

# TEXT\_ISH4\_Session1\_A47Blofield\_09112021

00:07

Good afternoon. Can I just check the people can see and hear me clearly. Yes, I can. Thank you. Thank you very much. Can I also confirm with Miss Allen that the recording and live streaming of this event has commenced? Yes, thank you. Thank you. The time is now 2pm. And the hearing is open. I'd like to welcome everybody to this issue specific hearing in relation to the application made by highways England, who is now national highways, whom I will refer to as the applicant for the A 47 Blofield to North Burlingham project. Today's issue specific hearing, I'll be considering the draft development consent order, or the DCO and some environmental matters. My name is Alex Hutson. I'm a chartered town planner and the chartered landscape planner. And I hold academic qualifications in these areas. I'm an examining inspector employed by the planning inspectorate, and I've been appointed by the Secretary of State to be the examining authority to examine this application. There are three colleagues from the planning spectrum here this afternoon, Miss Allen, the case manager, who you will already have met and James Bunten the max Baldwin also from the case team. If you have any questions regarding the application process in general or the technology being used, please direct these to the case team in the first instance. And I'll deal with a few housekeeping matters. Firstly, can I ask for all audible notifications for electronic devices be switched off. And unless you are speaking, you have your camera microphone turned off. If you do wish to speak, please use the raise hand function. No request to be made for any special measures or arrangement to enable participation in this hearing. Can I just check this is correct? Yes, that's correct. Thank you. If you lose connection, please use the same link that you use to log on and the case we will endeavour to reconnect to you as soon as possible. If for medical or other reasons and ROM requires a break at a specific time. Could you please let the case seem though and I can hopefully adjust the programme to meet your needs. Should anyone watching the live stream experience a problem a digital recording of the event will be published on the national infrastructure webpage as soon as practicable after the event has ended. For the purposes of identification, as every point in which you speak, please give your name and if you are representing an organisation or individual who it is you represent. Does anybody have any questions or concerns about the technology or the general management of the event? Okay, I'll say no hands raised. So I'll move on. I included information about the purpose of this issue specific hearing on matters around digital recordings and the general data protection regulations on the agenda document which was published on the third of November. As such, I do not intended to go into detail on these matters here. However, does anybody have any questions on them? Okay, I'm seeing no hands raised. So I'll move on. It would be useful to have a copy of the agenda to hand I'd just like to add that in addition to those items listed on the agenda and Item five, environmental matters. I also intend to ask some questions on cultural heritage having considered the evidence further. Are there any questions on that? Okay, moving on to the purpose of holding the issue specific hearing. The examination is a predominantly written process. And I've already asked a number of questions on the draft development consent order on the environmental matters in my written questions, which parties have responded to? I've also held previous issues specific hearings on these topics. I'm familiar with the documents that have been submitted. So when answering the question, you do not need to repeat at length something that's already been submitted. If you want to refer to information already submitted, please use the

appropriate pins examination Library Reference. While so may not ask a specific question or cover a particular topic that you're expecting. It's not necessarily that I've that I view this matter of satisfactory, it may indicate cycles consider that I've all the information that I need on this topic. I'd like to remind everyone that this is not an inquiry and therefore there'll be no formal presentation of cases or cross examine nation. Any questions that you may have for the parties needs to be asked through myself.

05:06

If you cannot answer the questions that are being asked or require time to get the information requested, rather than giving a restricted or potentially incorrect answer, can you please indicate the need to respond in writing? I can then defer the response to that action point. Before we move on to deal with the items detailed in the agenda, are there any questions at this stage rather procedural side of today's hearing or the agenda?

05:35

Okay, I'm seeing no hands raised. I'll move on. And I like to take names of those who wish to speak at this hearing. If you have a representative, can you please state whom you represent? So I think firstly, starting with the applicant. So good afternoon, Richard Guyatt partner at Womble bond Dickinson at UK LLP, which I refer to as web D from now on, if I need to sir. And I am here on behalf of National Highways limited. I'm the Lead legal advisor in relation to this application for development consent. And so there's quite a troupe here virtually, would you like me to go through them and ask them to each and introduce them selves to you and the other attendees? How many of you are there in total? I make it a roughly 10. So I it's probably now's a good time to flag up as well that we do not have a cultural heritage experts available to us. But we can come back to that in due course. We weren't aware that one was needed. But I just mentioned that now. And obviously that is clearly something we may need to take away. We're doing what we can, but are you able are they able to attend at all not finding out sir. Okay. I think perhaps maybe for expediency, maybe people introduce themselves as and when needed. That's fine by me. So I think other than me, probably everyone else has spoken in the examination before so they've been introduced you previously. So I should just add, I went ask them to introduce themselves. But so this is a triple header as far as WB D is concerned. So it'd be myself, Mr. Dagg and Miss Holmes who of course you you're recording it out from previous ice age as well. Between us well, we'll we'll deal with the points. Okay. Thank you. Thank you, sir. Okay, moving on to local authorities. Norfolk County Council.

07:41

Afternoon so it's David Cumming strategic transport team manager at Norfolk County Council.

07:49

Thank you. And Broadland District Council.

07:57

Good afternoon, Sir Charles Judson Broadland District Council.

08:02

Thank you and interested parties. Councillor Davis? I believe you wish to speak today.

08:17

Yes. Thank you very much, sir. So I'm Councillor Jan Davis. I'm a councillor for Brundle ward. And parish councillor for Campoli, Limpopo and Southwood with an interest that are at my comments, my own individual comments.

08:33

Okay, thank you any other interested parties today who wish to speak Mr. Hawker.

08:54

Good afternoon. My name is Richard Hawker. I live in hockering. But I am a member of the one Sun Valley Alliance. And I depending on how the the hearing progresses on I'd like to say something particularly about climate change.

09:15

Okay, thank you Mr. Hawker. Any other interested parties? Present who wish to speak? No. Okay. And there are there are other in these statutory undertakers here

09:35

No, I can't see any on my list either. So I shall move on. So moving on to agenda item two statements of common ground. Can the Applicant please provide just a brief update on stamps come around? I don't. I don't think I've received any signed ones as of yet. Service search again, web de mais probably wondering why I've launched in, because it's going to be her not me that's going to be talking to you about students a common ground. I prayed I was too slow in virtually raising my hand at the end of agenda item one. And the point. I know, it's my fault entirely. So I should have mentioned it. Before I introduce myself and others. It's just mentioned the the letter that we sent you last night about the change of name. In relation to highways England, there'll be national highways limited. So I, I fully expect will cover this item for but I just wanted to make sure that that was your understanding all so you didn't want to deal with it in any other way. I just want to not flag the point. And also to apologise that you got the letter yesterday, not earlier. Yeah, I was planning on doing that at the end under any other business. Thank you, sir. Okay, as just a niggly little item that we don't want to miss. Yeah, of course, we'll come back to that. And if I don't, please remind me. I should try that. So that was all for my my intention. I'm perhaps if I can ask Miss May come in on the streams coming around, please.

