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00:07

Good morning rent, rent. Sorry, your meat.

00:20

Good morning, everybody. And welcome to today's issue specific hearing 17 for East Anglia, one North and East Anglia to offshore wind farms. Before we introduce ourselves, Can I check with the case team that we can be heard now, and that the recordings of live streams have started and captions are switched on? around I can confirm that I can hear you now. I can also confirm that the live stream is booting up on my end. So give me two seconds all that's happening. And yes, it's working now. Otherwise, I can see in you all of you. So good luck for the rest of the day. Thank you very much, Mr. Williams. Much appreciated. Sorry two introductions Ladies and gentlemen, my name is rune Smith, the lead member of this panel which is the the examining authority for East Anglia, one North offshore wind farm and have another panel which is the examining authority for the East Anglia to offshore wind farm. I'm in the chair today and I will be leading the questioning in respect of the main items. I will now ask my fellow panel members to introduce themselves starting with john Hockley. Good morning, everybody, john hopper here, panel member.

01:31

My morning everyone. My name is Karen land Jones panel member. Good morning, everybody. My name is Jessica Paris, and I'm also a panel member. And good morning, everyone. Hello. I'm Guy Rigby, panel member.

01:48

Thank you very much Mr. Rigby. As you can see, the full panel is on screen at present. And as I said, I will be leading the items in this agenda and other members present may go on or off camera but they will all remain present throughout the event and can introduce questions to their particular needs or topics at any time. will also introduce our planning inspector colleagues working with us on these examinations, some of whom you will have spoken to already. Emery Williams is the case manager and leading the inspector case team today and Ray is accompanied by two case officers Caroline Hopewell and Kj Johansson, who you may have met in the arrangements conference this morning. The published agenda papers are available from the agenda links on the project websites, and they explain our and your reasons for being here to hold a final issue specific hearing on the draft department consent orders the draft dtos as we will be referring to them for the remainder of the day. In introducing this hearing, I do want to return briefly to remind everyone of matters that I have raised in the opening remarks and all previous decio hearings issue specific hearings at 6/9 and 15. The draft development consent orders are important documents. They are draft pieces of legislation which if the secretary of state decides to grant development consent would form the legal basis for the delivery of the proposed developments. For this reason, any interested parties in these examinations may wish to express views

about the drafts. And this is also why these hearings are being held on a without prejudice basis. And I will remind everybody what this means, as a starting point. Even if your position is that development, consent should not be granted, and therefore that the Secretary of State should not make one or both draft vcos into confirmed orders. You can make representations in these hearings on the drafting of the DCS without conceding your wider position that the orders should not be made. This is important for those speaking today, because it means that you can make representations that affect how the DCI is drafted, for example, relating to the content of requirements, the equivalent conditions to a planning permission. And you can do this even if your main position is that the orders should not be granted. And you don't need to refer back or repeat submissions that you've made elsewhere. In relation to the orders, we recall and take into account all of those. What we need to focus on today is the condition of the drafting of the deseos as they are currently before us in their latest versions. Now the without prejudice nature of today's event is important for the examining authorities because we're under a duty to provide the secretary of state with the best draft and DCs that we can, even if we were to end up recommending that the Secretary of State should not make one or both of them. And this is because we don't decide these applications. We make recommendations to the Secretary of State who decides and if the secretary of state decides to grant department consent, then we'll need one or both draft DC OHS and these need to be the best drafts that they can possibly be at the point of decision. So to summarise, even if our reports were to recommend that development, consent should not be granted, we will still append a draft decio to each report, ensuring that the Secretary of State can decide to make one if they wish. Every recommendation report from the examining authority to a secretary of state always contains the draft decio no matter what outcome the examining authority recommends. So now you know who we are, and why we're here and broadly, the ground rules of today's event and so shortly, I'm going to ask our participants to introduce themselves. And but just before I do, there are a few normal things to note for those of you who have been participating in these hearings throughout today's hearing is being live streamed and recorded. The recordings that are made are retained and published and form a public record that can contain your personal information and to which the general data protection regulation applies. Does anybody have any questions about the terms on which this is done? I'm checking in I'm not seeing any raised hands or hearing anybody. So we'll move forward on the basis that this point is well understood. Turning to today's hearing, I'm now going to ask the participants to introduce themselves. If organisations attending today have a number of representatives attending then a lead representative should be nominated in the normal way to introduce your team on behalf of your organisation. It would also be helpful if you can let us know at which point or points in the agenda you anticipate participating. And so I'm going first to the applicants today. Please can I check Mr. Ennis, will you be representing as lead the applicants today?

06:45

Yes, good morning. columbanus. I'm a partner in the law firm of chapter Wedderburn and I appear on behalf of the applicants instructed by Fiona coil of scottishpower renewables. This morning, I'm accompanied by three other people, Stephanie mill of my office. And I also have by Brian mc nellis, who's the onshore consensus manager, and Jerry Bella, the offshore concerns manager for both attending at the event as well today. Thank you.

07:16

Thank you very much Australia's. Can I then go to the marine management organisation.

07:28

Good morning. My name is Lindsay Martin. I'm a case manager for East Anglia to and with me on the call today I have my colleague, Mark caretti, who was the case manager for the sanghvi one north. And my colleague jack Cole, who was the case officer for East Anglia, one off, the MMO anticipates that we will participate in agenda item two, and otherwise previously indicated we would be leaving after that agenda item we have on reflection decided to stay for the duration of the hearing. And further for the rest of the hearing. My colleague, Mark caretti, will be the main speaker. Thank you.

08:01

Thank you very much, Miss Muller. I would just just on that final point, I mean, we had adjusted agenda. So that residual matters and relating to the MMO can be wrapped up in agenda item two, if that would assist at all, I'm very happy to continue to do that. Because essentially, the matters on which we wish to speak to you are, you know, essentially confined within the the marine licences and can be kept quite close together. As I say, I've adjusted my speaking or design i'm i'm very content to do it either way.

08:41

your content to proceed like that, then, yes, we're fine with that, too. We'll we'll watch the rest of the via live stream. If there are any further extra points for us, we can pick that up from there.

08:51

Indeed. And that is a very, very good point and useful for everybody else to note that the live stream is of course always there. And there is of course, always the opportunity to make submissions at the next deadline. So if we then move on, Can I check who will be leading for Suffolk County Council?

