, and diminish that sense of approach and need you to proxy in this case, to the church in the village. No, I don't. Okay, thank you. And I'll be back with you in a minute. I just got a quick question for historic England. Okay. So, Mr. Fletcher.

1:18:32

If you're still weathers with us, please. Could you help? Thank you. That's great. Please, could you just briefly explain your view of the magnitude of the impact on the proposals on the church would be medium or high?

1:18:45

Yeah, sure. And we'll flesh it out from the Office documents. And

1:18:51

are you aware we're an independent body, we don't have any particular axe to grind in relation to the simply trying to provide information to the zoning authority in relation to the historic environment, heritage assets, we've undertaken an independent assessment of the site. And I don't think there's a there's much in between ourselves, and Dr. Carter in the way that we go about the assessment work. So the assessment work, you know, that the understanding of significance, the way that

1:19:22

that significance contributes, you know, to the, to the, to the, to the setting of the asset and, and what lies in behind that? I think, well, when we came to our own view, we did a, we did, we took an independent assessment, we visited the site we've overcome, you know, all of the sort of usual matters. And I think we're concerned that that that the conflation of the assessment material, you know, has reduced the amount of

1:19:49

harmony applicant submission, I think we felt there was a higher degree of harm in relation to the to the setting it's, we feel that landscape to the north contributes more to that.

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The significance of the asset and plays more into the I think we talked about experience. And when I, you know, my first experience on the site was walking from that footpath into the more farm back towards the village. And it is quite an important relationship. There are strong relationships around around the village. And I think we we

1:20:19

Yeah, as I say, we are

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concerned that that the Applicants downplayed that that matter, and we produce our voice in light of that. Thank you. That's just one follow up question really on that?

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Do you think various instances of lessons of potential harm

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could can add up cumulatively to a higher level of harm? So say, for instance,

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any harm to little more farm and the church and potentially the footpath in between as a non designated heritage asset?

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Yes, interesting point, we've tried to

1:21:01

limit our advice to specifically for the church where we felt that there was the most harm, it's a very high grade asset, we've got the special regarding in the legislation was talked about earlier on and referred back to the the applicant submission in terms of

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you know, the response to the legislation. There is points. I, my view is there is there is harm to a number of assets here, I've was recently introduced to the council's local impact reports. And I received a copy of that last week, which is, which is very helpful. And I've found that there's a, say with our independent view, there's a, there's a good deal of information in there, which is very useful in relation to the harms of the other assets. Yes, I think there is an accumulation of harm in relation to this, particularly where assets are connected. And I think there's an issue here in in the way that this area of landscape to the north plays into the to the significance of the church, because of the relationship between the outputs of the parish in the in the inner core of the parish. And I don't think there's been significant changes in this landscape to take away from the fact that you can understand that relationship and bring it together. So yes,

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I would say that you can, there is harm to a number of different assets in this case. And I think that that does add something to the to the weight. Thank you, Mr. Fletcher. That's very helpful. Very clear. And if I could go back now to Dr. Carter, please, for the African. Dr. Carter, was there anything you wish to come back to on there for the views of

1:22:33

historic England?

1:22:38

I'm Steven Carter, the applicant? Um, I didn't think so. I think that perhaps my only comment would be with regard to the the final question that you put to will Fletcher? Yes. Um, and there, I would agree with him that I identify harm to a number of assets, as I set out in my assessment. And I'm nine, I'm sure that all of that needs to be taken into account in your decision making. However, I am not aware of any advice or policies that require you as it were, to, to create a sum of those different elements of harm, as it were to create a greater amount of harm a single greater amount of harm. So for example, you wouldn't add up a number of examples of lessons substantial harm and call it substantial, for example. So I'm sure you all must be taken into account. And the individual assets are assessed individually in my assessment, and I arrive at my conclusions.

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Thank you. That's very useful. Thank you for that. Mr. Fletcher. I can see your hands up did it? Did I? Did I cut you off then? Or

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no apologies. I must have clicked the wrong button when I was trying to turn my camera off. No problem at all recording my head.

