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00:06

The time is now 10 past 11. And the hearing is resumed. Mr. Schwartz, I wonder if you could move on to your subject matter to please.

00:17

Thank you very much. This is looking at the extent of the Rochdale envelope, and then as it relates to our clients land. And if you just bear with me a moment, sir. So in relation to the status quo so you've heard from the carpenters themselves at the open floor here and had the opportunity to question them as to the applicant in relation to their current agricultural use of the land. So we I'm moving from that platform as it were, we also have for your reference, so in documents 6.3 point 17. just clarify the point two, which is the applicants volume at appendix 17. to land classification solar resources document in volume three of the E s, we have the sole quality diagram showing all AMS you'll be familiar with. And so you'll be familiar also with the nppf, the National Planning guidance that we've set out in paragraph 170 B, which requires planning decisions to recognise the benefits the best and most versatile land. And you'll be familiar therefore, with the extent of the grade three, a three B and four land of different categories on the site. So you will also be familiar with the recent document helpful lead provided by the applicant, which is appendix one, exhibit three drawing showing indicative split between use for storage of sub soil and topsoil for ch one. It's sheet one, and that shows essentially how there's going to be cut and fill process at the northern extent of our clients land, where they're going to make a platform for the converter station. It also shows helpfully, the situation of the proposed lay downwards compound and you will have seen sir, from your questions yesterday, that the western extent of that as it falls on the west side of the proposed access road is in about the location where the telecom building is envisaged or hoped to be situated. And you'll see from that photographic overlay with a diagram our class farm at the southern end representation is the residual balance of the land of now. So, you can also see from that sheet one the extent of the red line around the whole of that situation which shows the order limits and just to put that into somewhat graphic perspective, for simplicity, if you were to for your notes, refer to figure 24.2 of the E S that is an illustrative cable route which shows the trenching illustrative alignment and the order limits you will see essentially a sea of red with a bit of hatched blue snaking up in the middle shows the actual extent of the operational development and land use envisaged by the applicant across an otherwise sea of red. Now, with that in mind, so if I could just ask you to bear in mind two concepts. One is the Rochdale envelope concept which we know advice note nine I think it is gives guidance in relation to it being a flexible tool and so forth. And we recall on ISS one decio hearing I think examining authority member mom saying that there should be clearly defined parameters. So these are the authority has in mind the Smith case that where you rely upon a roster long globe approach, it becomes imperative to have clearly defined expressed terms because they are going to be the parameters for the development going forwards. And therefore when we rely on principles and framework documentation, we would ask you to carefully scrutinise as it were the terms used to see whether they really do give clear parameters or not. That's

on the one hand and on the other on the other hand, they While there is that flexibility in relation to the authorised development, we know from the most recent version of the decio