09:15

Good morning, sir. Morning panel. My name is Michael Bedford Queen's counsel. I'm instructed on behalf of Suffolk County Council I will be the lead. It's conceivable if we get into any detail matters that I may need to call on either Mr. Steve Mary on highways matters, or Mr. Matt Williams on flooding and drainage matters. But I well understand this is a drafting exercise. So we'll only be if they need to explain in a sense why there is a concern that we would need to turn to them in terms of items, items, agenda item two, and agenda item four. We will want to say something about and potentially agenda item three depending on what others say at the moment. We don't have any anything particular that we need to say on agenda item three?

10:03

Thank you very much, Mr. very much appreciated and all noted. Can I then move to the lead for East Suffolk council please?

10:14

Thank you, sir. Andrew take keesee for he suffered cancel.

10:19

I'll be the principal speaker now Nick Gould, who's the council senior energy project officer will also be present. And we will be contributing on items, principally two, four and five. That will be here throughout. Thank you very much.

10:37

appreciated. Okay. Moving on down my list. Do we have the Right Honourable Dr. Theresa coffee MP or her representative present, please. Yes, he did. Thank you very much. And what we have arranged Dr. Coffee is that in relation to your participation, I do know that you're very busy. And I do note that you have other business to attend to shortly after the commencement of these events. So we have put in place a short session immediately prior to the formal commencement of agenda item two, where we will be asking you to speak on I believe it was agenda item five that you wish to speak to but you had concerns about being available at the time, when that would come forward. Is that agreeable to yourself?

11:32

Yes, it is. And I'm very grateful. Unfortunately, there are some cabinet committees afternoon. So that's why I'm really grateful that you've allowed this flexibility.

11:40

No, well, we thought that would probably be the case. So we will hear from you first. Okay, moving on. Then. If I can then check. Other attendees. I'm going to go to obrah Town Council. And do we have cancer? Marion fellows?

12:08

Yes. Good morning, Mr. Smith, sir. I hope you can see and hear me. Lovely sunny morning. From Suffolk sending you all our greetings. So Good morning, sir. Good panel members, ladies and gentlemen, counsellor, Marion fellows on behalf of Barbara Town Council, and our nearly 3000 residents, those who work and visit the area, which amounts to more than 10,000. Thank you. We'll speak soon. Thank you. Oh, sorry. Can I just with your support? Could I just reserve the right to speak on indication of my hand if I may?

12:44

Indeed. So no worries. Thank you very much counsellor fellows. So I'm looking at the remainder of the list of attendees. Can I now ask who will be leading for spaces and I do note here that there may be a change of representation partway through so Mr. Tony, take us to the story.

13:11

Morning Sir Richard attorney on behalf of spaces, and I will be leading any contribution we make this morning. At two o'clock, unfortunately, I have a core commitment. And Mr. Marnie will step in, so far as we're still dealing with matters with which we're concerned at that point. And I may rejoin depending on how long we go on this afternoon, and how long my core commitment goes.

13:37

I'd note both of those. And so Mr. Varney is of course welcome to take over at any point. And again, to reiterate, the live streams are available and the recordings are available. And if there are points that feel like they slip between the cracks and written submissions on the math of the event are more than welcome. That's the reason why we run things and given the way that we do now can I then check who is here for sees? Yes, I can't.

14:13

Energy action solutions and representing all our supporters from aura Nigel for now. In fact, London, across to Brixton, and wavy. Unfortunately, my colleague, Anthony is unable to join me today for personal family reasons. And so I will be picking all that up. And I'd like to reserve the right to put up my hand for it to speak in particular item five, but possibly other matters also. Thank you

14:49

ranking. Okay, thank you very much. Now, can I just check, looking at the spreadsheet that the case team has very kindly furnish me with I believe that is everybody who is the leader of a team or an individual who wishes to speak. Is there anybody else who I have not called upon? Who is here in attendance who wishes to speak? That is very good news because my notes and the case team spreadsheet are entirely

15:27

Mr. Smith. Sorry, Mr. Smith, we have a snake parish Council have got their hand up.

15:32

Ah, Mr. Beach. Apologies. Yes, I can see your hand now. Yes, Morning, sir.

15:40

Yes, much as the others, Tim beach, Snape parish Council, much as the others, I think my comments are likely to be in response to anything else that was said by anybody else, most of what we've had to say or really, an enraged writing is being done. So I just as the others reserve the right to put my hand up and make comment, please. All noted. Thank you very much, and apologies for missing you there, Mr. Beach. Just going down and reconciling with the spreadsheet and making sure it's got you noted there as well. Okay, thank you very much. So we know who's going to be speaking and as I've already indicated in relation to various requests by those who are introducing themselves. Any interested party who is not participating directly in this session, but he's observing on the live stream or listening to the recording afterwards, is welcome to set out observations about what they hear today in writing by deadline 11, the seventh of June 2021. So the introductions are now complete. And I do have some preliminary remarks before we move on. Now, As with previous hearings, these hearings are held for both projects in parallel, there is a single agenda for both, which was issued on the 12th of May 2021, and which I trust everybody now has before them. And this agenda is designed to enable us to get oral submissions to the two applications in parallel. But we do have the discretion to consider each project individually during proceedings and to break out if necessary, I do just want to make sure that we are based on the same documents that were on the same page literally, as well as metaphorically, in terms of the decio that we're considering the DCIS that we're considering. So in referring to the draft development, consent orders, the ddc's, I will have the most recent clean and tracked versions on

screen in front of me, these are version six. And then their reference numbers in the libraries are a s 109 for the clean version and a s 110. For the track version. Now these were submitted on the 22nd of April 2021. As documents in support of what the examining authorities have agreed to be a non material change to both applications, relocating the cable corridors a little further away from this house in the wardens trust landlord thought net. So the changes to the orders there were very, very minor indeed, and related to some headrow changed and changes to certify documents. But I do nevertheless, just want to check with the applicants that these are, in your view the most up to date versions available to the examining authorities and interested parties. And so if we're looking for the latest position those are they Is that correct? And as Mel or Mr. Ennis,

18:31

Stephanie, male for the applicants? Yes, that is correct. I would just flag it's version seven that was submitted on that date, version six that was submitted at deadline date. Version seven, that is the most up to date, but it is the version that was submitted on the 22nd of April. Right.

18:46

Although there is a probably a mild version control issue then because the revision is still noted on its front cover pages version six.

