

ISH4_23 March PT1

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FULL TRANSCRIPT (with timecode)

00:00:05:17 - 00:00:30:14

Good morning and welcome. It is now 10 a.m. and I'm starting the fourth issue specific hearing for the application made by Equinor Limited for the Sheringham Shoal and Dudgeon Wind Farm Extension Project. We'll introduce ourselves in just a few minutes. Before we do that, please bear with me while I deal with a few housekeeping matters. Can I check if everyone can hear me at the back?

00:00:33:15 - 00:01:03:15

Thank you. Can also confirm that the meeting, recording and live streams have started. Thank you. Were there any requests for reasonable adjustments? No. Thank you very much. There are no fire alarm drills today, so if the fire alarm sounds, please exit the building and congregate in the churchyard outside the building. There are three exits at the back of the room. Then you go across the main entrance hall and out of the building.

00:01:03:17 - 00:01:17:03

There are also two exits on the side of this room. Head downstairs, walk past the rear of the building and then outside. Toilets are located to the right as you enter the building, and then also some to the back of the hall onto the right.

00:01:19:15 - 00:01:38:25

Entree introductions. I miss the. Hi. I've been appointed by the Secretary of State for levelling up housing and communities as lead member of the examining authority to carry out an examination of the above application. I'll hand over to other members of the examining authority to introduce themselves. Mr. Manning, we'll start with you.

00:01:39:18 - 00:01:51:08

Sure. Hi, I'm Mr. Manning, and I've been appointed by the Secretary of State to be a member of the examining authority. I'll be leading on items five and six today and also contributing to item four. Thank you.

00:01:53:12 - 00:02:04:26

Good morning. I'm Mr. MacArthur. Have been appointed by the Secretary of State to be a member of a panel of inspectors to examine this application. And I'll be leading on items seven, eight and nine today.

00:02:08:00 - 00:02:12:03

Good morning. Mr. Rennie also appointed as member of this examining authority.

00:02:14:22 - 00:02:19:10

And good morning, Mr. Wallace. I'm also appointed as a member of this examining authority.

00:02:25:00 - 00:03:00:23

I can confirm that all examining authority members have made a declaration of interest responding to the planning inspectorate's conflict of interest policy, and none of us have declared interest in relation

to this appointment. Also present today are members of the case team. Case manager is Miss Louise Haraway. Miss Haraway is supported by Miss Phoebe Challis here at the venue and by Ms. Harper and Mr. Christopher Glaser Online. If you have any questions about today's event, please contact a member of the case team.

00:03:01:19 - 00:03:06:20

The audiovisual and Internet service today is provided by a team led by Mr. Stuart Avis.

00:03:08:11 - 00:03:40:21

That's the team on our end. Turning to attendees today. First, would like to acknowledge and welcome those who are watching the live stream. Welcome and thank you for joining us. I would now like to start with introductions from attendees. Um, when I read out the name of a team, all members of the team present in person, please introduce yourselves one by one, followed by introductions from the virtual attendees of that team. My running order with a roughly be the applicant. North Norfolk District Council.

00:03:42:07 - 00:03:46:15

Norfolk County Council. South Norfolk District Council.

00:03:48:15 - 00:04:19:29

Broadland District Council. Barford and Warpaint. I'm sorry. Parish Council. Oulton Parish Council. Bid Wills. Savills. Brown and Company. Brown and Co. Apologies. National Farmers Union. Derek Aldous and Norfolk Coast Partnership. Although I have been informed in advance that Norfolk Partnership will um. Apologies Norfolk Coast Partnership are not attending.

00:04:20:05 - 00:04:23:19

So if I could start with introductions from applicant please.

00:04:24:27 - 00:04:39:24

Good morning, madam. My name is Julian Boswell. I'm a solicitor and partner with Burgess Salmon. We are the legal advisers to equinor on this application. I'll ask the rest of the team sitting at the table to introduce themselves. Starting on my right.

00:04:42:02 - 00:04:47:21

Good morning. I am Laura Fuller. I'm a solicitor and senior associate with Burgess Salmon, representing the applicant.

00:04:49:25 - 00:04:53:12

Good morning Sarah Chandler development and consents Manager for Equinor.

00:04:55:25 - 00:05:03:13

Good morning Kerry and Mark project Director for this project representing Equinor.

00:05:05:16 - 00:05:11:28

Good morning. Alan Shields, onshore technical director for Royal, has gone in. Representing the applicant.

00:05:13:22 - 00:05:17:06

And good morning Joe Rodriguez working in the consents team in Equinor.

00:05:23:26 - 00:05:26:09

Is that everyone from the applicants team for now.

00:05:28:28 - 00:05:37:25

Yes, madam. We're not expecting anybody to dial in at any point today. There will be other members sitting up for different topics later as yesterday.

00:05:38:09 - 00:05:39:24

Understood. Thank you.

00:05:49:06 - 00:05:49:22

Um.

00:05:50:15 - 00:05:53:24

Is there anybody present from North Norfolk District Council?

00:05:58:04 - 00:06:11:09

Good morning. My name is Kathy Batchelor. I'm the senior landscape officer at North Norfolk District Council in the Planning Department. A colleague, Jeff Lynne, will be joining us a bit later. About 11:30, we hope. Thank you.

00:06:12:24 - 00:06:14:00

Thank you, Miss Batchelor.

00:06:16:06 - 00:06:17:23

Norfolk County Council.

00:06:20:06 - 00:06:36:29

No. Thank you, madam. Stephen Falkner from Norfolk County Council. I'm principal Planner and lead officer or ship development in Norfolk. I'm here for item six on the agenda, but I will listen in this morning to the event. Thank you.

00:06:37:20 - 00:06:38:23

Thank you, Mr. Faulkner.

00:06:44:02 - 00:06:46:09

South Norfolk District Council.

00:06:49:11 - 00:06:51:06

Good morning. My name is Claire Curtis.

00:06:51:08 - 00:07:00:06

I'm lead officer for and, and I am representing both South Norfolk District Council and Broadland District Council.

00:07:05:00 - 00:07:09:06

Thank you. Is there anybody else from Broadland District Council here today?

00:07:11:06 - 00:07:18:00

Good morning. My name is Catherine Ju. I'm the ecology and biodiversity officer for South Norfolk and Broadland District Council.

00:07:18:27 - 00:07:20:05

Okay. Thank you.

00:07:22:05 - 00:07:22:25

Um.

00:07:24:12 - 00:07:27:10

Barford and Ron Lincoln Parish Council.

00:07:27:21 - 00:07:41:12

Good morning, madam. My name is Sandra Betts and I'm representing Barford and Framlingham Parish Council. But I also represent the Norfolk Parishes movement for an and have my colleague with me today as well. Thank you.

00:07:41:15 - 00:07:42:20

Morning, Mrs. Betts.

00:07:44:22 - 00:07:50:18

My name is Jonathan Betts. I'm representing the Norfolk Parish's movement for an offshore transmission network.

00:07:50:28 - 00:07:55:29

Thank you, Mr. Betts. Um, do we have anyone from Alton Parish Council here today?

00:08:05:12 - 00:08:08:01

Okay. Will move on a bit. Wells.

00:08:13:02 - 00:08:20:13

Good morning. Christopher Bowen from Bidwell in Norwich, a member of league and representing clients affected by the scheme.

00:08:22:24 - 00:08:25:27

Morning and Savills.

00:08:27:13 - 00:08:33:02

Good morning. Kenney from Savills and a member of Lig and also representing affected landowners.

00:08:35:05 - 00:08:38:00

Morning National Farmers Union.

00:08:44:13 - 00:08:48:28

Good morning. Yes, Louise Staples, representing National Farmers Union and League.

00:08:54:06 - 00:08:56:25

Good morning, Miss Staples. Brown and coal.

00:09:05:02 - 00:09:06:10

No. Okay.

00:09:06:28 - 00:09:08:05

Mr. Derek. Aldous.

00:09:08:19 - 00:09:12:02

Good morning. My name is Derek Aldous, a resident of Norfolk. Thank you.

00:09:15:00 - 00:09:16:02

I think that covers it.

00:09:16:04 - 00:09:21:25

If haven't. If somebody's not had the opportunity to introduce themselves, could you please raise your hand?

00:09:26:00 - 00:09:28:22

Okay. Thank you very much. Um.

00:09:41:01 - 00:09:41:18

Moving on to.

00:09:41:20 - 00:10:14:27

Agenda item two. Um, I have four points here to set out the procedure for running the hearing today. I appreciate that attendees who have attended a hearing before will already know some of this information, but I ask that everyone bear with me. I must repeat this for the benefit of attendees who have joined us today and for the recordings. Um, first of all, a few words to acknowledge the format of the event. This is a blended event. It allows attendance both in person and virtually through Microsoft teams. It is expected that both blended and fully virtual events will form a part of planning Inspectorate's future operating model.

00:10:16:18 - 00:10:49:07

Um, we, the examining Authority are attending this meeting from Norwich, as are several of the attendees. For those attending virtually, please be rest assured that you have our full attention at all times, even if you're not looking at the camera. Um, to avoid visual and noise distraction, please keep your cameras and microphones off unless we invite you to speak. The proposed timing of the of the day today will take 15 minutes break approximately at 11:30 a.m., a lunch break around 1:15 p.m. and an afternoon break around 3:45 p.m.

00:10:50:01 - 00:10:53:20

Our aim is to finish around 530, but we will keep this under review.