05:11

draft terms that article 23 one is proposing compulsory purchase powers quote over so much of the order land described as is required for the construction operation or maintenance or the authorised rent or to facilitate it always as incidental to it now, in relation to my client site, sir, they the applicants oral submission transcript only relies on required and facilitate and does not rely on incidental so to just focus your mind on their case, they are relying on required and facilitate and nothing else in relation to my clients line. Now, if you then go further forwards to the related article 30, which was set out and there was some discussion about yesterday. So, you might recall that this is quite a broad power. And article 30, if you bear in mind, the Roger long globe approach explains that there's a power in connection with the carry out of the authorised development or maybe construction, as you indicated. And there's a category 31 A for two types of land, the the 31, a one land is essentially yellow land. And our client has two plots of that. So if you were to go to shedule 10. On page 72 of the order on the row one, you'd see our clients land at 157 and 171. And that is a two little yellow slivers on the eastern boundary of their land where the accessway will come in. And there's a hedgerow it's that that bit but otherwise 31 a two is any of the order land. So if you go back to figure 24, point to the sea of red, that's the other any of the order land. Now, if you then go to Article 34, let's assume that the applicants gone into that land. This gives them a choice. It's a choice to essentially either give the lamb back, but it also gives them an obligation to acquire the land or rights. So essentially, what the applicant appears to have drafted is a Rochdale envelope approach to CPOE. For flexibility up to the edge of your limits for a trench which is shown it's so small, you probably can't see it, but it's that blue line snaking up. And which Mr. Sullivan who understand is a land valuer said yesterday will be 700 millimetres wide and might need about two metres either side to access it. So we've got a little cable which we've seen from plate 3.2 and plate 3.3 of the description development snake me its way up through a sea of red. Which you have to consider on the one hand on the roster longer lobe approach, yes flexibility in relation to the authorised development. But when it comes to capacity purchase, we submit and we've submitted previously that the law requires least intrusive interference, which is a shrink to fit approach. Now there's an inherent tension then in the scope of Article 30, where 34 gives a power to the applicant to choose whether or not to get the land up or to acquire it. And this will feed into the funding point we're going to make later but the scope of funding what's been estimated. So essentially so we would ask you to act in accordance with the laws we previously submitted and carefully scrutinise what's been proposed, and whether there's a match in relation to what's justified by the applicant to be compulsorily acquired, as opposed to what you may seek to authorise. So that's the first point in relation to that part of the topic we'd like to just draw attention to you just bear with me

10:02

Moving further into our plants land situation, you've already had our submissions and documentation, which essentially show that the extent of the compulsory purchase option, if I can put it that way that's been proposed in the decio, has been amplified up to land boundaries for apparent convenience, as opposed to need for the land. So for example, we know on the eastern side of our clients land aquin have an option to acquire a piece of land to its North. So instead of having an access way that's only 7.3 metres wide, that comes straight in from the highway across towards our land, they've amplified the

space between the northern side of that access way and the southern boundary the option land and filled it in, because it's convenient. We asked you sir to not today, but consider carefully whether commercial convenience can be a proper justification for that land extent. Similarly, to the north of the converter station, the same approach has been adopted, where the northern side of the land extent of the order limits has been extended to the southern boundary of Peter Carpenter's site, where there was envisaged to be battery storage facility, as was envisaged to be on the auction land as well. So the approach to the capacity purchase situation seems to be driven in our submissions by commercial convenience, as opposed to need in relation to the proposal. Mr.

11:52

White, if I could just hold you on that just for a point of clarification. And the area that you were talking about, first of all, in terms of to the south of the existing substation was an element of plot 160. Yeah. But that element of plot 160 is outside your clients don't have any interest in that particular area of 160. Is that correct?

12:20

That's correct, sir. We're using these points to illustrate the approach by the applicant seems to be a wider approach of which we are an example.

12:30

Thank you. And then coming on to the second matter, then I'm referring then to the battery storage area that you talked about? Yes. Was then would be then related to plot 122, one that runs underneath the overhead cables?

12:48

Yes, I think that's right. So on the land plans that you just pulled up? Yeah, you can see in dark purple. At the bottom, the access way parameters,

12:58

I'm content now that I've been I'm content, I've obviously got the plans on my screen as well, where I am. I'm content now that I'm following the areas where you are, I just wanted to clarify. And I'm also content as to what status they have in terms of the book of reference. Thank you.

13:14

Thank you. So So, for example, that the access zone point feeds into our submissions in this way. We know from a design access statements submitted by the applicant that the highway that they want to put in temporarily for construction is going to be about 7.3 metres wide. And yet, if you measure their scale plans, you'll see that that pink, that dark purple zone is about 30 odd metres wide. Well, there's no rational basis to have it wider than they've shown. Other than conveniently they own the app condones the option land to the north. And so we ask you to consider whether that's a justification for, for taking that land, it then comes into our land on the same width. Why it doesn't need to, it can be narrower, for example. And then similarly, if you go to the north, you'll see there's a straight line above the the top pink area, and the northern edge of that pink line abuts Peter Carpenter's land who's in his capacity as another objector. And again, that seems to us to be driven by convenience. So we asked