18:55

Now is that the track changed version cuz I think we had this discussion. A clean version should be version seven. And the track changed version is version six being the sixth version of a track changed, but I think that's probably caused a bit of confusion before maybe going forward towards

19:11

exactly the same confusion, I'm afraid but yes. So it is version seven, but still noted as version six in the track as long as we're clear, and we're on the right document. Now, I'm also conscious, however, that the changes between deadline aid and the additional submissions dtos that I've just referred to work were limited, as I said, but they were very substantial changes incorporated in the deadline, eight vcos that were submitted. And these are rep 8003 clean and rep 8004 tracks. So I will also be working from these and anybody who wants to see a picture of what changed between our last issue specific hearing on the DDC O's and now will be well advised I would suggest to have rep 8004 on screen. And I would also just flag that a full suite of supporting documents were submitted with those including a schedule of changes, Rep. 8005, expansion, memoranda, Rep. 8007. And that was cleaning tracked as well. 008. So, again, can I just check with the applicants that we we concur on on that story about what represents the latest picture of the DCR? And how it's changed?

20:32

Yes, that's entirely correct. And I guess one additional point to mention is the schedule of changes was also submitted at on the 22nd of April, and so that will obviously show the changes made to deadline eight version and the subsequent version as well.

20:48

No Good point. But because the changes are so small, I must admit, I'm pretending not to look at that version now. Okay. If I then note that on the 20th of May, and the examining authorities published and written commentary on both DCs and this is pd 048 in the library's responses to that, and not due until deadline 11. But, and it's not our intention to cover all of the matters raised out early today. But there are some that will benefit from discussion in the round. And there's agenda item five, where we will be doing that, and I'm very conscious that Dr. Coffee wishes to move to that agenda item shortly. Both of the DCA O's and whatever version or a pigeon pair, and so we're going to deal with them in parallel. I trust everybody's clear about that. Now, we've done it on a number of occasions. So if anybody isn't happy with that, raise your hand now. I'm not seeing any hands raised. And then there are three Finally, preliminary organisational matters that I will deal with before we move to Dr. Coffee am firstly at issue specific hearing 16. Earlier this week, Miss Gilmore requested that we might consider devoting some time either in this hearing or set down another hearing for a further investigation of tourism matters. Now this is a request that the examining authorities have considered with great care. And we have concluded that we do not need to have another hearing on this topic or to use time in this hearing for it. And I do emphasise very strongly. That's not because the issue is not important and relevant as it very plainly and evidently is. The decision, however, has been made because having reviewed the range and extent of materials that have been put before us on the topic, the examining authorities are contend that we do currently have sufficient information to enable us to factor tourism properly into our report recommendations without needing further evidence or to ask further questions on it. So on that basis, I thought it was only fair to tell Miss Gilmore that that was our position now so that she didn't wait until the end of the hearing with a view that she might introduce tourism materials when we would not be requesting it to be introduced. And mosquito if there are outstanding matters that you wish to draw to our attention on tourism, please put them in a deadline 11 which means that the applicants in turn can then respond to them a deadline 12. We've dealt with the MMO. And we know how we're going to deal with them. I'm going to draw them as far as possible into agenda item two. And we've also advised Dr. Coffee, how we will introduce her. So before I move on to Dr. Coffee. Are there any other questions of a preliminary or procedural nature about how today's hearings will run that need to be dealt with now, matters relating to the balance of the examinations we will deal with in any other business at the end of this hearing. I'm Seeing no requests. And so on that basis. I'm going to move to introduce the Right Honourable Dr. Rose coffee MP as a preliminary item addressing matters from agenda item five. Before we move any further on the agenda, Dr. Coffee, the floor is yours.

24:07

Well thank you Mr. Smith, again for allowing me to speak today and at this specific time, I really do appreciate it. And as I've been active throughout this process, both of making verbal and written submissions I've wanted to contribute to the end of the hearing by making a number of brief points and providing an element of an update that I think is still relevant to your consideration of the drafting of the decio in recognition of what is effectively changing and government policy. Firstly, I wanted to draw your the examining authorities attention to comments made by the Prime Minister Prime Minister's questions on the 19th of may 2021. When responding to Suffolk, South Suffolk MP, James Cartledge, when he firmly backed the need for an offshore transmission grid. And to quote from Hansard as well as building the fantastic windmills it is vital that we bring the energy onshore in a way that has minimal disruption for local communities and enables us to maximise efficiency. And I put it to the examining authority. The application does not lend itself to fulfilling that clear policy statement from the Prime

Minister. There is further evidence of the government's policy in the area adding to the promises 10 point plan the risk is the prime minister's response to

25:21

Duncan Baker MP in Parliament. There's also the Bayes review and the government's energy white paper. All of these promote greater offshore coordination to protect the environment and reduce the cumulative impact of associated onshore development. I've already made the examining authority aware of and they will be aware anyway, of justice whole gates ruling back and when he ruled against the particular project on grounds of cumulative impact, and not being clearly considered. It's not not aware that the government has decided to appeal that ruling, indeed, in a written statement to Parliament, by the energy minister and Marie Trevelyan, and they've actually postponed the consideration decision making for the sister project to the one that was quashed, in order to allow for an effect the effects of that ruling to be considered as part of the planning consent process. And that's why I don't think it is good enough for the Africans simply not to engage in developing policy landscape. And while I appreciate they are not currently legally required to engage on the potential for sharing transmission, the opportunity is open to them to do so. Even at this stage. Our justification that EA won and an EA to to be built out too soon to engage with the injuring regime does actually detract from what they could achieve if they chose to. And as I pointed out deadlines and the enduring regime is not all that the BS review is about. The base review is face stakeholders have been requested by base to come forward with proposals for Pathfinder projects capable of early implementation. In the case of EA one end and the A to these two projects can share the same technology share the same developer, which quite possibly would need negate the need for changes to legislation, and therefore have opportunities to integrate within the existing regime, and to engage with the base review as a Pathfinder project or similar. Now ensuring this happens now would negate the need for cable corridors to be dug and re dug with every future wind farm project attempting to connect to the grid here on the Suffolk coast. This is why previously back to split decision which would enable an alternative grid connection to be identified that is actually in line with the government's emerging environmental and wind energy policy by ensuring the onshore infrastructure minimises environmental and community damage. And while not holding up the whole project, do we give the Acton sufficient time to really look at the alternatives such as at Bradford or bramford. And a comprehensive justification I made for that in writing deadlines and demonstrating the technology is available now. In short, for the Atkins proposals to adhere to the emerging government policy of greater offshore coordination to protect our environment. This has been backed again at the very highest level in Parliament just in the last month. And so the onshore aspects of these projects must be rejected, in my view, in favour of the grid connection, which offers the capacity to integrate multiple projects without having a devastating impact on local communities and our precious landscapes. And so that and that is why might in my view, the aspects of the onshore decio that has been drafted, should be reconsidered, to anticipate what an alternative which will certainly help us fulfil the ruling in effect given by Justice Holgate. I just want to thank you, I will be putting in some further written submission, or I expect to just to collate some of those comments further together with some references, I think, to hand sides to help inform the examining authority. What I don't have the ability to do is to share the minutes of the meeting. I don't have that. But certainly Suffolk Norfolk MPs have had regular meetings now with the minister also with off gem and national grid on ways forward on how we believe that these sorts of projects specifically

this project, projects can actually be part of that Pathfinder approach and we think it's a very worthy candidate candidates to do so. Thank you very much.