1:24:00

No problem. That's great. Thank you very much. I just have one

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final question on this issue, if historic environment for him, open it to the floor and is to East Suffolk council please.

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And the applicant proposes further funded research on the history of Friston and to utilise such findings for local history talks, booklets and or interpretation panels are raised, do consider that those proposals in combination with any planting proposals would or could mitigate for the loss of the public right of way to the north of the church.

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Good afternoon, sir is available for a separate Council and

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the council don't think that those such measures would mitigate for the

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To the heritage assets, that they could certainly be seen as compensator II measures. But they wouldn't, as it were undo the harm that the scheme is causing, and so we wouldn't consider them to be mitigation. Thank you.

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I was just about to open up to the floor now. So is there anything that the yourselves as a council want to add on historic environment before we move on? Yes, please. So I'm going to ask Miss Eastman to address you on a couple of matters. Thank you.

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Yes, thank you. Good afternoon.

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In terms of the built environment, which is what I can comment on, I will just keep it to the areas where we are in disagreement with the applicants. That would be

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specifically the harm identified to high house farm, wood highs, Woodside farm and the Church of St. Mary. And in terms of high house farm, we disagree with the

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the magnitude of adverse impacts that has been identified, which is low by the applicants, we believe that it would be medium.

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And then for Woodside farm, similarly, we think that

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regardless of whether only a one north or a two or both substations would be built, we believe there would be a

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an adverse impact of medium magnitude. And this would be

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similar to the harm that has been identified to little house farm. Sorry, little more farm.

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Because of the

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way we think that the, the,

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the significance of the site's in its current state, since current open agricultural character

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is more important to the setting and therefore the significance of these listed buildings than has been

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assessed by the applicants.

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And then for the churches and married we fully endorse historic England's views. And we also believe that there would be a

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an adverse impact of

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medium magnitude, which would then result in an effects of major significance because of the significance of the church.

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And then also, in terms of the landscape mitigation, we do not believe that this would mitigate or reduce the harm that has been identified

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by us, and

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that's, I believe, all I would say on that.

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Thank you very much, very useful. I now go to Mr. Keen for cc's please.

1:28:07

So thank you very much. I'm going to hand over to Dr. hoggett, to deal with the substance of this. And can I just say one thing very quickly on the exchange you had earlier with Mr. Ennis, on the fact that there are differences in the wording between the infrastructure regulations, indeed, the MPs and, for example, the list of building act and other planning policy, which is absolutely right, of course, there are those differences. So all I want to say, very quickly at this point is there is that difference of wording. But of course, the documents that you've referred to predate

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the National Planning policy framework are 2012, let alone the extent version 2019. The framework in my submission is a material consideration in the determination of these DCM O's.

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And so up to date government policy, we see places great weight on the conservation of designated heritage assets. And as you've already pointed out, there's a clear direction of travel in terms of emerging policy. So simply that some direct integration and more recent policy approaches clear. Thank you, Mr. Ma. Thank you.

1:29:22

Good afternoon. Good afternoon, sir. Can you hear me? I can't hear you and see you. Thank you. Thank you very much indeed. And I just start by introducing myself. I'm Dr. Richard hoggett. timer, a heritage consultant based in East Anglia. I have extensive experience of planning applications and landscape schemes within the Suffolk landscape. Particularly in my former life. I was a senior archaeological officer with the County Council responsible for that, and I have an academic specialism in the Anglo Saxon and mediaeval landscapes of East Anglia, in particular, with an emphasis on the church. So I was I've been approached by sasses to produce an independent assessment