you to carefully scrutinise the approach of the applicant to the extent of the order limits. And we respectfully submit that the because of that, and the apparent flexibility that they see as a sort of Rochdale CPO approach, that you carefully scrutinise what they actually need as opposed to what they desire. Now if we move forward from their place, to home. Our client has, as you heard at the open floor hearing been with their father farming this agricultural land for nearly a century. And they've been living cheek by jowl other development as it's come forward. And you may recall from our submissions in about the 1960s, the electricity substation arrived and was the first part of what in effect is now becoming electricity city. And the farm was facilitative to it coming and most recently has been simply facilitative in conveying to the substation, the field over which option B two would extend into which is shown hatched on your plan between the western side of the electricity substation, and the eastern side of the proposed location converter station. And our clients continue to facilitate that cheek by jowl arrangement with the current applicant by for example, enabling the applicant to visit the site recently to undertake borehole analysis across the site for purposes of the construction and so forth. And they would like that relationship to continue and they continue themselves to be facilitative. So, to that end, they put their thinking caps on and being very pragmatic. And they recognise that we as we have submitted that this is a nationally significant infrastructure project in relation to energy related need, there is a substation east to their land. And as you see from our submissions of the footprint, and the small area around it, we accept is necessary for a converter station to be situated upon. Similarly, the electricity bearing cable, and the electricity support monitoring function of other cables placed along it is also within that scope. And that we understand will be laid below the agricultural land at a depth below. situation where it might be damaged by being farmed over in due course, entirely sensibly. So that leaves in play as it were, what happens next. So

18:15

now, in line with the facilitative approach that they've adopted previously, and it's obvious that if you're going to build a construction state, a converter station, that there's going to be a lot of temporary disruption to the farm for three to four years or thereabouts. And we know from the helpful sketch one, which I showed you earlier, sir, with earthwork storage, the location, the compounds, so realistically, the carpenters are aware that they're not going to be doing much farming on that land for the period of construction works, but there's no reason at all we say why after the event of construction, the prior status quo that has existed for many decades with a substation cannot simply carry on also with the converter station. Now to arrive at that end, practically. We've looked at access. Now, whatever the commercial, practical, legal and otherwise decision making process that resulted in aquin, choosing a site for their converter station, by which they landlocked the site from access, and the prudence of doing that. And whether or not that was a good idea. They are where they are. They've got a landlocked site. helpfully, we know from their design, access statements and other documentation that the converter station is on manned. So it's not going to be needed to be visited very often. It's also we know from Mr. Jarvis and other documentation that applicants provided, it's going to be a bespoke design. And it's going to be a building with components in it design with a design life for 14 years. So we can expect it's not going to go wrong very often, because if it does the contract line behind the design, which can be relied on to sue for breach of all sorts of things, and insurance policies to provide for all sorts of breakdowns. So that's the practical background, I think we necessarily reasonably assume. This is what

20:34

just just because before you continue I conscious now this is not that we're at 1130, you've given me the 15 minutes previously, I'm not looking to pressure you at all at this stage. But How much longer do you think you would be on this particular element of your submission?

20:49

I'm sorry. So I would hope to be able in 10 minutes, I hate giving time limits, because they invariably get broken in you get whipped by them.

20:57

I always like I always like to have them because they are useful, even though they're only an indication and understand. So.

21:03

So, the practical points that will be in the back of your mind is all right. So the carpenters are happy to give up their land for not happy, they prefer not to but that they land they accept will be taken against their will to to locate a converter station on part of it. What happens next? How do you get in and out this building, even if it's on manned? Because sometimes lectricity situations do go wrong? Okay. So they've given some thought to that. And essentially, you may have seen from the land plans we submitted in our deadline one representation. So I think that the there is an existing track within their land that runs up the eastern boundary of the land. Now that connects to the highway along the southern boundary below the yellow strip, just below the dark purple strip. And there is a right of way between the highway and the bottom of that track. And as our as our understanding is, it's simply a right of way, it's not from farm machine, it's just a right of way. So it allows them to put vehicles on it as well. And they use that for access to their farm. Now, if

