

Application by WTI/EFW Holdings Ltd for Wheelabrator Kemsley K3 and WKN

The Examining Authority's further written questions and requests for information (ExQ2)

Issued on 6 May 2020

In accordance with the Government's measures to reduce COVID-19 infection, which includes stopping all gatherings of more than two people in public and requiring people to stay at home, I confirmed in my letter of 26 March 2020 that the hearings scheduled for the week commencing 13 April 2020 were postponed.

In light of this decision and remaining dates reserved for an Accompanied Site Inspection and Issue Specific Hearings, I now set out my request for further information from Interested Parties (IPs) regarding how best to proceed with this Examination and other matters.

Table **ExQ2A** sets out the Examining Authority's (ExA's) request for representations from all IPs regarding potential Issue Specific Hearings (ISHs). The responses to these questions will help the ExA to determine:

1. If any ISHs are to be held, which topics/issues/matters should be covered;
2. If any ISHs are to be held, what arrangements and preparation is required; and
3. Whether the Examination can be examined by further written questions **only**.

Each question has a unique reference number which starts with ExQ2A.1.1 (indicating that it is from ExQ2A). When you are answering a question, please start your answer by quoting the unique reference number.

Table **ExQ2** sets out the ExA's further written questions and requests for information by named parties. Column 2 of the table indicates which IPs and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with Q2 (indicating that it is from ExQ2) and then has an issue number and a question number. For example, the first question on *Principle and nature of the development, including waste recovery capacity and management of waste hierarchy* is identified as Q2.1.1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team, please contact WheelabratorKemsley@planninginspectorate.gov.uk and include 'Wheelabrator Kemsley K3 and WKN – ExQ2' in the subject line of your email.

Responses are due by **Deadline 4: 20 May 2020**.

Abbreviations used

PA2008	<i>The Planning Act 2008</i>	km	<i>kilometre</i>
µg.m-3	<i>Microgram per cubic meter</i>	KMWLP	<i>Kent Joint Municipal Waste Management Strategy</i>
AC	<i>Ambient Concentration</i>	LAQM.TG16	<i>Local Air Quality Management Technical Guidance</i>
APIS	<i>Air Pollution</i>	LSE	<i>Likely Significant Effects</i>
CEMP	<i>Construction Environment Management Plan</i>	LVIA	<i>Landscape and Visual Impact Assessment</i>
DCO	<i>Development Consent Order</i>	m	<i>metres</i>
dDCO	<i>draft DCO</i>	MCZ	<i>Marine Conservation Zone</i>
EA	<i>Environment Agency</i>	ME&M SPA	<i>Medway Estuary and Marshes Special Protection Area</i>
EAL	<i>Environmental Assessment Level</i>	MMO	<i>Marine Management Organisation</i>
EIA	<i>Environmental Impact Assessment</i>	NE	<i>Natural England</i>
ELV	<i>Emission Limit Value</i>	NH3	<i>Ammonia</i>
EMMP	<i>Environmental Mitigation and Management Plan</i>	NOx	<i>Nitrogen Oxide</i>
EPR	<i>Early Partial Review</i>	NPPF	<i>National Planning Policy Framework</i>
EM	<i>Explanatory Memorandum</i>	NSIP	<i>National Significant Infrastructure Project</i>
ES	<i>Environmental Statement</i>	SoS	<i>Secretary of State</i>
EU	<i>European Union</i>	PC	<i>Parish Council</i>
ExA	<i>Examining Authority</i>	PD	<i>Proposed Development</i>
ExQ1	<i>ExA's First Written Questions</i>	PEC	<i>Predicted Environmental Concentrations</i>
HE	<i>Highways England</i>	PEIR	<i>Preliminary Environmental Impact Report</i>
HGV	<i>Heavy Goods Vehicle</i>	PINS	<i>Planning Inspectorate</i>
HRA	<i>Habitats Regulation Assessment</i>	PRoW	<i>Public Right of Way</i>
HRAR	<i>Habitats Regulation Assessment Report</i>	RIS	<i>Ramsar Information Sheet</i>
IAQM	<i>Institute of Air Quality Management</i>	RR	<i>Relevant Representation</i>
IBA	<i>Incinerator Bottom Ash</i>	s	<i>Section</i>
IED	<i>Industrial Emissions Directive</i>	SAC	<i>Special Area of Conservation</i>
IP	<i>Interested Party</i>	SEWPAG	<i>South East Waste Planning Advisory Group</i>
IPPC	<i>Integrated Pollution Prevention and Control</i>	SO2	<i>Sulphur Dioxide</i>