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And of the heritage impacts of this game. And I've just started start by endorsing the comments of historic England and and the Suffolk council there as well. The conclusions that will three bodies have reached independently, are broadly in accord. And you can read the details of my reassessments in my written submission on behalf of sasses. And I'd like to just raise a few points with you, sir, if I may. And the first is to emphasise that the heading of this section is, of course, historic environment. And we need to be thinking here holistically, rather than as a series of individual heritage assets. I'm sure you appreciate the difference there, sir. So the assessments that we've undertaken focus on one asset after another, looking at individual settings, but I think has come out as has come out in the course of discussions on heritage, but also on the historic landscape character as well. We're looking here at an interconnected landscape with iron farmstead, which Yes, described as isolated the sitting within an agricultural landscape, which forms a network which surrounds then the core of a forest in itself. And so, and those sites, I think, are interconnected. And I think your question earlier to the applicant about

the the cumulative harm, and we've heard of we've talked about cumulative harm earlier in the context of additional projects and additional use of the site, and I'll come back to that later on. But there's also a cumulative harm, in my view, in the number of heritage assets affected by the proposed developments, the fact that the site is ringed by them. I think that is significant. And I think when you say, could you so I think you do need to factor in the number of different sites which are affected. And I think it's the interconnectedness that makes that significant greater. And there are there is an argument for taking sites in isolation. I think, in this case, because of that relationship, we need to consider them together. In terms of the issues of setting which have been raised again, again, we're all working to the same guidance that the GPA three, and we've all taken the same approaches and we will see reached different conclusions in terms of contribution to significance from setting, I would emphasise that they are my own assessments, particularly the farm houses to the north. I've taken a similar view on the extent of the short range views of those particular buildings and the short range setting. But of course emphasise the fact that a lot of the Northern infrastructure lies within even that boundary. And so in my own assessments, you'll see I give a higher grade to the the harm being caused to high house farm for example. And on the subject of those northern farm states, again, we draw your attention to the the viewpoints that have been adopted. These are a separate set of viewpoints to the landscape visualisations there's a series there. There's also a series within the heritage assessment as well as cultural heritage chapter or the environmental statement. The views there we would argue against suffer from the same problems as we've highlighted earlier in the context of the landscape visualisations, we have that mismatch between the initialised 90 degree view and then the more detailed 50 degree views, but also with those Northern farmsteads. In particular, we're only provided with views that are taken beyond those buildings to the north, looking back towards the side. And what we're not provided with, as I'm sure you've registered already, sir, is that we're not given views from those assets or from the south of those assets, which gives us the immediate relationship between those buildings and the development site. And I, for example, have stood in the garden ground level of high Hill House, for example, and taken a long view back towards the church. And you can see the church very, very clearly from the garden of my view, as I provide a copy of that photograph in my submission, sir. So I think those those interconnected views across the site, which is acknowledged will be severed by the development of our fundamentals, I think those do contribute to the significance of those individual buildings, nothing that doesn't need to be registered.

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In terms of the the setting of the church in particular, again, I'd like to say working and have concluded that that is a very high degree of impact that that's had due to the change of character particularly from an arable and tranquil landscape to the north, to a sort of semi industrialised or industrialised landscape. And when we're talking about setting again, we need to remember that yes, partly setting is experiential from outside looking in. But we also need to remember that that setting can also be from the inside looking out as it were, and again, we need to bear in mind that something like the church which is used for for worship, for marriages, and funerals and so on, as well as for quiet contemplation, a rural setting, and a quiet tranquil setting is obviously contributing to the significance of that building. And so when we see that dramatic change in character from a rural setting to an urbanised setting effectively, that does fundamentally alter the significance of the building in terms of visualisations again, with the church in particular, I hope that that the additional visualisations might include additional visualisations from the church because again, the