00:10:55:13 - 00:11:27:18

The timings are approximate if you are joining for a particular agenda item, we do recommend that you join at the start of the session that that agenda item is in. You can of course keep in touch with the case team who can tell you if the sessions are running a few minutes late for virtual attendees. If you decide to leave the meeting during the breaks, then you can rejoin using the same link provided in your invitation email. If you're watching the live stream, then please refresh your browser to resume each subsequent session.

00:11:29:21 - 00:12:09:17

Um, the second point that I want to make you aware is that this event is both being livestreamed and recorded. The digital recordings that we make are retained and published. They form a public record that can contain your personal information and to which general data protection regulation or GDPR applies. The planning inspector's practice is to retain and publish recordings for a period of five years from the Secretary of State's decision on the development consent order. Consequently, if you participate in today's issue specific hearing, it is important that you understand that you will be recorded and you therefore consent to the retention and publication of the digital recording.

00:12:09:23 - 00:12:36:00

It's very unlikely that the examining authority will ask you to put sensitive information, personal information into the public domain. Indeed, we would encourage you not to do that. However, if for

some reason you feel that it is necessary for you to refer to sensitive personal information. We would encourage you to speak to the case team in the first instance. We will then explore with you whether the information could be provided in written format, which might then be redacted before being published.

00:12:38:21 - 00:13:09:21

The third point is about the substantive matter of today's issue specific hearing itself, which is titled Onshore Matters. An agenda for this hearing was published on the Planning Inspector's National Infrastructure Project webpage on Tuesday the 14th of March 2023. Those are the only matters that are for discussion today. To be clear, it's not intended to discuss all matters relating to onshore environment. Some matters will be pursued through rounds of written questions or at future hearings.

00:13:10:15 - 00:13:27:20

It is a full agenda. Mr. Manning and Mr. McArthur and I will keep progress under review and we may request certain aspects to be held over and progressed as part of your responses to second round of written questions. The second round of written questions will be issued on the 12th April 2023.

00:13:29:08 - 00:14:08:08

The fourth and final point is regarding posturing actions should they arise during this hearing. Mr. Wallace will be noting hearing actions as they emerge at the close of the meeting. We intend to go through the entire list of hearing actions which will then be issued as soon as practicable. The assumption is that the Post hearing actions will be expected at the next deadline. In this case, deadline three, which is Tuesday, the 2nd of May. However, acknowledging any resourcing constraints on your end, if you feel that meeting that deadline will be difficult, please raise that at the hearing itself so that if possible, we can accommodate that in the deadline set out in our post hearing action list.

00:14:09:24 - 00:14:26:03

Given that the responses for written questions are also expected at deadline three, it is likely that the examining authority will place many, if not all, the post hearing actions in written questions if it feels that it would be more appropriate and indeed to avoid duplication.

00:14:29:03 - 00:14:30:02

And that covers.

00:14:30:04 - 00:14:35:27

Almost everything in agenda item two. If anyone has questions about what I have said right now, please raise your hand.

00:14:40:00 - 00:14:40:20

Okay.

00:14:40:27 - 00:14:47:02

We will turn on to agenda item three now, which is development scenarios and alternatives.

00:14:49:09 - 00:15:26:25

Going straight into three one. We have understood that the reason for the development scenarios is the uncertainty or the reliance on the contracts for difference or CFD process and the outcomes of that process. But the reason we've still asked the first part of the question in here is because we are looking for a bit more clarity and nuance of that process that you will follow and what aspects of that process will determine the scenario, the development scenario that you ultimately choose to go with? You've given us quite a lot of detail about the process itself, which is very helpful.

00:15:26:27 - 00:16:00:16

So thank you for that. But what we're trying to do is determine a correlation between that selection, between the process that you're likely to follow and the preferred and the selection of the preferred development scenario. So in our written questions following the hearing and we had a bit of a discussion about this at the last hearing in January as well, we asked you to provide a flowchart showing steps leading to the applicant's decision on which scenario to proceed with. And we just like wanting to put a little bit of flesh on that.

00:16:00:18 - 00:16:08:29

Bones, you responded with four bullet points and we're that which is which is what we want to just put flesh on those bones at this hearing. So.

00:16:11:12 - 00:16:23:09

My first question is what is happening right now with respect to the process? Are you waiting for outcomes for the regulatory change in the regimes?

00:16:26:23 - 00:16:55:01

Sarah Chandler for the applicant? Yes, that's correct. What we set out in this scenario statement in terms of the engagement that's been ongoing with Ofgem and based on the regime that continues. Um, we as you know, are seeking amendments to that regime to enable joined or linked bids from, from projects with different ownerships so that we are very much continuing that dialogue and engagement.

00:16:56:10 - 00:17:05:25

When is the outcome for that process likely, the changes that you're seeking? When do you expect to hear about that?

00:17:22:25 - 00:17:40:26

Sarah Chandler for the applicant. As you will appreciate, that process is entirely out of our control. We're lobbying to attempt to drive that process in a particular direction that will serve these two projects, but we have no certainty over a timescale with with regards to that.

00:17:41:09 - 00:17:53:09

Okay. So understood. So you have no certainty about the timescales and until you have the outcome, does that mean that all the scenarios that you currently have in application need to stay active?

00:17:53:17 - 00:17:54:29

Understood. Okay.

00:17:55:01 - 00:18:05:07

So what's the next step that you can do as the applicant? Will you, for instance, at some point prepare an application to the CFD process?

00:18:06:24 - 00:18:58:27

Sarah Chandler for the applicant. I think in response to the questions we'd set out that having a development consent order is a pre prerequisite for the CFD bid regime. So until we have consent, we're not pre-qualified to be able to bid into an allocation round. Clearly they'll need to be a commercial decision taken on the projects at an appropriate time as to whether we continue to pursue the regulatory changes that we're seeking and we therefore wait to put in and a bid into an appropriate allocation round or if we choose to take the projects down a different route, which would follow other scenarios and bid into an allocation around us entirely separate projects accepting the risk that they're not linked and that one project could succeed and the other could not.

00:19:01:11 - 00:19:02:20

Just repeat that last bit.

00:19:02:22 - 00:19:28:00

For me again. So if there is a change in the CFD process, you will bid into the change process as a joint bid. That's one scenario. That's one possibility. The other possibility is that there's no change in the regime and you then have two potential outcomes of that that you want is successful and the other is not successful.

00:19:29:12 - 00:19:33:24

Sarah Chandler For the applicant, that's correct. But of course both could be unsuccessful as well.

00:19:33:26 - 00:19:35:13

Both could be unsuccessful as well.

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And just to draw a new nuance out, if I may. Um, yes, our intent is that any sort of change to the regime would allow for linked or dependent bids. But of course, even if changes to that regime come around again, that's you know, what that actually looks like is outside of our control.

00:19:54:20 - 00:19:59:03

Understood. So okay, so the.

00:19:59:19 - 00:20:37:19

The point of us asking you the second part of the question, which is introducing and securing. Sorry, I should just make the point that so therefore, right up until this point, all scenarios that you have put in would need to stay active. Okay. So the point of us asking you the second part of the question, which is introducing and securing a cutoff point of selecting a development scenario as a point of no return is because we're still unclear what other than technical and commercial drivers could then influence that decision.

00:20:37:21 - 00:20:50:09

So, for instance, could environmental factors at any point influence that decision? What if both projects commence and then, due to technical and commercial reasons, one decides to drop off

00:20:52:06 - 00:21:17:24

what damage might be left in terms of sacrificial construction work, for instance. Secondly, if there is such a damage, then has that been assessed in the ES and linked to that, would that then need to be taken into account in the planning balance, potentially reducing the benefit of the scheme and increasing the damage of the scheme from the scheme, the adverse effects from the scheme.

00:21:45:19 - 00:21:53:11

Sarah Chandler for the applicant. Um. There was quite a lot to. I know. Do you want me to repeat it? No, I think it's okay. Um,

00:21:54:28 - 00:22:33:20

if I can just come back first to, I think the direction of travel. You are going down with the question around the sort of flowchart approach. Yeah, yeah, yeah. We thought about that a lot in responding to the questions. And the reality is that's quite challenging because of the simple, vast number of variables that could play out. Um, and I think to just take it a step further that might help you in terms of what happens with the regime, um, if one project was successful and the other wasn't, there were then therefore need to be a commercial decision made as to what to do with the unsuccessful project.

00:22:33:22 - 00:23:05:12

And that could mean not proceeding with it. It could mean that we sell it to another entity. Um, or it could mean that we seek alternative routes to market, which would come with different timescales and their own sort of process. Or we could look to resubmit into a later CFD round. So when you track that through, that could then play out in a number of ways that could put the project either back onto the same timeline or onto differing timelines.

00:23:05:23 - 00:23:09:21

So to present that in a flowchart is, is quite challenging. Yeah.

00:23:11:26 - 00:23:21:09

To your second point around the sort of balance of technical and commercial and environmental considerations. Really, the way that we have

00:23:23:09 - 00:23:47:24

structured this application and structured the environmental statement and undertaken the framing, that worst case scenario very much accounts for any one of these scenarios playing out, and that has been wholly done because of the uncertainties that we have to cope with in both the technical and the commercial world.

00:23:49:25 - 00:24:27:00

Each project. We won't have the we won't have the absolute certainty of which ultimate development scenario we are following until each project has reached final investment decision until we reach FIDE. We don't know for sure if the project is going ahead and when it will go ahead, and that is normal for any other major infrastructure project, you know, and financed in this way. So I think the concern that you're alluding to in terms of kind of abandonment of work, yes, we're not anticipating being in that situation.

