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00:05

Good afternoon, everybody. And welcome to today's issue specific hearings number four for East Anglia, one North and East Anglia to offshore wind farms. Before we introduce ourselves, I need to deal with a few preliminary matters. So can I check with the case team that we can be heard on the recordings of live streams have started over and I can confirm that the live stream is working, and I can see and hear you.

00:32

Thank you very much and the recordings are commenced.

00:39

Thank you very much. Thank you, Mr. Williams. So two introductions. My name is Ron Smith. I'm the lead member of this panel, which is 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 application. I'm in the chair today. And I will also lead the questioning in respect of Agenda Item number two.

01:05

I will now ask my fellow panel members to introduce themselves starting firstly with Caroline Jones. And afternoon everybody. My name is Caroline Jones panel member and I'll be leading on item three of our agenda this afternoon.

01:19

Good afternoon, everybody. My name is John Hockley panel member. I'll mainly be observing and taking note of actions arising from this afternoon's hearing, but I may ask questions if they arise. Thank you Mr. Smith. Thank you very much Mr. Hockley. Now, and for those of you that have been involved with or watched any of our previous hearings, you'll note that the full bench of the panel is not here today. And this is to allow the other two member members of our panel to work in the background on preparation for the rest of the hearings that we're conducting this week. However, if needs be for contingency purposes, our colleagues can join us. I will also introduce our planning Inspectorate colleagues working with us on these examinations, some of whom you will have spoken to already Emery Williams, who you will have seen as the case manager leading the planning Inspectorate case team, and you've seen him in the arrangements conference this morning, and he is accompanied today by two case officers, Kj Johansson and Karolina Hopewell.

02:16

I trust ladies and gentlemen that the published agenda papers for these hearings this afternoon provide a clear explanation of our and your reasons for being here. And that is to hold an issue specific hearing on the topics of the onshore environment, construction, transport and operate.

02:32

We will be dealing with items 123 of the agendas this afternoon, at which point we will adjourn overnight, and issue specific hearings number four will then be resumed tomorrow, where we will deal with the remaining agenda items. And that resumption will be at 10am. Now you know who we are, and why we're here. I'm going to hand over now to Mrs. Jones, who will ask our participants to introduce themselves. And she will also speak to you briefly about procedural issues arising from public health controls on the current lockdown position. So Mrs. Jones. Thank you, Mr. Smith. Just before we begin, Miss Andrews, you have your camera turned on. Could I ask you to turn your camera off just until we get to your point in the introductions please.

03:22

Thank you.

03:25

Good afternoon, everyone. This is Caroline Jones panel member speaking. Shortly I will be running through our list of participants and ask them to confirm who will be leading their contributions this afternoon. Before I do just a few things to note today's hearing is being live streamed and recorded. The recordings that we make are retained and published. Therefore they form a public record. They can contain your personal information and to which the general data protection regulation applies. Does anyone have any questions about the terms on which our digital recordings are made?

03:56

I'm not seeing any raised hands or hearing anybody so we will move forward on the basis that this is all understood. Turning to this afternoon's meeting, I will now ask the participants to introduce themselves. If organisations attending today have a number of representatives. Could I ask that you nominate a lead representative to introduce your team on behalf of your organisation? Because I know that for a number of you here today we have several different individuals that may wish to contribute during the course of proceedings. It would also be very helpful if you could let us know at which point in the agenda you anticipate participating.

04:29

In the first instance, could I check the name of the main speaker that we have representing the applicants today please?

04:40

Thank you Mr. Jones. It's Colin Innes partner and chapter Wedderburn instructed by Fiona Coyle, divisional solicitor from scottishpower renewables in terms of the session this afternoon. It's intended in terms of item number two, that I will be the main speaker on behalf of the applicants in relation to that

05:00

White Paper.

05:03

In terms of matter three, we potentially have four parties who may speak. Brian mcnellis, who's the onshore consensus manager for East Anglia, two in East Anglia, one north, and as a civil engineer, and also having experienced that environmental matters as well, having worked in the energy sector for over 23 years.

05:25

We also have David Gibson, another member from scottishpower renewables and he is also he is a civil engineer with 20 years experience in delivering a range of infrastructure projects, including railroad water, and also dealing with cable matters. And his particular matter that he'll be discussing this afternoon is HDD matters. We also have Nick Cooper, who is a chartered civil engineer and a fellow at the Institute of civil engineers. And he's got over 28 years experience in coastal protests and geomorphology. In the early parts of his career works the coastal processes engineer for the environmental agency covering the East Anglia region, and is currently a technical director with royal haskoning. And he's involved with a very wide range of coastal schemes around the UK, at which engage coastal matter, coastal management issues. And finally, I also have Claire Smith, who's a chartered ecologist chartered ecologist, and a member of the Chartered Institute of ecology and environmental management. And she would deal with any ecological matters raised from the agenda items this afternoon, and that would complete at the applicants team for this afternoon's session. Thank you. Thank you very much, Mr. Ennis. Okay, turning now to Suffolk County Council, please.

06:52

Good afternoon, Mr. Jones. My name is Michael Bedford Queen's counsel. And I'll be the primary speaker this afternoon. On agenda item two, we don't expect to need to address you on agenda item three. And it's possible depending on the level of detail, we get into an agenda item to that I might need to bring in Mr. Phil Watson with the strategic energy lead for Suffolk County Council. There are a number of other county council representatives that they're observing and will participate more tomorrow. Thank you. No problem. Thank you very much. Mr. Bedford.

07:31

Can I ask for a specific counsel, please?

07:37

I'm Andrew Tate also QC for East Suffolk counsel. I will be the main speaker on item two the energy white paper. Although if, if it's helpful, I may also be assisted by Naomi Gould, the senior energy projects officer for the council. And on item three, it will principally be Mr. Paul Patterson, who is the senior coastal engineer for the council as coast Protection Authority. And Mr. James Mayer, the council's ecologist will also be available if any matters relate to his expertise. Thank you very much, Mr. Tate.

08:18

And can I ask for the representative now from Norfolk County Council, please?

08:32

Do we have anyone here from Norfolk County Council?

08:38

Nope. I'll move on then. Snape parish Council, please.

08:51

Hello, yes. My name is Tim beech. I am the Chair of snow parish Council. The issues I wanted to speak about are about transport and hgvs. And works traffic to and from this site.

09:06

Okay, Mr. beech. I don't know whether you've seen our agenda, but our intention is to deal with those matters at to tomorrow's the continuation of this hearing tomorrow. So traffic and transport is actually on the agenda for tomorrow rather than this afternoon. If you're if it's okay, I'd quite like to observe this afternoon and come and speak tomorrow. I didn't see that on the agenda. That's absolutely fine. Thank you, Mr. beech. Thank you.

09:36

I'm just moving back to Norfolk County Council Do we have Naomi Chamberlin from Norfolk County Council present in the meeting?

09:49

Sorry, Mrs. Jones, it seems like we've lost her again. So I am aware that she's having internet issues. Okay, thank you, Mr. Williams.

09:59

I move on to

10:00

And all over town council please.