ISH	<i>Issue Specific Hearing</i>	SPA	<i>Special Protection Area</i>
K3	<i>Kemsley 3</i>	SRN	<i>Strategic Road Network</i>
KCC	<i>Kent County Council</i>	SSSI	<i>Site of Special Scientific Interest</i>
KJMWMS	<i>Kent Joint Municipal Waste Management Strategy</i>	TA	<i>Transport Assessment</i>
TE&M	<i>Thames Estuary and Marshes Special Protection Area</i>		
WFD	<i>Water Framework Directive</i>		
WKN	<i>Wheelabrator Kemsley North</i>		
WR	<i>Written Representation</i>		
WSI	<i>Written Scheme for the Investigation</i>		
ZOI	<i>Zone of Influence</i>		

Citation of Questions

Questions in Table ExQ2A should be cited as follows:

Question reference: issue reference: question number, e.g. ExQ2A.1.1 – refers to question 1 in this table.

Please note that any responses to the questions in Table ExQ2A relate to practical arrangements for the examination of this project and **will not be published**. Responses to these questions will not be considered when decisions on the substantive merits of the application are made. I will however, when deciding on how to proceed with this Examination, include my reasoning based on responses received, shortly after **Deadline 4**.

ExQ2A	Question to:	Question:
Q2A.1.	Participation in the Examination	
<i>Please provide the ExA with an indication of your anticipated level of participation during the rest of the Examination. This information will help the ExA to plan appropriately. Formal notifications of a request to speak or observe any Hearings (if necessary) will be requested later.</i>		
Q2A.1.1.	All Interested Parties	How would you want the remainder of the Examination to be undertaken? i. By means of written submissions ii. By means of oral submissions at Hearings iii. By means of written submissions and limited oral submissions at Hearings
Q2A.1.2.	All Interested Parties	How much do you anticipate participating in the rest of the Examination? i. I am unlikely to make any further submissions ii. I may look at written submissions made by others iii. I may make further written submissions iv. I am likely to make further written submissions v. I may access recordings of Hearings (if held) vi. I would like to follow any Hearings in real time (if held) vii. I may wish to speak at a Hearing (if held) viii. I am likely to want to speak at a Hearing (if held)
Q2A.1.3.	All Interested Parties	Which topics at an Issue Specific Hearing, if held, are you likely to want to observe? i. Principle of development, recovery capacity and waste hierarchy ii. Transport networks and traffic iii. Other environmental matters (please specify) iv. Draft Development Consent Order v. None of the above

ExQ2A	Question to:	Question:
Q2A.1.4.	All Interested Parties	Which topics at an Issue Specific Hearing, if held, would you or your nominated speaker(s) like to participate in as a speaker and if so why? <ul style="list-style-type: none"> i. Principle of development, recovery capacity and waste hierarchy ii. Transport networks and traffic iii. Other environmental matters (please specify) iv. Draft Development Consent Order v. None of the above
Q2A.1.5.	All Interested Parties	If you selected a topic above, please provide reasons as to why you would like to speak at such an Issue Specific Hearing(s)?
Q2A.2.	Your Facilities	
<i>Please give an indication of the facilities that you have available to you. This information will help the ExA to decide what arrangements should be made for any Hearings (if necessary) the ExA decides to hold. When answering, please assume that the Planning Inspectorate will provide you with reasonable advice and support.</i>		
Q2A.2.1.	All Interested Parties	Do you have access to a computer or tablet connected to the internet, or to a smart phone? <ul style="list-style-type: none"> i. A computer running Microsoft Windows 10 ii. A computer running Macintosh OSX Catalina iii. An Apple iPad iv. An Android tablet v. An Android smart phone vi. An Apple iPhone vii. Another type of smart phone (not Android or Apple) viii. None of the above

