From:	Michael Rayner
To:	HornseaProjectThree@pins.gsi.gov.uk
Cc:	greg.clark.mp@parliament.uk; norman.lamb.mp@parliament.uk; George Freeman; sarah.butikofer@north-norfolk.gov.uk; [redacted]
Subject:	re: deadline 7 submission
Date:	13 March 2019 13:21:08
Attachments:	PINSorsted13March19.doc Norman Lamb [ref1].doc LambHarringtonJan18 [ref2].doc

Good Afternoon,

Please find attached the deadline 7 submission from CPRE Norfolk regarding the Hornsea Three Project by Orsted, along with copies of the two documents referenced in the submission.

Regards,

Michael Rayner
Planning Campaigns Consultant, CPRE Norfolk

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View and read CPRE Norfolk's Vision for Norfolk at http://v4n.org.uk/

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Working locally and nationally to protect and enhance a beautiful, thriving countryside for everyone to value and enjoy

To: The Planning Inspectorate, National Infrastructure Directorate, Temple Quay House, Temple Quay, Bristol BS1 6PN - sent by email attachment to HornseaProjectThree@pins.gsi.gov.uk

13th March 2019

CPRE NORFOLK RESPONSE TO THE PLANNING INSPECTORATE CONSULTATION REFERENCE NUMBER EN0 10080.

Application by Orsted Hornsea Project Three (UK) Limited for an Order Granting Development Consent for the Hornsea Project Three Offshore Wind Farm

Dear Sir/Madam

CPRE Norfolk have had an active interest in the above application through all stages of the consultation process including from the start the public roadshow events – likewise Vattenfall Vanguard. More recently we have read the Statement of Common Ground between North Norfolk District Council (January 2019), the Report on the Implication for European sites (21 February 2019) and the Examining Authority's Schedule of Changes to the Draft Development Consent Order (7th March 2019).

As such we now make a Closing Statement which embraces these documents; and we do this in the context of the Examination as a whole on two key and inter-related points which are never addressed anywhere in the documentation, or questioned by PINS. These are the relationship between the National Planning Policy Framework and the Hornsea Three Project; and the interpretation of PINS Advice Note 9 on the Rochdale Envelope, and with it the power transmission onshore and the implication for open-cut cabling of HVAC versus HVDC.

The Ecology and Nature Conservation document at page 5 gives a summary of NPS EN-1 and NPS-5 policy on decision making (and mitigation, which come back to later as regards HVAC versus HVDC). This is followed at 3.4.2 with 'Other relevant policies'. The first of four at 3.4.2.1 is National Planning Policy Framework (NPPF) (DCLG, 2012.) Table 3.3 expands to say "One of the overall aims of the NPPF is that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. Principal relevant statements are included at paragraph 10 of the NPPF."

The 2012 NPPF was replaced on 24 July 2018, and while the Introduction at paragraph 5 at 2012 in referring to the NPPF and Nationally Significant Infrastructure Projects is repeated at 2018, there are in 2018 some major additions and emphasis in the relevant topic, Section 15, Conserving and Enhancing the Natural Environment. Note that for the 2012 NPPF the reference quoted above should be Section 11, not paragraph 10. More important is that the applicant's documentation has been written in a mind-set of the 2012 NPPF. The biggest changes registered in the 2018 NPPF turn on the ecological network, in which river systems and their connectivity with each other is of high importance, see paragraphs 170d and 170e; also paragraphs 174a and 174b; and the definition in Annex 2 of the Nature Recovery Plan - all derived from the 25-Year Environment Plan launched on 11 January 2018.

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The implications of this are that we have to deal, where relevant, with the wider countryside, and not just focus on individual EU designated sites and EU protected species in isolation, which is the approach of the applicant. Even at 2012 there was some reference to the ecological network that justified consideration, and with the 2018 NPPF it should not be ignored again. There have been some major advances since then, and in particular that the restoration of farmland ponds is a very powerful addition to hedgerows and grassland in enhancing connectivity in wildlife networks, within which there may be included EU sites which benefit and make more robust, and also protected species. As regards rivers, the Glaven is the most vulnerable to open cut trenching, as the cabling route runs throughout the corridor rather than crossing as it does for the Bure, Wensum and Tud. The onshore landing is again at Weybourne, Hornsea Three will be the third to do so. The Glaven shares with the Wensum protected species white-clawed crayfish (highest level), brook lamprey and bullhead. The upper half of the Glaven is an Ark site which has heathy populations of the native species, almost alone in the chalk rivers of south east England, including the others affected by the cabling route. One careless incident over the many years of the Project, for example contamination from the plague carried by the spores and not disinfecting clothing and equipment used on another river site, would see that lost. Other protected and more robust protected species are otter and great crested newt.