10:08

Good afternoon ladies and gentlemen. And all good wishes for this new year hoping it's a healthier, happier and a successful one for

10:21

Could you introduce yourself please sorry, Marian fellows representing over a town council.

10:28

Thank you. Good afternoon counsellor fellow.

10:33

And do we have the representative from EDF, please?

10:39

Oh yes. Good afternoon. My name is Katie Abraham here on behalf of EDF energy nuclear regeneration limited who are the owner and operator of size will be nuclear power station. And I've got with me Angus Greenfield, who's our expert in this area. We would like to speak in respect of our agenda item three d which is the codeine crack.

10:57

Thank you. Thank you, Miss Abraham's.

11:01

And do we have the representative from CS please?

11:11

Good afternoon. I'm Fiona Gilmore representing Suffolk energy action solutions and our supporters. And in particular, I wish to speak on item to the white paper. Thank you. Thank you very much, Miss Gilmore.

11:27

Moving on to CCS please.

11:31

Good afternoon. My name is Richard Turney counsel instructed on behalf of sizes. I have with me for today's agenda item. Mr. Chris Wheeler, who will be speaking on Agenda Item Number two, we don't intend to participate on Agenda Item number three. And in light of your indication and Mr. Smith's indication, the experts we have for tomorrow's agenda items will sign off from the call and I'll introduce them tomorrow. No problem. Thank you very much, Mr. Attorney.

12:06

Do we have a representative from save our samplings?

12:12

Yes, good afternoon. My name is Paul Chandler, and save our sandlings supported today. My colleague Richard Reeves is with us. We primarily are in observation mode today. But no agenda item three may be of interest. And we will comment, comment accordingly. Thank you. Thank you very much Mr. Chandler.

12:37

And finally, do we have a representative from the old or Association please?

12:51

Hello. Hello.

12:55

I'm unmuted. Can you hear me? Yes, I can hear you. All right. My name is Alison Andrews, and I'm chairman of the association. And there's just me. And I'd like to speak on agenda item three particularly. See, thank you. Thank you very much Miss Andrews. Is there anybody present in the meeting who I haven't introduced?

13:20

Now I'll move on then. So anyone who is not participating directly in this session, but is observing is welcome to set up any observations about what they're here this afternoon in writing by deadline five, which is Wednesday, the third of February. Now I've completed the introductions, I'm now going to raise some issues emerging from the current public health position. Participants in these hearings who have been involved in the examination since they started will be aware that the examination timetables were prepared, enabling flexibility so that if by the New Year, we were in a position to begin to plan for a return to physical hearings, we could do so I think it's fair to observe that the Coronavirus situation remains difficult, perhaps more so than many would have anticipated. And on that basis, the examining authorities consider that it is important but all interested parties are clear that we now consider that it is most likely that all remaining hearings in these examinations will be virtual equally. And for the same reasons. The examining authorities have recently taken steps to significantly limit attendance at the site inspections timetable to be held next week. Only people whose attendance is essential will now be supported to attend them. It is important to place on record. The examining authorities consider that the site inspections must be delivered in this limited manner to enable them to be safe and compliant with public health regulations and guidance. Finally, if you do consider that you cannot participate in these examinations in the manner or to the extent that you deem necessary due to the current public health controls, please write to us by deadline five setting out your concerns. The examining authorities will consider any such submissions in our planning for events programmed for February and March 2021. And for the remainder of the examination.

15:00

As a whole, I'm now going to hand over to my colleague Mr. Smith to lead the next part of this session.

15:07

Thank you very much, Mrs. Jones. Now, this afternoon we're holding the first part of issue specific hearings number four for both East Anglia, one North and East Anglia two projects in parallel. And so you will have seen the single agenda that deals with these that we issued on the eighth of January. And whilst the agenda is designed to enable us to hear oral submissions for the two applications in parallel, we do have the discretion if needs be to consider each project individually during proceedings. If at any time you feel that it's necessary to ask us to sub divide in that way, then please engage with whoever is leading the relevant agenda item and ask for the split to be made. And we will give it consideration then and there.

15:54

And before I move on then to the next agenda item and the main business of this afternoon's hearings, does anybody have any questions of the preliminary or procedural nature that need to be addressed now in this session, because there is no following Agenda Item where they will arise? And we need to deal with them now in order to organise ourselves for the rest of the hearings?

16:20

I am checking to see if there are hands and I do see Mrs. Gilmore and representing CS and Mrs. Gilmore before I bring you in. I will just check to see if there's anybody else who wishes to speak. No. So Mrs. Gilmore.

16:38

Mrs. Gummer, I believe you've muted yourself.

16:42

That's

16:45

that's better, I think, Oh, no, no, you're mute again. Apologies.

16:49

That's it. Okay. Thank you, sir. It's really just a question because I'm not sure where it comes in the agenda. I think you received over 50 letters, written representations at the last deadline, asking the examiners to help clarify what exactly we're examining. In terms of our understanding of cumulative impact, and we have written in great detail on the subject. We believe that there are eight to 10, substations and interconnect as planned for this site at priston. And we're comparing apples with pears continually whether its impact on ecology impact on tourism, whilst we don't have clarification, and given that Scottish power and National Grid continue to refuse to acknowledge this, we wonder if the examiners have now come to a conclusion. Thank you, sir. Okay, thank you very much Miss Gilmore, and in very brief terms, and what we have asked everybody to do is to make submissions to us drawing to our attention, the projects that you consider to be relevant. What we have to do then is to consider all of those now the applicants themselves have the opportunity to respond to those written submissions and put to us whether or not they consider those are relevant projects. And as indeed, National Grid in its various guises may do so as well. And

18:24

what I think is the simplest answer to provide you with in relation to the primary question is what are we examining? We are only examining the applications before us, we cannot examine matters that are not applications and are not being put before us. Other than the consideration of cumulative and or in combination effects. Now, we will continue I think probably the fairest and simplest way of dealing with this is that we we will continue to keep an open book on that question. until we reach the end of the examinations, i think i think it's it's very clear that we need to hear from all interested parties, and what they believe is relevant, and we need to give that due consideration. If on the evidence, it appears to us that it is relevant. And now I'm conscious that that doesn't give you the kind of immediately easy shooting target to land your arrows in. But I think it's the simplest and most complete and legally correct way of answering your question, Mrs. Gilmore. And now I can see also a hand from Council of fellows.

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Is that Is this on this point? counsellor fellows or is it a different matter?

19:46

No, it is on this point if I may, sir. Indeed, means I'm Mrs. Gilmore I you contend for the time being and I know I will move to here, counsellor fellows

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I understand your point of view. And, and you are the examiner and we bow to your judgement. Thank you so much, sir.

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Thank you very much, counsellor fellows,

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counsellor Maria Fellowes on behalf of over town council, yes, I do understand the position. And of course, it depends on the stage at which other applications are within the planning process. However, we would contend that if the application for the National Grid substation was being reviewed itself independently as an application by National Grid separately, does, it would then also include all the other connections that have been offered at that same location. So although you are constricted, we would urge you to consider that, because the National Grid substation is not being looked at separately, it actually does mean that all the other connections planned for this area are part of this application. Thank you, sir.