29:28

I have muted myself thank you very much Dr. Coffee and and to note the few questions that I had had arising from that you've already moved to address which were essentially to ask for the references to the relevant hands out points, etc. So if those can come in and deadline 11 that would be much appreciated. Before we move on. I am going to turn specifically to the applicants and asked for a brief response to those submissions and to a degree, unless the applicant says differently, we note that nothing in time Their overarching position has changed because they have put before us, essentially the proposition that they're entitled to have a scheme schemes considered under the framework of the policy that is in inverted commas rather than the policy as it might be. Now, they've set out that position. And it is not our role to tell them to set out another position, but we must consider on balance all the matters that have been put before us. And part of the role of an examining authority in making a recommendation to the Secretary of State will be to attempt to region adjudicated and balanced position in circumstances where there are outstanding disputes between parties. So that's the territory that I believe we're in here, but let's hear from the applicants see what their position finally is on these points.

30:57

corners of the applicants, I'll obviously, take the opportunity probably to respond to Dr. coffees submissions when they're made in writing, or having had the full regard to all the context. But on a preliminary listening of the matter, the response from the Prime Minister seem to generally be about the promotion of an offshore grid, which is a matter which clearly is prefaced in the white paper already. So it appears to be a restatement of of that position. And as regards the base review, we have submitted at every stage, the information that we are receiving from the base review to the examination. And we will continue to do so if there is an update in the context of that review. I will, again, we'll come back and in writing. But we have evaluated the technologies that are potentially available. And we've made our submissions very clear on that. But one of the matters, which, if you're suggesting or alternatives, the technologies have to be available to use them. And we've been very clear as to where that stands at the current time. And apart from that, I think, concentrating the Justice whole case decision, which is essentially a technical failure in relation to decision making. To the particular circumstances here is a separate issue. And clearly, we've addressed you on the matters arising from that. But I don't think it's a matter of it's a technical matter, rather than generically dealing with the fact that the off grid connections associated with offshore wind farms, so as so we've addressed those matters, but apart from that, our position has not changed. Because the public position policy statements, and the updated information that's publicly available, has not open and as I say, will respond to Dr. coffees. marks on Sir, we have those that deadline. And thank you.

33:01

Thank you very much, Mr. Nunez. And in that respect, you'll all have noted that we did include in the examining authorities commentary, an observation that if the policy framework, which is viewed as being potentially highly dynamic changes further between now and the end of these examinations, we will do whatever we have to do, to try and engage as fully and fairly and capably with whatever the

external environment serves up to us up to a point where we can do no more. And so that is a commitment that we've made. And that has to be obviously conducted with justice, care, and fairness, above all talk to all participating parties in these processes. So we may have just heard the last word on this. But if something else emerges next week, we may have to pivot swiftly and indeed, all parties may need to pivot swiftly. So watch this space, I think is the best way of dealing with that. So Dr. Coffea, you contend that we then move on to the rest of the full agenda, and on that basis, you can leave these hearings, if you wish. Thank you very much, Mr. Smith. And I will now leave. Thank you. Thank you very much. In which case Ladies and gentlemen, many, many thanks for parents in moving out of the gender Order, order and we will now move to substantive agenda item two, and the progress position statement by the applicants and they're essentially we know where we're starting from are just before we start, I do see a hand from counsellor fellows counsellor fellows,

34:46

um, thank you Mr. Smith. Sorry that there was some delay in my hand. I did put it up before our MP had finished speaking. But um, I just wanted to add this. I think it's really, really disappointing. Things that the applicant continues to say that risks around possible policy changes that they don't believe they can consider. I think they're in their adaptive provisions statement, they've said that they continue to believe that it's not warranted, that they do this. And I would really ask that the questions Dr. Coffee has raised today are addressed not just by SPR as the applicant, but they're also forwarded by yourselves, if possible, to be addressed and commented on by national grid. Thank you.

35:32

Thank you very much. I do though, think we now need to go back to a gender audit. And we will come to matters arising from the excise commentaries in due course at agenda item five. So can we return them to agenda item two? And I'm assuming, Mr. Ennis, that I'm going to introduce them as mill on the setting out of the applicants positions, and essentially, the passage through the changes that have occurred since we last met. Is that the case or will you still be leading? males?

36:11

Yes, definitely will for the applicants. It'll be myself speaking on this agenda item this morning.

36:15

Okay, thank you very much. Well, look, can I just touch on some specific points that appear to the examining authorities to be the highlights in relation to the changes that have been taken on board since we last met? I mean, essentially, we note and at articles five changes to the mechanism of transferring benefits of the orders, that article articles 41 changes to the crown rights provisions, that 44 amendments to water now to be referred to as the offshore ornithology compensation provisions and related measures in schedules 18. Now, here, we have to have a care because we don't have natural England, in the room with us. So there's a degree to which we will have to deal with any issues that engage their interests. In a written process that deadline 11. We note requirement requirements 12 there's been a further restructure here. And we can touch on that only briefly, as mill in this agenda item because they're specifically identified in more detail in agenda items for and indeed nine. Requirements 13 the landfill construction method statement and the outline monitoring plan on landfill construction method statements are sorry, I've covered that already. Requirements 23 and 24.