In summary, the point we make above is that evaluation of ecology and nature conservation is more complex than considering an EU site in isolation, or by looking at protected species site by site, when most species have a greater or lesser mobility, and that in assessing environmental impact there is a need to take account of the relevant polices in the 2018 NPPF. We add that in the EIA process, it is not in the public interest to do so in terms of worst case scenario or maximum impact when in all cases, except connection to the national grid, this is in effect HVAC. Further that HVAC becomes the baseline scenario all along all the cabling route. Why not make clear it is HVAC versus HVDC with the one exception of the substation at the national grid? This lack of plain speaking is further confused by giving no data for comparing land take in the cabling route for the two options. Why not make clear that HVDC provides much mitigation with less land take and a shorter time scale on the impact on nature conservation (and of course for farmers).

A CPRE member has made contact with BEIS through Norman Lamb MP and presented at point 4 our best estimate on the difference in land take between HVDC and HVAC, and the wider mitigation benefits of HVDC, which we attach as the document of 22nd November 2017. This was followed by another letter on the 17th January 2018, also attached. In this we discuss the interpretation of the PINS Advice Note Nine. To leave HVAC as an option in our view does not accord with the intention and spirit of this, and perhaps the legality if tested.

Finally, on the January 2019 statement of common ground between Orsted and North Norfolk District Council we note that the greatest concerns are socio-economic: the impact on the tourism economy in the construction phase, which is under discussion, and NNDC consider has been significantly downplayed, and access to public footpaths. Agreed common ground is that “The use of HVDC transmission for the Hornsea Project would help to reduce the impact of construction on the local tourism and the agricultural economy.” We think that farmers will think NNDC seriously underplays their situation. We add that NNDC underplays the ecology and nature conservation interests, but this can be explained by there being no in-house ecologists in Norfolk’s local councils other than one at the County Council.

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Given that this is our Closing Statement, we copy those below.

Yours faithfully,

Dr Ian Shepherd, Trustee, CPRE Norfolk

Michael Rayner, Planning Campaigns Consultant, CPRE Norfolk

Copies: Greg Clark, SoS, Dept. for BEIS; Norman Lamb MP; George Freeman MP; Cllr Sarah Butikofer, Leader, NNDC.

Enc:

letter from Ian Shepherd to Norman Lamb MP, 22.12.17

letter from the Friends of North Norfolk to Norman Lamb MP, 17.01.18

Ian Shepherd

[redacted]

[redacted]

[redacted]

22 November 2017

Dear Norman Lamb

The Onshore Environmental Impact of Orsted and Vattenfall Wind Farms: HVAC versus HVDC for electricity transmission to the National Grid

I write to you as a constituent, but one also has been a member of CPRE Norfolk for 27 years, and the River Glaven Conservation Group (RGCG), as a founding member and Secretary since 2001.

The Dong Energy (now Orsted) consultation on their Preliminary Environmental Impact Report (PEIR) for Hornsea Project Three closed on the 20th September; closely followed by Vattenfall Vanguard, now mid-way through their PEIR consultation. The Orsted cabling runs north-south from Weybourne or Kelling (we are not sure which) on the coast to the national grid south of Norwich, a distance of about 55 km. The output from the project is 2400 MW. The Vanguard landfall is at Happisburgh South and the cabling runs from east to west to the national grid at Necton in Breckland district, a distance of some 60 km (the cross point of the two routes is near Reepham in Broadland). Alongside Vanguard will sit the Vattenfall Boreas, with about one year between them, and on separate applications. Both the Vattenfall projects are for 1800 MW. All are a Nationally Significant Infrastructure Project (NSIP).

I realise that as an MP you have had considerable correspondence around these applications, and much of that has centred on the differences in impact between HVAC and HVDC transmissions of power; in particular that HVDC removes the need for booster stations. I seek in this letter to relate to the various perspectives of residents, farmers and wildlife, the impacts on which, would be significantly mitigated with a DC solution. In particular I focus on wildlife and the potential impact on the county ecological network. River catchments and the valleys within them are of the utmost importance to the ecological network. The Glaven is perhaps the most vulnerable as Hornsea Three runs through the spine for the whole length of the river, whereas in most cases it would just cut across the main river at a particular location, for example the Bure, Wensum and Tud for Orsted. The compartmentalisation of topics in the PEIRs is a generic issue, and no account is made of collective impacts with little or no recognition of ecological networks.