11:12

Do Sophie May on behalf of the applicant? Yes, I'll give you a summary where we are with each of the statements of common ground. As we touched a new we haven't yet received any signed ones. The most progressed is Environment Agency that we have agreed all points and that he's out for sign off with the Environment Agency. I'm hoping that we'll get into the next deadline. But we'll submit that soon as it's it's ready. And the other is we're starting from Norfolk County Council. So we are actively engaging with Norfolk County Council to go through each of the matters in the state of common grounds, we are making progress. Albeit due to the number of matters involving a number of people it does take a little bit of time, but the really the key points that are I suppose taking more time than others are the chunking adaption of assets, which made progress on irrespective we shared asset plans and

are discussing the finer detail of how that works. And and in respective which are walking, cycling horse riding, it is likely that will not agree on the matter relating to the essential crossing points. And all other matters, I would expect to be agreed by the end of the examination. Broadly broadland District Council we had a good meeting actually yesterday where we discussed all outstanding matters. We've agreed now 17 of the 25 matters. We have agreed to not agree on the walking cycling horse riding matters. There are four relating to the crossing in the central one relating to connectivity to Akel. which you'll see in the next submission and is similar response to opposition previously. The other current state of common grounds and Natural England unfortunately not had any contact from Natural England we have reached out to them. We don't believe there are any matters are outstanding, that are agreed. Guess the patients were comfortable with the position. We haven't had a relevant representation or read representation. It's just we haven't got a confirmation back. And Historic England, we're just currently waiting feedback. We believe all matters are resolved, or that there's no outstanding issues. And that should just be a matter of getting it signed and agreed. And there's a new one. Obviously, we touched on Anglian Water this morning, where we did Mr. Dagg spoke about so we've drafted that statement for common ground. Unless Mr. Dagg would be pester speaking about that, the details of that. And the final and say the common ground is blofield parish council with a don't believe any reason why we won't have that agreed before the end of examinations, a number of matters of detail primarily relating to the car park, what we will provide at the end of the scheme, how we're going to manage the interaction with them throughout the construction phase, which we've got a meeting on Thursday the 11th. So yeah, just yeah, this coming Thursday to discuss and hopefully agree those matters.

14:58

Right. Okay. Okay, thank you for that. I think Caden was at another one. But I think we discussed that this morning.

15:07

Yeah, the my. Mr. I don't believe that we've actually proposed. We haven't drafted stone concrete at the moment. Mr. Dagg. If you're able to revise

15:19

after that a state that there isn't a state of common ground in circulation with cadent. I don't think one is needed because we will have agreement with Caden.

15:30

Okay, thank you. Anybody have anything else to add to? Agenda item two? From the council, the District Council, that's all. Mr. Cumming

15:57

Thank you. So it's David Cumming Norfolk County Council, I can only really confirm what Ms. May has just said in terms of our negotiations are continuing discussions are continuing on our statement to common ground with the applicant. It is taking a long time, as you'd appreciate Norfolk County Council is dealing with three separate a 47 projects. And between them, they are taking a lot of resources, but we are moving forward as quickly as we can on each of the statements of common ground. As indicated, I think there Miss May so picked out the most pertinent points where we're probably not

going to be in agreement around the the walking cycling links and the adoption, we are probably going to have a slightly different perspective as well on some of the the surveys for for cultural heritage, etc. But I think that those are going to likely be sort of minor points, rather than anything, particularly major. But I think we would probably be best to leave the detail if I may, to the actual statement or common ground because I would be speaking on behalf of specialists who have very detailed technical knowledge, which I don't have, I'm afraid.

17:24

Okay. Okay. Thank you. Mr. Judson. Did you have anything to add to that?

17:32

Charles Judson Broadland District Council? No, sir. Really just to confirm what Sophie May said we're working towards having a completed statement of common ground will be unlikely to reach agreement on the the WCAG issue.

17:49

Okay, thank you. In that case, I'll move on to agenda item three. We already discussed this briefly. Well, we discussed this this morning. And I'll just for the benefit of people who weren't here or who may be watching the live stream. Regarding the change request made it deadline six, I note that it is larger reflective of the previous change request made by the applicant, which I declined to accept for the reasons given in my procedural decision dated the eighth of October. Given the similarities, I think it'd be useful again just for the applicant to provide a very brief description of the change as you did this morning. The change request the reasons for it, please, Mr. Guyatt. So thank you, Richard Guyatt and WB D. So so this change relates to the repositioning the relocation of what is known as a block valve a compound, which sits on the crossover of the two a cadent gas pipelines. So the East West pipeline, we are moving as part of the scheme or intend to move as part of the scheme to allow the new 847 carriageway to be constructed. This results in the need to move that block valve a little to the south so that it sits on the crossover with the two pipes the East West pipe which we are moving and the north south pipe stays in situ as a result of that there's a need to slightly extended access track it so that Kayden pinned access its new block valve and we need to amend the reference land plans and our powers so as to allow a little bit more new rights. And a little bit less than the temporary present. Well, same amount of temporary possession actually is the addition of a new right to extend southwards. So don't if that's sufficient for now. I mentioned it now. So as well, though I respond to in relation to this morning's hearing. But I have reminded myself of those unknowns that you were concerned about, and rather like the 1925 deed, they are actually benefits and burdens on the title. So I think we're going to be able to, let's hope, anyway, satisfy you, sir, that those who are interested can be disregarded. But appreciate so that won't make very much sense to those that weren't enjoying this morning's discussions. So I should leave it there. Okay, thank you. So you're, you're put all that, obviously, I will say. Okay, thank you, Mr. Guyatt. I think that's, that's all we need to cover. For the agenda item three. I've got there may be some questions later. relating to what, whether that impacts on certain things or not, but in the meantime, does anybody have any questions on the comments on the change request?