action taken to close the class of essential works, operating hours, exemptions, requirements 27 introduction of a definition of standard operation of substations with control of noise purposes, requirements 32. requiring a public rights of way strategy prior to onshore preparation works affecting the public right of way, then we are going to in this session cover the changes to the dmls. And so I will in this session be seeking views on these from the MMO as well. And principally there we're talking about the splitting of the Southern North Sea sac, si p into a piling plan and a UFO plan. That's conditions 26 and 27. In schedules, 13 generation assets and 14 transmission assets, the addition of new conditions on sediment sampling and completion of construction. And I do have an issue that's particularly going to engage the MMO which is in relation to arising from originally agenda item five and the commentaries, which is herring spawning provisions. And whether or not there's additional work needed in the orders on those schedules 18 I've already flagged above, we're going to have to tread lightly and carefully but deal with anything imbalance in writing that affects the interests of of natural England. And I'll flag that I think the best place to pick up schedules 15, arbitration and 16 the discharge provisions will be an agenda item five, alongside the consideration of matters arising in the acts as countries. And that will also be the best place for parties to speak to any concerns about the definition and extent of operational land and the enjoyment of substation permitted development rights, because that's that's part of the discussion that we've had in the commentaries and schedule 17 the documents to be certified have their own agenda item line. Okay, so it was Mel Do you want to walk Through the changes, hopefully picking up on those. And once you've done that, I will then introduce any other parties who wish to speak on the changes that have taken place. Since we last met, as well, the floor is yours.

40:16

Stephanie, Mel for the applicants, yes, that was a comprehensive list and and covered everything that's also on my list. So that's good that we are both on the same page. And I'll run through the changes then that have been made. And obviously, as we've already mentioned, this morning, there have been two versions of the VCO submitted since issue specific hearing 15, and to version six at 38. And version seven, on the 22nd of April and accepted on the 29th of April. And some of these changes, I did speak about issue specific came 15. Because at that point in time, they were in progress. And so obviously now the that status has changed, and we have the need. So turning firstly to Article five and the benefit of the order. And so this came about as a request from the NMR at issue specific hearing 15. And for that article to be aligned with the equivalent provisions in the Norfolk Vanguard and Hornsey 3d seals. And so the applicants have engaged with the MMO on that point. And we added the new paragraphs at the end of the article to reflect the equivalent provisions in the Norfolk Vanguard decio. And, and that's really to provide a bit more certainty around the notification process. And when the there's a transfer of the order. And so at deadline nine, the NMR did confirm that it had reviewed the updates that article and was content that all necessary and notifications were provided for. And that had no further comments to make on the article. And so our understanding is article five is now agreed with the MMO. And as a result of those changes made it deadline date with respect to Article 41. So that's the crime rates. And that change came about as a request of the crown estate and wanting paragraph two to be deleted. And that was on the basis that the applicants are not seeking compulsory acquisition of any interest in crown land, and therefore that particular paragraph was not required. And so again, the applicants made that change of deadline eight, and that was with the agreement of the code of state. And with respect to Article 44, and there's just a very small change, as you pointed out to

the terminology within that article, and that came about as a comment from yourself at a specific hearing 15. And so Previously, we just called it compensation measures. But given the we talk about a few different types of compensation within the DCM, we completely agree that clarification is helpful. And so we have changed that to offshore ornithology compensation measures. So it is absolutely clear what it relates to. And that change has carried through into schedule 18 as well. Now, there have been a number of changes made to schedule 18. And I'll run through those fairly quickly. Again, they were all discussed either issue specific hearing 14 or 15. Previously, and because we were considering them at that point, but obviously, you'll see that they have now all been made. And so the first, the first key change really is a new provision has been added to each part of schedule 18, requiring the undertaker to provide details of the cost of delivery of the relevant compensation measure and to demonstrate how this has been secured. And that must be to the reasonable satisfaction of the Secretary of State. So that now appears in each part. And in part three, which is guillemots, and paragraph three d and has been updated. And because the text and or adaptive management measures and was admitted in error, and then I think one of your colleagues picked that up at a previous hearing. So that has now been inserted in parts three, four and six of schedule 18. So that's the Guillemot Razorbill and red throated diver and schedule parts, which provide compensation for species that may be displaced. The timing of the implementation of the compensation measures has been revised. And so this now refers to the installation of the towers comprising and sorry, comprised within the wind turbine generator, rather than the operation of the turbines. And given that the displacement is predicted to occur as a result of the presence of the turbines, rather than the match the operating. And so again, we discussed that at a previous hearing, and we made the change to reflect that discussion.

44:23

And in part four Razorbill, and paragraph three, five and six of that part had been updated, and to refer to an eradication programme, rather than just a general reference to compensation measures. And that was really just to bring that part in line with the gillenwater provisions, which are, as you'll see, virtually identical in terms of the compensation measures proposed and then finally, in part 234, and five, so that's Gannett Guillemot Razorbill unless a black backed go and the text has been updated to include the potential for an additional compensation measure, and that's the ornithological bycatch rate measures to be considered and potentially taken forward as a compensation measure for those species. And so they were the key changes, made it deadline eight, to schedule 18. Another change that was actually made to the version on the 22nd of April, just a fairly minor one. And that came about as a comment from natural England at deadline eat. And they requested that any references within schedule 18 to natural England should actually refer to the statutory nature conservation body. And we absolutely concur with that. And we updated those references in the version seven that was submitted in April.

45:34

Yeah. In relation to these changes on I'm checking with my natural environment xa colleagues and and they are clear and understand the nature of the changes. I think here the critical point that we need to place on the record and record essentially as an action for natural England, and indeed any other body with a specific interest in in natural Environment Matters. And HRA is that if I'm reviewing the changes in the track change version, and having heard your explanation, there are any outstanding matters at all that they really do need to be placed in writing with a reason for the matters that remain of concern to

them by deadline 11. So that we can finish the job of considering the proposed amendments to these provisions. And beyond that, realistically, that there's probably not a great deal more that it's sensible for us to say all that we need to say, if I can just check with my colleague was how it's whether there's any other matter that she wishes to raise at all. Not at the moment. Thank you, Mr. Smith. Excellent, good. So that's clear. And just one very brief technical matter rather than anything else. And that is that certainly on the versions of the live stream, presenting themselves to us, and indeed on teams internally, Mr. Ennis is frozen on screen. So given that he is not leaving this item, if there's any measure that could possibly be taken to have him, returned to the backroom so to speak, how it could be much appreciated. Ah, that has happened. Excellent. Thank you very much. Mr. Ellis, you're back properly. No, you're not. Do do do the Gremlins are with us. This was mail, I returned to you and apologies for the interruption. That's not a problem at all. We should now be into the requirements I believe, and to require 12 restructure?