ExQ2A	Question to:	Question:
Q2A.2.2.	All Interested Parties	If you have a computer running an operating system that is not Microsoft Windows 10 or Macintosh OSX Catalina (version 10.15), please tell us the manufacturer, type and version of the operating system, for example, 'Microsoft Windows 8', or 'Linux Debian 10:10.3'.
Q2A.2.3.	All Interested Parties	<p>How confident are you that you could use your computer, tablet or smart phone to participate in a Hearing where you could see and be seen, speak and be spoken to, by participants in real time?</p> <ul style="list-style-type: none"> i. Highly confident ii. Confident iii. Reasonably confident iv. Not at all confident v. I do not have a suitable computer, tablet or smart phone
Q2A.2.4.	All Interested Parties	<p>Do you have access to a telephone that you could use?</p> <ul style="list-style-type: none"> i. A land line telephone ii. A mobile phone other than a smart phone iii. None of the above
Q2A.2.5.	All Interested Parties	<p>How confident are you that you could use your telephone or mobile phone to participate in a Hearing where you could speak and be spoken to by participants in real time?</p> <ul style="list-style-type: none"> i. Highly confident ii. Confident iii. Reasonably confident iv. Not at all confident v. I do not have a suitable telephone or mobile phone
Q2A.3.	How the Planning Inspectorate can help you	
<i>Considering your current circumstances, please help us to identify how we can help you to engage with the rest of the Examination.</i>		

ExQ2A	Question to:	Question:
Q2A.3.1.	All Interested Parties	<p>If your confidence in being able to participate in a Hearing by use of an electronic device is low, why is that?</p> <ul style="list-style-type: none"> i. The internet in my area is slow or intermittent ii. The equipment available to me has performance issues iii. I am not confident with this type of technology iv. A video conference is not suitable for Hearings v. A teleconference is not suitable for Hearings vi. Not applicable: I am confident in being able to participate
Q2A.3.2.	All Interested Parties	As applicable, please could you provide further details of why your confidence level is low or why you do not consider that a video conference or teleconference is suitable for Hearings?
Q2A.3.3.	All Interested Parties	How could the Planning Inspectorate help to increase your confidence level?
Q2A.3.4.	All Interested Parties	Is there anything else that we should do help you to increase your confidence level or otherwise help you to engage with the rest of the Examination?

The Examination Library

References to questions in Table ExQ2 set out in square brackets (eg [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link:

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010083/EN010083-000533-Kemsley%20K3%20-%20Examination%20Library%20\(pdf%20version\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010083/EN010083-000533-Kemsley%20K3%20-%20Examination%20Library%20(pdf%20version).pdf)

It will be updated as the Examination progresses.

Citation of Questions

Questions in Table ExQ2 should be cited as follows:

Question reference: issue reference: question number, eg ExQ2.1.1 – refers to question 1 in this table.

ExQ2	Question to:	Question:
Q2.1.	Principle and nature of the development, including waste recovery capacity and management of waste hierarchy	
Q2.1.1.	Applicant	Applicant's Response to Examining Authority's Written Questions (ExQ1.2.5) [REP2-009] stated: " <i>The WKN permit application will be submitted not later than the 1st July 2020.</i> " Please provide an update as to the progress of this application.
Q2.2.	Environmental Impact Assessment	
Q2.2.1.		See related questions below
Q2.3.	Air Quality	

ExQ2	Question to:	Question:
Q2.3.1.	Applicant	<p>Paragraph 2.7 of the MMO’s submission [REP3-017] cross-refers to paragraph 11.9.38 of the Applicants ES-Chapter 11 submission [REP2-024], where the MMO disagrees that Swale MCZ is a subtidal designated site.</p> <p>On review of NE's Conservation Advice Package, MMO found intertidal features to be present, e.g. coarse sediment, mixed sediments, sand and muddy sand. The same intertidal features were included in the Applicant’s assessments submitted as part of the marine licence application.</p> <p>Will the Applicant review this statement, explain the inconsistency and describe what implications there are for the conclusions of the air quality assessment?</p>
Q2.3.2.	Applicant SDC EA	<p>The information currently in the draft CEMP [APP-012] is at a very high-level and appears substantially no more than in ES Chapter 5 [REP2-020]. Reference is made to the IAQM dust guidance, referring to the avoidance of site runoff, bonfires and burning of waste materials and some information provided on wheel washing. Requirement 22 of dDCO states the CEMP must accord with the ES and the draft CEMP.</p> <p>ES Chapter 5 and the draft CEMP state a Dust Management Plan will be developed and implemented. Do you consider it necessary or helpful to provide a draft Dust Management Plan for consultation with IPs as part of the stated air quality mitigatory measures in paragraph 5.3.1 [APP-012]? Do you consider reference to it should be made in the dDCO and are you satisfied that the draft CEMP provides sufficient detail?</p>
Q2.4.	Archaeology and Cultural Heritage	
Q2.4.1.		None at this time