21:05

Okay, see no hands raised. So I'll move on to Agenda Item four, which is the draft DCO development consent order. So the most recent version is the revision for with examination Library Reference rep five dash 00 to be useful if people had a copy of that sand but I think we'll we'll share it. I'll share it shortly anyway once I get on some questions, but can the applicant please very briefly highlight some key changes to the DCO since the first version discussing the previous issue specific area, which was revision two, which was submitted the deadline three days?

21:57

Certainly, sir. Stephen Dagg from Womble bond Dickinson so there are there are an I was briefing as quick as I can. But I think there are 11 main changes that have been made since the last hearing. The first is to amend article 20, to remove the right to use watercourses and public sewers in line with chapter 13. As we have amended article 33, paragraph eight, to make it clear that the undertaker can't acquire the freehold freehold of the subsoil or airspace of land, which is sheduled as temporary only land and that's a concern that you expressed. We have deleted article 45 in relation to appeals relating to the control of pollution at 974. There are a number of amendments that have been made through the requirements to add the lead local flood authority and the Environment Agency in his consultees in respect of requirements. Requirements six, which relates to contaminated land and groundwater has been amended, so that the determination in relation to remediation is determined on the basis of the findings of the risk assessment as opposed to the findings of the undertaker. And we've also added a provision that that the remediation must, in addition to what it was originally to do, must also prevent any impacts on controlled waters. We have amended required eight to remove references to foul water drainage on the basis that the final scheme does not include any foul water drainage. In we've made a minor amendment to the classification of to reflect the classification of road roads plans in shadow three part one by adding in an entry in relation to point A to G shedule three, Part six and shreddable for part two have been amended in respect of the new length of cycle track, which were previously included as footpath or footway, and that's led to consequential amendments to shadow one amending the reference in certain works to refer to cycle tracks and also amendments obviously to the rights of way and access plans. Shuttles five nine were amended to include to reflect the change request to add new plots into the schedules relating to temporary acquisition and to the acquisition of the rights to more Sir, do more to go. In sheduled nine Paul Three and Four, we've included amended protective provisions, Anglian Water for cat and gas. And finally, in sheduled, 10, we've amended the sheduled to identify the details of documents to be certified. So again, as you have requested

25:20

Okay, thank you, if you can make sure that that list is updated at each submission.

25:31

So there should be there should have been a list of changes submitted to you. I'm sure I've seen on on the website. So for each for each order when it's revised draft order, and it's been

25:45

Yes, yeah, I've just I'm just talking about the list of Doc documents be certified. Oh, yes. Yes, of course, there's update to that each, you know, just to reflect documents that are submitted at the same deadline. Yes.

25:57

Understood.

25:59

Okay, so take it, we'll take that message away. And we didn't put in a draft DCO last time around. So but I think from now on it gets we'll get into a bit of a muddle if we don't. So that's definitely, definitely an action for us. Thank you. Okay, thank you. Okay, so, I've just got a few questions on the DCO some of these might overlap slightly with lakes questions on environmental matters.

26:29

Is it possible for one of my colleagues to share the DCI documents please if you could scroll down to page 57 I just need some clarification on where footpaths are referenced in the DCO

26:53

and where these are shown on the rights of way and action plans and the master plan just to ensure consistency between all the documents so on page so sheduled six sorry shedule three part six the third row down on page 57 writing to sheet four the it makes reference to a footpath so a footpath from point FP four to FP five on the rights of way and action plan or sorry on the rights of way and access plans

27:51

is it possible to bring up sheet four of those please It's the rights away plans rather than works plans. If you can zoom in to the inside the the insert box

28:57

where you're Yeah, so where we have the green dashed line here. This is where we're talking about on the in the DCO. But so the dig the draft DCO talks about a footpath but this is that green and the key for this on the right way and action plan is for is a foot way is a post the distinction or is this a is this a incorrect? Does this need to be dashed brown looks?

29:30

Yeah, so it looks like an incorrect colouring on the plan. So a footpath while a foot way is is what you would normally think of as a pavement next to a carriageway footpath the freestanding highway which only carries rights for pedestrians. So if this is being shown on the plan as a footway, it should be it should be shown on the plan as a footpath. The rationale of course being that this is a replacement of a replacement for by three where it's being interfered with by the new access road

30:15

okay so that's that's just that's just nice changing to brown brown yeah other any other is that the only footpath on the rights away election rights away Lexus plans everything else is either a cycle track or foot ways that right

30:34

I think that's I think that's right now so yes obviously the the the East West was originally a footpath but but I think this is the only one remaining remaining part which will be a footpath so yes

30:48

right okay if we could just go back to the DCO document please so if you go to page 62 sheduled four parts one go down to sheet five on page 62 There's reference here to a new public footpath should that be a retro they refer to a new cycle track

31:37

I'm trying to figure out from the description precisely where this where this is suddenly direction

32:01

because the only footpath is where we looked up before

32:05

I think I think that's right so I think it'd be helpful to see the right of way and access plan the same time which i i do have

32:21

I do have here sort of a time sheet five this is a six so yeah, so that should that should be referenced to the new

33:28

sidetrack. So it's it's it's a description of highway which has to be stopped up basically from the existing a 47 down to the new cycle track. So that's, that's an amendment which we'll need to make to that part.

33:50

And then in sheduled, seven if you could scroll down to sheduled seven so sheduled seven, refers to the construction with a new footpath again in relation to a number of plots including three two c three two D 475. One A and five one c. So this also refer to a cycle track rather than a foot rather than the new footpath. So sheduled seven

34:48

could you just confirm which engine I'm looking at?

34:50

Yeah, so all the thing is on page 89. If Well, If you look at entry three to see for example which is on

35:20

page 96 Okay, so here it says required for the sake facilitate construction of a new footpath and access road and then that's also referred to in three to D four seven a five one A and five one C I think that should refer well I think that's probably referred to cycle track again that sort of footpath.

36:02

I think that's correct. Yes.

36:06

Okay, George, read those numbers out again for you.