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These were provided with at the moment, and cultural heritage viewpoint, one, for example, is taken from the size of the church looking north. And the eyeline of the photograph is below the footings of the church itself, because we're effectively looking up a hill, at the church. And personally, I think that gives a slightly disingenuous view of the relationship between the church and the landscape beyond, we're not given a view, for example, from the church looking northwards, you know, from the northern side of the church in the church are looking northwards. And similarly, we're not given a view, for example, from the top of the church tower looking northwards, I've provided you with one of those. So a great personal risk from within my written submission. And related view, again from the church are just to pick up slightly there is an interrelationship there with the war memorial, for example, and again, the visualisation were given the war memorial is taken standing to the north of the war memorial, looking north, so you're looking straight to the tree within the church and not looking at the war memorial at all. And again, I think, a more sympathetic interpretation of the viewpoint for that might have been taken from the size of the memorial, looking at the front of the memorial, for example, with a backdrop behind it. So I think, again, we need to perhaps just look again, at the the views and how representative they are. So I've set all of that out in my representation for you, sir, in more detail and provided you with some of the images that I've mentioned there. I think the other major concern that I'd like to highlight, as well as the fact that the report, as presented in environmental statement really focuses on the operational phase and the impacts of the operational phase of this project. And very early on, it says that, although there is an impact, which will be caused by the construction phase, and indeed, the decommissioning phase, those are scoped out very quickly as being temporary, and not going to be having a heritage impact worth assessing. And personally, I think that that's not a correct approach to take. And you've heard from landscape colleagues already today, that we consider the temporary nature of the development to be in the region of five to 10 years, potentially longer. And I think we do need to see a reasonable assessment of the likely heritage impact of that construction phase, not least because when we look at the the plans provided the the redline plan, if you like of the development area, as opposed to the footprint of the scheme brings the the site right up to the doorstep of the church, it takes in the lane immediately north of the church, and indeed looks like it takes in some of the church our boundary. And similarly to the north, it takes the development area, right the way up to the property boundaries, a little more farm and high horse farm as well. So again, I think there's clearly going to be a much wider area of impact on those listed buildings on those heritage assets than is perhaps given credit in just an assessment of the operational phase. I think, again, I'd draw your attention to that admission. And then just as a final point, to bring that together, we've touched the mitigation again. And obviously, these issues are very much interconnected with the landscape planting schemes and so on as well. But it's worth highlighting that even Dr. Carter's own report accepts that the the planted mitigation even after 15 years, will only reduce the level of heritage harm. In one instance, in the instance of Woodside farm, and you've heard that I and he suffered counsel disagree with his assessment on which I farm anyway. And I would argue that in none of the cases presented the proposed planting the proposed mitigation will reduce the identified harm in in any way. And I think that does broadly accord with the the conclusions of the applicants own assessments. And obviously, there are wider issues around landscape planting, which which have been touched on already. And I want to bring those up again. And then the final point, again, is just to come back to that word cumulative, because I mentioned at the start the cumulative impact on individual heritage assets. And we heard him

talk yesterday about the potential cumulative impacts of other schemes connecting it Friston. And again, this is something which in the assessment of heritage harm hasn't really been acknowledged, as it hasn't been across the board. And again, we would highlight the fact that were these initial developments to take place we then need to be considering heritage impact of future schemes, which may also connect to the scheme here in much the same way has already been argued in other contexts. So thank you very much indeed for the opportunity to speak sir. And appreciate the time as against if

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I was muted, apologise, no problem. Thank you very much for your contribution, Miss target. That's very useful indeed. Okay, if we can now go to Mr Fane of the Suffolk Preservation Society, please.

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Thank you very much indeed, sir. I should like others. briefly introduce myself. Though. Before I do that, I have to say much of my thunder has been stolen by the recent excellent contributions, particularly from Dr. Richard hoggett. So I'm the chairman of Suffolk Preservation Society.

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which covers the whole country. Of course, it is also CPRE in the county. I'm a former deputy chairman of English Heritage in the days when it was one body. And I'm a former chairman of the historic buildings Council for England.

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I particularly would like to make the point that SPS is something of an umbrella organisation. So we have been actively supporting the other organisations who have been appearing before you today. And in particular, I could not stress more strongly how much we value the contributions from Dr. Richard hoggett, who just heard it doesn't need any promoting and, indeed, from Michelle Bolger to, and indeed from historic England, so I won't repeat anything, any that they have said, or I'm trying very hard not to and what other participants have added today. Suffice to say, however, that the self preservation society does disagree with the applicants professional judgments regarding the values ascribed to these great two buildings predominantly, we consider their approach artificially lowers the assessment of impacts upon the setting of the grade two assets, we will make specific conscious, conscious

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comments, we would particularly draw your attention to the historic environment good practices advice note issued by English Heritage planning note number three, which brings in an additional point, other than those which others have mentioned, it's an emphasis on how the asset is experienced. And factors which can affect setting include noise, dust, vibration, increased light and activity levels. Now specifically with particularly the church and the village of Reston, it is self evident that for an extended period, there will be noise, there will be dust, there will always be noise, the substations as we know hum, there will be increased light, there will be activity, all of these are going to impact upon the setting of these listed buildings. And I would take issue slightly with Dr. Carter when he said he was talking about adding up the sum of of adverse impacts.