48:01

Yes. So with respect to requirement 12. And the changes made, arose from issue specific hearing 12. And were and that was a discussion on noise. And so one of the changes made to requirement 12 is that the applicants have agreed to submit an operational noise design report. And this will set out the details of the specification of the plant comprised within the onshore substation, together with any noise mitigation proposed and updated modelling. And all of this has to be approved prior to the commencement of work number 30. And that was secured within requirement 12. And the wording was agreed with the Suffolk council at the time. And the requirement also states that the details provided must accord with the substation design principles statement. And that document was also updated and provide a bit more detail on the information that's actually to be included within that operational noise design report. And so those changes were all made in discussion with the Suffolk council prior to deadline eat, and then the other change to requirement 12 came at the request of cc's at issue specific hearing 15 cc's requested at the maximum height of the gantries and the other electrical equipment comprised within the cable ceiling and compounds should be listed out separately. So previously, we had one height to cover all of the equipment within the cables to the end components. And so what we've done now is we split that out so there's a separate height for the gantries and a separate height for the electrical equipment listed. And so Turning now to requirement 13 and that's the landfall construction method statement, and again issued specifically and 15, the MMO requested to be named as the console t in that requirement. And that's the respect of the land for construction method statement. And the applicants have therefore made that change. But whilst discussing that change with the Council, the MMO and it also transparent that natural England were keen to also be referred to there. And so the relevant statutory nature conservation body has also been named as a console tea and that wording was agreed with both But with all of the MMR natural England and the Suffolk County Council, and so that those changes were all put in at deadline eight.

50:11

Just before you move on, and just winding back to the requirement, well, restructure, and particularly the change of 12 to the specifications of plants and the noise mitigation proposed in respect of work. Number 30. He suffered council as we call it, it, I think it was no deadline 10 submission, was seeking more detail in respect of noise impacts from plants in relation to ecological receptors. Is that a matter on

which you are able to comment in relation to these changes? Or are there any possible additional changes in prospect?

50:54

And I'll need to hand over to my colleague, Mr. McGraw Ellis on that particular point. And with respect to the ecological perspective, I don't know if if Mr. McGrath you're able to respond on that.

51:09

Morning, Brian Krauss, but we are discussing the matter with a soft Council and a deadline 11. If there are any changes to be made, we will highlight those changes at that line level.

51:21

Okay, so essentially, where we are now is no, but thinking about it. Correct. Okay, Miss male apologies for the interruption, we can now return back to requirements 30

51:35

no problem. And so requirement 13. I think we had just finished that once the changes made to requirement 13 role agreed with the relevant parties, and the changes were made at deadline date. And one minor change was made to requirement 15. And that was at the request of the Suffolk Council. And that was to extend the 10 year replacement planting period to woodland planting forming part of work number 29. In addition to the work numbers that were previously specified, so just mentioned that one, and again, that was agreed, obviously, with the council, construction hours requirements 23 and 24. Again, the changes made there came as a result of a request from a specific Council. And they wanted to change to be made to require agreement. And with the Suffolk Council on whether works are essential. And to the extent that they don't fall within the list of work specified in paragraphs to A to E,

52:29

what I referred to as closing the list, because we'd have expressed a previous concern that the essentially, the list of potential essential works exemptions was an unclosed list, it was open, so almost anything could happen. And it's now closed list and a consent is required to open it.

52:47

Absolutely. So to for it to be determined essential that needs to be agreed with the council. And again, that was discussed with the Council on the text that went to the deadline eight was agreed with with the Suffolk Council. And that can be found in paragraph three of the requirement. And so moving on to requirement 27. And this is control of noise during the operational fees. And this again came about as a result of issue specific hearing 12. And following that hearing the applicants continue to engage with the cific counsel regarding the concerns that were raised. And one of the concerns was to do with the term standard operation. And so within requirement 20. Within requirement 27 a definition has now been included of standard operation. And the other concern that was being discussed at that point in time was the potential for a noise report to be submitted prior to commencement. And so as I've already mentioned, that was incorporated into requirement 12. And so both amendments were discussed with the cific Council and were agreed with with them, and they formed part of the VCO that went in at deadline eight. And requirement 32 is a public rights of way. And again, this change came about as a

request or following some comments made by Suffolk County Council at issue specific hearing 15. And on whether onshore preparation work that affect the public right of way would fall within the scope of requirement 32. And the applicants intention was always for those to be caught and appreciated that the text maybe wasn't as clear as it could be. And so we've made specific reference now to onshore preparation works within that requirement. And so that it's clear that that is now what is covered by the requirement. And the amended text was agreed with Suffolk County Council at the time. And and then so that takes us up through the requirements. There are a couple of changes made to the schedules, which you've touched on briefly at start. And this came about as a result of the work number nine amendment. And so this was a realignment of work. Number nine resulted in a public right of way, and diversion being altered slightly. So schedule three, and now has a slightly different description of temp to eight which is one of the diversions and just to reflect That that slight alteration, and then schedule and live in the headrow schedules. And as a result of the order limits change at work number nine, the crossing of important headrow four can now be undertaken at a reduced width of 16.1 metres. And so that means that particular headrow has now moved from part one of the schedule to part two of the schedule. And in addition, there's now no longer any need to cross important or to remove important headrow. Five at all, and still referenced important headrow. Five has been removed from schedule 11. altogether. And now, I sorry, did you have a question there? No, no. That was good. I know that you said sure. Just 16 we will discuss later but just to get to touch very briefly on the change that was made it and that deadline, because I think it was quite an important one and to resolve some outstanding matters with the Civic Council. And that has to do with the inclusion of a deemed approval mechanism. And now the applicants did set out their position as to why they considered that to be appropriate and justified. And that was all rehearsed at issue specific hearing name and in the submissions made after that. And whilst the applicants do still feel that it's such a provision is justified, and in order to reach agreement with the Suffolk Council and move forward, and on this particular matter, we removed the reference to deemed approval, and from paragraph one of the of the schedule. And as a result of removing that deemed approval mechanism, we had to make a subsequent knock on amendments to paragraph three, just to include non determination as a grounds for appeal, and to make sure that wasn't then lost. And that reflects standard text. It's in the planning advice, not 15 in the appendix there. And so our understanding of schedule 16 is that's now agreed with with the council. And so hopefully that that change has now allowed us to move to that more positive position. And so that's everything within the VCO. And I think now if I can go into the deemed green licences, obviously, they are part of the DC orbit. And so I'll run through the changes made there. Do you want me just to focus on the points that you read out at the start? Or would you like me to go through through a number of other choices,

57:14

I think, given that one of the exercises we're trying to do here is to enable the MMO to sort of combine all of their contributions to these hearings in one hit. It's probably best if we do the lot. And and as I've already indicated, to bring in consideration of what isn't there as well as what is so that we do cover off the the position in relation to herring spawning provisions that we've identified in the essays, commentaries as well. I'll leave that to the end. Let's do everything else bearing on the dmls first, and then we'll come to hearing supporting provisions.