36:10

Yes, if you could please I got three two d. So three

36:13

to C three to D four seven a five one a yes. And five one C thank you and then if we go to just work number 17 A which is on page 37. So it says what work to support the reclassification of the existing a four seven provision of shared use cycletrack That's the only reference to share to use cycletrack Everything else refers to cycletrack because the definition of cycletrack includes rights away on foot anyway. Yes, I just wondering whether is this a differentiation for any particular reason or is

37:29

it isn't an intentional differentiation? I think it's it's probably a stray use of the term shared use I think the those words need to be deleted from the next iteration of the Odyssey

37:42

okay. And then if my one of my colleagues could just bring up the Master Plan please any any page actually maybe sheet three not sure if it's one document or whether it's all separate that's been submitted so if you go to the zoom in down to the bottom to the key

38:26

if we go down to the right Okay, keep going. Okay, stop. So the awesome there is we can see it says new footpath. If you just go up if you just scroll up to the if you scroll up a bit to the road corridor just scroll up scroll up to the road corridor. Yeah a bit further up stop. So all the masterplan again it's showing it showing the footpath and my understanding is this is you've you're posing for this to be a cycle track. But the key doesn't show cycle track only shows footpath. So this needs this should this new chapter

39:24

needs to be tracked and updated.

39:28

Okay. And also the most recent version of the master plan that was submitted all the while some of the pages seem to have gone slightly awry. So the key plan is now appearing as like further down rather than the beginning. And all the squares which show which part of the planets referring to seem to have disappeared so good one of my Colleagues just show show the key plan these?

40:35

Sorry, I'm looking at it separately on the master plan document I see it appears to slip down at page 12 Squares aren't there?

40:46

Yeah. So it makes it difficult to follow.

40:49

They should they should be there. So I think when we when we come to look at the the footpath issue, we will look at will we'll look at this and get it corrected and moved up as well. So,

41:04

right, okay, thank you. Okay, if you can remove that plan, please. Yeah, maybe not. And so ask question previously around whether working hours should be specified in the DCO. And this matter was also discussed on the previous issue specific hearing into the DCO. Now recognise that G one of the record of environmental actions and commitments or riq. Within the environments management plan relates to working hours. However, it's not particularly detailed, insofar as it does not specify or clarify situations where working outside normal working hours might be needed. Sofia can explain why such detail is not specified in G, one of the rake. And also, whilst each case should be considered on its own merits, is the applicant or are you aware of any other made GCOS including relating to highways projects where the environmental management plan and Reek is used to control working hours rather than specifying working hours? And then the exceptions to the under a specific requirements of the DCO?

42:24

So I think this is a question where I'll have to ask one of my one of my colleagues to step in, I'm not sure what that would be. Mark Murphy, or Sophie May.

42:41

Said, unfortunately, as Sophia, I'm able to answer that question, either, so may take it away. Yes, Mr. Guyatt

42:50

it's I'm not sure I can shed any light. So as far Richard Guyatt WVD? I think so we'd have to take it away and have a look at other examples. It may be that there are other examples of highways England or national highways, DCS that control working hours. My understanding, however, is it's usually not the case that working hours are so controlled because of the need to do work at night because of not interrupting the flow on existing carriage ways. And I suspect that is what we will find. It's quite a detail point. I don't want to go wrong on this one. I think we may see Mr. Hawker wants to contribute, but I think that's where we will find ourselves that the answer is that that working out restrictions are tend to be avoided. And controls are usually dealt with through the local authority in the controllers police clip. So he controls Pollution Act Section 61 processes, but if I may leave it there and if we can take it away as an actions Okay, so considering the whether it should be a requirement or whether more detail needs to be put in into G one, perhaps to specify maybe what exceptions might be needed outside of normal working hours. Mr Hawker.

44:26

Thank you, sir. Richard Hawker, Wensum Valley Alliance. I have to contribute to this. I was looking through my notes because I did attend last week's hearings for the A 47 North Todman scheme and I'm trying to look for my notes because I'm almost certain that working hours were specified in the DCO for that scheme

44:53

Okay, thank you. Okay, Mr. Guyatt, all If that with you to follow up. Thank you, sir. Yes, we will obviously respond. And grateful to Mr. Hawker for his indication, that is an order that colleagues of mine are dealing with. So we should be able to check that very easily. Okay. And just one further question on the DCO. And requirement three, which has to do with detailed design. And I've asked, I've asked this question before, but I just want some further clarification. Why is the general arrangement plan not specified, or, for that matter, the Master Plan, or rights away in an access plan, given that they provide a greater detail on design than simply the engineering drawings and the works plans?

46:05

So the the, the wording of the wording of the article is based on precedent, I think, possibly on the last last deadline on before that we provided examples of some orders where this element was set out. So we have, what we've done in relation to this, this requirement is to is to follow the precedent in terms of in terms of citing the works plan, I actually, rather than requirement in front of me at the moment, but it seems to be a fairly, fairly universal, funny, affiliative universal way of proceeding to cite things in the way that we have cited them rather than to include more, more detail in there.

46:58

So what's the purpose of the general arrangements plan which of the moral is more as much more detail than the others? So it's Richard Guyatt. WVD. To my understanding, the GA drawings are largely hesitate to use words illustrative because they are more than that. And no doubt by the time one runs through what's in the reaction of the Gauss there. They're relatively they're more than just illustrative but it's there to put some, some context into what would otherwise be fairly impenetrable for most people, including lawyers, frankly, works plans. So you know, what to agree with and support what Mr. Dagg says that really is. This is how it is done with higher eating national highways limited. And the GA is a useful and helpful and informative but it's not there to sort of pin down the detail to, to effect create this as being a effectively a full planning permission. There's a degree of flex but not very much. And that's something I'm sure that national highways would wish to preserve. Right, okay. Okay, well, they were all the questions I had. Thank you. Consider your answers on those. Is there anything anybody else wants to raise with regard to articles schedules or requirements in the draft? DCO, Richard Hawker.

48:44

I think Richard Hawker went some value lines following my intervention a moment ago, I've managed to find my notes. And in fact, I have noted on the north Tottenham that the working hours are in the React table. 3.1. So please ignore my earlier statement.

49:08

That's okay. That's okay. But I was I did ask that because if they could, if they were were really made the CEOs as well as to what was in the pipeline, so we'll take it away. We're very grateful to Mr. Hawker for saving me a bit of a job. So thank you, Mr. Hawker for that and absolutely. So we notice what you say and we will talk through the mate DCS and let you know what we find. Okay, thank you. So agenda item three. Sorry, agenda item five is protective provisions. But we discussed these this morning. At the compulsory acquisition The hearing. So I don't think we need to cover that again here. Unless there are any statutory undertakers who have joined since since we opened, but I don't think that's the case was Alan, could you just confirm that please?

50:32

Oh, Mr Bunton, can I just confirm without no one joined from a most statue Undertaker's during the hearing?

50:43

Not to my understanding.