22:15

I could just come in on that point about a right of way, and I'm not looking for it to be resolved. Now I'm simply making the point is that I understand that to the east, as hard as Broadway farm, you're talking about an access track which exists within plot 160. I, you've spoken in the representations about your clients rights along that access track. I couldn't see any writes in the book of reference, relating to that relating to plot 60. It's a point really to both you and Mr. Jarvis, just to ask for clarification on that at some future stage as to its status within the book of reference. Thank you, right. So

23:00

thank you, we will. So, in order to maintain the facilitative approach the carpenters have adopted in relation to the substation construction and also the extension. Were in the planning application you may have seen for the substation extension consideration was given to use of this boundary track to access the field at its top that our client envisages as our representations, providing a DCA planning obligation that can enable access, where your cursor is along that boundary and track inside of their land, which then tracks westwards. All school southwestwards that's it to the south eastern corner of the footprint of the converter station. Now, our understanding from the photographs that you have before you have that track is that it will enable a light vehicle like a van or something to visit the converter station periodically. So long as there's an entitlement to gain access through that situation. So that's what we're envisaging

and we provided indicative heads of terms and we'll formulate something to show that now, in our submission in relation to the evidence need for periodic annual access to design and access statement envisages three to four times a year that is more than sufficient to allow checks to this Oman building to be taken throughout its life. Next steps in relation to the telecommunications building, notwithstanding submissions that we've made in relation to it. What about access to that unmanned building similarly, surely that building in the middle of field can't be accessed. And we respectfully disagree with that proposition that we've just put up ourselves because As equitable well known, they undertook recently, licenced borehole analysis of the land under licence and the licence terms included and showed you one a plan. And the plan looks like that and finds a sense essentially show continuation of a route from the track I've just described, around to the location on the edge of the field line to the proposed location of the telecommunications building. So in terms of maintenance access, it seems to us that there can be an alternative within the wide parameters of the Rochdale envelope approach, similarly widely framed, adopting the applicants own approach that can enable on our drafting that kind of access to that kind of building, if for whatever reason, your recommendation otherwise the second state says actually no aquin cannot commercial telecoms, that doesn't therefore mean we submit at this stage, that they need to compulsorily acquire the land to get to that building, because a planning obligation can provide them with access. So you could there might be positioned, if contrary to our submissions, the telecom building were authorised in some way, you would still not need to compulsorily acquire the land around it, if we can provide the access to it periodically. Now, sir, in the back of your mind, I think we'll be well, that's all fine and dandy, but what about the transformers, we know that this building is going to contain six Transformers three for each circuit. And there's also going to be a seventh which is a spare. If you were to go to the field notes to the description of development in the environment statement, just bear with me.

27:10

You will find

27:13

in that a helpful illustration in play 3.6 looks like that. Thank you. And that shows the converter station layout. And you'll see sir item four there is a block about central centrally located within the compound which is labelled spare transformer. So, if there is a, we understand from the applicants, submissions to this decio hearing at this stage ca two, that there is a critical need for a transformer. That critical need is important because it identifies as it were the compelling need to have a spare but healthfully and logically aquin had that spare envisage to be on site. And they provided for it to be on site. So the justification for having some other form of access for Transformers seems to be limited to replacing the spare. What we know is that if there's a situation where the transformer fails, there won't be a catastrophic loss of electricity as a reason as a result of no access because there's a spare on site. So that can be resolved. Instead, they'll simply be a need to replace the spare with another one. Well, we submit that if you've got a volume of parameter volume in option B one, which seems to be the jockeys favourite at the moment, that if you've got a 26 high metre volume, you can just keep more spares on site. You can stack them vertically in some form or framework, because we're only dealing with rochow, long below parameters. And if it's so critical, you just have two spares or three or four. So there's no real practical need to maintain an access parameter zone in perpetuity over otherwise decent agricultural land simply for happenstance potential to replace the radically a spare. That's against the