57:56

No problem. Okay, so, in the tinkering licences again, there were a number of changes made at deadline, eight. And so the first one was to condition 16 of the generation licence and 12 of the transmission licence. And this relates to the USL clearance closeout report. And so the MMO wanted requested two minor changes, and Firstly, for a time period for the submission of the Closeout report. And secondly, it's some minor tweak to change the word me to will in paragraph six. And natural England also asked that a copy of the Closeout report be provided to the relevant statutory nature conservation body as well. And so all of those changes were reflected in the draft DCU submitted a deadline date. And condition 17 of the generation deemed marine licence only. And we made a change in respect of layout principles. And so the applicant submitted a Leo principles statement, and with which the turbine layout must accord and saw the design plan condition which is condition 17 and has been updated to secure that plan. And now that only is relevant to generation deemed relicense because that's where the turbines are obviously consented. And that particular change has been agreed with both MCA and Trinity house. And in also in condition 17. And of the generation licence and condition 13 of the transmission licence. We made a minor amendment to the provision around the best practice protocol for minimising disturbance red throated diver. And so the MMR requested the condition securing the adoption of procedures with within vessel transit corridors and be updated to refer to the period in respect of which those mitigation measures apply. And so we updated the text that deadline eight just to make it clear, and what period those measures apply to, again, that was agreed with the MMO. And in terms of the construction monitoring conditions, so that's condition 21 of the generation licence and condition 17 of the transmission licence at deadline seven. This is the one that we went back and forward a few times on so a deadline set We updated paragraph three, and to refer to statistically significant, and that natural England and then submitted a representation requesting the word statistically to be removed. And so because we originally added that wording at the request at the end, the more we then discussed that with the MMR and Andrews natural England, and no more, we're happy for us to remove that reference to statistically. And so it's it we've gone full circles, we're back with the original wording that is agreed with animal and natural England now. And then that brings us now on to the southern North Sea and sac site integrity plant condition, and which, as you noted, are conditions 26 and 27 of the generation licence and 22 and 23 of the transmission licence. And so here the MMO requested that the applicants separate the separate conditions so that we have one for piling and one for UX or clearance activities. And so and that's exactly what we did, we split it out into two conditions. And we discussed the wording with the MMO and sort of agreement with them on that. And the only kind of consequential change was at the definition of the guidance, because it now appears in two conditions, that's now been brought into the interpretation section at the start of the DML. And has moved out of the conditions. And But otherwise, those, those conditions are agreed with the animal. And I'll skip over herring spawning. But we'll come back to that last, just in terms of the next one in the chronological order. So for sediment sampling, which is conditioned 30 of the generation licence and condition 26 of the transmission licence. And this is a condition that the MMR requested, and in relation to sediment sampling, and we engaged with MMR and the drafting of this particular condition and agreed the text with them. And that was all submitted at deadline eight and an agreed form. And that was to address some sampling that will need to be done post concerned and prior to construction. And, and then finally on the DML the completion of construction conditions. So that's condition 31 of the generation licence and condition 27 of the transmission licence. And again, this came about also the request from the MMO at deadline seven. And this was for the inclusion of a new condition. And that requires the completion of a construction closeout report. And the intention of this condition was to seek

to address some of the industry issues and around releasing headroom from an ornithological perspective. And so the applicants included this condition, again, in discussion with animal and natural England. And so the wording that went into both dmls and was agreed with both parties prior to submission. And so that brings us to the end of the deemed marine licences. And I'll just be happy for me just to run through, because we did make some changes to the herring spawning condition that were agreed. But then you've got the outstanding 14 points that is currently

1:02:49

not yet agreed. So with herring spawning, and that's condition 29 of the generation licencing condition 25 of the transmission licence. And we obviously included that herring spawning condition at deadlines seven, following a request from the MMO. And the the changes that are more requested to be made to the condition that we initially put in there and was for the methodology for the analysis undertaken to be referred to and also for some different timescales to be agreed for submission of the report. And so we did make those changes to the hand spawning condition. And that was updated at deadline eight. But at issue specifically in 15. And and subsequent to that, and then more of advice that they don't agree with the reference to approximately 14 days been included within the condition. And so that's obviously the points that I think you were keen to come on to. And so I think we've set out our position on this on a couple of occasions. And, and, you know, the applicants do disagree with the suggestion that that reference, approximately 14 days should be removed. And the reason for putting that in there was to try and provide some certainty as to the likely piling restriction, because obviously, without that it prefers to full three month period, which is, you know, is significantly longer and that your that was never the intention was for it to be piling to be potentially stocked up for that duration.

1:04:15

If I can briefly observe on on this as well. I mean, essentially, it's the war of uncertainties. It's it's the concern, as I read it in the MMOs submission, that they wish to see what they believe to be statutorily certain drafting that addresses the tests in nppf, paragraph 55. And they're concerned about your confined period that might float around is that they don't believe that that is is sufficiently certain. Whereas from a contracting perspective, a construction contracting perspective, the undertaker wishes, it to be clear that this is a period that is not going to grow from broadly in the order of two weeks to broadly in the order of 10, or 15, or 20. And so there there are very clear drivers on both sides of this question, which is why we wanted to discuss it here and to hear the the MMOs views on this as well. And then there's the the consultation that was undertaken by the Secretary of State on the tennis extension decision where, again, the consultation there on a herring spawning provision sought views on a draft condition that did nominate specific and certain dates for the period. And so maybe is slightly closer to the MMOs vision of the world that it is to yours is currently set out. But of course, the dilemma that we have there is that whilst the Secretary of State consulted on that, he never came into effect, because that particular order was never made. So So yeah, we're in we're in I mean, interesting, and an almost a kind of push me pull you set of considerations here, we just wanted to make clear that we were in a world where if there was any potential, further approach between yourselves and the MMO, we're aware of it. And that if we do how to adjudicate the point, we've got enough clarity on each of your own positions to be able to make the call on one side or other of the line.