50:45

Okay, thank you. In that case, I'll move on to agenda item six, which is environmental matters. So, firstly, first of all appointments climates, including clarification around cumulus assessments and carbon budgets. I just wish to seek some clarification from the applicants on matters around climates, cumulus assessments and carbon budgets. And this, Dr. Jackson was almost Dr. Jackson, wasn't it? That's right. Yes. Okay. Thank you. So you're, you're going to be answering? Yes.

51:32

Okay. And I'm joined by Miss Holmes, that web as well. Okay.

51:37

So I'd just like to run through my understanding of this matter and where you're coming from, and then ask a couple of questions on it. So the national networks National Policy Statement recognises that the impact of road developments on aggregate levels of greenhouse gas emissions is likely to be very likely to be very small, and that this is unlikely that the impact of a road project will in isolation affect the ability of the government to meet its carbon reduction plans. Furthermore, it sets out as the government is legally required to meet its carbon reduction targets. And the increase in carbon emissions is not a reason to refuse development content unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of government to meet its carbon reduction targets. And the national networks policy statement is the policy which I have to have regard to in determining this application. Nonetheless, the national networks National Policy Statement requires an assessment to be made of any likely significant climate factors in accordance with the requirements of the EIA directive, which is apply through the infrastructure planning environmental impact assessment regulations 2017, or the EIA regs and in respect of road projects, evidence of the carbon impact of the project and an assessment against the government's carbon budgets the whole correct yes. Okay. So the EIA regs and schedule for paragraph five require a cumulative assessment to be undertaken, including in respect of climate, as does the design the dmrbl 104 guidelines. So the design manual for Rosen bridges la 104 guidance. That's correct as well. Yes.

So, in ies, chapter 15 which is cumulative effects assessment. The table 15 One under climates, it states that as the construction and operational phase traffic data includes traffic associated with other developments. The emissions assessment reported within the climate chapter is inherently cumulative. So turning them to as chapter 14 And it might be useful if one of my colleagues could could show this on the screen which is rep two dash 002

55:00

And if you go down to page 15. Sorry, page 16. So, we have a table 14 Nine and 1410 Sorry. So table 49 sets out the carbon emissions baseline or do minimum scenario

55:46

versus the carbon emissions total or do something scenario. And the difference in these figures is then assessed against the fourth fifth and set carbon budgets, National Carbon budgets and then table 1410 The percentage of the carbon budget is arrived us which is equal to or less than naught point naught naught 1%. So, if you move back up to the table 49. In in the baseline, you have included vehicle emissions from other road projects, such as the two other a 47 and CIP schemes currently go through the ENSET process, the large Western link road. But is that, is that right?

56:47

Yes, that's right, say as per the traffic model and the affected network.

56:52

Okay, so, firstly, have you included the envelope is the embodied carbon emissions from the construction of these projects in the baseline?

57:04

So, no, not within the baseline, the embodied carbon emissions are what is a in the second second row there the construction for do something emissions and that is within the site, or excuse me, the study area are set out in DL and RB la 114. For the construction emissions.

57:23

Okay, so just I've decided to start in the baseline. The emissions from other schemes are included, but not the embodied carbon from the schemes,

57:32

the emissions from end user emissions and end user. tailpipe emissions.

57:37

Yeah, but not the embodied emissions? No, that

57:40

is correct. Okay.

57:44

So in the construction do something that is from the project that we're looking at on its own

57:59

Yes, that is correct, that is the proposed scheme and the study area as set out in dmr, hely 114.

58:07

Okay, the operation do something. So definitely the do minimum, they do something total relates to just the scheme on its own just just the scheme we're looking at.

58:25

So, the difference between the operation do something and do minimum we'd have a operation of the scheme. So for example, energy through street lighting, and also the the end user emissions from traffic which is for the whole effected road network.

58:43

So, the difference between the baseline and the total. So, the road at the bottom do something versus do minimum takeaway do minimum that those if that figure of 35 to five three is just relates to up to the project that that where this application relates to.

59:06

That is correct. So, in that it is the the emissions associated with the construction and operation of the scheme A with regard to a cumulative assessment, the A and in accordance to le 104. There is a two types of assessment there a first single project and the emissions associated with that through a the construction operation and use phase A including end user emissions and also a within the affected road network. There was a cumulative assessment in that it takes into account the other schemes that you've already mentioned, on the 47 and the Norwich link, sorry, Norwich Western like

59:50

okay, so I think what I'm struggling to understand is how it is. If the date is the difference that you used to look at the carbon budget, the difference only includes our scheme. And I'm struggling to say how that then becomes is cumulative, because effectively the baseline if it was zero, or if it was, say, a billion, the change would be the same. So I'm struggling to understand how how it's inherently cumulative, when the baseline figure has nothing to do with the the figure which you then feed into assess against the carbon budget.

1:00:39

Hey, with regards to the traffic assessment, and I might have to refer to my colleague, Mr. Battershill, who is the transport a side of things. But with regard to the assessment done with follow the Department for Transport, say tag guidelines on how this has been done. And for the projects that should be included within the assessment, a as my assessment a has come after the traffic model was done, I might have to refer to Mr Battershill, to give a more informed answer on how the traffic model has been put together.

1:01:19

So as their assessment is their assessment of the proposed development on its own against the current baseline? This doesn't, that isn't that what the MRP guidance suggests is done, as well as the future baseline.

1:01:43

So as far as I can see, from dmr, a, we the assessment is to be done a modelling that do something versus or against do minimum with regards to the affected road network, which will include a projects which are a significantly far into planning a, which is why the other schemes have been included within that. But again, I'll have to refer to Mr. Battershill

1:02:07

But, okay, but whether whatever is included in the baseline, the actual, the end result would, wouldn't change with it, because the change only relates to the project that we're looking at. So for example, you do not you don't take the baseline, and then you take the difference of the scheme we're looking at. And then you take the base, the current baseline, and then you look at the scheme we're looking at, with the other schemes to see the difference. You include those other schemes already in the in the baseline. So they're not that I certainly say how they're, they're how that's the cumulative assessment.

1:02:55

I'm going to have to ask Mr. Battershill to answer the questions from the traffic model and how that has been derived.