00:24:27:11 - 00:24:58:01

We will know what scenario we're going under for each project once that project has taken. And once the project has taken, there is a significant incentive on the developer and a responsibility towards its investors to to get out and construct that project. So to the point on your agenda about a cutoff point and a point of no return for any project, that cutoff point is naturally once you've reached F.

00:24:58:17 - 00:25:30:25

Yeah. And we would then of course, under the requirements that you've seen already, look to notify the LP and the the MOE of which scenario were under. But I think as we've also set out in one of our question responses, if the projects were coming forward separately, then one project, one we call it that. Yeah. Um, you know, whilst we could confirm what scenario we are under, we couldn't speak to the scenario that, that the second project may come under in terms of if it will come forward at all.

00:25:30:27 - 00:25:34:04

So whether it's in isolation or whether it's not happening at all.

00:25:38:29 - 00:26:34:27

But the abandonment of project, then you're you're right. It seems like it would be highly unlikely. But isn't that then potentially, even if it is separate timelines, isn't that something that you could write in at some point, either in the DCO? Well, potentially in the DCO. Couldn't that be highlighted? Even if it is something that's outside, it's very clear that this is all going to be outside the examination period. But my our concern here is to be able to find a way to say that this would be that cutoff point for the project where the decision once made cannot you cannot change it, because at the moment, that scenario of of an abandonment of project and therefore it potentially not being assessed is possible but is not been assessed in the is and would need to be taken into consideration in our planning balance exercise.

00:26:48:03 - 00:26:52:29

Julian Boswell for the applicant. I have to say we're really struggling at this point.

00:26:55:01 - 00:27:16:27

The we have assessed the scenarios where only one project is built. We're obviously explaining that there are various factors that are not within our control that mean and not within any project's control that mean that we can't be certain how things are going to play out.

00:27:18:17 - 00:27:48:27

If you have a consent granted, whether under the mainstream planning regime or the DCA regime, there's obviously a time limit for commencement. And the corollary to that is that if you do commence within that time limit, um, the overwhelming I mean like 99.99% recurring position is that you then have that consent available to you to build out at a later time if you choose.

00:27:49:03 - 00:28:21:11

And whilst in theory the regime provides for notices to completion notices and equivalent to to take to take an unused consent away from you in practice, that that never happens. I have dealt in a long career. I have only come across one such example and even that didn't actually happen, i.e. there was a threat to serve a completion notice which didn't then actually happen. Um, so the abandonment scenario is just hardwired into the planning regime.

00:28:21:18 - 00:28:51:18

It doesn't happen very often. Um, particularly when you look at a project like this and the effort that's gone into it. You look at the market generally for offshore wind is a very buoyant market as a general rule. I appreciate there are some challenges at the moment because of increased costs and so on. And so we don't really see how there can be a justification for adding an extra sort of control on top of what's already in the DCO.

00:28:52:01 - 00:28:57:12

Um, and, and that's going to, that is going to remain our position.

00:28:59:00 - 00:29:09:22

Okay. That's understood. Just going back to that question then, where Ms.. Chandler, you said that the final investment decision in reality is that point.

00:29:11:24 - 00:29:13:09

What then?

00:29:15:27 - 00:29:45:16

Do you think could be the risk to you as the applicant if you were to say that that final investment decision is the cutoff point and after that, the decision has been made for either both the projects together or in isolation? Is there a risk to you because I can see there being benefit to other parties of having that kind of certainty. But would there be a development, a risk of any kind for yourselves as the applicant?

00:30:15:29 - 00:30:16:14

My next.

00:30:49:09 - 00:31:23:00

Sarah Chandler for the applicant. So generally what would occur is once we've reached final investment decision, we will then make the final kind of placement of all of the contracts necessary for the project. It's likely that procurement work will have been ongoing towards that milestone but

won't be concluded ahead of that milestone. And then thereafter we would look to start to commence discharging the requirements and conditions.

00:31:23:02 - 00:31:29:12

So I think really in terms of the risk, it's just back to the point that Mr. Boswell has already made.

00:31:33:15 - 00:31:43:03

Julian Boswell for the applicant could add an additional point which did I think make the first hearing. But I think is worth reiterating that if.

00:31:46:16 - 00:31:52:03

If we had made separate applications, we wouldn't be having this conversation at all.

00:31:52:05 - 00:31:52:20

It's my next.

00:31:52:22 - 00:32:24:15

Question, and I just don't understand why this you know, it can't be right that having for good reasons, for the reasons we've set out extensively in writing, in the scenario statement and in further submissions, ET cetera. ET cetera. It just I don't see how it can be right that we should be subject to an extra control because we have, as we would see it, done the right thing by including the two applications into a the two projects into a single DCO.

00:32:27:10 - 00:32:28:14

Can we move on to the.

00:32:28:16 - 00:32:32:03

Next question, which is three two? This is.

00:32:34:03 - 00:32:36:01

This is an easy one, but.

00:32:36:03 - 00:32:58:06

You've helpfully explained to us that there's absolutely nothing stopping the applicant coming forward separately. Could you just put a bit more flesh on the bones and compare the absolute worst case scenario in the current application of the two proposals coming forward separately for examination or the two proposals, SAP and DEP coming forward separately examination, which would be worsen.

00:33:00:08 - 00:33:10:04

I suppose the point of me asking you this question is, is there any benefit at all for it coming forward separately? I'm just trying to tease out as full a picture as I possibly can.

00:33:13:29 - 00:33:21:12

Julian Boswell for the applicant. We weren't quite sure how to prepare for this question, if I'm honest. I guess the.

00:33:23:12 - 00:34:00:29

The well. So so this discussion was debated back in, in the spring of 2019. Um, so that that is when Equinor led the discussion within the different, you know, partners as to whether or not this was a good idea. Um, and there was extensive consideration of the pros and cons of either making a separate application for each project, which would be the norm or to, for the first time ever, have two differently owned group, differently owned projects come together.

00:34:01:13 - 00:34:44:07

And obviously you know the answer because we've made the application that we have. I guess the main the main factor that was weighing in the other direction that, you know, comes to mind recalling those discussions was that ordinarily a project wants to be under its own steam and therefore it meant that in multiple respects the two projects were necessarily coming together, would have a single team, um, and a single in practice, a single decision making process for the vast majority of things and so on.

00:34:44:09 - 00:35:24:24

So there were some, you know, that that meant that we had to kick around how the process might play out, what the consenting risks might be and so on in terms of impacts and benefits. Having discussed this question in advance with the team, um, I mean, the, the overarching view we felt was that if you were making separate applications, it would be likely to have bigger impacts because I mean, the classic example would be that it was much less likely that you would choose precisely the same corridor and be literally right next to each other.

00:35:25:05 - 00:35:57:29

We have gone with a single haul road approach that's much less likely to have happened. I mean, it's not impossible, but it's much less likely to have happened. And then obviously there are secondary issues, which I'm sure you know, you can see very clearly, namely that we would have been running two separate processes. They would have probably not been on exactly the same timeline. Um, then there would have been engagement with all sorts of stakeholders and third parties, landowners, all the rest of it separately as opposed to on a single basis.

00:35:58:01 - 00:36:37:12

And then there would of course been two examinations taking place because I think it's unlikely that the Planning Inspectorate would have sought to merge the in effect, merge the examinations, as I'm sure you know, took place on the Scottish Power East Anglia two, East Anglia one North. So, um, if a superhuman effort had had been made to sort of run those two applications. To to come as close to what we have actually done running a single application, then you could probably make a case that it would have been there or thereabouts the same, but just the way in the way of the world.

00:36:37:14 - 00:37:01:10

I think they would have it wouldn't it wouldn't have been like that. And in terms of in terms of trying to find a benefit, the only the main benefit, as I've said already, would be to the sort of the applicants feeling that they were in control of, as it were, their project, um, in terms of a wider benefit to third parties and the environment and anything like that, we're struggling to identify a benefit.

00:37:01:15 - 00:37:03:06

Okay. Thank you. That's very clear.

00:37:03:08 - 00:37:10:11

I'm unless anybody has questions on that, I'm happy to move on to three. Three. Mr..

00:37:10:13 - 00:37:25:08

ALDOUS Thank you. Just a very brief query about the unlikely event of abandonment or one project not going forward. There's presumably a coupling there to pre commencement activities and the

00:37:26:27 - 00:37:39:04

the question perhaps it doesn't need an answer, but the question is, is that coupling robust between in the event of one not coming forward that the pre commencement activities are limited in scope and well defined.

00:37:39:18 - 00:37:41:28

Thank you. Thank you. Mr.. Aldous.

00:37:42:17 - 00:37:44:13

Could the applicant respond to that, please?

00:37:45:21 - 00:38:01:10

Sarah Chandler to the applicant. Think that links to a discussion that we took yesterday around pre commencement activities and how they are secured and how they'll be delivered. So if I may, I suggest that when we respond on that in writing, we also consider Mr. Auditor's point. Okay.

00:38:04:09 - 00:38:10:00

I'm satisfied with that. Okay. Yeah. Any further questions?

00:38:13:22 - 00:38:17:15

Okay. All right. I'm happy to move on to three.

00:38:17:17 - 00:38:19:10

Three? It's related. Ever so.

00:38:19:12 - 00:38:20:03

Slightly different.

00:38:20:05 - 00:38:20:20

Though.

00:38:20:22 - 00:38:21:15

Um, it's.

00:38:21:17 - 00:38:47:24

Just about the delivery time scales. We talked about this at the last hearing, and we also had questions about it, about the construction program for all scenarios and the maximum construction period. And Ms.. Rodriguez helpfully explained some matters at the last hearing. But we're we're just unclear because we don't see the relevant information in the is what is the worst case scenario assumed in terms of the maximum construction period.