1:06:23

Sorry, I was using what a kid does, there has been a little bit of an update, which I was just about to come on to in terms of the further engagement that we've had with the MMO on this point. So the applicants position remains as it has been. But we did have a meeting with the MMO. Yesterday, not yesterday, apologies Wednesday, and to discuss this point. And so at the moment, both ourselves as the applicants and the MMR are currently looking at whether it may be possible to substitute the reference to approximately 14 days with up to a specified period and try and make that a little bit more certain. And within that wider that wider three month period. And so when the applicants, this, obviously just we had this discussion on Wednesday, so we haven't had a chance to properly explore it and to go and in as much detail as we would like yet. And that we hope to be able to provide an update at 1311 on this. And obviously, if we can reach agreement with them, and more, we would then update the provisions of the DCA accordingly at deadline 12. And obviously, if we can reach agreement, then our position is as we've stated in terms of the needing that certainty of the 14 day reference somehow. But that is certainly where we're at at the moment. So we're hoping that we can try and move forward with no more than this and reach an agreed position. And but it's a work in progress at the moment. Okay,

1:07:47

now, that's very clear and hopefully gives the MMO the platform that they need to articulate their position when we come to them. Right now, having them marched through all of those particular points. Are there any other principal issues arising from the changes that you want to specifically draw attention to you've covered off all of my list? What I was proposing that we do is the tie invite parties wishing to speak to this item to speak to it, my proposed order of play would be to go to the MMO first so that we can immediately resolve as many of their issues as possible. And that I would then go through the council's councils to Suffolk County Council, the Suffolk council checking off from the position as we recall it from the end of the last issue specific hearing on on, on progress on on certain conversations and negotiations. Now, looking at the time, we would normally break at 1115. It is now 1110. I'm going to suggest that we do now break and return at 1125. If you're content with that was mill because when we come back, we can then move into that process of hearing from the parties. And at that point, I will seek a show of hands from any other parties who wish to speak to this item. So we contend

1:09:28

Yes, can I just make one? minor point is one point I haven't touched on yet is that changes are currently in progress that we're hoping to make for deadline 12. So I wonder if and before we open the floor up to everybody, it might make sense to run through those so that people are aware of them. And just to allow comments to be based on everything. But I'm happy to do that after the break if that would be preferable.

1:09:52

No, no continue. I mean, we've got about is that roughly sort of five minutes or so?

1:09:56

It probably is yes. It's a fairly short list in terms of what's going Maybe

1:10:00

worked on, let's, let's proceed. And then we'll break at the anticipated time of 1115 at the conclusion of your position, and then we'll move to the

1:10:10

other speakers. Okay, so changes are currently in progress to the draft decio. First one is the removal of Prop 10 from the order limits. And so this has come about as a result of the, the changes to work number nine that I'm sorry, apologies. So when we're looking at reducing work number nine, which results from the removal of 10, altogether, and some minor amendments to plots, 11 and 12. And so this came about from as a result of them theories discussion. So first of all, and this is prompted by representations made by Dr. Jimson on behalf of the wardens trust, and in terms of seeking to increase that separation distance between the order limits, and the wardens draft property, which this change, which would achieve slightly further than what was done with the realignment of work number nine. And also in response to the consultation that we held on that. realignment of work. Number nine, both Mr. Richard Reeves and Miss Turner was, what's the act. And during that informal consultation, they requested the removal of Prop 10. And then, and through further engagement with the supply chain and progression on the landfall outline design, and the applicants are not quite confident that that reduction of work number nine can be made. And that won't compromise on the required flexibility at the landfall or the delivery deliverability of landfall. And so that will result in a reduction of the order limits there in about 25,000 square metres. And which we consider is non material, because obviously, it's just removing that plot. And so in terms of the change that that would result to the DC or and it would just be the removal of reference to plot 10. And, and in requirement 12. There's also a Working Width that relates to the cable route within 480 kilometres of the transition bees. And that's currently 190 metres and that will come down to 113 metres. And just by removing that clock, turn it kind of fun now, check that 113 or 130113 sorry, 113 metres like that. So the changes to the DC are fairly minimal in terms of actual drafting changes, it will just be removal of reference to plot 10 and then requirement 12 will that width will be reduced slightly. And obviously, we'll submit full details at deadline 11 explaining that change. But hopefully that that goes some way to resolving some of the comments raised by stakeholders in that respect. And the other change we'll be making is a reference to natural England as a console t within condition 22 of the court of construction practice. And that will be specific to the plants that are within natural England remit. And so that's the surface water and drainage management plan in respect of work number 7014. And work number 19. And the construction phase noise and vibration management plan in respect of work number seven to 14 and the soil management plan. And that will just relate to the SBA crossings work numbers 12 and 12. Eight and also the pollution prevention response plan and the artificial light emissions plan and the watercourse crossing method statement again in perspective of specified works. So that amendment has, obviously is a comment that natural England's have made a couple of times, we've put it in the course of construction practice, and but they still would like to see something in the decio. And so we have agreed to make that change that deadline 12. And then the final change. So two more changes, and another change arising from natural England's comments. And they have requested and schedule 18, which is the compensation measures schedule. And that paragraph three, it be amended to require the provision of information that explains ecologically why the selected location for compensation measures are appropriate and likely to support successful compensation. And now our view is that that change wasn't required, because that was actually integral to what's required under the implementation plan anyway, and so it

didn't need to be specified. But we're conscious that naturally would have made it a couple of times. And in order to try and reach agreement with them. We have agreed that we'll make that change to schedule 18 to reflect that. And then very Finally, the NCAA has now issued some updated guidance. So what was mgn 543 is now mgn 654. And so we will be updating the references in the DML to reflect that updated guidance. And so they're the changes are currently in progress as well as obviously the herring spawning change which I've discussed and which we plan to make it deadline. 12 Okay,

1:14:58

thank you very much. Well, there's just one observation I'm going to make in relation to those noting that we don't have the wardens trust in the room or Dr. Jimson. And that is of course, that they are entirely welcome if they want to make final observations on the changes that are proposed there to do so, in written form at deadline 11 or, or indeed at deadline 12 after they have seen the proposals. And other than that, I am going to suggest that we do break now it is 1115 we will return is 1130. I think that's a good point to break. When we can then come back to here all of those who wish to speak on the remainder of this item. So ladies and gentlemen 1130 for the return. Thank you very much