background, sir, that this is a bespoke building. It's been designed by whoever there will be designed warranties against failure against catastrophes. There will no doubt be all kinds of insurance policies to against that situation. They can easily cover the cost for example, of if necessary, and the choices made by that good to not have more than one spare putting in a temporary haul road over the land to put in another spare. But our practical solution, sir is that if there is a need at all to bring in another transformer, one just keeps it on site. One has two transforms. They're only the size of Porter cabins. As we know from the applicants representations, well, you can stack water cabins. So why can't you stack transformer blocks within some kind of steel framework? It can't be said to be unable to be done. And given that Quinn's approach and your experience as an engineer, sir, is that we're dealing with a framework where there's no detail yet envisaged. It seems to us that there's no reason to to have therefore, a 7.3 metre wide haul road permanently crossing the land. So we submit respectfully that that then disposes of the need for the access road to be permanently in situ after the end of construction works. So we've dealt with, in summary, the telecoms building, the fibre optic cables, for commercial telecoms purposes, not for electricity monitoring support function purpose, we've dealt with the access in our submission. And that seems to us therefore, to lead the attenuation ponds, the southernmost attenuation point itself is evidenced by aquin to be parasitic on the access road. So the access road goes, that also gets grabbed up and removed at the end. That leaves the attenuation pond in relation to the converter station to be resolved. In that respect, sir, we've submitted appendix K, which shows that as a diagram, not only the route the track along the western boundary that we've envisaged, it also shows against item six on the top left hand side,

32:01

the approximate location of the attenuation pond Now, just to remind you, sir, and remind those listening, and whilst we see many diagrams and illustrations and plans, the application is for Rochdale parameter volumes alone. So these are merely ideas theoretically, of the outcome of the design principles and so forth. They are not fixed locations of attenuation ponds, roads, or otherwise, only the can. The converter station volume and the telecoms building volumes are fixed. So our view is that there is no reason why if we're going to cut and fill the landscape, you have to put the attenuation pond for the converter building on its south side, when you're acquiring land to its west and east. And so we've shown near numeral eight, there's space there, it could be a different shape, it could be a slot. Now, all of this so you can see the direction of travel is pushing back up further north and bringing in a result of least intrusive interference with our clients land, and practically so so. So where does this get us in relation to land take? Well, you can see the dotted line just to the south extent of the converter building. What we've done is we've tried to estimate thank you for your cursor, we tried to estimate that that's about the the line southwards or permanent landscape that would allow the parameter volume, plus funding plus landscape on top of the funding, plus a trench to carry water coming off the land westwards into an attenuation pond. And that's all that's probably justifiable at all, for permanent situation of the converter building. The little bit the diagram you see above the numeral nine in black dashed, that's where the access could be taken into the corner of the parameter volume converter station. So that provides the access there for that. Now, that leaves the landscape. And we know from the most recent aquin representations, that the landscape is there primarily in their own words for visual effects. What does it mean to be funny, sir, but the carpenters would rather keep their view than have someone's other alternative view of how their view should be. They give up land for the sake of having trees rather than grass. And we don't find it at all compelling to permanently take grade three a cultural

land permanently simply to vegetate it with something that looks like a different view. And we see there's no force in our respectful submission for any need to take their land simply for landscaping. So so I hope in that summary, we pull together the strings of our submissions. We've shown why the telecom is building and fibre optic cable for commercial telecoms purpose, in our respectful submission is not justified and is not legally justified. We've shown that there are rational turn actives in relation to access, there are pragmatic solutions which have not been explored by the applicant with us, but because the carpenters recognise that they are in the midst of electricity city, that that relationship will carry on hopefully in the next century and their facilitative approach remains. And we would hope, therefore, that Quinn would come alongside us in relation to drafting the birth documents that ensure that they have what they need as opposed to what they desire, and that the substation and converter station can continue to live cheap by Java's use pilot yesterday, sir, for many years to come. We've also I think, outline in summary, the situation with access and the situation of the converter station, so. So coming full circle, we can see that the roster long below approach gives flexibility to the to an applicant. You need to check that that flexibility is not abused as the guidance in junk shoe to do the price of that flexibility here, we submit sounds in a problem when it rubs up against compacity purchase situations and the obligation to be least intrusive against the landowner, as opposed to maximum flexibility. And so we've tried to strike a pragmatic, alternative solution, recognising as we do that such a converter station is going to be very disruptive for a period of time to our clients Lancer. So that concludes the summary of topic two.