21:07

Thank you very much. Um, I think in fairness, given the nature of those two submissions, and before we move on to agenda item two, I will just briefly turn to Mr. Ennis, and ask if the applicant has any response by way of reply.

21:26

Yes, good afternoon, colonists on behalf of the applicant. We didn't just invite the panel to read the actual submissions that have been submitted, in particular by NGS. So as regards what has been offered in the area, in my submission that depicts a very different picture from that which has been presented. I don't really want to get into a debate this afternoon, but that you're perfectly capable of reviewing that material and drawing your own conclusions from it. But I just highlight that the applicant has a very different view of the material which has been submitted at the relevant deadline in relation to these matters.

22:03

Indeed, and I hear what you say, I think in in in that respect, it's probably best that we now then move on. So can I ask both Mrs. Gilmore and Councillor fellows, unless there are other matters that you wish to put to me and have a preliminary or procedural nature that you then lower your hands. And we will move to agenda item two.

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My hand is lowered, sir. very unbalanced. Thank you very much. That's excellent. Right, if we then move to agenda item two. And now you'll see from the agenda paper that

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here we are aiming to review and issues arising from the energy white paper, and then to provide an opportunity and two relevant parties to to respond to those, and essentially here cutting to the chase. And

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if we look at the energy white paper, I'm very conscious that that it is not immediately in the examination library. However, as a, as a government policy paper, it is a piece of general background that we will refer to and it is available to be read on the internet. So it's generally available and the most relevant elements of the white paper and emerge at page 80. And

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where

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an objective is set to minimise the impact on local communities, the government proposes to implement a more efficient approach to connecting offshore generation to the mainland grid

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in broad summary terms, and the white paper then glosses

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the

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offshore transmission network review, which we in previous hearings have referred to as the BS review. And as being the means by which it will deliver to that commitment, and which it views as being critically important in relation to delivering it's ambition to have 40 gigawatts of offshore wind by 2030. And that particular point of interest and relevance to us and the point that has, in our view, potentially changed the position as we discussed it at the last round of hearings in early December, is that government refers at the foot of page 80. And I will quote

24:45

in order to start delivering these benefits, the benefits of a coordinated and offshore generation transmission connection regime. We will encourage projects already in development where

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Early opportunities for coordination exist to consider becoming Pathfinder projects. This will help inform the design of the engineering regime, we will consider changes to the current regulatory framework which enable developers to implement innovative approaches, including on anticipatory investment.

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For the 2030s. And beyond, we will redesign the current regime to incentivize more extensive coordination and minimise environmental, social and economic costs. Now, if I then return to the position as we had it, in our issue specific hearings in early December, the point that was put to us by amongst other participants and the applicants, and Afghan as a key regulator here was a general view that projects that were already in the planning process by inference, these applications would not be ones that essentially would be expected to pivot to respond to outcomes from the offshore transmission network review the base review, and would, therefore not needed to build into themselves and mechanisms that would enable

26:19

potential different approaches to transmission system connection than possibly the ones that are currently part of the applications in front of us. And there's an agility point there. Now, the reason why we felt it necessary to turn to this specific part of the white paper, and to put these points to participants is essentially because that last paragraph that I referred to on page 80, does tell somewhat different story to the one that we would have put before us. And

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when when we heard you all in early December, and

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because there is a clear view on the part of government that has certain projects that are already in the planning process projects already in development, and may have opportunities to adjust the way in which they deliver their transmission system connections. So the first set of questions that I wanted to raise work directly with the applicant to ask whether or not any consideration has been given to becoming in inverted commas a Pathfinder project or Pathfinder project, and if so, and whether

27:36

there are any implications for the means by which transmission system connections might be made, and that are different from those proposals that are currently before us in the applications as they have been submitted. So as the applicant first on that point, and then I am going to open the response generally to the white paper positions, and both to the applicant and more broadly to the other parties who have requested to speak on this item. Back to the applicant. First please. Mr. Ennis.

28:20

Thank you. So

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colonists behalf the applicant in terms of that particular passage that you have quoted from on the second column of page 80. The word used is projects already in development. And in my submission, that may well be directed to those that are currently considering formulation of proposals as opposed to projects, which are already at an application stage and and have a formulated DCA and in most submission that is appears to be supported by the Secretary of State's decision in the horn see three project where in terms of the Secretary of State, a very clear articulation was made because in terms of

that particular proposal, equally accepted counter proposal regarding a ring main was suggested, and later evidence was submitted to the Secretary of State to consider the base review. And at paragraph 1823. The Secretary of State sets out the position obviously in relation to the project three and July 2020. Phase launch the review of the on offshore transmission network full stop, which was the review is exploring early opportunities for coordination of projects connected between 2012 to 2030. It is not intended to automatically apply to applications for development consent that currently in the planning system, and I certainly draw a distinction First of all, is that this project is clearly within the planning system.

30:00

And equally in the context of East Anglia to its connection agreement is currently ahead of 2025. In terms of the process. So in terms of my starting position in terms of the wording of the policy, which is effectively in development, that in my submission is more likely to apply to projects, where they are currently at the stage of seeking to formulate their project, and have opportunities to potentially alter that project, in line with potentially becoming or launching and becoming jointly with potentially another project to bring matters forward. That's the first point. But the second point, I think, is pretty important. The context of this, these particular applications is we've had the evidence from Mr. Green. And we've had very clear evidence that these two projects when considered properly in terms of a grid connection, the most cost effective and efficient means of connecting them is through hv AC connections, and there wasn't an ambiguity, it was very clear in terms of the process of connecting these two projects. They're close enough to the shore and the connections for those to be the most economical and effective grid connections, insofar as the consideration of alternative technologies, which was the HVDC, as Mr. Green illustrated those in relation to these projects would be very expensive. And equally, and the context the project, the sizing of the project relative to the technical capability of DC links within each project required a DC link, which in itself would not be viable in terms of these projects. So the issue that he put is there is not an easy

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alternative technologies for connecting. Now, insofar as what we have seen in terms of government pronouncements in relation to this is they have seen and a recognition that where a project may already have been considered a may well be one which is beyond a high voltage, AC length of connection, so be a DC connection at any event, but there may be future potential for joining together in the early stages with other projects. And that was highlighted in the government's was published by base in

32:30

December as well at about the same time of the white paper in a document called enabling a high renewable netzero electricity system call for evidence. And that effectively is a document which is looking at the market conditions that might be applicable to the changes that are likely to occur in the structure to the particularly offshore industry going forward. And within that they identified that as offshore wind generation is deployed further out to sea. Combining the technologies of offshore generation and Market to Market interconnectors has the potential to further reduce costs increase the flexibility of wind generation and limits environmental footprint onshore and offshore compared to completing the project separately. So what they were illustrating there is a practical example where there was a synergy between the offshore wind farm project and the alternative other type of project

that was coming forward. And National Grid ventures and their responses identify that that is a concept that they are beginning to look at. But they haven't taken forward to consideration at this stage of the process with an individual project. So insofar as as, as the applicants have looked at it, they don't see that their projects and themselves align well in terms of the likely technology

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synergy between what was envisaged by government and what was likely to come forward as Pathfinders. And equally in terms of as I say, the the wording of the particular passage in the white paper and the Secretary of State's decision making, that there is, in my submission, a very real recognition that it is very difficult for projects that have already been formulated and put into consenting prod processes to start altering their projects at that stage of the process. And in my submission, that is one part I have a separate submission, but it goes beyond paragraph 80. So perhaps you'd be better left until we've left page 80 and move on to the other context of the white paper. Indeed, you're going to do that and if we if we look at the the kind of very loose subdivision of this agenda item between review of issues arising and responses even though there are questions, the time wishing to put to you which are you know, principally these ones and then I am going to provide you with an open opportunity because

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The white paper is clearly a very, very important document. And so I will provide you with an open opportunity to make generic submissions across the piece whether or not I have specifically asked questions of you on the matters. So, yes, I'll be coming back to you.