ExQ2	Question to:	Question:
Q2.5.	Ecology	
Q2.5.1.	Applicant	Please explain what if any differences exist between the Application document 6.8 Ecological Mitigation and Management Plan [APP-154] and ES Appendix 11.4 – Ecological Mitigation and Management Plan [APP-046]. Both documents state they were issued in July 2013.
Q2.5.2.	Applicant	<p>Referring to ExA ExQ1.5.2, the MMO [REP3-017] disagree with the statement in ES Chapter 11 para 11.9.38 [REP2-024] that Swale MCZ is (solely) a subtidal designated site. NE's Conservation Advice Package indicates intertidal features are present, and such features were assessed as part of the marine licence application.</p> <p>ES para 11.9.38 states that as the MCZ is sub-tidal there is no potential for disturbance of interest features during construction. Paragraph 11.9.103 notes the same for operation. However, para 11.4.15 notes it is intertidal and subtidal.</p> <p>Please could you explain the inconsistency and describe any implications for the conclusions of the ecology assessment?</p>
Q2.5.3.	Applicant	<p>The MMO in its D2 submission [REP3-017] concerning ES Chapter 11 para 11.9.73 [REP2-024], notes the reference to outfall pipes and operation and advises the Applicant to consider any maintenance works needed for the outfall pipes, and to either incorporate this into a DML or request a variation to the existing ML.</p> <p>(i) The current ML does not consent operation of outfalls, nor does the MMO consent discharge of water under MCAA, and operation is not clearly</p>

ExQ2	Question to:	Question:
		<p>defined in the ES, i.e. does it include maintenance or discharge of water only?</p> <p>(ii) Could you please explain how exactly if at all the current licence would cover operation and maintenance activities and whether you now seek a variation to the ML to cover maintenance.</p>
Q2.5.4.	MMO EA	What is your view of the Applicant's statement that no DCO Requirement or environmental permit is needed in respect of operation as only clean surface water will be discharged from the outfalls?
Q2.5.5.	Applicant	Please identify where in the application documents is information about the rate and volume of the discharge from the outfalls.
Q2.5.6.	Applicant	<p>Regarding ExA ExQ1.5.9 and the Applicant's submission [REP2-009] that the draft CEMP [APP-012] contains examples of what would be included in final CEMP rather than a comprehensive list of all means necessary (including that detailed in the HRAR).</p> <p>(i) The details requested by the ExA have not been provided. What measures for example would be taken to prevent rubbish entering reedbed areas used by breeding marsh harrier, or what measures would be taken to avoid pollution incidents?</p> <p>(ii) Can the Applicant provide more precision to satisfy the ExA that the detail in the dCEMP is adequate to form the basis of the final CEMP thus ensuring that appropriate measures are secured and would be implemented?</p>
Q2.5.7.	Applicant	Regarding ExQ1.5.12 the Applicant states at D2 [REP2-009] that paragraph 11.9.113 of ES Chapter 11 [REP2-024] should state that an updated