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Because what the setting of his store of heritage assets produced by English Heritage says, inter alia. For example, buildings that are in close proximity, but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. And I think we know that to be true. When we go around any historic site, we see different buildings, different periods, possibly not in sight of each other, but the cumulative effect is significant. So I would certainly agree, agree stronger. That's what Dr. Huggins has just said about Friston church on the war memorial, I make the point. The front of the memorial, with the inscription on the south face results in people congregating and looking directly onto the development site.

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Therefore as a place of congregation and remembrance and don't forget these war memorials were predominantly in this part of England related to World Wars one and two, so relatively within living memory of many people. Therefore, it's a place of congregation and remembrance. The SPS considers that the assessment of harm as negligible significantly underplays the impacts, and fails to act adequately recognise the sensitivity of the site. So I throw that into, I'm not going to talk about the various other buildings because I don't think others have done a first class job of that.

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It's a bit cheeky of me to comment from Dr. Rick, Richard hoggets written report.

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He does however stress the dismissing the heritage impacts are likely to be caused by the construction phase to demonstrate a clear failure on part of the applicant to adequately quantify and assess the heritage impact across the full duration of the scheme. So I do think that is a very important additional point. We've I think, covered mitigation more than adequately. There is one other point I'd like to bring to your attention. And that is something we found by analysis

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is that and we think this is material increase traffic including hgvs during the construction phase, and of course we know it cumulative term that should read construction phases on the setting of heritage assets along the access routes. And this extends we submit to heritage assets and our great many which are set back not immediately beside the very congested action

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access routes. There are many, many more adversely impacted because of the extremely congested access to this site in terms of the wider road networks.

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And that applies during the construction and the decommissioning phases. I think it's important that we don't forget that these substations actually have a life, if you go to Bradwell is a huge derelict substation just beside the redundant power station. And it's just not a thing of beauty. And nobody has just decommissioned it as yet. So I think, you know, we have to recognise that these adverse impacts are not just during the construction phase, and not just during the lifetime, they should also be in some

decommissioning phase, unless it's going to be left lying there in perpetuity. And we believe all of those are essentially incapable of mitigation. So I thank you very much for listening to me, I hope you'll give me a little credit for not trying not to repeat things that we've put into our written report, and which have been said, in many cases very, very well, by our colleagues. We support all these organisations who are appearing as participants today, as, as I say, an umbrella organisation. I think that is really the main contribution I can add. Thank you very much for giving me some time, particularly this time of day. Thank you. Thank you very much, Mr. feynan. And yes, thank you for cutting down your submissions based on previous responses. That's much appreciated. Thank you. If I just return now, to the applicants, was there anything that you wanted or needed to come back on at this stage?

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On historic Environment Matters?

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Oh, Steve, Stephen Carter, the applicant.

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We think that everything that we've heard from the other contributors are all points that they make in their written representations. And we can deal with them in writing, subsequently, so we don't need to deal with them now. Okay, that's very useful. Thank you very much. Thank you.

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If we now move on, then to

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agenda item four, B, D,

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just worth flagging here at this juncture that we do propose to complete the agenda today, and not adjourn. So if anyone is in a building with a closing time, they might want to ensure that they are able to remain until 6pm, which should be complete by and on. On the same lines on the same vein, we move on to good design. But I think good design, from my perspective has been covered quite a lot already.

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This this afternoon, and I don't have any more specific questions that I can't pose in writing. So on that basis, I don't have any more questions on good design. But of course, I will open the floor to anyone who wants to make some final points on good design on points that haven't already been made today. So Mr. Bedford, for the counter counsel, please.

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Thank you, sir. Thank you. Briefly, I referred to the point earlier this afternoon.