00:39:06:03 - 00:39:43:00

Thank you, madam. Helen Shields for the applicant. Um, so that considers building CIP and debt concurrently, which reflects the maximum peak effects of the project. But then in addition, it assesses building CIP and EP in isolation or sequentially, so that assesses the maximum duration of effects. So in terms of the realistic worst case, it's topic dependent essentially, and then the sets out which per topic within each chapter, which is that realistic? Worst case, whether it's concurrently or sequentially representing maximum peak effects or maximum duration of effects.

00:39:43:05 - 00:39:45:01

So if it were sequential.

00:39:45:03 - 00:39:47:20

What would be the maximum construction period?

00:39:53:04 - 00:40:03:05

If you want to look at plate 4.25 and chapter five of the ease and relate, just refer to that when you're responding, that will help.

00:40:31:16 - 00:40:38:05

Ellen Shields for the applicant. So sequentially, the worst case we are business assessed is 24 months.

00:40:49:20 - 00:40:53:21

That's the maximum period for the entire construction of September.

00:40:53:27 - 00:41:01:14

Just to correct that, sorry. SHIELDS For the applicant that's specifically for the cable route construction. The onshore ducting part.

00:41:04:24 - 00:41:05:24

And is that for.

00:41:05:26 - 00:41:08:29

Single project or for both the projects?

00:41:10:12 - 00:41:30:23

Joe Harris Rodriguez for the applicant. So single project alone it will take 24 months okay for the cable installation and ducting and so on. When we're talking concurrently together, the two projects will be 26 months. When we think sequentially each project, 24 months, each project, 24 months.

00:41:30:29 - 00:41:42:25

So if we go back to plate 425, in chapter five of the is, would there being potentially a gap of four years between the start of construction of both the projects?

00:41:44:17 - 00:41:52:14

Then the maximum construction period of the two projects were to happen independent of each other would be six years.

00:42:06:19 - 00:42:09:18

Sorry, can you rephrase that to put in my mind calculations?

00:42:09:23 - 00:42:10:12

Absolutely.

00:42:10:14 - 00:42:18:13

So if you look at the title of plate for 25 and Chapter five, which says here, I'll.

00:42:19:17 - 00:42:20:13

Pull it up.

00:42:22:07 - 00:42:49:25

SEP and debt build sequentially with up to four year gap between construction start dates. That means that from the start to finish it could be a maximum of six years. If one project is 24, the other project starts four years after the start of the first project and that builds out to another 24 months. So you're looking at roughly six years.

00:42:57:09 - 00:43:27:05

No, he just goes for the applicant. So we have always seen that and I'm trying to now see how it relates here because I always work with the spreadsheet and the maximum together gets to eight years because it's like seven years point something. So if we get maximum eight years. We're talking about

Gap is always the commencement of the first project versus the commencement commencement of the other project. And that's how these numbers get a bit confusing when you're reading them. If yeah, if that term is not clear, essentially. Okay.

00:43:27:20 - 00:43:31:15

How is it eight years? Can you just explain that to me?

00:43:33:24 - 00:43:45:07

So sorry. I'm just been noticing here that in the description chapter. Paragraph 21 is the best reference that we can give for that for the explanation of the timing.

00:43:51:13 - 00:43:52:12

Power of 21.

00:43:53:12 - 00:43:53:27

It's.

00:43:55:01 - 00:43:57:19

Just. Can you repeat that reference to me again, please?

00:43:58:10 - 00:44:03:28

Project Description Chapter paragraph 21 and document Reference.

00:44:04:01 - 00:44:05:13

Yeah, no, that's fine. Have it open in.

00:44:05:15 - 00:44:06:02

Front of me.

00:44:12:24 - 00:44:13:27

Miss Staples while.

00:44:13:29 - 00:44:18:27

I'm looking for this paragraph reference, would you like to come in with your query?

00:44:20:03 - 00:44:31:24

Thank you. Yes. Louise Staples were National Farmers Union and Land Interest group. I was just really going to raise the same point that we'd had a reply. A response from Aquanaut to.

00:44:33:10 - 00:44:59:05

Our submission from the last hearing and it did state plate for 25. Um, if CIP and debt built sequentially with up to a four year gap between construction dates illustrates an eight year time frame. So I'd still don't understand from what's being said this morning if each project only needs 24 months. Still don't understand why they need eight years. Thank you.

00:45:00:15 - 00:45:03:27

That would be my question as well. Ms.. Rodriguez could you explain that?

00:45:05:15 - 00:45:27:00

Yeah. RODRIGUEZ for the applicant. Um, I'm actually just of course, I'm talking about the cable as such, we guess here you're talking about the full, the entire project, right, Entire construction of the

project. So obviously the onshore and offshore part together. So the time that it takes for each of those to be built. And then you have the gap in between the start of construction of the second project.

00:45:28:04 - 00:45:29:29

Just for a moment. If we were to just.

00:45:30:01 - 00:45:36:11

Stick to the onshore part, you said it's about building the cable corridor. Does that include the cable pulling as well?

00:45:41:09 - 00:45:45:11

For the applicant? Yes. So it's deducted in the installations and deducted.

00:45:45:13 - 00:46:02:27

Okay. And so for the onshore bit, it's 24 months for each project separately. But if you include the offshore bits, it's roughly four years and that's how it's a total of eight years. I'm still trying to locate paragraph 21. Apologies.

00:46:02:29 - 00:46:04:29

It's got lots on my screen.

00:46:08:18 - 00:46:10:08

Oh, yeah, that's just the scenario. So.

00:46:11:03 - 00:46:12:05

Yeah. Okay.

00:46:15:12 - 00:46:16:07

Okay. Thank you. Ms..

00:46:16:09 - 00:46:20:15

RODRIGUEZ This kind of quite neatly leads us on to the madam.

00:46:20:17 - 00:46:21:18

Sorry, Julian Boswell.

00:46:21:21 - 00:46:25:20

For the applicant, would it be possible for me to just add something that. Yeah, of course.

00:46:27:09 - 00:46:30:25

What? You. You've been using the term maximum.

00:46:32:29 - 00:47:03:29

It's inevitably the case with any environmental statement that the temporal question has to be based on assumptions, ie what is likely to happen in the context of what the applicant would, you know, fundamentally wants to do commercially or intends to do commercially, but subject to the uncertainties that there may be. And that's why the planning regime only places limits on the commencement of development. It doesn't, in practice, place limits on how long it takes to complete a development. As I was saying before.

00:47:04:01 - 00:47:47:27

And so we've done our best as any team preparing an environmental statement does to put forward a credible range of scenarios for the basis of the assessment. But it doesn't then follow from that to say, aha, you know, whatever the maximum length of time that you have put in that, you know, attempt to put forward, you know, a credible analysis means that that it is impossible or that there should be a control that prevents the impossible, that it might take in theory longer than that, which would be very much not what the applicant wants to happen, or that for the reasons that I said before, if there was a start, there can in theory be a long delay.

00:47:48:14 - 00:48:10:12

That then means that the scheme isn't built out until, you know, whatever. Pick a number in terms of how many years that that might be. So I just want to emphasise that all we have done here is what any environmental statement would do in terms of trying to make reasonable assumptions about the range of, of timings of of the construction.

00:48:11:06 - 00:48:13:15

Well, I'm struggling now because.

00:48:13:25 - 00:48:34:02

Wouldn't that be essential for your assessments, particularly on matters relating to, um, I don't know, all the adverse effects that have been assessed for the construction relating to construction will relate to construction period and the length of time that those adverse effects are there.

00:48:35:06 - 00:48:36:11

Julian Boswell For the applicant.

00:48:36:29 - 00:48:39:04

Well. It.

00:48:40:20 - 00:49:20:05

It's an obvious point of practice, isn't it? You have to make some assumptions about how you know how long a scheme is going to take firstly to build, and then there's a case of, well, when does the build start and when is it, when does it finish? We've been explaining in the application in different ways in the previous questions today that there are uncertainties attached to the timing. We wish we did have everything under our control. We'd want to get on with it and complete it as a single project as soon as we've got, as you know, both CFDs or links here, if that's available and we can get the finance in place.

00:49:20:07 - 00:49:56:15

You know, we're, you know, Equinor wants and its partners wants to get on with delivering the project. But so that in one sense is the base case. And then we are expected as part of good practice to ask ourselves, well, what else could could happen? And so we have put forward, as any does, one of the first things I look for when I'm reviewing an environmental statement, which I do all the time, is what are the what is the assumption that we're making around the construction period? And that has to be a reasonable assumption or a range.

00:49:57:04 - 00:50:34:18

But you don't assess every, you know, every sort of hopefully unlikely scenario that this could take. The project could could commence in three years or five years time. There could be a five year wait and then it starts up again. Otherwise, you know, you'd be you'd be assessing everything under the sun in environmental and so in so and therefore I'm just all I'm saying is there has always has to be a limit and based on reasonable assumptions about what the timing of a construction project is for the purposes of doing a competent and meaningful EIA.

00:50:35:02 - 00:50:36:25

So your makes the.

00:50:36:27 - 00:50:41:05

Assumption that at the moment the maximum construction period will be eight.

00:50:41:07 - 00:50:43:04

Years. But what you're saying is that that.

00:50:43:06 - 00:50:44:20

Could be 9 or 10.

00:50:45:19 - 00:50:48:12

You can't rule these things out is all I'm saying.

00:50:50:22 - 00:51:22:18

Mean, that's why I mean, you can debate what the phrase, what the term likely means when it's in the phrase the classic phrase likely significant effects. I think that mostly focuses on what when something happens, what is the likely effect of of that thing when it happens? But you can also read into that, I think reasonably that that relates to to to the assessment in terms of the temporal likelihood of how the project would would would be would be constructed.