For residents, for farming, for wildlife, and landscape there is an over-whelming case for HVDC cabling over HVAC, but this been obscured by both companies in the use and interpretation of the Rochdale Envelope approach, as set out in the Planning Inspectorate Advice Note Nine. We have yet to see any data from Orsted that would indicate the differences in impact for HVDC versus HVAC with regard to open cut trenching, which is the predominant approach for cabling. Information has come from Vattenfall in stages but sufficient now to make a strong and confident case for HVDC.

1. Many residents were quick to realise that HVDC transmission does not require booster stations. This point was made clear by both companies from the first stages of the consultation process. Farmers are used to easement issues for normal public services, but the scale of the land take required for these cabling projects came as a surprise; that and the potential times for back-fill and return to normal operation. As a result Savills now act as agents for a consortium of some 40 farmers on Vattenfall, which has led to a clear exposition of some key differences between HVDC and HVAC. As published in the EDP Farming and Country section 9th Sept 2017 (for key points see Ref 1). Since that time Savills are in addition acting for some farmers affected by the Orsted project. The RGCG/CPRE in their response to the Orsted PEIR set out the importance of the ecological network; and this is indicated here by a subsequent underlining in the text (Ref 2). Support to this was given by an ecological report on Upper Glaven (Ref 3). One key finding on the Glaven is that the restoration of farmland ponds, particularly at the water shed, can allow them to act as stepping stones linking one river system with those adjacent, in this case the Bure.

2. For all 'receptors' the NSIP process becomes a damage limitation process; and a fair outcome through a package of mitigation approaches is sought. Both companies view horizontal direct drilling (HDD) as the major mitigation measure; albeit at present neither will commit to using it other than where the cabling route crosses a main river or road. But we consider there is a second major mitigation method available, that of HVDC rather than HVAC for open cut trenching, the main cabling technique. The adoption of an AC-DC blanket approach by both companies through the whole planning process raises the prospect that the benefits of HVDC over HVAC will be obscured. With the current compartmentalised approach, quite modest mitigation measures for HVAC might be identified as acceptable, and what was formally seen as a major adverse impact may then be reassessed into a lower category. It then becomes 'not significant' in terms of the Environmental Impact Assessment (EIA) terms; and as such not be included in the Environmental Statement. The use of HVDC would give a higher baseline standard from which to make the impact cabling assessments. The lack of clarity and data on AC vs DC in the envelope approach obscures this.

3. The use of HVDC for power transmission should now be considered as a major mitigation measure alongside HDD; and at recent Vattenfall roadshow events there does appear to be some acceptance of this view, and there is an ongoing debate reaching to the top ranks of the company. There remains, especially in Orsted, a more guarded view that HVDC is comparatively new and much less used than HVAC, and therefore, the company must take both systems through the whole process and not have to take a decision until permission is granted and the company is about to commence construction work . However there is ample evidence from experience that HVDC is a reliable and robust technology. There is concern that the final decision will be unduly influenced by any cost differences in HVAC and HVDC equipment.

4. We can find no information from Orsted on the differences in land take between HVAC and HVDC. Vattenfall did however provide information in their Landowner Pack with their SoCC report, but this was for Vanguard and Boreas combined. However Vattenfall in their print version (obtained on 9th November at the Aylsham event) of their PEIR Consultation Document, page 34) gave in diagram form the required data for HVAC vs HVDC cabling for Vanguard alone. For Vanguard the temporary working strip is 35 m for HVDC, and 50 m. for HVAC; and for the permanent easement is 13 m for HVDC and 25 m for HVAC. From this 1800 MW project we can make an approximate estimate for the Orsted 2400 MW project, using an assumption of a proportional power factor. On that basis we have for Orsted a temporary strip of 47 m for HVDC and 67 m for HVAC; and the permanent easement of 17 m for HVDC and 33 m for HVAC.

5. Both companies focus on farming as the main issue, but ignore the ecology. Based on the above for both projects HVAC takes about twice the permanent easement than does HVDC. This is significant over a 55-60 km length. The temporary land requirements can be seen as a short term irritant in terms of degree of loss of crop, severance and the timescale that might be involved. But for habitats, species and the ecological network, the temporary working strip is as critical as the permanent take. We accept that both companies are seeking to avoid designated sites of nature conservation, but removal of topsoil and vegetation from ancient habitats such as hedgerows, meadows, grassland and heathland across the wider countryside cannot be replaced.