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But in relation to this particular matter, and essentially what we need to be clear

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from you is that it is not the intention of the applicant to in any way pivot

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the applications before us, and

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in the interests of becoming

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a a Pathfinder project. So that's the first and simple question. I, what I hear from you is that the answer to that is no. But can I just have that confirmed?

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Yes, the answer is no. And so the applicant, the answer is no. Indeed, and and then it is your broader submission that because of the specific nature of these particular projects, and the transmission system connection method that has been chosen and costed, and that as you would see it, there would be no methodologically different connection opportunity that might arise from the change in the policy

framework that's emerged in the white paper that you would have any and wish to pursue. So you would only be pursuing something different if in terms, the Secretary of State were to express the desire that the Secretary of State wished you to, it's not something that you're going to bring to the table and offer

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not to the stage. So if the applicant not at this stage, so no, we there is nothing that we envisage right there that is realistic in the timescale that we can bring forward. So the answer is, there isn't a there isn't a Pathfinder solution for these projects that we can envisage that would come forward.

37:05

Okay, right. That's a that's a that's a simple and clear set of submissions. However, I will just check with my panel member colleagues

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to see if there are any points that they wish to raise was Jones, no. Mr. Hockley? Okay, thank you very much. Now,

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accounts, council fellows, I see your hand, but very, very shortly. And I am going to hand the question of responding to the white paper out to participants wishing to speak. You didn't specifically asked to speak on this item, but I'm more than willing to call you in. And would you be content this I called you in once I've heard from the county and the district. But yes, Mr. Smith, thank you for letting me speak now. Briefly, Marianne fellows over town council. I apologise when I introduce myself, I didn't mention the items I wanted to speak to. I do wish to speak briefly to the white paper, and also to the landfill and coastal processes, as this does impact on Obrist. Specifically, I just wanted the opportunity. Why raise my hand now, though, was to respond to what the applicant had just said. Can I can I can I ask you to wrap that in. And because what I'll do is i'm as indicated, I'm going to, I'm going to go to the parties who have asked to speak on this item. So I'm going to go to the County Council, the District Council, and I will then bring you in as a as a council. I will then go to CS and Stacy's. And I'll be asking for their in principal positions on the white paper. And I will also be asking them to respond to the applicants position. Before I go to them, I will as I've foreshadowed with the applicant, providing the applicant with an opportunity to respond to the white paper in the round, rather than to my specific question to them. And so if I can ask you to wrap your response to what you've just heard into your own submissions, and you may find that it's a little easier to pause at that point, because everything will have become clearer. You'll have heard the rest of the African submissions, you can say. Yes, I'm happy to follow your lead on that. Thank you very much, sir. Okay, in which case, you've now seen me paint a roadmap of the way in which the remainder of this agenda item will proceed. So what I'd like to do first is I'd like to return to the applicant and ask for the broader submissions that they wish to make on the white paper in general terms to be put, please. So back to Mr. Ellis.

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Thank you, sir.

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If

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I, of course invite you and it's the part of the

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Can I invite you to read the white paper as a whole?

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I think that's particularly important in any of these policy documents, particularly in the context of what it sets out as an approach. And in particular, some of the key policy priorities. And the way that they're expressed in this white paper,

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are, in my submission, quite unusual in the sense that I've been dealing with energy policy matters for over 25 years. And in my submission, this particular white paper is highly unusual in a number of respects. But in particular, picking out a particular technology, which is to deliver a particular potential output of capacity by a particular time is unusual, and I think reflects that particular position that this government has adopted in relation to onshore winds, responsibility for the transformation, which is set out in this particular white paper, and builds upon policy announcements, which have been expressed over the past

41:12

over 12 months now, since this current government came in to power. But in my submission, that is a unusual circumstance where a single technology is expressed in this manner, and one which expresses its key role in not only transforming the energy sector, but a meeting the nation's response to climate change. And I just said, at the outset of page four of the white paper, the four key themes that the energy systems to meet, they've got to be a transformation of energy, we've got to support a green recovery. And I think that economic aspect, offshore wind is another factor, which in my submission, weighs heavily in the decision maker. And finally, creating a fair deal for consumers is always a an important consideration and the context of energy, and has been reflected as such since the privatisation back in the early 19, late 1980s and early 90s, and the electricity act where those particular interests were specifically identified, and given a high priority. So in terms of that, those general themes, those then the discussion of what's the compelling case, for tackling climate change. And on page nine of the white papers, there is this interesting output of a figure 1.44. It's one which is not a binding policy objective, but indicates a scale of change that is likely to be required over the time period, in order for us to achieve our climate change objectives. And one of the key aspects of this is that electricity has been chosen at this stage to be the key response in terms of transforming the decarbonisation of our country. And that's a very key commitment. And one, which without setting the specific target, there is part of what this transformation sets out to achieve.

43:25

And in terms of that other key aspect is that section, page 11 of the white paper sets out employment involved in low carbon and clean energy. And I think, again, in terms of this particular white paper, what is unusual is the proportion of that employment aspect, but which again, is a key part of the white paper and is expressed in very strong terms, both a policy and government commitment, and support and support have particular outcomes. And in terms of pages 16 and 17 of the white paper, we get the overview of those key commitments, and in terms of transforming energy. The first and in my submission, most relevant commitment in relation to these projects is the targeting of the 40 gigawatts of offshore wind by 2030. And clean being one gigawatts of floating alongside the other expansion, low cost renewable technologies but that key aspect is that it's onshore wind, that is going to deliver the bulk just you mean off offshore industrialists offshore wind, yes. And in terms of the second aspect, which we'll come to deal with, is supporting the green economy is another key part of this. And as part of this overview of key commitments,

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and turning to the consumer, there's a whole section on consumers, but again, have direct relevance to the matters

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All these projects is the section on power, which is headed up in chapter two. And within that it sets out the goal. And it says electricity is a key enabler for the transition away from fossil fuels. And decarbonizing the economy cost effectively by 2050. And then underneath that, it sets out a number of commitments. And what I think is particularly important in these applications is the first one, which the government commits to accelerate the deployment of clean energy generation through the 2020s. And my solution, that's another key aspect of this, if this isn't featured beyond 2030, this is this decade is where this has to be achieved. And as part of that, the government is also investing in other future technologies that may come to support the decarbonisation, obviously, in the longer term. And the third point is ensure that the transformation supports UK jobs and new business opportunities at home and abroad. As I've come to point out, and my submission, offshore wind is selected as one of those key opportunities.