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In relation to a drainage matters related to suds infiltration, I'm very conscious of the time so if it's acceptable to you, sir, what I was going to do, and it's partly in fairness to the applicant. So they have noticed if the point is just briefly myself explain the point but not ask my drainage, flood engineer to go through the detail because we can pick that up in deadline three, in our

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written submission. The point is simply this I referred you to the documents and the

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subs infiltration clarification, no, that was submitted at deadline two. And that proposes sizes for infiltration basins, based on the parameters that have been used in that report to define what the runoff rates will be and what the therefore appropriate dimensions should be. We I'm afraid disagree with to the key assumptions which have been used to input into that exercise. The assumptions we disagree with is one that the assumption is made that the exist sorry, the proposed substations will be 50% permeable and only 50% impermeable. We don't think that that is appropriate and we think they should be assumed to be 100% impermeable. Fellowes has a significant implication on the calculation. And secondly, in relation to the safety factor, which has been used the safety factor which has been used as a factor of one, we think for this type of infrastructure, the factor ought to be 10. And that also has a size implication. The reason why we're stressing that at this stage is if we're right, and those infiltration basins need to be materially increased in size.

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To cope with the runoff from the substations dealing as they are with the present connections or the near the currently proposed position, obviously, that reduces the land available for expansion of the natural grid substation in particular, within the confines of the red line of sight, and so on and so forth. That has a knock on consequence, again for the debate that we've been having about GIS, or AI s. And it's just a further illustration of the reason that point we've made previously as to why we think the one needs a comprehensive and coordinated approach to all of those issues, bottoming out the technology bottoming out the further connections from other projects, in order to know that effectively, this scheme can deliver good design, because it's actually looked at not only itself, but also the long term. So that's the point. Thank you, Mr. Buffett. That's very useful. As you mentioned at the start, if those can be submitted in writing, that would be very useful. And of course, I know it's not the sole sole gist of your point. But obviously, there will be consideration of flood risk

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in the new year as well. Separate hearing, thank you very much, Mr. Bedford. To have anyone else who wishes to make any final points on good design, any new point?

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I'm not seeing any raised hands,

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or hearing anybody. So on that basis, I'll just return to the applicant if there's anything you wish to finally say on agenda item for please.

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colonists on behalf of the applicants. I've got nothing further to add thank Mr. Bird for for that useful introduction. And helpful notice are gratefully received. Thank you. Thank you very much, Mr. Ennis. Okay, so that's an agenda item for complete. And we will now move on the agenda, and I shall hand over to Mr. Smith. Thank you.

1:52:05

Thank you very much, Mr. Hockley. Now, you'll be very pleased to hear ladies and gentlemen that the remaining agenda items in this hearing will be brief as Mr. Hockley foreshadowed this morning, and in the procedural session, agenda item five is not going to proceed we're very conscious that there are a number of potential implications arising for the draft development consent orders that have arisen from this hearing, there is insufficient time to do justice to any of them, but we will be holding a development consent order issue specific hearing in January 2021. To which those matters can be a journey with no harm to anybody's interests. So that is what we will do.

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Moving then on to agenda item six, any other. Again, I'm conscious of time and testing the patience of all participants here who have contributed so much across the two days of hearing. And so, on that basis, I'm not proposing to take any further detailed submissions in this item. The examining authorities are aware that interested parties who wish to speak on topics not included specifically in the agenda in the agendas for these hearings, and we've held this week, have asked potentially to speak under ob. Now to the extent that only one was seeking to make submissions on other topics than those listed on the agendas. Rest assured we're giving very careful consideration to all such requests that have been put in writing and to the construction of agendas for our future hearings. important and relevant matters will be addressed in those or in recent questions as best fits the issue. And I will again refer to the fact that we're shortly serving notice of issue specific hearings for January 2021. There's amongst other matters, we'll examine or further examine biodiversity and habitats regulation, assessment,

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onshore environment, construction and operational effects that will include flood risk as mentioned today, social economic land and sea use effects, which will of course include and tourism impacts and cultural impacts. The draft development consent orders the draft DCA OHS,

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there will be to further open floor hearings also held in January.