1:03:03

Hello, David Battershill, on behalf of the applicant, CA. In terms of the traffic model development, we follow the DFT transport appraisal guidance, say that's tagged guidance, and they require us to develop a core scenario. So the core scenario includes all our developments, both transport and land use developments, which are more than likely or near certain. So we developed a uncertainty log, we capture all of the developments in the area, we classify their likelihood and those ones which are more than likely a new set and are included. So as part of the transport model, do minimum scenario, it includes the very 47 projects and the N WL project. And then similarly, a do something core scenario is then created, which is the additional scheme on top. So the difference between the two is the scheme. And that's the process that we follow. Additionally, we done a you can do sensitivity tests to look at those different arm developments, removing different developments. And I believe we can look at those as part of further further work.

1:04:31

Right. So I understand about the transport model. What I'm not fully understanding is how it's inherently cumulative. If the figure that your base pushing against the carbon budget is just the project on its own, because the baseline doesn't feed into that. So how can it be cumulative As your unless you have a baseline without the other schemes, and then you look at our might that our scheme on its own and then with the other projects and group them together that way, I could see how that might be cumulative. But with the other projects in the baseline, and using the change, which is the figure that feeds into the carbon budget assessment, it's you're only ever looking at, you're not only ever, ever looking at the project on its own. I'm, I'm struggling to say how it's a cumulative assessment.

1:05:35

But I don't think I can just go into the details on top of Dr. Jackson. He does the quality ups in terms of the transport modelling assessment, it's designed to try it the only difference between the demonym or do something is the scheme. That's the way the transport modelling assessment is derived.

1:05:58

So okay, so is, is there a cumulative assessment of greenhouse gas emissions? That feeds into the car? Looking at the carbon budget? Or not?

1:06:19

I think, yeah. I've outlined the transport model, I think after defer that question to a colleague.

1:06:28

Can I just assist in terms of the decision making framework, because the the complexity comes because of the requirements in the national networks NPS for the significance of the scheme to be assessed at a national level. And that is, obviously in the context of carbon budgets. And that is the test obviously, that Parliament determined should be used as the test for the significance to determine likely significance of the carbon effects of the project. And there is no provision in the NPS for any other level, to have carbon assessment to be undertaken for these projects, and that is reflected in the approach in the DMR B's and in the assessment that's been presented. In the context of this scheme, the Secretary of State will look at the test that has been defined is the one that is set out in the NPS. And then in accordance with the EIA regulations, the information that is necessary for the Secretary of State to take into account in determining significance of carbon emissions. Is that that is at the national level in the context of the carbon budgets the the EIA regulations don't dictate to Parliament, the level at which a particular significance is to be determined that is a matter for the decision maker in accordance with with a legal framework and the NPS in this case, under Section 104. There are no other carbon budgets that are material in the determination of this application, because the NPS does not identify any that are material it is the carbon budgets themselves and hence the test that has been defined in in the NPS.

1:08:32

Okay, but the EIA regulations? Yes. By talking about them, shouldn't there be a cumulative assessment of this project with others?

1:08:50

Well, that's in the carbon budgets because it's, it's not possible for our scheme for all for you or the Secretary of State in this particular case to look at the array of other complex matters and other projects and other sectors of the economy because of course, carbon budgets aren't just restricted to development projects. To go through and choose one or the other, based on the information that is presented in the context of those schemes. So for the purposes of this scheme, the Secretary of State requires information on whether the carbon emissions from this project are of such a scale that they would impede his ability to well ability relevant time to achieve the carbon budgets that are defined in the Planning Act. And that is the test of significance.

1:09:51

Yeah, I'm still wondering. So the other the other projects are included in the baseline. So you are including other project of the road projects,

1:10:01

not in terms of assessing the significance of the carbon emissions generated by this project, there is no measure mandated by Parliament to do that, but all all of those carbon emissions will be factored in to the carbon budgets should should all the schemes proceed? Right.

1:10:22

But what's the purpose that are included in the baseline? Because the baseline, what does it tell us? Because all we're looking at is the change and that you can know the change without even having a baseline.

1:10:34

Okay, I'm gonna pass on to methodology matters to Mr. Murphy.

1:10:39

Good afternoon, but lawfully environmental impact assessment or EIA coordinator, on behalf of the applicant. So the the intention of the watering, being that it's inherently cumulative is that yes, you have the if you're building other projects, see, our housing scheme that's attracting X amount of cars, is that our scheme would perhaps divert those cars or change the speeds of those cars. So in the baseline, you have the traffic moving as it would including including those projects. But when we build our proposed scheme, what's been modelled is hybrid, that proposed scheme, change those car movements, so that the different speeds and potentially different movements. So it's not just a case of our scheme on top of our baseline, the baseline, do something scenario includes how that traffic would change. So as taken into consideration. Does that make more sense? It's it's complicated. I think, perhaps, maybe we could respond in writing.

1:11:49

Yeah, okay. So because what I'm reading from this is that it's just a, it's just a scheme we're looking at which is fed into the carbon budget. And that's where you're like, arrive at naught point naught naught 1%. And it's from the construction and the operation of this scheme. And I don't see how the, I'm not sure how the baseline affects that.

1:12:17

So the base, the baseline is something to compare it against. But once we build the proposed scheme, the traffic would change. So it's as well as the embodied carbon, you have the end tailpipe emissions, and that would change by putting in the dual carriageway, though change the affected road network, not just a lateral A to B, start and end of the dual carriageway, it has a wider effect. And that's included in the emissions and that table, we can see on screen.

1:12:47

Okay, so just in the dmrB la 1143 point 10. And the baseline scenario suggests that greenhouse gas emissions without the project shall be identified for current baseline. Does this table tell us that or is it or does this table tell us just for the future baseline?

1:13:14

Then,

1:13:15

would it be any different? Anyway,

1:13:18

this is this is the baseline for the project. If we didn't build it, what would happen? And that's based on the methodology of the transport assessment sets out how it includes the uncertainty logs of certain projects in the area. So it has a future element to it, but it is best practice and follows follows the methodology. But from my perspective, I'd have to divert back to the transport specialists and their methodology. But But that's where that's derived from is that we look at probability of different schemes and that's, that's done in consultation with the local council.

1:13:57

Right, okay. Mr. Hawker.