37:36

Thank you, Mr.

37:38

Mr. Jarvis, do you have anything in response at this stage? Hello, what if I could just ask you to me to mute your microphone, please. Thank you.

37:54

Hello. In the first instance, Mr. Alamos Sullivan is going to respond. And then if there are any of the points that I'd like to pick up or Mr. Byrd would like to pick up in relation in relation to those submissions. We'll pick them up following

38:07

Thank you, Mr. O'Sullivan.

38:14

Thank you, sir Mr. O'Sullivan. On behalf of the applicant. I'm going to run through the points raised by Mr. Rock resort and then in turn, and yet, Mr. Jarvis. Mr. Berg will will then follow up on any other points that I missed, as there are quite a few which have been raised. And I think, first of all, and in relation to the sea of red, which Mr. voert referred to, again, the area that's been identified here, it's for the converter station itself, and the cotton fill operation to create the platform for the converter station. And it

38:51

just hold you there the moment and I think this is happening now. Okay. Thank you. Thank you very much on the on the screen. Mr. O'Sullivan, you can continue now. Thank you.

39:00

Yes, so far the converter station itself and the cotton fill operation which will take place to accommodate the platform for the converter station. And it's for the drainage for the access road, which I'll come on to in a little bit more detail for the telecommunications building. And for the landscaping and biodiversity improvements, which have also been put forward as being necessary for the scheme. And I think primarily in relation to the access road the fundamental aspects here again, they relate to the ability for the applicant to bring in Transformers to the size and the position of the access road takes into account the existing constraints. on the eastern side of the plus by Broadway lane. There are constraints from Existing oil sells underground 132 kV cables. And as we move further west, there is the existing ancient woodland, which is stone acre cops, which is shown on the plan in terms of the proposed alternative routes, which the which Mr. vora suggested which would run along the existing farm track which which is at the eastern side of his his clients property. And this was discussed with the landowners agent at a meeting on the 15th of November. And so the first of all, the key issue here is that the turning circles required for the vehicles which will be accessing the converter station area wouldn't be sufficient to get through that area. The access road in this area and the distance between the ancient Woodlands either side is approximately six six and a half metres wide. And I thought meeting on the 15th of November I provided an overview of the protections afforded to ancient woodland. And I followed this up with an email on 13th of November and setting out that ancient woodland is defined as an irreplaceable habitats which takes hundreds of years to establish and which has been wooded continuously since 1600. I also provided the protection that and the policy said I was in the the national policy statement for energy E and one at the National Planning policy framework. And then also refer to natural England and the forestry Commission's guidance on ancient woodland ancient trees and veteran trees protecting them from developments November 2018. And the woodland trust, practical guidance plan infringement woodland planners manual for ancient woodland and veteran trees of October 2017. And so, the application documents that the applicant has submitted they do make reference to the ancient woodland in a number of areas. And the principle which is being applied as a buffer of 15 metres would be retained from the ancient Woodlands which in turn the if the the access would have been proposed by by Mr. xlarge was to be taken into account it would it would not only result in a road being installed between this area which we believe is practically possible to get the turning circles required and what would also result in the removal of ancient woodland either side of that road and would also result in passing under the would result in the access road passing parallel but under the existing overhead line and configuration, which is shown on the plan. I will note that the existing proposed accessory both passenger the overhead line close to what immediately west of an existing pylon and the reason for this is that in those areas, the the line has actually got a larger distance from the ground and because of the midpoint between two pylons that the line sides more and in terms of the reference to keeping more Transformers on face, again the when a transformer needs to be replaced, you need to bring in an adequately sized crane to to move that transformer into place.