ExQ2	Question to:	Question:
		<p>management plan for WKN would be produced, as required by R21 dDCO [REP2-006, REP-007], similar to the EMMP produced for K3 in Appendix 11.4 [APP-046]. This WKN plan is variously titled in ES Chapter 11, and entitled 'Ecological management and enhancement plan in dDCO R21, which provides that it must be in accordance with the survey results, mitigation and enhancement measures included in ES Chapter 11.</p> <p>The ExA notes that no commitment appears to be made to producing a WKN EMMP during the Examination. The ExA is concerned that if no draft WKN EMMP is provided to the Examination this will affect the confidence with which it could be asserted that the required mitigation would be adequately secured for the Proposed Development.</p> <p>Please provide a draft EMMP.</p>
Q2.5.8.	Applicant	<p>Regarding ExQ1.5.13 and the Applicant's response at [REP2-009] the dDCO [REP2-006] is amended.</p> <p>(i) The Applicant states that the restricted months are consistent with those in the ML, however the ML allows works between 1 Apr - 31 Sept. Please comment.</p> <p>(ii) It is not explained why piling is acceptable in March. Please comment.</p>
Q2.5.9.	Applicant	<p>ML Condition 5.2.7 states that Continuous Flight Auger piling must be used where possible but that if impact piling is required a slow start must be applied. The Environmental Appraisal included with the full copy of the ML application submitted at D2 [REP2-036] states (p13) that as all sheet piling</p>

ExQ2	Question to:	Question:
		<p>is to be installed via vibro hammer it is highly unlikely that any noise disturbance effects would occur for intertidal species.</p> <p>As there appears to be no reference to piling in the description of the Proposed Development in ES Chapter 2 the method of piling to be used for construction of the 2nd outfall is unclear. Please provide the outstanding information.</p>
Q2.5.10.	Applicant	<p>Regarding ExA WQ1.5.14 and the Applicant's reply at [REP2-009] the two points included in the Question, on habitat loss and measures that would be implemented if post-development monitoring identified any issues, have not been addressed.</p> <p>Please provide the outstanding information.</p>
Q2.5.11.	Applicant	<p>ES Appendix 5.4: Assessment of Ecological Impacts is updated at March 2020 in D2 Submission [REP2-032, REP2-033]. This Appendix assesses air quality impacts on designated nature conservation sites and presents the results of detailed modelling at each of the sites.</p> <p>(i) For Nutrient N Deposition relating to Shingle & sea cliff (dunes, shingle & machair), the PEC is 153% of the critical load and the impacts can't be screened out. The results have been passed to the projects' ecologist to assess the effects. Please provide an update to this assessment.</p> <p>(ii) Table 5.4.11 (Predicted Nutrient N Deposition at Designated Sites) has been removed from the updated ES Appendix 5.4, although references to it remain in the updated ES Chapter 11. Please could you explain why, and provide an amended Appendix 5.4, if necessary, for Deadline 4.</p>

ExQ2	Question to:	Question:
Q2.5.12.	Applicant	<p>ES Appendix 5.2: Stack Height Determination for WKN is updated (no date in document) at D2 Submission [REP2-030, REP2-031]. It is stated that the stack height may be subject to change and may increase as the detailed design for the WKN Proposed Development continues to evolve. The stack height will be confirmed as part of the formal submission to PINS in spring 2020.</p> <p>The original submitted Stack Height Determination [APP-026] stated that the stack height would be confirmed as part of the formal submission to PINS in spring 2019. Please explain what submission or submissions have been made that confirms the stack height within the Proposed Development.</p>
Q2.6.	Greenhouse Gases and Climate Change	
Q2.6.1.		None at this time
Q2.7.	Ground Conditions	
Q2.7.1.		None at this time
Q2.8.	Habitats Regulations Assessment (HRA)	
Q2.8.1.	Applicant	<p>Regarding ExQ1.8.10 and HRAR paras 3.1 and 3.11, an in-combination effects (ICE) assessment of the project together with other plans and projects should take place at both screening and AA stage. No screening ICE assessment appears to have been undertaken, as it is not presented in the screening matrices, only the integrity matrices. Please provide a separate assessment of the ICE for the screening stage and reflect this in updated matrices.</p>
Q2.8.2.	Applicant SDC	The WKN CEMP states that the listed measures will be implemented, <u>not</u> that they are examples, and is light on detail in Section 5.3. The measures