00:51:23:02 - 00:51:24:06

So your has.

00:51:24:08 - 00:51:34:15

Assumed traffic effects for a certain period based on an assumed construction period, but you're telling me that that traffic effect could potentially be longer?

00:51:36:22 - 00:51:54:14

Well, that simply flows from the way the planning system works. That's about as hardcore into the planning system as anything could be since 1948 that the planning system only controls the start of development. It doesn't meaningfully control the end of development.

00:52:19:08 - 00:52:25:19

Miss Staples? No. Your hand is up. Mr. Boswell, you've just raised a made a point here, which just.

00:52:27:17 - 00:52:31:05

Which means that then the.

00:52:31:18 - 00:52:43:17

The the validity of the or the assumptions that you've made in the. Yes. And the assessment that you've made on the basis of those assumptions are a you've just put them under question.

00:52:44:15 - 00:53:06:12

I don't think I have I think I've just pointed out just a fundamental feature of the whole way the system and the planning system works. And the only reason I did it was because you were constantly questioning what the maximum was. And that begs the question, well, is there something to control what the maximum is? And the planning system doesn't offer that control.

00:53:06:14 - 00:53:08:21

Well, the Planning Act 2008.

00:53:08:23 - 00:53:19:16

Does, because if you're the adverse effects of your project are beyond what has been assessed in the A in the IS, then potentially isn't that a criminal offence?

00:53:26:19 - 00:53:30:21

Julian Boswell for the applicant. I don't see how that is a criminal offence.

00:53:33:19 - 00:54:06:29

The environmental assessment regime identifies seeks to identify likely significant effects so that when the decision maker is making his or her decision, they are taken into account in practice. It then leads on to the identification of mitigations which are secured in the DCO or some linked mechanism, and then those mitigations apply in relation to to the project.

00:54:08:04 - 00:54:15:25

What there isn't is an absolute control over when the project takes place.

00:54:17:07 - 00:54:18:13

But it does control.

00:54:18:15 - 00:54:23:12

The effects of the project, which cannot be any greater than what's been assessed in the US.

00:54:24:24 - 00:54:49:18

I don't think strictly the regime is quite that powerful. It's clearly trying to get to that point if it. But I don't think I don't think you are committing a criminal offence. If it turns out that what's inevitably a predicted effect doesn't turn out to be quite as predicted. I don't think that's a criminal offence.

00:54:50:14 - 00:54:56:09

We'll have to take that away and we'll probably revert back with questions. Ms.. Staples.

00:54:57:24 - 00:55:29:23

Thank you. Louis Staples for the leg. I just wanted to come back to that. I understood it was very clearly stated that the the build for each project would take 24 months. I understand that they're saying, one, they might need four years between the start date. So that still gets us to the six years, not the eight years. I mean, looking at this and as you understand completely, we look at this about about the impact on the landowners that are going to be directly affected.

00:55:29:25 - 00:56:00:01

And obviously, that is that time of the construction. So six years compared to eight years. You know, that's a big difference of an impact on a on a landowners farming business. So we do want it to only be six years for that cable corridor if that's what is being stated. And I completely understand. That's what I've understood. That's been stated to me this morning. Hearing this, um, further, I don't understand. Going back to a previous question.

00:56:01:04 - 00:56:40:16

It was, it was asked what's the difference between the projects coming through together now on the worst case scenario? Because if each project requires four years, I don't see any difference between whether this application, whether the application can be done for both of them or had been done separately in what they've stated. We the NFU has is really concerned about this and how they're supposed to be a pathfinder and they're supposed to be reducing impacts. We actually wrote to the Minister about this and we have had a letter back, um, and it's been very clearly stated.

00:56:41:28 - 00:56:42:16

Um.

00:56:43:12 - 00:56:55:10

As a pathfinder. Um. They are supposed to, um. Yeah, lowering consumer costs and reducing environmental and consumer impacts.

00:56:57:24 - 00:57:23:00

Um. So, yes, to me, if they if they doing these projects together and they can do six years, I can see then they are reducing the impacts than if they were they put in two separate applications and they needed four years for both for both projects. Otherwise I still can't see the difference about impacts on landowners and reducing the construction impact. Thank you.

00:57:24:05 - 00:57:25:25

Thank you, Miss Staples.

00:57:26:23 - 00:57:29:11

My colleague, Miss Wallace has some questions.

00:57:30:23 - 00:58:18:12

Yes, indeed. Now, I'm not necessarily put in the applicant's case for it as such, but the way to understand it is that it's 24 months onshore and then 24 months offshore per project. Now, the only question then would be coming on to Miss Staples Point is what part of the development would be commenced first? Would you do the onshore works, then the offshore? And then when you start the second project again, you do the onshore works, then the offshore, in which case that would be the six months, the six years, if you like, in terms of the effect on land with a further 24 months on offshore or what would start first when you start a project is basically what I'm asking.

00:58:25:24 - 00:58:35:13

And Sarah Chandler for the applicant. Think, Mr. Wallace, you've described the plate very well there. And yeah, it would it would be typical to start onshore construction first.

00:58:37:21 - 00:58:39:26

So would it be fair to assume.

00:58:39:28 - 00:59:04:16

That the impact on landowners then would indeed be roughly six years rather than the full eight years? Because even if the two projects were to start four years apart, one project has a two year impact onshore and then the other project has a two year impact onshore. The real effect on landowners would potentially be six years.

00:59:13:21 - 00:59:28:18

Sarah Chandler for the applicant. Yes, I think if I've understood you correctly. That's correct. So in the sequential scenario, those kind of two extra years, if you like, at the end will be the offshore construction completion of the offshore construction for the second project.

00:59:28:20 - 00:59:34:21

Okay. Does that satisfy you? Okay. Thank you. Ms.. Staples, does that satisfy you?

00:59:40:10 - 00:59:45:29

Thank you. Yes. That that that is clearer. I'm not sure, though, how we actually secure that with secure that.

00:59:46:22 - 00:59:48:04

That was going to be my next question.

00:59:48:06 - 00:59:50:15

So is that something that can be.

00:59:50:17 - 00:59:59:21

Written into the is? I mean, it is in the plate, but making quite specific reference to landowners and onshore effects?

01:00:43:18 - 01:00:45:15

Apologies, madam. Julian Boswell for the applicant.

01:00:47:03 - 01:00:50:16

We've lost our train of thought. Do you mind repeating the question she just asked?

01:00:51:00 - 01:00:52:10

We were talking about.

01:00:52:12 - 01:01:24:08

The effect on landowners and the what we've understood from what Ms.. Rodrigues has just explained in Ms.. Chandler that the effect on landowners would effectively, even in the worst case scenario of sequential build out sequential construction periods, would only be six years, two years onshore for one project, two years offshore for that project, and then two years onshore for the second project. So cumulatively that would come to roughly six years because then the second project would go offshore.

01:01:25:05 - 01:01:38:22

Ms. Chandler said yes to that roughly, and if that is the case, then can be can that be specified in the ears or maybe, yeah, maybe, yeah.

01:01:40:06 - 01:01:56:27

Sarah Chandler For the applicant, I think it's sensible that we take these points away and we can come back at deadline three. We hear the comments that have been made by yourselves and Ms.. Staples, so we'll take that under consideration and see if we can provide a bit more clarity. Yeah, okay.

01:01:58:10 - 01:02:45:16

Bye. Madam, there are two. Can I make two supplementary points? Julian Boswell for the applicant. The. The first is to emphasise what I would hope is obvious, namely that Equinor and its partners have an overwhelming commercial interest in building projects like this as quickly as they sensibly and responsibly can. I am. The intervention I've made has been more a theoretical one. Just because I was slightly concerned that your comments about the emphasis on the word maximum might mean that you were heading towards some kind of attempt to to limit something that is never limited in a in a or equivalent planning in that way.

01:02:45:23 - 01:03:19:26

The other point, if I may, is, is I think to some extent linked to that, which is or just building on the point I made a few minutes ago about how any anyone prepares an environmental impact assessment in in the in the EIA regs. Um one of the requirements of environmental statement which I've got in front of me is that it includes includes the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment.

01:03:19:28 - 01:04:05:26

Taking it. This is the key bit, taking into account current knowledge and methods of assessment. Now, again, I think I think that includes what the applicant knows about the project as well as I mean I think it's it's, it's mostly aimed at knowledge of how one carries out environmental assessments. But this is clearly at an important feature of an environmental assessment. What assumption are you making about the length of the programme and then when that programme might take place, how does that link to, you know, other projects that are planned in a similar period as far as cumulative effects and so on and so forth are concerned? All, all any team in our situation can do is to make reasonable assumptions about a construction programme and sequential, as Ms..

01:04:05:28 - 01:04:26:13

Shields has explained, we've looked at the peaks in terms of things happening. At the same time, we're also having to look at the peaks in terms of the length. And in doing so, we have tried to make and explain our thinking as to what assumptions we have made in that respect. We've then conducted the assessment on on that basis.

01:04:28:22 - 01:04:30:20

That's helpful. Mr. Boswell, I'm just going to.

01:04:31:02 - 01:04:33:23

You read out something from the regs. Could you tell me.

01:04:33:25 - 01:04:35:06

Where you read that out from?

01:04:45:14 - 01:04:47:07

Is that Regulation 14.

01:04:48:27 - 01:04:59:06

Julian Boswell for the applicant. Regulation 14 from the infrastructure planning regs and I was reading subparagraph three B.