43:58

This in itself would be a fairly substantially sized vehicle. And fundamentally, I set out in the transcript provided for compulsory acquisition hearing one yesterday the defunct Transformers taken off site for

repairs and a new one is brought in as an additional replacement and transformers are expensive pieces of cash. And it's not standard practice to store more than one on site. And again, I think that I've been on numerous power stations between doing re-ups in Scotland and dungeons down in Kenton and I'm yet to come across a configuration which results in the stacking of transformers also. Which I think is especially relevant for these transformers given that they weigh the best part of that 300 350 tonnes and in terms of the reference to the battery storage facilities which Mr. Swart made reference to, and so the applicant has, has had engagement with landowners in the area when, when putting together the plans for the proposed developments. And those landowners have set out their preference. Thus, the plan for the proposed developments shouldn't prejudice their abilities in relation to other proposals they're looking at. Of course, the two and in case being the battery storage, which was proposed, immediately, immediately south of the existing substation, and the other battery storage facility, which is located north of the proposed converter station sites on land owned by Peter and Dawn Carpenter, and with Peter, of course, being part owner of the meat farm also, in terms of the other points raised, I think in relation to the attenuation ponds, again, that is proposed the southern attenuation pond today, and its proposed location is in the lower part of the site. And again, it's the best location for it based on the engineering designs which have been undertaken. And again, in terms of the just the potential, I think, for going back to the access road in terms of the potential for the access road, to be removed and replaced with something more temporary. Again, I think the information provided and the transcript for compulsory acquisition, hearing one clearly demonstrates why this wouldn't be practical. And I'm happy to pass back now to Mr. Jarvis and Mr. Berg, see if there are any additional points to raise.

47:09

Mr. Sullivan, just before you do, I had just one question of clarification. When you were talking about the access track, you compared the overhead cable clearances at the location for the proposed crossing the overhead line, and the track which follows the overhead line for some distance in a parallel fashion. Do you know the difference between the clearances at those points?

47:41

I don't, sir. I don't

47:42

know. If that I wonder if that then could be provided to us in the deadline six submission somewhere, please.

47:51

That won't be a problem, sir.

47:52

Thank you.

47:54

That was all from me on this. Just a bird, Mr. Jarvis.

48:06

So yes, the only point I think we would want to add is in relation to landscaping, which was raised. As you know, from evidence that you'll hear next week, very careful consideration has been given to the landscaping and the converter station. significant improvement in the relevant planning authorities. And we consider that the extent of landscaping which is proposed is the minimum which is necessary in order to mitigate the effects of the development.

48:34

Thank you.

48:36

Was there anything else from the applicant at this stage? Thank you, sir.

48:42

Thank you, Mr. Swap, then,

48:46

would you proceed with your third topic, but just before you do, am I right to remain with the indication for 15 minutes? Or should it be something else?

48:56

kind of say 20? Sir, thank you

48:59

very much.

49:01

I'm not going to respond to the points just made, other than to help me note that aquin is helpfully it appears engaging with us by providing new information, for example, about transformer weight and clearance heights. And we anticipate perhaps over the Christmas period, having some dialogue with them to try and enable them to get practically what they can with our systems.

49:33

So in relation to funding. This arises in a number of different ways, but can I just set the scene this way? And we heard yesterday your request to aquin for a KPMG documents about electricity, marketplaces. funding,

50:01

Mr. Smart if I could just hold you there. I've just noticed that it is actually on 12 o'clock now. And I think it would be useful to actually take the break now, rather than actually take it in a couple of minutes when you actually get into this particular topic. So, on that basis, it's just on 12 o'clock now. I will actually take just a little bit longer than than five minutes. I will adjourn the hearing now to be resumed at 1208. Thank you.

50:32

Thank you, sir.