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In terms of page 45 of the white paper, we come to our key commitments in the context of the power section.

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And in terms of the first column, and my submission is a key section where it says, by the government state, that our actions are a strong signal to project project developers and the wider investor community about the government's commitment to delivering clean energy. This should stimulate the continued deployment of key low carbon technologies in the near term. And I particularly emphasise that aspect of the clean energy, the clean electricity having to be delivered in the near term, it then further commits to the target of 40 gigawatts of offshore wind by 2030. And that then understand goes on to set out the process of how the CFD and other government actions support that particular process, and how effective the CFD regime has been in giving us

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confidence to the market to continue to develop technologies and deploy them in the United Kingdom, and drive down the costs associated with offshore wind, and what a success that has been. And then goes on to look at the 2021 CFD auction process, and does a firm commitment given to 2021. And as part of that process on the second column of page 45, there is a key element which is subject to sufficient projects coming through the planning pipeline. To maintain competitive tension. We plan to double the capacity awarded than the last round, with the aim to deploy around 12 gigawatts of low cost renewable generation. And within that there's discussion about onshore wind and solar being in the mix, along with offshore wind. But again, in my submission, what you get here is a clear indication of the government's ambition to push forward with that decarbonisation and clean electricity and for that to be supported by a near doubling. And one of the key aspects of that is that they need to have sufficient CAPAC concentrate capacity to compete effectively in an auction system, because the government believes that delivering lower cost electricity is achieved by having fully competitive markets and for those aspects to be as competitive as possible. And then my submission, all this points to one conclusion, which is the government has in policy terms, an exceptionally strong policy position, and seeking to bring forward as much clean electricity as quickly as possible of a scale indicated on page 45 in the auction round.

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And in terms of another key aspect, which I have identified

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is the whole question of

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essentially, how the UK as an economy can truly benefit from this transformation and energy and that is sent out in relation to offshore wind in Pages 56

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Extra 57.

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And in my submission, again, I'm not going to read large chunks. But if one reads those particular sections, and the government support for the sector, that they genuinely believe that offshore wind has a key role to developing new opportunities within the supply chain and UK, growing employment and economic opportunity, and in particularly highlighting that it provides high value and skilled employment opportunities. Under my submission, again, considerable weight attaches to the sector, arising from the growth in the UK supply chain, and the employment opportunities that are afforded that these are identified again, and the key targets and 59 in paragraph on page 59, both in relation to offshore wind targets, and the sector's employment opportunities.

51:05

Those set out in my submission and important contexts. And when we come to see how quickly be grid and other matters can be delivered. But I think in terms of the response to the Bayes review, but one of

the factors that is being considered and very carefully considered by government, is the extent to which any change in any of the systems act as a disinvestment for future investment, and equally hope, the progress towards the 2020 2030 target. And that's expressly acknowledged and the

51:46

nzso final report published in December, and it's also reflected effectively in the position of off gem before this examination, and my submission, considerable weight should attach to the views of off gem, there are a party who sit at over the top of the energy system, and a particularly the electricity one in terms of regulation. They understand the process and my submission, their position is very clear. And in my submission, the government in terms of its action decision making in Hornsea project three, also make that very clear that they do not see it as appropriate, that the Bayes review should all hold up the achievement or delay the implementation of the projects, which will seek to meet the highly ambitious 2030 target, and which are such a key plank of the pairing of our net. NET sera future.

52:48

And I think that's very important context at the grid aspects can't be looked in isolation, for the overall thrust and position of the white paper, which in my submission is very clear. And I don't think we have anything else to add. And I think that sets like our position on the white paper, and we'll be happy to answer any questions, if you have any. Thank you. Thank you very much.

53:17

What, and those were clear submissions, and so I'm not going to interrogate the detail of them in the header now.

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But what I am then going to do is to move to

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the County Council District Council obrah Town Council, then

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aisons, let's say us, who are the the bodies who requested to speak on this item. And so if I can go first to Michael Bedford for Suffolk County Council and what I would like your submissions to do.

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Mr. Bedford is essentially to tasks to set out your own store in relation to

54:05

the nature of the policy changes introduced by the white paper and the degree to which they bear on the decision decisions to be taken by the Secretary of State in relation to these applications. And also to respond to both the line of questioning that I put to the applicant at the outset of this agenda item and also to the broader submissions that you have just heard from the applicant. So Mr. Bedford.

54:32

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

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So

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in terms of your first question, I think the short answer is to note paragraph sorry, page 55 of the white paper, which confirms what we had all anticipated at the time of the December issue, specifically

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hearings, which is that yes, there is to be a review of the national policy statements in relation to energy.

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The page 55 gives an indicated timetable, which is that they are to be expected to be produced during the course of this year, with a view to finalisation by the end of 2021. But secondly, it provides the confirmation that it is not expected that the existing

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and energy policy statements should not be applied to decisions in the interim. So that that, in a sense provides you with the full position in terms of obviously, your obligations under Section 103, and four, and so on. So effectively, no change the formal position. But of course, the energy white paper is, as you say, an important and we would say a relevant and important consideration for you to take into account against that backdrop, that the statutory position hasn't changed as to what the national policy statements are. But it ties into the point that I think we made in our deadline, three submissions, that you can rightly regard the direction of travel, as helping to inform you on the weight that you give to different strands of existing policy, when you are applying that existing policy. So that's the sort of the overarching point that we make. turning them more to the specifics of what the energy white paper

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says, I'll come back to

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page 80 in a moment if I can, but it is just worth picking up at page 87. In terms of the key commitments

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in relation to the energy

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system, I'm afraid they're not numbered, but I think it's number five

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is to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid.

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And that is obviously then fleshed out at what he said at page 80. But no one just emphasises that is a key commitment. And you've already sort of as it were rehearsed what is said at page 80. We would also draw to your attention in the left hand column, clearly the way that that is dovetailed into the base review, and as you say, that seen as the means of delivering on flat in relation to the to the Bayes review, which I say is the vehicle that is is

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chosen by the white paper. It is worth emphasising since we last discussed that in December, there have been the further developments. Mr. Ennis referred to you helpfully to the NGA eso offshore coordination phase one final report, which was published on the 16th of December,

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just after our last deadline for that purpose. So it couldn't have been, I think, referred to at that stage.

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And obviously, we'll provide you with the references in the written summaries of the cases. But that clearly recognises the benefits of greater coordination by 2025, specifically at page 27.

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And essentially, what it does is it sets out that there are two competing

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objectives, there is trying to do everything as quickly as possible. And then there are the economic consequences. And it chooses a strategy of looking at 2025, as well as at 2030, as well as at 2050. So it doesn't see it as all in one direction. But it's worth drawing your attention to that it also notes the evolving technology position at page 21.

59:19

And that it's making the sensible point that this is an area where technology is evolving, and changes, which are perhaps not currently possible may become possible in the near future. And I just ask you to keep that thought in mind. We also I think, referred in our deadline for submission to another element of the Bayes review, which was the a comb study, which is being undertaken for the crown estate. That study has not yet been published, but it's rehearsed in the material that was presented by Bayes at the presentation that took place on the fifth

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The December game will cover the detail in a

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written summary of the comments. But that was again, making the point in terms of its early findings. What was stressing the point that effectively, if you continue to adopt a first come first served approach, instead of a more coordinated approach, you end up constraining the options for those who come later.