1:14:13

Thanks, Richard Hawker Wensum Valley Alliance, I know this subject has been the subject of a lot of correspondence between somebody I know quite well. Andrew Boswell Dr. Andrew Boswell of climate policy and CCPP I should say. But as a as a real layman on this climate change aspect, unfortunately I should say Dr. Potts was unable to attend today. In everything else I've looked at in my career, I feel like an engineering baseline is the current situation against which a particular proposal is to be assessed. And now I take the point that that these are the three projects, the EB 47 and Northwestern link are considered to be near certain or most likely to go ahead. But if you'd like, one wonders the purpose of of a DCO inspection such as this an examination in public, if if there isn't the option, that this the scheme may may fall may not go ahead. And that surely is the case for the other schemes as well. There is always the possibility, and if that should happen, but this scheme does go ahead, then I feel that the inspector would not have been provided with all the the relevant information. In other words, if the scheme here goes ahead, on its own, should have had the opportunity to to understand the the effect of just that scheme against what is on the ground. Now. I don't feel that that's been shown by the applicant.

1:16:26

But I guess that the the this table it, it's the scheme, the change is just a scheme, isn't it? So in a way, regardless of the baseline, this changes the scheme, and that is what that if the other projects were not included in the baseline, would that change be the same? I guess is the question. As to Mr. Murphy,

1:17:00

yes, my theme on that for the applicant, that uncertainty is taken accounted for in the assessment. And that's the field in our methodology, that that's the uncertainty log. And that's in accordance with the planning inspectors guidance, not 17 that we're following there for the cumulative assessment. Just wanted to clarify that point that we are following best practice. And that was set out in the environmental sort of the scoping report for the environmental statement, and then that was followed through in the environmental stimuli itself.

1:17:38

Okay. Councillor Davis, so you have your 100?

1:17:50

Yes, I think this whole episode just demonstrates that we need more clarity and transparency over these figures. I do appreciate that there are standard models, and that those can be followed. But actually, it's quite impenetrable. At the moment, we've just had what, three, four or five different officers come on, to try and explain the situation and not being able to do so very, very clearly. And I suggest that there does seem to be some inconsistency between these figures. And actually, they make quite a significant difference. I mean, I have prepared a statement and I have figures to quote, but I think given this discussion, it illustrates certainly some of the points that I was going to make, which is about comparing like with like, for example. And clearly we don't appear to be doing so in this particular case. And, and that is very concerning. I think we do need to have that transparency. There's also mention of the NNPS which is quite ancient comparatively now in terms of its initial guidance, and we do know that the government has now agreed to review the the MPs policy under Section six of the Planning Act 2008. I understand the government has decided not to suspend and PSN was to review is ongoing. So it does remain policy, but clearly in view of of the statements that have been made and the lack of clarity on assessing carbon impacts, then, I think it's incumbent on The applicant to to provide additional information just to clarify the figures that they have.

1:20:09

Thank you, Councillor Davis. I can see another 100. But I can't see who says Mr. Hawker.

1:20:31

Thank you, sir. Richard Hawker wensen Valley Alliance, just a small point i in the document that I think you refer to, which is rep six, dash six from the applicant. It does say at so I'm trying to find my note with respect to the 660 1784 times increase in emissions may affect government's ability to achieve carbon reduction targets. That is a statement from the applicant. So this this is of definitely major concern if, if the scheme might not enable the government to achieve those targets.

1:21:28

Yeah, we did address that. Last I asked that question previously. And I was I was told that subsequent to that, it has been determined that they wouldn't. But yeah, I mean, I did. I picked that out. Also, I just, if I can go back to Mr. Murphy, I'm sorry. And so in do dmr, la 104. It says 3.21, the environmental impact assessments will assess cumulative effects, which include those from one single project, and two different projects. Is the Israel Climate Assessment, which includes cumulative effects with different projects.

1:22:28

So the in the transport assessment that includes the uncertainty log, which is a list of different projects, and this is a range of different certainties, and also has traffic movements associated with them. And from from those other projects, that's included in the model scenarios that you see in that table there in front of you. So yes, it does include the different projects for construction.

1:22:59

Right, even though the finger against the carbon budget is just just our project, just this project.

1:23:08

What figure are you referencing referring to?

1:23:11

Well, the difference figure is just our project is just a project. So against the carbon budget, you're assessing it against just this project, not our project, this project with the project.

1:23:25

And so right. So what has been modelled as what, what is if we didn't build our project. So that's how traffic would move and other projects would be progressed. And that's in the do minimal. And then we've assessed that against if we did build our project, so the same way that if you were to not build through a field that would have an impact on agriculture, or woodland, it's then what would you what would happen if we did build through that if that was taken away in say, ecology or agricultural assessment? So the assessment here for carbon is, what would we do? What would happen? What would be the emission, so that's the baseline, if the e 47. blofield, was not built. And then the we have the emissions that would happen during construction and during operation, and if our schema was built, and then the differences between those two, and if we had a baseline that didn't include those future projects, then you would get a mission mismatch of information. But it also includes that if we have our proposed scheme built in traffic may change is likely to change depending on what schemes are in the area. You know, for example, cars going into dual carriageway along the 47 blofield section to get to a certain proposed development faster. And so that's all that is all modelled and taking into account sort of, it's not just the tailpipe emissions going straight along. It's the affected road network, which I would need to defer to my colleague to give him more and detailed explanation, but that's my rice. Okay.

1:25:07

Okay, I think I'll move on from this. But still on the climate change matter. So conscious, we're getting up to half, three hours plenty on taking a 15 minute break. But I'll just first of all see if we can get through through these questions. So there's been reference made in some representations to the European Commission EIA guidance. What is the status of this document? If I could ask the applicant that and if my colleague could take down the the table on the screen, please. Thank you.

1:25:52

Sara Holmes, for the applicants. And I think we've covered this in in responding previously to some of Dr. Boswell's representations on this, the guidance has no formal status in the decision making

framework for the the DCO it is it is guidance documents, which provide guidance when we were a member of the European Union. They had more direct relevance, perhaps, but still didn't even at that time form part of the decision making framework, they they they are an expression of an opinion of the consultants that drew together that particular guidance.

1:26:40

So because we're no longer in the EU, then because this is effectively EU guidance, it doesn't apply. They used suggest as though it

1:26:49

didn't ever have any formal status in the decision making framework. It it aids in interpretation. The EIA regulations obviously continue to or transposed within our regulatory framework or initially transposed the provisions of the EIA directive. And then the regulatory changes that were made to those to enable them to stand alone as a regulatory framework outside of the EU mean that they continue to have effect. But neither the guidance nor even the regulations, which are of course, legal instruments, and not just guidance, placed any obligation on the Secretary of State to assess significance at any particular level. So the fact that there is guidance that makes certain suggestions has no bearing on the decision that Parliament took in 2014, when we were members of the European Union, to say that the significance of carbon emissions from these projects shall be assessed in the context of the carbon budgets which capture emissions across the economy. And as we put into our submission. Last week, the climate change committee's independent analysis of the netzero strategy and the transport decarbonisation plan is that we're on there is a defined pathway to achieving net zero. And in order for the guidance that's been identified, to have any bearing on well, it has no bearing on the decision making framework.