6. The use of HVDC also offers advantages in providing more ‘wriggle room’ and fine tuning of the cabling route and have benefit in a number of ways. For example in gaining some separation from farmland ponds, lesser damage to hedgerows, more distance from historic buildings and their settings, avoid impacting on underground water flows. It would represent a more significant and cumulative mitigation along the entire cabling route, bringing it standard that many would accept.

7. The Rochdale Envelope approach as interpreted by these companies risks not only losing the benefits of HVDC over HVAC, but could potentially lock out HVDC from a wider use in the UK'. As pointed out by Vattenfall there is a large number of HVAC suppliers of equipment world-wide. HVDC is a newer technology, less established in the UK, and at present far less suppliers; but is nevertheless proven.

8. We would also wish to highlight to the Dong/Orsted press release, which emphasises the company going 'green' with divestment of their oil and gas businesses and concentrating on renewable energy. However, much was made, with the aid of graphs on the great reduction in price of offshore wind energy in recent years. There was also a pledge to continue to 'drive down prices'. Fair enough, but not at the cost to our natural environment.

9. A delayed decision on the HVAC vs HVDC until construction work on the project starts has the risk of getting stuck indefinitely with HVAC into the future. What HVDC company is going to invest in gearing up production with no guarantee energy company will decide on the option just before work starts? It will result in HVDC companies standing back in an uncertain situation; and Intense competition on price by existing HVAC companies might drive down prices of electricity, but extract major environmental penalties. We note that the Vattenfall is fully owned by the Swedish. Government. Cannot the Secretary of State for BEIS intervene now to ensure that the Rochdale envelope is not being misused; and that some assurances , and perhaps incentives, can be offered to interested HVDC supplier companies.

Yours sincerely,

Ian Shepherd (Dr) References: see on Friends of North Norfolk web site

FNN letter in response to correspondence between Norman Lamb MP and Richard Harrington MP, Minister for Energy and Industry 17th January 2018

Dear Norman

Many thanks for forwarding to FNN the letter to you from Richard Harrington MP, Minister for Energy and Industry, dated 12th December 2017. This was in response to your letter of the 29th November 2017, which drew attention to the views of two of your constituents on behalf of Friends on North Norfolk.

We very much appreciate the Minister responding to you and would accept his point that the determination involves legislative processes that must be followed.

However in the case of Vattenfall and Orsted applications we have a major concern that the approach of both companies is seriously flawed in the way they interpret and use the legislative processes with respect to the consultation stages. As such we consider that the public will be denied "a proper and legitimate and informed debate". This centres on the way that both companies run with two different onshore power transmission systems, HVAC and HVDC, and on the expectation of both gaining approval, and they then chose which system to use, with the option to deciding just before commencing construction. There are strong indications that the choice will then be made on the basis of cost.

This is acceptable if taken in isolation, but it is not in the public interest if the planning approach and consultation not only lacks clarity, but omits some key information on the differences between the two onshore transmission system, and then use these as the baseline parameters in terms of the environmental impact on residents, farmers and landowners, and our wildlife; and then conclude that with mitigation that the inferior HVAC option is good enough. It is not, and this is detailed in our responses to the companies.

This situation arises from the way both companies mis-use the PINS Advice Note Nine, April 2012. We consider that it is clear that the identical approaches on the Orsted and Vattenfall PEIR consultations that PINS should intercede now and say that they would NOT accept the applications from the companies using their current approach. Both companies point out that HVAC requires large cable relay/booster station within 10 km of the onshore landing, and also provide data on the substation for linking to the national grid. While the footprint of the substation is the same for HVAC and HVDC, the latter is higher.

However in all the many chapters of both consultation documents we meet with a total absence of any information on the land take of 55-60 km cabling corridor. From just one Vattenfall print source we estimate that the land take by HVAC is double that of HVDC; and this applies both to the 'temporary' land stripping and permanent easement for cabling and maintenance. Alongside is the consideration of how many years are involved; and that HVDC offers more 'wriggle room' in the context of the deciding the final route within the corridor, which can benefit the setting of historic buildings, and less proximity to sites forming part of the ecological network of our countryside. The lack of data on the DC vs AC is compounded by the deliberate confusion in chapter after chapter in describing environmental impact and its mitigation.