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Further hearings including an additional compulsory acquisition hearing will be held in February. And information on the content of these will emerge in due course.

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If there are any matters that arise from you, for you rather from these agendas, please ensure that you address them in writing for us by deadline three on the 15th of December. So again on that basis, I don't propose to take our all our big matters, on any matters arising from the agenda today.

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Having given you the

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explanation of what I won't be hearing. And can I briefly check? Are there any other burning matters that bear on the business of these hearings today, and that must be addressed now because they relate to something that needs to be done before deadline three, or is otherwise at risk of being forgotten.

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That we need to deal with now. And I will come to the action list in the next agenda item. So we don't need to discuss actions now.

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I'm not seeing any hands raised. So on that basis, ladies and gentlemen, I will then move to agenda item number seven procedural decisions, reviews of actions and next steps.

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There is one procedural decision that has emerged during this hearing it arose on day one and a decision was made in principle to accept the applicants outline documents on levels and height of structures proposed for Friston deadline three to be followed by detailed analyses of deadline for on the condition of course, that these are not proposals for material change. And because if they turn out to be then we will have to reevaluate them. And this I will flag will be procedural decision 25 and will be added to our published procedural decision tracker early next week.

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And we have not identified the need to make any further procedural decisions today.

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I will then move on two actions.

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We have a very considerable number of actions arising from two days worth of hearings, 24 of them in total, and most of them were verbalised by the examining authorities, as we move through these hearings, and a few have been added to or amended as necessary, as consequential matters have arisen in response to oral submissions, as we have passed through all of the actions relates directly to oral submissions has been put, with one clear exception of principle,

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natural England

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and get

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an mg. So we're invited to attend these hearings, but did not do so.

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A number of matters arose orally, that have they been here we would have put to

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these are matters that that therefore would benefit from the direct attention. And the actions asked them to review the hearing recordings generally, and to address certain specific points in writing. These and most other actions require response by deadline three,

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a list of all 24 actions arising and will be published on the national infrastructure planning website at the latest by Tuesday, the eighth of December, as we had flagged at the beginning of this hearing, but we are in fact doing our best and quite a lot of revision has been going on behind the scenes during this hearing. To try to put these into condition to release them sooner if we can.

1:58:04

I'm very much hoping that we might be able to even to release them and publish them by the end of Friday tomorrow. So on that basis, I don't propose to take you through them verbatim. Now.

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We do have a revise all participants today, and those not in attendance. But with an interest in the matters covered by this hearing, to review the action list as soon as it's published, and to take the necessary actions by deadline three, or occasionally deadline for.

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So turning to next steps. This has been issue specific hearings. Number two, the examination timetables which are the same for both projects are published on our project web pages and set out the time reserved for all future hearings. And as I've said, we will very shortly be issuing notice for our next round of hearings in January 2021. And on that basis, I can then move to agenda item nine, which is the formal clothes.

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I would like to very much thank all of our speakers today and over the preceding days this week, and the other hearings for your attendance and your very considerable commitment and contributions. We do appreciate, again that many of you would have preferred that these hearings could have been held in person because again, we feel that given the national lockdown that we have just passed through in the very substantial controls that still remain in force. And these remain the best and safest means to hold these type of hearings in the current circumstances.

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I would like to very much thank our case team lead bonus Emre Williams for supporting these hearings so well and so diligently.

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And on that basis Ladies and gentlemen, I will have a final check to see if there is anything else that anybody needs to raise now as a matter of almost emergency

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again on the basis of time seeing no electronic hands rising on my board. I will then ask all of my examining authority colleagues to come back onto camera to say their goodbyes. If I could pass first to Mr. Hockley. Thank you, Mr. Smith. And yes, just to reiterate Mr. Smith's comments there. Thank you all for your contributions during this week and personally, especially for agenda item for today. Much appreciated. Thank you again. Good night.

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Thank you, everyone, for your contributions today.

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Thank you for me as well. We're very much appreciated.

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Thank you, everyone. Goodbye.

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And again, finally, thank you for me, Rynd Smith, lead member of these panels. The time is 535 of these issues specific hearings number two are now closed.