01:05:02:00 - 01:05:03:21

Okay. Um.

01:05:05:23 - 01:05:11:21

Let's hope. Well, that's helpful. Um, you have worried us slightly.

01:05:11:23 - 01:05:12:13

But let's hope.

01:05:12:15 - 01:05:13:21

That not intentionally.

01:05:13:24 - 01:05:14:16

Let's hope that's.

01:05:14:18 - 01:05:22:27

Unnecessarily worried us. But we will take this away and we will discuss it. And of course, if we have follow up questions, we will come back.

01:05:27:04 - 01:05:32:14

Thank you. I'm happy to move on. Mr. Manning here. Apologies, Mr. Aldous, you had a question.

01:05:33:01 - 01:06:05:22

Thank you, madam. Just a minor point in connection with that and the CFD process. What is the earliest date for a CFD application? Assuming that the normal timescales are followed, the project proceeds to consent, then CFD and financial investment decision which CFD around. What would be the date of the financial investment decision? And does the CFD process then impose a completion date on the project, which would have a bearing on the previous discussion?

01:06:07:00 - 01:06:08:06

Mr. Alders I'm.

01:06:08:08 - 01:06:09:25

Very aware of time.

01:06:10:00 - 01:06:14:15

And can I make two requests? One, I think the second.

01:06:14:17 - 01:06:45:10

Part of your question is very interesting and we will put that in our post hearing actions. The first part of your questions, may I request that you have a look at the applicant's response to our question on and I'll give you a question number. Q1 2.3.2, if you still have questions, then of course the examination provides you with various deadlines where you can ask it. But the second part of your question is interesting, and we will put it in our post hearing actions. Um.

01:06:46:02 - 01:06:47:04

Okay. That's all from me.

01:06:49:08 - 01:07:29:29

Okay. Thank you very much. I'll come on to the next agenda. Item number four, which is whether the environmental statement suitably assesses the potential for the proposed development to be constructed at the same time by completely separate construction crews. Um, I think probably the, the the best way to illustrate our potential concerns here are in relation to transport and how the current scenario has what the assumptions behind the concurrent scenario. So it's noted in table 24 two, which is realistic worst case scenarios in the chapter chapter 24 for traffic and transport.

01:07:30:01 - 01:07:47:17

That in the event that there is an overlap between set and DEP in the sequential build out scenario, the potential maximum impacts are assessed within the worst case parameters identified for CIP and DEP concurrently the concurrently built out scenario. Um.

01:07:49:06 - 01:08:25:24

Is the applicant able to explain the assumptions behind what went in to the concurrent scenario? Worst case for traffic and transport? And the reason for asking is if they were built out completely separately, that would be the isolation scenario. And the question I have is for the figures for the concurrent scenario, why are they not significantly different to the isolation scenario? Because would logic not say that it should be the isolation scenario times two at the same time,

01:08:27:14 - 01:08:36:00

which in many cases the figures are not significantly different? Which raises questions for me about what has actually been assumed in that concurrent scenario.

01:08:57:19 - 01:09:39:28

Thank you, sir. Alan Shields, for the applicant. So the traffic and transport assessment assumes that the onshore cable duct installation method is conducted in a sexualised approach in order to minimize the impacts and that then inform the strategy in terms of suitable identify and suitable access points and optimum routes for the construction traffic, which then in turn serve to minimize the daily construction traffic demand. And all construction crews would utilize the haul road to reduce the number of access points and in turn, the number of HGV trips on the local road network.

01:09:42:03 - 01:09:45:15

Does that is that a start of an answer?

01:09:46:00 - 01:10:07:06

But there's no requirement in the DCO to do that, is there? There's nothing to stop potentially. Both projects coming being built by separate crews, generating the same amount of traffic as the isolation scenario undertaking works in very close proximity to each other, basically doubling the isolation traffic movements.

01:10:09:05 - 01:11:03:06

And thank you, sir. Ellen Shields for the applicant. If I can maybe take you back a little step, which might again help understanding. So thinking about the practicalities of how any linear scheme is constructed and the land that's affected won't be subject to the impacts of construction at the same time and for the whole period. So once works are complete on one section of the cable route, the area is reinstated as quickly as possible, mitigating the length of time that construction occurs at that location. So with regards to our specific project, we've split it into sections with multiple construction teams working on the different sections of the project and the considers up to a maximum number of ten work fronts could be worked on at any one time and can signpost you to paragraph 278 of Chapter four Project description, which is DOT reference 090.

01:12:02:21 - 01:12:26:14

Okay. Thank you. Those ten work teams. I guess the question comes back to presumably those ten working teams could undertake those works for the isolation scheme for for one project. Does that ultimately mean then, if those ten working working teams are taken up by the first project, the second one can't commence? Is that the intention of that?

01:12:29:05 - 01:12:31:01

And again, is that secured in the DCA?

01:12:40:03 - 01:12:45:25

Yeah, he just to go for the epic. I'm sorry. Would you mind reformulating your question so that. Yeah, I can do the answer together?

01:12:46:02 - 01:13:03:22

Yeah, absolutely. Ultimately, the question was, is that if if the ten construction teams were working on, say, the first project, would that stop the second project, therefore being able to be the construction started for that project. And if that's the case, is that secured in the DCA?

01:13:06:09 - 01:13:20:14

Sergio Rodriguez for the applicant. Initially, your question was that if we are constructing at the same time, so the concurrent situation and you have both projects with different contractors, right? Yes, that's that's the thinking.

01:13:22:07 - 01:13:57:12

So in reality, in a practical point of view, more often than not, you have different contractors working in one project because you have you may have the civils, you may have the cable system group, you

may have the actual ones are constructing the substation. So that already are different contractors that you will have to coordinate. So guess if we were in a situation where we have, let's say both two groups doing civils, the the practicality of it, you are adding one level of complexity, but it's yet just another point to coordinate.

01:13:57:14 - 01:14:19:07

So you will coordinate the work of this together. And normally if you are working in in the linear schemes, you will stack your work. So you will have fronts. Are your system into each other. So that will work that way. So theoretically should not be a specific limit in the sense that you may distribute the work depending on the activity along the corridor, if that helps in any way it does.

01:14:19:09 - 01:14:39:14

But I think that that indicates there would be approach as coordination. The scenario we're talking about is if it is completely separate, there's no discussion, no coordination between the two projects and the potential for the impact to happen simultaneously with no coordination between the two. So they would be completely separate projects.

01:14:48:21 - 01:14:49:06

And.

01:14:53:27 - 01:15:27:12

And Sarah Tyler for the applicant. Think paragraph 89 in the scenario statement here might be helpful. Um which acknowledges that there will need to be a level of coordination and cooperation between the two projects. Um, we see that that would be the case irrespective of which scenario was to come forward. Um, it speaks back to the point that Mr. Boswell made earlier in terms of a shared haul road and appreciate what you're saying. You know, you're thinking of the scenario one where the two projects come together and they're, you know, they're separate.

01:15:27:14 - 01:15:50:10

We're not not delivering the integrated transmission system, but that need to coordinate and collaborate between the two projects would still remain and would still be controlled by the necessary commercial agreements between the two. Um, and it's it's not a dissimilar scenario to what's being seen on the ground at the moment between the Sofia and the Dogger Bank C project.

01:15:52:09 - 01:15:59:15

But, but it does allow the scenario that we've just discussed of now coordination doesn't it. As it stands.

01:16:03:17 - 01:16:08:06

And the overall framework of my question really is whether the yes actually assesses that or not.

01:16:35:18 - 01:16:36:05

It has to be.

01:17:01:23 - 01:17:09:03

Julian Boswell for the applicant is the lead author. Mrs. Fuller is the lead author of The Echo, so we'd like her to address this.

01:17:14:13 - 01:17:37:02

Apologies. Laura Fuller for the applicant. So, no, I don't agree that that does that the allowed for that, except that we set out all the scenarios and those scenarios allow for separate construction and the separation of the two projects. But you also have to read that alongside.

01:17:37:04 - 01:17:37:19

The works.

01:17:37:21 - 01:17:44:24

Descriptions and the works plans and consider how in a scenario where the two projects were.

01:17:44:26 - 01:17:45:25

Coming forward.

01:17:46:00 - 01:17:46:29

To any degree of.

01:17:47:01 - 01:17:48:00

Separation.

01:17:48:07 - 01:18:09:10

What they can actually do within those parameters. So in my view, that then does link back to that point that Ms.. Boswell made earlier, in which Ms.. John just reiterated that the work descriptions and the work plans, when you look at them, show the single haul road. The way it's been put forward means that we.

01:18:09:12 - 01:18:10:06

Aren't taking.

01:18:10:08 - 01:18:12:19

Entirely separate corridors to.

01:18:12:21 - 01:18:13:10

Allow that.

01:18:14:00 - 01:18:28:25

Absolute separation, that by the nature of what is included in the works, there has to be that level of coordination to be able to to implement those projects in the scenarios that are set.

01:18:28:27 - 01:18:29:12

Out.

01:18:30:08 - 01:18:32:12

Because the scenarios are entirely linked.

01:18:32:20 - 01:18:33:25

With the work.

01:18:34:00 - 01:18:37:01

Packages that are set out in the DCO.

01:18:37:15 - 01:18:50:09

Does the show need to be clearer than in terms of the scenarios? Because the way it reads, there is a scenario where they can come together completely separately, and that's certainly my understanding of the drafting is what that indicates.

01:18:52:05 - 01:18:55:03

I haven't got the door open right in front of me at the second.