1:28:33

And if I could just ask. So in terms of climate change mitigation, the guidance mentions, assessments should be should take relevant greenhouse gas reduction targets at national, regional local levels, where available,

1:28:47

it says can be, I think, when I went through Dr.Boswell's, report, I thought I could, with my highlighter, added some extra words, which if you'd highlighted would change the change. Just from that wording.

1:29:01

So just the question, so I guess to the applicant, Norfolk County Council and the broadland District Council, I mean, I where it says where available? Are you aware of any local or regional greenhouse gas reduction targets or carbon budgets, which have been adopted locally or regionally?

1:29:24

So for the purpose of this scheme, the only relevant one that Parliament has required to be assessed is in the context of the National Carbon budgets.

1:29:34

Yeah. Are you aware of any local regional carbon budgets?

1:29:40

I'm not conscious of the current status of those and they're obviously not part of the framework in the NPS.

1:29:48

Mr. Cumming, Mr. Judson if they're aware of any

1:29:56

David Cumming forward, Norfolk County Council North County Council adopted some environmental policies at the end of 2019. And that did include carbon targets, looking both across the County Council's own estate, which was to be net zero by 2030. And then a target to head towards carbon neutrality by 2030. across all sectors.

1:30:30

Right, but how but have you got any? Do you have carbon budgets to measure that against effectively or

1:30:38

not we, we are currently reviewing the local transport plan and one of the commitments so as David Cumming for Norfolk County Council, we're reviewing local transport plan. And as part of the work that we intend to do on the implementation plan, we will be working through methodology for how we do that that piece of work. We have not yet started that.

1:31:05

Okay. So currently, there's nothing to measure against locally or regionally. In terms of carbon reduction targets.

1:31:17

I'm not aware of anything.

1:31:20

Okay. And Mr. Judson

1:31:27

Hello, Charles Judson broad Industry Council, broadened have adopted an environmental strategy. But without taking this away and coming back to him writing, I couldn't commit to the the the exact nature and extent of that and whether there are any carbon budgets within that.

1:31:49

Okay, thank you. Okay, well, that they were all the questions they had.

1:31:57

On that part of the agenda, does anybody wish to ask anything? Or comments or anything which we've spoken about? Okay, I'm saying that has, like a counsellor Davis.

1:32:21

Yes, thank Thank you. So I'm, I'm I don't know, is this the point where I can make a statement about cumulative emissions? Given that I know, we've already just discussed but I think there are one or two points just to further highlight

1:32:41

how when you say make a statement, so the purpose of this is for me to ask questions, rather than someone to put their case across necessarily. Have you submit a man as I know, you sort of representation, but if you have, if you have, you know, a statement submit that that should be submitted at the relevant deadline?

1:33:04

Well, it was in relation sorry, in relation to what you were just asking about. Carbon targets and and comparisons if you like, okay. So if I can just, if that's the case,

1:33:18

well, is it are you going to be reading from a document? Or is it just respond by what I've got my

1:33:23

notes, and I just wanted to make kind of a half a minute comments on on the on the level of target of carbon emissions? And whether they're small or not.

1:33:38

Okay, if it's okay, that's fine. Thank you, guys.

1:33:43

I'm sorry, I'm not familiar with the process. So yeah,

1:33:47

go ahead. Okay.

1:33:49

Um, so. Yeah, in the applicants, response to the set, rep five, Dash 019. In the applicants, empower to pre 17 quotes the NN PS, para 5.6 16, as say, that the impact of road development on aggregate levels of emissions is likely to be very small. And the significant word here is likely. And as we've seen from the figures we just discussed, that's not borne out by the figures in this specific case. And just as a comparison, because you are asking about what are their carbon targets and I know there aren't locally which is an issue in itself. But as a comparison, the current total territorial carbon footprint for blofield Parish through which the road passes is estimated to be 24,000. Just over 24,000 tonnes of co2 equivalent per annum. Under Construction nations for the A 47 blofield to North burning and scheme of 25,765. Using the applicant's figures, tonnes of co2 equivalent alone supersedes the total annual

territorial carbon footprint of the parish through which the road passes. So I'm just saying this cannot in any way be called a small impact when you compare those two figures. So for parishes, the whole Puranam territorial carbon footprints of just over 24,000 estimated and the scheme, as noted by the applicant, is over that that's 24,765 tonnes of co2 equivalent, so it's not small.

1:35:48

Okay. Thank you, Miss. Thank you, Councillor Davis, however goes that you're you are aware that the the MPs I mean, we are looking at the national carbon budget, because there are no local carbon budget. So the scheme is naught point naught naught 1%, of the national budget. So, and that, and that's what the MPs tell, that's what the LM MPs PS tells us to look at, in the absence of local targets on regional targets.

1:36:24

And as I commented earlier, it's been acknowledged that the NNPS needs a review, and that the government is currently looking at that in terms of the Planning Act 2008. And I think that needs to be taken into consideration, given that we're in dynamic times, and this is a very urgent issue that many, many people are concerned about. Having it's and the discussion we just had just shows how difficult and complex it is, and why we need to be absolutely clear of the figures that have been quoted by the applicant, because it's taken three or four of their members Representatives today to try and explain those figures. And they haven't been explained clearly. As and, and that that's that's a key point to bear in mind. Thank you.

1:37:14

Okay. Thank you, Councillor Davis. Just quickly with the applicant like to respond to any of that.

1:37:26

So Richard Guyatt WVD I don't think we will respond to you now, if that's okay. So I think probably we need to gather our thoughts and provide a response in writing. Councillor Davis very kindly indicated that he has at least notes and if he wants to put his point in writing, I mean, obviously, we've been listening and we will listen again. But if he wants to put something in for us to look at with him, we'd be very happy to do so. I'm just conscious so that if if he does it the next deadline, and then we respond at the deadline after that we're getting close to the end of the examination. That's entirely up to Councillor Davis. But if he gets something to us beforehand, we can deal with it quicker. Indeed. Okay. Thank you. So it's coming up to 24. I'm going to take a break, I think 15 minutes. So if we could come back at 355 Then we'll reconvene. So for now, the hearing is adjourned until 355. Thank

1:38:34

you