ExQ2	Question to:	Question:
	EA NE	<p>listed in HRAR 6.6 are described as expected to be included in the CEMP, however only one of those (Water Env, para 5.6.1 - wheel washing) is included.</p> <p>Are you content that there is sufficient detail in the HRA/CEMP to ensure that the necessary mitigation would be secured through the DCO and if not please explain what further detail might in your view be provided?</p>
Q2.8.3.	Applicant	Regarding ExQ1.8.14 and the Applicant's reply at REP2-009 HRAR para 6.151 has been amended but refers to dDCO R11. Is this an error and should it refer to R22?
Q2.8.4.	Applicant	<p>Regarding ExQ1.8.17 and the Applicant's reply at [REP2-009] as outlined in Appendix 1/2 of the HRAR, the matrices address the practical effect (PE) of the K3 Proposed Development (PD) along with those of the WKN PD. The updated HRAR submitted at D2 makes this explicit.</p> <p>However the Applicant suggests the preamble to Appendix 1 also applies to Appendix 2, although no K3 PE likely significant effects were predicted so no integrity matrices are required. The reference in HRAR para 6.1 to the inclusion of integrity matrices for the K3 PD in Appendix 2 has been deleted, however 'K3' has been inserted in the title of Appendix 2, which suggests the integrity matrices do apply to both K3 and WKN.</p> <p>Please would you clarify the position?</p>
Q2.8.5.	Applicant	Please provide Word versions of the updated matrices, as requested in ExQ1.8.18.

ExQ2	Question to:	Question:
Q2.8.6.	NE Applicant	The MMO in its submission [REP3-017] notes that saltmarsh habitats and locations were not identified in the HRAR, despite being discussed in the ML application. What comments if any do you have on this matter, including the scope and proliferation of habitats and individual species information?
Q2.9.	Landscape and Visual Impact	
Q2.9.1.	Applicant	Regarding ExQ1.9.1 and the Applicant's reply at [REP2-009] no detail of architectural treatments or surface finishes are included in the dDCO. The maximum design parameters for WKN have been modelled in the photomontages as simple grey forms. Can the applicant explain how this fits with the good design principles set out in MHCLG's National Design Guide (2019)?
Q2.10.	Noise and Vibration	
Q2.10.1.		None at this time
Q2.11.	Traffic and Transport	
Q2.11.1.	All Interested Parties	The ExA intends, subject to the latest Guidance from the SoS, to undertake USIs of locations nominated by IPs in relation to traffic and transport effects wherever possible and practicable. However, if you have nominated locations for an ASI and submitted them at D1, do you wish to provide photographic and/or other video evidence to support your submissions? If so please indicate when you would be in a position to submit any such evidence, indicating how you propose to verify the location(s) and date(s)

ExQ2	Question to:	Question:
		in the evidence and link it to your submissions. I will take this information into consideration when determining how to proceed with the Examination.
Q2.12.	Water Environment	
Q2.12.1.		None at this time
Q2.13.	Draft Development Consent Order	
Q2.13.1.	Applicant	Table of Amendments to the dDCO [REP2-008], Art 2(1) - Works plan is changed to Works plans for consistency with Art 16. All other references in that sentence are still to 'plan' – do these also need to be amended?
Q2.13.2.	Applicant	No decommissioning activities are permitted within the existing marine licence. Do you agree that it would appear that a licence variation would be required to include such activities, or you would need to consider decommissioning activities within a deemed Marine Licence (dML) within the DCO? How do you intend to proceed in this regard?
Q2.13.3.	MMO	Do you consider that the piling restrictions set out in the tracked dDCO [REP2-007], and any other mitigation included in the dDCO are consistent with those in place in the existing MMO marine licence [REP2-036] including the specific project conditions and if not why not?
Q2.14.	Other Matters	
Q2.14.1.	Applicant	The MMO submission [REP3-017] points out with regard to ES Chapter 11, Section 11.2, that the South East Inshore Marine Plan is now a material consideration following consultation with the SoS. The MMO expects a robust and comprehensive marine plan policy assessment to form part of this application. Please explain the extent to which and where in the Application documents you have addressed the considerations in the Marine Plan.

ExQ2	Question to:	Question:
Q2.14.2.	Applicant	The Applicant's covering letter [REP3-001] refers to continuing liaison on SoCGs. The D1 versions are still the latest version. Please provide updates on the progress of SoCGs referred to therein and Statement of Commonality of SoCGs.