01:18:56:29 - 01:19:12:03

My understanding of how I drafted it is that when you you read the scenarios, definitions and obviously this took quite a lot a lot of thinking through. They are they are linked to the works descriptions.

01:19:16:20 - 01:19:21:21

There is a little bit of tracking through admit in terms of the definitions.

01:19:23:24 - 01:19:34:04

What what might be more of assistance is if perhaps try and help with that tracking through and that thought process and put that in writing

01:19:36:02 - 01:19:39:06

rather than try and sit and take you through each thing off the.

01:19:39:11 - 01:19:52:24

Yeah, I imagine we'll have some follow up written questions which may be again, appropriate mechanism to to deal with with the sort of further clarification that we're seeking. So is everyone else happy with that?

01:19:55:17 - 01:19:58:06

Yeah. Okay. Sarah Chandler.

01:19:59:09 - 01:20:00:22

So we can.

01:20:19:05 - 01:20:20:18

Okay. My question.

01:20:21:13 - 01:20:36:07

QUESTION And Mr. Manu, if can make a suggestion, you might recall that we submitted some supplementary figures to the scenario statement at procedural deadline A, and it might be that we can address this point through some updates to that.

01:20:37:02 - 01:20:39:29

Yes, I think that would be be useful if that's okay. Yeah.

01:20:41:17 - 01:20:47:15

Okay. Do Norfolk County Council have any thoughts on this particular matter?

01:20:52:21 - 01:21:08:08

Thank you, Mr. Manning. Um, clearly there are implications for the County Council's highway authority. Um, I think it's really obviously for the the applicant to demonstrate the scenarios. You've tried to tease out this morning

01:21:09:27 - 01:21:21:23

and it might be one to address through further written questions. We're happy to come back, but I think it's one the Highway Authority would want to see any further evidence of these scenarios.

01:21:23:09 - 01:21:53:21

Okay. Thank you. And just one more thing comes to mind before we do move on in terms of the the basis of the the is that there would be ten crews working, maximum of ten crews, let's say, at any one time, which is how the the Yes. Has sort of been based upon the traffic movements. Again, is there anything in the show that restricts or limits the you know, any scenario only having ten construction crews at one time?

01:21:57:00 - 01:22:01:21

And again, would that be a slightly different mechanism of ensuring that the worst case had been assessed?

01:22:28:11 - 01:22:30:00

Yes. I think he was.

01:22:47:00 - 01:23:19:20

Sarah told the applicant. I think the example you're drawing out there, Mr. Manning, relates very much to the worst case scenarios, has been determined for the traffic assessment. You'll note we don't have Sam here who had yesterday our transport planner. And each worst case scenario was determined by the top specialists for, you know, they've taken those broad parameters and established what that means for their discipline. So think it would be wise for us to take that away and get him to respond on that.

01:23:19:26 - 01:23:34:11

Okay. That's one to say. I'll probably have a written question along those lines that will deal with the position. Okay. Thank you. Okay. Shall we move on in that case to agenda item number four, and I'll pass it back over to Mr. Hyde.

01:23:36:19 - 01:23:40:04

Thank you. So agenda item four is about assessment of.

01:23:40:06 - 01:24:02:22

Alternatives, and this is relating primarily to the grid connection at Norwich. Main substation offered by National Grid. And it's about the process of assessing, uh, and it's also about the process of assessing those alternatives. So we did have several questions in the first round and we discussed this in the first round of hearings in January. What we've received.

01:24:02:24 - 01:24:03:09

Back from.

01:24:03:11 - 01:24:44:09

Yourselves and from National Grid is a very helpful, overarching view. But it's, um, it's quite a generic response and it does not present us with any new information, which is the only reason it's back in here today on this agenda. So basically what we're trying to assess here, if the N1 policy requirements in paragraph 4.2. 11 to 4.2. 13 and the regulation schedule four, paragraph two are met with respect to the assessment of alternatives when it comes to grid connection.

01:24:45:03 - 01:25:01:17

So am I from the reading of the material that's before us. Am I correct in assuming that the applicant was not offered more than the one site which is Norwich Main for its grid connection?

01:25:06:21 - 01:25:08:13

Julian Boswell for the applicant.

01:25:10:16 - 01:25:32:23

The way the coin, I know it should be Scion, but everybody in the industry says COIN, so I'm going to stick with that. Then flipping the oh and the eye around for whatever reason. The way the coin system works is that it produces a single offer. And that is what happened. That's what always happens. As I understand it.

01:25:37:09 - 01:25:41:27

Okay, so, um, the the coin.

01:25:43:12 - 01:25:54:20

So if there was any process of considering different grid connection points that would have happened by National Grid and the applicant is not involved in that process, would that be correct?

01:25:54:22 - 01:26:22:12

Know that there is a public guidance on the COIN process, which it may be advantageous for the for the panel to be aware of? It is a process that is led by National Grid ESO, and it also involves national grids, electricity transmission and the applicant. And so it's a national grid eso led process. So the applicant is involved.

01:26:23:00 - 01:26:35:05

So you were aware of other connection points that the applicant that National Grid might have considered other than Norwich, Maine. Yes. So are you then able to tell me what other sites were considered?

01:26:36:12 - 01:27:07:00

Well, this is where we run into the point that National Grid Ieso puts in their response around confidentiality. So the coin process is an Ofgem regulated process that is, and it's focused on questions of cost to the consumer and efficiency, but it also takes into account questions of environmental impact and deliverability and consent ability. And that's all explained in the guidance. National Grid Yes.

01:27:07:02 - 01:27:07:21

So.

01:27:09:26 - 01:27:49:01

Considers the COIN document to be confidential. Our position on that is that we don't think it's appropriate for us to get into the detail of what's in the document that has emerged from that three way process where we see that document as being national Grid ESOS document from Equinor's point of view. It doesn't have an in-principle objection to more information about from the COIN process coming out, but thinks that that should only be done on the basis that it's agreed with the other parties that were involved in the process.

01:27:57:05 - 01:27:57:22

Okay.

01:27:57:24 - 01:28:41:10

There is a bigger point. If I don't. Perhaps I can make it now. Julian Boswell for the applicant that as to where where this as it were, this topic could go because in the national policy statements, Ian one obviously the extant 2011 statements, it's clear and I could read out the relevant bit of it's helpful that the national policy statement makes it plain that there isn't a general requirement in the consideration of alternatives that an applicant in our situation identifies the best or the optimum option, and that the

01:28:42:27 - 01:29:19:08

and so our unless there are certain sort of legal tests that can apply but which don't apply on the facts that we've got here. And so from our perspective what we what what we have done here in terms of the whole approach to identifying alternatives, what we've explained in the environmental statement is that that process, in terms of us being in charge and the decision the decision maker has taken place in the usual way from when the coin process has reached its outcome.

01:29:19:10 - 01:29:23:13

And the the

01:29:25:26 - 01:29:55:29

the decision on the substation is known, i.e. the offer has been made and it's been accepted. So we have followed EIA practice, you know, from that point onwards in terms of explaining the alternatives that we considered, but recognizing that at that point it's about the detailed location of the substation at the Norwich main location, not whether it should be at Norwich Main in the first place. The prior stage to that, the coin process is, as I've already said, a national grid.

01:29:56:06 - 01:30:14:04

So led process. It is not the applicant making a decision as to which substation it ends up in, and that is a regulated process in the way that I've referenced. And there is guidance on exactly how that process operates that's available on the web.

01:30:14:12 - 01:30:17:23

Okay. So just going back to the earlier part of the.

01:30:17:25 - 01:30:46:04

Point that you've just made that I am looking at the right now and I'm also looking at the rig, which I just which I just told you, the one I was. You said that there is guidance which basically or the policy states that it is from the point at which the applicant has been offered the grid connection. The assessment of alternatives is post that point.

01:30:47:06 - 01:31:02:29

Didn't I didn't I didn't intend to say that. I think that I was getting to that point. But the the way I get there is as follows that the in paragraph 4.4.1.

01:31:05:24 - 01:31:11:20

Of the 2011 NPS. It says in the final sentence.

01:31:14:18 - 01:31:54:12

See it. Maybe I should read the whole paragraph. It's not very long as in any planning case. So this is a section beginning on alternatives, as in any planning case, the relevance or otherwise to the decision making process of the existence or alleged existence of alternatives to the proposed development is, in the first instance, a matter of law detailed guidance on which falls outside of the scope of this NPS. Okay, from a policy, this is the key paragraph. The key sentence I was referring to from a policy perspective. This national policy statement does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option.

01:31:54:21 - 01:32:26:24

And so the way I'm applying that to the facts of this case and many similar cases that are subject to the COIN process, is that, um, the and then sorry, that goes on to be a sort of reference to the, to the long standing obligation in the environmental impact assessment process that says that where you have considered alternatives, you should then explain what considers alternatives you considered and how in the high level terms how you've made that that decision.

01:32:27:07 - 01:33:15:17

Um, what we have here, if it was the case that the applicant got to just choose which grid connection it was, it was connecting to, then the, the full weight of the EIA process would apply to that. That isn't what happens here. The applicant makes an application for a grid connection, but where that grid connection ends up depends on the coin process. This Ofgem regulated process led by another entity, National Grid, which has a whole load of duties on it under the electricity regime and the applicant feeds into that process, but it's not making the decision in a way that that means that the EIA obligations bite on that.

01:33:15:21 - 01:33:48:22

Um, and so that was the point that I was that I was making and the, the normal approach to electricity IEA is that you do start that you reference the fact that there has been a coin process sometimes in the past. Certainly projects haven't even perhaps done that. Um, and then that you go from the position where the applicant is in control of what happens thereafter and that only takes place once you know what grid you've connection you've been offered and that you've accepted it and, and that you are going from there.