And that can have deleterious effects, particularly where you've got constrained choices. So that obviously all chimes into some of the messages that we've already been rehearsing to you earlier stages. And in terms of the points that were put to you by Mr. Ennis, about what page 80 is saying. And I've said, as a matter of approach to policy guidance, and bearing in mind that ultimately what policy means is a matter of law. Have to I would urge caution on you, in accepting Mr. Innocence approach, the guidance at page 80, in terms of the phrase projects already in development, should be interpreted by you to exclude

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projects which are at the application stage, but still pre consent.

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I don't see that in the word at all. As a matter of what they mean, there may be a matter of judgement as to how far advanced a project should be before you should expect or not expect it to consider putting itself forward in response to the Secretary state's encouragement. But I would I would not suggest to you that that statement is intended not to be an invitation to parties in the position of the present applicants, that they don't even have to consider whether they should respond to the invitation to put themselves forward as a Pathfinder project, merely because of the stage that they are at. Can I just very briefly interject there, and I will ask the applicant to come back on this point in their final concluding remarks at the end of this agenda item too, because taking a plain English meaning

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and placing it on the words in the final paragraph of page 80.

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We will encourage projects already in development. One potential plain English meaning of that

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drafting would be

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for it to be applicable to projects that are already consented and are already in physical development. And the therefore government is seeking engagement by

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developers actively delivering projects and therefore anything earlier in the pipeline is by definition also included. It's It's It's taking the pipeline right out to projects in active physical delivery. And that's that's that's placing a plain English meaning on that drafting.

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Now, the meaning of that drafting that's been put to us by the applicant is considerably different from that. And I would bet you Where do you fall on that? Do you think I'm going too far?

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I would say there is a spectrum. And one could certainly take the view that something is in development until it has been constructed. And that that would be a tenable view, I would say, I don't for the purposes of the points that we've made, you need to go quite that far along with spectrum and incense. Going back to what I said earlier that if there is a spectrum, obviously, the ease or difficulty of responding to the Secretary state's encouragement may change as you move up up the spectrum towards implementation. But we are not even we're not at the stage that this project is in development in a physical sense, a, that works are already underway. We are at the pre consent stage. And we're at a stage where the project is still itself being changed by the applicant, where it sees that there is a justification for change. And I refer you obviously to the recent changes that were proposed to reduce, for example, the sizes and some of the heights of some of the equipment within the substations. And so the applicant clearly is able to flex the project where it sees that there is a justification for doing so. And and to that extent, I don't see this as a

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is a matter that falls outside of the phrase,

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projects already in development? That seems to me to be absolutely what this project is an aside, I don't need necessarily for my submission to go quite as far as well. What about post content projects, which haven't yet been built out? But again, I don't see as a matter of principle, why they would be excluded. But in a sense, you don't need to go that far for the purposes of bringing it into to bear in this case.

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But obviously, what one note is that the Secretary state has taken the stance of encouraging participation rather than compelling participation. And that if I can say, so that might reinforce my interpretation, because it is recognising that there may be

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parties who, despite the fact that they are being encouraged, aren't able or don't feel able to do anything in that regard.

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But what I would say is that when you look at the white paper, and going back again to one of Mr. greens, his point, which is he invited you sensibly, to read it as a whole, obviously, we would all do that, I'm sure. But then, with respect, it seems that the parts that he invited you to read perhaps more closely, were somewhat lopsided, because there was a lot of emphasis on looking at the Clean Energy benefits, which obviously are there in which we recognise, looking at the employment economic benefits, which again, are obviously there and which we recognise that there was minimal if any consideration given by the applicant in its remarks on the white paper to the important priority, that the white paper also sets about minimising environmental impacts, when obviously, I call you your attention, Lucky commitment earlier.

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So that's what we would say about the the white paper, I have already touched on the position in relation to the Bayes review, again, the direction of travel, that comes out of that the energy so offshore coordination phase, one final report of the common crown Estate Report. And can I perhaps just leave this with it, it's a final point, it's sort of almost tries to bring things down to a more

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practical level in relation to these particular projects. And it may be a matter that's more for exploration,

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subsequently, but taking this point about, we have got a project, which is put before you on the basis that the applicant is seeking or the applicants are seeking consent, with an extended period for implementation, because by requirement one of shedule, one, they're asking for a seven year period for implementation, as opposed to the prescribed five year period. Also, they're perfectly entitled to do that. But they want flexibility for a longer period for implementation, in part in recognition that this is an evolving marketplace, an environment in terms of the delivery of

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this type of clean energy. And there may well be technological changes, as well as regulatory changes. During the period that this project if it were to be consented, let's say notionally, during the course of the latter part of 2021 Corden's with the

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regulatory timetable.

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with seven years for implementation, we could be in the closing periods of 2028 before it was actually implemented. And obviously, that's a significant period of time in which some of these changes whether they're policy changes or whether they're technical changes could have taken effect.

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just

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interject briefly there, and Mr. Better in relation to that point. Is it your submission, essentially, that these applicants cannot have a pound each way

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that to a degree. And if they are seeking an extended implementation period, they're also exposing themselves to the significantly higher likelihood of there being completed policy around minimising the impact on local communities through a more efficient approach to connecting offshore generation to the grid. And that

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the price in inverted commas that they pay for that extended period is the need for agility around

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a greater level of prospective impact. reduction. That might be the case if they were just going for it.

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Standard period of commencement.

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I think I think I would say that that certainly reinforces the point. But I don't think I would say that that extra two years is necessary to make my point because I say that the way that I have tried to put the position is we have an existing policy framework, which has to be applied. And we know that. But we also have an emerging policy framework, which we can see. And it's becoming clearer, as it were, almost as each month goes by tonnes of documentation coming forward. And the policy is to be applied at the point of decision. But in applying the policy at the point of decision, you can give weight, I say to the direction of travel. And so to that extent, I say that you can simply recognise that when this project is implemented, things may well have changed in both policy terms, and in technological terms. And it's legitimate. Going back again, to the discussions we had earlier about designs being fit for purpose, designs being fit for purpose over their lifetime, that you recognise, or at least the applicant recognises in the way that the project is designed, that those

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evolving matters, may well come to fruition before it's necessary to build out the scheme. And if it's possible for the scheme to adapt to take those on board within the parameters of what has been consented, then the applicant should have an obligation to take up those opportunities. So say, bring his incense to a nub. But the point being that you will have seen, I think a deadline for that has recently been submitted to a composite design principles statement for the substations, I think bringing together the the earlier documents. And obviously, we welcome large elements of that. But we don't see why in principle, there could not be a design principle expressed, which required the applicant during the design process to have regard to technological and regulatory reforms since the date that the order was made. And if it were possible, through taking those factors into account, to reduce any of the impacts on the receiving environment,

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that the applicant should have to consider doing that, so far as reasonably practicable.