01:33:50:29 - 01:33:51:14

Sorry.

01:33:51:16 - 01:34:24:02

Just very quickly, you've helpfully read there from the MPs and 4.4.1 and you mentioned again going on to 442. It says that applicant, however, applicants are obliged to include in their. Yes, as a matter of fact, information about the main alternatives they've studied. Now, from what I understand, you're saying that the main alternatives, if there were any, were in the COIN process and as a result of the COIN process, an option, if you like, was given to you.

01:34:24:28 - 01:34:34:11

But where is there in the is the information about the other main alternatives that may have fed into that coin process?

01:34:34:29 - 01:35:06:23

There isn't. And the reason there isn't is because this is about the it goes on to say in the next sentence, this should indicate include an indication of the main reasons for the applicant's choice. Well, it isn't the applicant's choice. The applicant is not in control of the coin process. It it participates in the coin process, as the guidance explains. But it does not make the decision in the way that this is assuming that the applicant is making a decision in relation to it, to that aspect of its project.

01:35:06:25 - 01:35:09:13

And that's not the way the COIN system operates.

01:35:09:22 - 01:35:25:11

Okay. And then purely then, out of my own curiosity and education, if you like, in terms of the applicant's involvement in the COIN process, were you able to contribute alternatives for National Grid to consider?

01:35:51:16 - 01:36:11:09

Julian Boswell for the applicant. My understanding, and we'll confirm this in our submission, but I think it's also referenced in the guidance that I've mentioned a couple of times is that it is National Grid here. So that comes up with a long list and that sets the agenda for for the process that follows thereafter.

01:36:13:09 - 01:36:19:05

Thank you. That they have there that they are overseeing the entire electricity network.

01:36:20:20 - 01:36:21:05

Okay.

01:36:22:18 - 01:36:27:06

Thank you, Mr. Boswell. Um, so that's fine. That was the first part.

01:36:27:08 - 01:36:30:22

Of the question, which is, were different sides considered?

01:36:30:24 - 01:36:32:24

The next was about the process.

01:36:32:26 - 01:36:57:19

And in my reading of the way that you've described the coin process and indeed National Grid have, is that it's largely a commercial process. And my question is when and where and who considered environmental consideration, for instance, when making that assessment of alternative sites Grid connection points. Sorry.

01:37:00:29 - 01:37:02:18

Julian Boswell for the applicant.

01:37:04:17 - 01:37:10:26

It's clear from the guidance and it's the way it operates in practice that it is not entirely.

01:37:12:13 - 01:37:48:12

It does take into account environmental considerations. Um, not necessarily to the detail that some people may argue that it should, but it does. And the I think also I think you should be slightly careful about the word commercial. I mean, one of the core drivers at the heart of this process as an Ofgem regulated process is about the cost to the consumer. And so it's about a combination of cost of the consumer efficiency, but also deliverability and and impacts.

01:37:50:07 - 01:37:51:19

Thank you. That's helpful.

01:37:52:04 - 01:38:17:04

And it's just worth highlighting one thing that one of the reasons this is an important part of this examination is because of the number of representations, number of parties who've raised this point and who think that in terms of the adverse effects of the cable route, there should have been a consideration to other, um, to other great connection points

01:38:19:15 - 01:38:20:09

the.

01:38:22:28 - 01:38:55:06

Julian Bosworth the applicant. The risk of repeating myself, I guess I would just want to emphasize that in terms of what we see as the correct application of the national policy statements, um, the applicant is not obliged, as I've said, to show that this is in some sense the best option and the various tests that can kick in. You know, if we were in a national park or something, then there may be an extra test in the mix.

01:38:55:08 - 01:39:27:21

That meant that actually we did have to show that that is not the case. And therefore, I think the information that may or may not emerge in relation to the COIN process that's taken place on this occasion can only in the end we say be background information about how that that decision was made rather than something that feeds into a question about, aha, you know, we'll all poll to pick to pick the example that other parties have particularly mentioned and is actually addressed in the national grid.

01:39:27:23 - 01:40:06:08

ESO response that somehow Walpole was or was or is some in some sense better a better site and therefore we should have our not have our granted because there was a better alternative. We say strongly that that isn't the correct approach of applying the national policy statements and therefore we say that should be your examination, madam. But we say that should limit how much you look at this question because of where of a of a of a recognition of where that can go in terms of this decision.

01:40:07:21 - 01:40:09:21

Um, yeah. And I think what.

01:40:09:23 - 01:40:32:20

We've made clear, what Mr. Wallace's question actually made very clear, it's we completely understand what both regs and state that it doesn't have to be the best option as long as you demonstrate that you've considered options. And we're just trying to understand if options were considered. So yeah, I think we're saying the same thing. Mr.. BOSWELL But yeah, that's understood. Um,

01:40:34:07 - 01:41:04:27

two things that you've relied on. One, in your response to written questions, you've referenced a quote from the recent Energy Minister to the East Anglian communities. Um, and it's a partial quote. If he could please have that full statement submitted in the examination. You've also talked about the coin, um, the COIN guidance. Um, if you could please have that in examination.

01:41:05:08 - 01:41:30:11

We do understand that both the statement as well as the COIN guidance will be in the public domain. But as you well know, two things. One, it must be an examination for us to consider it. And two, the examining authority cannot go looking for its own evidence and submit it into its own examination. So we do have to rely on you to submit things to us if we want to take that into account.

01:41:32:10 - 01:41:51:27

Julian Boswell for the applicant. Yes, obviously. Happy to to submit the COIN guidance. We thought we had already submitted the the full statement from the Statement of Communities, but we'll double check and if we will either provide the reference to it, if we have or if we haven't, we will submit the full document.

01:41:53:03 - 01:41:54:10

Thank you, Mr. Boswell.

01:42:08:19 - 01:42:14:13

I'm very aware that we're running over, but I do want to open the floor up. If there were any questions on this matter.

01:42:14:22 - 01:42:15:21

Mrs. Betts?

01:42:15:23 - 01:42:56:03

Yes. Thank you. Sandra Betts, Norfolk Parish Movement for an, um. Would be fair really to our response to you rep to 066, which was our response to the written answers from. So with regard to this matter and we are very happy to answer any questions that you may have on it or any follow up questions that you would like to ask us. We'd also like to express our disappointment, to put it politely, that all refuse to accept your invitation to come along this morning and explain the situation.

01:42:56:05 - 01:42:56:22

Thank you.

01:42:58:24 - 01:42:59:20

Mr. Betts?

01:43:00:25 - 01:43:02:05

Yeah. Yes.

01:43:02:11 - 01:43:02:26

I mean.

01:43:03:21 - 01:43:05:12

I would expect this.

01:43:05:25 - 01:43:19:04

Examination from my limited experience to be open and forthright. And it seems to me, you know, looking at the guidance that there is a requirement for the applicants to

01:43:20:29 - 01:44:01:19

provide information on the alternatives that they've looked at, this president has been set by a number of previous applications, and the applicant has often referred in their responses to the actions and what's been provided to to previous examination authorities with regard to other aspects of that, but now is not prepared to follow the precedent set. Previously it would appear in this. The other point I'd like to make is that the parties involved with the decision are all commercial organizations, and I do accept the point that there are responsibilities upon to act independently and so forth.

01:44:01:21 - 01:44:02:21

However,

01:44:04:12 - 01:44:16:15

it seems to me totally unsatisfactory for this conspiracy of silence to operate between the three parties involved with this process. And that's the point I would like to make. Madam Chair. Thank you.

01:44:18:21 - 01:44:28:01

Mr. Betts. I think that's a point well made. I, I, I do think that is something that we will follow up on. However, I.

01:44:28:03 - 01:45:06:00

Do take Mr. Boswell's point that he made earlier when he, um, put a little bit more, um, he explained a bit more about the term commercial and the um, the criteria that, that that includes, which includes cost to the consumer deliverability and so on and so forth, which is, which I'm sure is there. So however, having said that, I do think that the, the confidentiality with to this process is something that we would probably need to process a bit more and understand why there needs to be and what aspects perhaps could be shared with us.

01:45:06:02 - 01:45:07:22

So that's, that's understood.

01:45:08:09 - 01:45:16:07

Mrs. Betts, with respect to your previous points, I'd make note of your disappointment and if we have any further questions on your submissions.

01:45:16:09 - 01:45:21:09

Then we will follow that up in written questions. Thank you. Are there any other.

01:45:21:11 - 01:45:23:13

Questions before one?

01:45:25:06 - 01:45:48:25

Julian Boswell For the applicant, just to say or just to reiterate what I said a few minutes ago. Equinor is in principle agreeable to providing more information from the COIN process. Okay. The reason. But it doesn't feel that it's appropriate for it to do so unless that is agreed with the with the other parties. And that is that that is that's our position.

01:45:48:29 - 01:45:49:14

Okay.

01:45:49:17 - 01:45:51:18

Thank you. That's actually helpful to know.

01:45:55:27 - 01:45:57:09

Any other questions?

01:46:05:16 - 01:46:06:24

Do apologize. We've run.

01:46:06:26 - 01:46:08:07

Over and we've not actually.

01:46:08:09 - 01:46:12:02

Finished everything in this. But we will we will.

01:46:12:23 - 01:46:13:09

Take a.

01:46:13:11 - 01:46:14:11

Short break.

01:46:14:24 - 01:46:20:15

Um, and it's 11:46 a.m.. If everyone could return at 12.

01:46:21:09 - 01:46:22:10

Please. Thank you.