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In other words, it's a way of trying to one can't force but one can certainly require consideration to be given to this changing picture, I say, both regulatory and technologically during the life of the project before it's actually implemented. And we don't see what why that couldn't be expressed as a design principle. And obviously, if it was a design principle, then the requirement would bite on it. And obviously, it would have to it would flow through into the the terms of the consent ended now in relation to the detail of that, obviously, here now not the place where you do have an issue specific here hearing on the draft development consent orders. And what I would flag is that if you wish to develop this theme, and talk about the how, yes, then that will be the place for those for those submissions.

Yes, it was. So it was absolutely that was the intention. But I just should say slightly, perhaps in to do to explain why I've trolled you with it. Now, unfortunately, due to another commitment, I won't be there on that occasion. And Miss perec will be there on the county Council's behalf. And I just wanted to rehearse that. So it links in with our more primary submissions that we've already made. So that since it doesn't come out of the blue, and certainly not to the applicant, and obviously not to you and your colleagues. Okay, fine. And

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all the other principals submissions that you need to make Mr. Bedford and I just need to check whether you intend to use Mr. Watson on any of this before then move on to the district? Yeah, I think so. I think I think I've been able to cover the points that I think we wanted to make. Okay, thank you very much. In which case, I'm going to move directly on to the district council and Andrew Tate of counsel for East Suffolk counsel, please.

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Thank you, sir.

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I, on behalf of the Suffolk Council, we would endorse all that Mr. Bedford has said and just make four points. We

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summarise the position. First, that the white

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that the white paper

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confirms the review of the energy MPs is

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that it makes a decision not to suspend them, so that the national policy framework and the NPS is remain in place. And the white paper is consistent with those MPs is and can be read alongside it and would form an important and relevant consideration in its own right.

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Secondly, as you have noted on page 80, the offshore transmissions Network Review that the county and district have been pressing hard for,

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is confirmed as launched. And the problem that it seeks to address is explicitly identified.

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In that the it's recognised there's an impact that it is having on the coastal communities.

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The present position where there is simply single point to point connections, and the significant reduction in environmental and social impacts on coastal communities are likewise recognised and hence the need for a coordinated approach. Thirdly,

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turning to that last paragraph on page 80.

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We would ally ourselves with the way in which Mr. Bedford put the matter that a project in can be described as being in development. Certainly, if it hasn't yet received consent, may not receive consent, then it's developed the continuum of its development starts again, so that

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this is, we would say, directed at projects, certainly before they have received the any consent, and they can be influenced by decision makers.

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And turning to the first sentence of that paragraph, we see in order to start delivering these benefits, so there's a recognition of a general

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tone there, there is a general tone, that it's important to deliver these benefits as soon as one reasonably can. And it's for that reason, the fourth point,

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again, we won't trouble you with the wording. But we think it is important that

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there is the opportunity taken through this decio these gcos

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for at least some element of coordination to be taken,

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undertaken, insofar as opportunities present themselves in future, whether through technological advances or otherwise, which would

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be of benefit in reducing impacts on local communities from a coordinated approach prior to its actual implementation, which may be

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many years off. So those are our four points. In summary, they are consistent with what Mr. Bedford was saying. And we would urge that approach. Can I promise you that I'm just one of those, which is the the the particular issue of

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the relationship or lack of relationship between the extended implementation period sought by these applicants and the proposition that there is then a need for greater agility around the minimization of impacts on local communities? Yes, it applies equally to find to find the position where there is a five year implementation period.

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But it is emphasised and reinforced by the fact that seven years is proposed in requirement one.

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Okay. So those are your submissions for the district. Yes, they're short, I don't want to repeat everything. There is absolutely no reason to repeat anything that Mr. Bedford said if you agree with it, and again, with with

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reference to that point, moving on down the list to the remaining speakers. If any of you wish to adopt anything with any of the preceding speakers have said then feel free to do so and reduce your submissions accordingly. So I'm going to go to counsellor fellows for Old Town Council before I come to se C's and C's, so counsellor fellows.

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Thank you, sir. Marianne fellows over town council.

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We do endorse

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What Mr. Bedford for Suffolk County Council has so eloquently expressed to you. And some of my points are similar, but I won't dwell in detail on them. But I do feel I need to give you the perspective from the community, and from the very much the local people affected by these projects.

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So in terms of Firstly, page 80, and I have, I have read the whole white paper,

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over town council disagrees strongly with the position taken by the applicant. And we're really disappointed by this, as everyone recognises that the current applications are not fit for purpose. And in fact, they will become even less fit for purpose if consented, and then judged in the future. Looking back with hindsight of what can be achieved, I think, very quickly on the horizon.

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This community should not suffer irreparable harm, just because the energy white paper and the base review have been delayed. And this applicant has forged ahead. And that's the situation we're in. We believe that this application was not in the format that it was ready to be put forward to yourselves for examination. We've heard from observations this morning, and from the previous issue specific hearings, that there are many matters that have to be put forward, again, to future deadlines. There are things that can't be resolved currently with the statutory consultees. And in fact, I specifically recall that the applicant themselves said at the last issue specific hearings, that they could not, or would not be able to determine technical details, because of changes in innovations within the supply chain, which they were expecting to occur over the next few years. Yet they want to tie down from yourselves a quick approval now and then take many years to sort out as we've heard implementation over seven years or more, to sort out the detail of everything.

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I don't believe in Obertan castle doesn't believe that the applicant should be able to ignore the ambitions of the white paper. Mr. Ennis didn't actually say that. First, when you asked him he changed it. Secondly, but when you first asked him, he didn't say it was not practical. He said it would be too expensive. And cost shouldn't be the whole factor. Taking into account what is being proposed new technologies, new frameworks may be more expensive. And again, I believe that's why the applicant wishes to forge ahead, without flexing or without altering.

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Yes, we have a hard end deadline, unfortunately, upon us. And the six months doesn't take into account the delay over Christmas and New Year and due to COVID. The fact that all our resources are limited with home schooling and having to cope with the environment we're currently in.

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pings needs time to digest the evidence. So we would contend that if the applicant is not prepared to flex or alter the application, then it should be either withdrawn or yourself should push for an edge foot should recommend a rejection of the application. Mr. Ennis has quoted all the parts of the white paper that supports the applicants position, and none of the others that don't.

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With regard to the white paper in general,

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I think it's fair to say that jobs and targets would be delivered wherever the applicant connects to the National Grid. So it's not an overwhelming reason to press ahead with Friston, per se. It's just an acknowledgement that we do need in this country to move ahead with projects but not right now. And not here.

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I would ask the examining authority to recognise that these do not say application should progress at pace at all cost. There is a lot in the white paper that says harm to communities should be mitigated

and reduced, and innovation should be taken on board. And we believe along with Mr. Bedford, that it's possible to achieve more and better solutions if the delay was imposed. Now, rather than proceed ahead.

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We would ask Finally, that the examining authority pays due regard to what has been raised today, specifically with regard to the ambition to deliver a better solution for everyone but applicants for employment, for jobs, for the environment for communities, and it would be negligent of yourself not to acknowledge the direction of travel but

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regulatory and technical when you form your decision and the view in which you give to the Secretary of State. Thank you.

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Thank you very much.

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I'm now going to ask Richard tourney of counsel for Stacy's to speak on this item.

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Thank you very much, Sir Richard Turney.

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Um, if I may, in the first instance, can I hand over to Mr. Wheeler, who was going to address this point to you, and then I'll come back on any wrap up points if I need to.

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You may indeed,

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Mr. Wheeler.

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Good afternoon, sir. Can you hear me? I certainly can. Good. Thank you. My name is Chris Weaver. I'm a Friston resident. I'm a member of se C's. And by background, I'm a chartered engineer. And I have a few comments. And obviously, the points about the white paper referring to community impact is one that has already been made and we are most grateful for that. And the sages position is that we would accept that the current applications have had some regard to environmental impact, so far as consideration of the status of the AONB is concerned. But we do not agree that proper regard has been had to the impact of the project on the local communities affected, particularly Kristen, but obviously elsewhere as well. There are many such impacts as others have explained at length. So we do hope that as part of the examination process, you will be given full consideration to the interests of the local communities as is now recognised by the white paper.

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Moving on, the white paper emphasises the 6 billion potential savings that could be achieved by taking a coordinated approach to wind farm infrastructure, rather than the current piecemeal approach. Such an approach would, of course, also substantially reduce the adverse effect on communities, as already has been mentioned by others. But there is a caveat, which is only brought out if one only reads the fine print of the OTL report. And that is that the full benefits of coordination are not available unless an early start is made. And indeed, if that start is delayed until as late as 2030, the size of those benefits is very standard substantially reduced. Now going on to the Pathfinder project, one thing what I would like to do without disagreeing with what Mr. Minister said, because I don't think I have to, is that I would like to remind the examiners that the proposal was made an open floor hearing three, that the two projects should be coordinated as a Pathfinder project as a single offshore platform. And the results of 1.7 gigawatts of power delivered to Branford is our preferred solution using high voltage DC over a reopened boards into bramford cable route. The applicants already own land at Brownfield to believe to be suitable for the required converter station and National Grid are previously accepted that they could provide a grid connection at Branford and the off channel representative confirmed that is h2 that such an approach was supportable by the current regulatory framework. So we see this as a very practical solution. Now, Mr. N is commented on the lack of cost efficiency of high voltage DC. But I do believe that in making that comment, he was referring to the idea of each of the two individual projects being converted to high voltage DC. And I think I would not choose to disagree with him, if he says it would be more expensive, in fact, I think is my vague belief is that one gigawatts probably represents the hurdle above which high voltage DC is most effective, most economic below that high voltage AC is less than economic. And we should remember of course, that the standard three project which the applicant is busily getting on with will be delivering 1.4 gigawatts of power to a single substation we convert a station that bramford

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and the cable route for that the whole road between between boards in Branford is as we understand it going to be rebuilt shortly in order to allow the installation of the cables. So, again, we have the possibility of other civil works along that route in order to achieve a good outcome.

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So, we would ask that bearing in mind the place that there has been this interest in the coordinated approach that we do seriously consider the possibility of these current projects being coordinated in this way. And a particular point is it is the whole ethos of the odnr project, that the offshore wind farms should be coordinated in power turned out to sea and they should be delivered over the smaller

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as possible number of cables to the onshore environment so as to reduce the number of cable trenches, which can be one in this case and reduce the number of converter stations, which could be one in this case rather than the two of everything. And in the case of what's proposed with Kristin, for cable trenches with all the disruption that goes with that, now, just finishing off

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the bazer channel odnr review is also interesting because it makes comments regarding the footprint of the height of high voltage AC substations. This is a direct relevance to current projects. As it happens, it suggests the possibility of a significant reduction in the size of the offshore substations should that approach with regret continued to be continued to be required, and says it made some submissions about this in deadline for now, there's just one other thing that I would like to add on to Mr. Owen is made quite a lot of comments about being concerned about the economics for the consumer. It is worth noting that as a result of the greening of German electricity, the residential customer electricity there has now grown to 25 pence per kilowatt hour, which represents a doubling since 2020. This is not something that should be ignored.

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And that completes my comments. I think, probably, Mr. Attorney will wish to wish to comment further on this at this point. Thank you,

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such as just breathe really, really?

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Well.

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I think there's a bit of feedback that

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will prevent that from happening. Okay.

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So just just briefly on the on the points about the white paper, firstly, to adopt Mr. bedfords comments on it and on the way in which it should be approached and interpreted. Secondly, Mr. Ennis, referred to Hornsey three. And there's actually a decision on that. And of course, we need to be careful about fishing hours in earlier decision. But

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the Bayes review there was described as not being intended to automatically apply to a scheme within the planning system. Not that it wasn't intended to apply to a scheme within the planning system.

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I think the next point is that, of course,

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the white paper suggests

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strong support for offshore wind as an important component of energy supply in the UK, that is unsurprising, it's consistent with other government policy. But it contains no suggestion that the environmental protections that are contained within the existing Swedes, then P SS will be in any way weakened in the delivery of that

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further supply of offshore energy. And that aligns with the points that have been made specifically in the context of coordination, and the clear and expressible for coordination that is found within the white paper. And finally, just very briefly, a comment on on the how, as you put it, sir, which Mr. Bedford addressed in part and said that he would come back to, or someone would come back to on his behalf at the decio hearing. But obviously, one of the possibilities is refusal of development consent, where there's a clear absence of coordination and an absence of flexibility to ensure coordination. Another one is some measure taken within the DCA to secure future coordination should it become available. And the detail of that is a matter which obviously, you will want to think about. But the third solution, there may be more but a third solution is a split decision. That's to say, to consent the offshore wind farm, but not to consent the grid connection. That's one of those perfectly open to the examining authority in the face of an application such as this, it is not inconsistent with the way in which

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grid connections are dealt with in the suite of energy MPs is it's not inconsistent with the way in which other schemes have been promoted with grid connections being promoted separately. And we do say that given these are schemes for to offshore wind farms, they are to the

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console proposed to be consented with a seven year implementation period they are coming forward. If they come forward at all, at some point considerably in the future. There really is an opportunity here to take advantage of the government support the coordination and to do that, through making an appropriate decision at this stage which doesn't sell the past on delivering to new grid connections.

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Friston together with whatever else might come forward at first and in an uncoordinated manner. So those are our submissions. Thank you very much.

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Thank you very much, Mr. Attorney. Now, what I'm just going to do is take a brief time check. And because I'm conscious that we have reached the point of which we would normally call an afternoon break. And can I just ask CS

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was Miss Gilmore? And how long do you think your remarks on the white paper will need to proceed for? Are we looking at a few minutes? Ah, I think this is the most important thing I have to talk about. So I would really like at least five minutes. Therefore Would you like to take the break now? Thank you made the case for a break. Now. So ladies and gentlemen, let us break for 15 minutes, so we'll call it

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we'll call it 337. By the time we finish, all that makes that makes them that makes it a little bit more complicated. Let's, let's

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let's resume at 350. I'm sorry, that abbreviates the break a little but i think i think it's clear and neat for everybody. So ladies and gentlemen, we will resume at 350 Thank you very much.