The mis-use of the Envelope approach comes in taking a range which is essentially not a range but defined by the parameters of the two transmission options for cabling. Hence we have a maximum and minimum numbers where, with much reading, you can decipher that maximum will mean HVAC and minimum will mean HVDC; and of course there is nothing in between. Also in use is the term worst case scenario (WCS), where WCS simply means HVAC. We understand that there is a need for a WCS where a combination of events can lead to a bad outcome; but surely the public expectation is that you do not start with the WCS as the baseline and see if you can patch it up with hundreds of individual mitigation measures to just get by along a 60 km corridor, many based on desk work and good practice not in good accord with what actually happens on the ground.

We cannot believe that the PINS Advise Note Nine (ANN) was written with the expectation that the Rochdale Envelope would be used to embed a worst case scenario as the baseline for assessing the environmental impact on these NISPs. Leaving aside any possible legal challenge issues which might be made, just to read the 11 page text of ANN it is very clear that all consultations, from the PEIR on, there are standards for transparency and clarity which we consider are not being met. We make our case in brief below, but also in more detail in an appendix. We do this in the context of not seeking to de-rail or delay the applications. To the contrary, as already many residents, and farming, already face years of uncertainty on the degree on blight they face. We would also expect the companies to look to see their projects run smoothly and on time, and emerge with some local goodwill.

There are five short paragraphs in ANN Conclusions. We quote and then comment (italics).

1. The 'Rochdale Envelope' is an acknowledged way of dealing with an application comprising EIA development where details of a project have not been resolved at the time when the application is submitted. *We are not dealing with some details here, but in essence two different onshore power transmission options with **known** technology and advantages and disadvantages. There is ample evidence in the technical literature that, although HVDC is newer than the 100 year old HVAC technology, HVDC is robust and reliable and its advantages will make it the technology of the future. The only 'detail' that is not known is the degree of leverage on suppliers that the companies can obtain on cabling and associated equipment costs of supplying HVAC and HVDC equipment. This is not the only cost factor of course, but it should be noted that HVDC does not require a cable relay station, one for Orsted, but two for Vattenfall. One for the Vanguard, and one for Boreas which will follow about one year later.*

2. (and 3). The approach set out in this note seeks to provide an acceptable solution, under the 2008 Act regime to address areas of uncertainty as proposals progress towards making the application. The approach needs to be clear and robust. The key areas where the level of detail needs to be addressed are during pre-application consultation; in the EIA; and within the description of the project in the application documents. *The further progression of the HVAC approach is not acceptable as an option (and it certainly not to be bracketed with HVDC as a 'solution'). We add that HVDC should be used as an embedded mitigation measure, to join the single generic mitigation measure available at present, horizontal directional drilling or other technique which avoids open cut trenching and subsequent backfill. We are now, with the PEIRs, at the pre-application consultation stage. The approach is far from 'clear and robust'. In fact on the cabling options and impacts are wilfully*

obscured. This makes it very difficult for residents affected to respond to the consultation; and not easy for farmer and landowners, and those with an interest in wildlife to make their case, or even realise the environmental impact on an embedded approach based on the worst case scenario. This fault-line should not be permitted to run through the rest of the public consultation process.

4 (and 5). Pre-application consultation forms an important element of the 2008 Act regime. Developers must be able to demonstrate, amongst other things, that they have complied with their duties under sections 52 and 47 of the 2008 Act. Under the 2008 Act it is important to consult comprehensively on the project and to report fully on that consultation. The process should be clear and thorough. The challenge for the EIA will be to ensure that all the realistic and likely worst case variations of the project have been properly considered and clearly set out in the ES and as such the likely significant impacts have been adequately assessed. *The consultation documentation can be described as comprehensive and thorough in terms of MB or Kg of documentation; but it becomes repetitive across some 30 specialist chapters, and that after mitigation nothing is significant in EIA terms. However, as already stated the process is not clear, and the value of the report on the consultation will be diminished by the use of HVAC, the adopted worst case scenario, not as a variation to a single project, but what are essentially two different projects with different outcomes, which have been bundled into one Envelope.*

We close with a comment on mitigation, which is crucial to the success of these projects. Firstly as already stated, these applications should be about a single project where onshore power transmission from landing point to grid sub-station is by HVDC; and HVDC treated as a key mitigation measure. Secondly, the wider range of mitigation techniques quoted in documents are most often good practice guidelines which might look good from a desk but on the ground reality can be very different. Look at one example, the decades of degradation of agricultural soil and the impacts of arable run-off that reaches our rivers, and the levels of agri-chemicals in our aquifers and rivers.

The risk of onshore cabling doing the same is much higher with HVAC than with HVDC, the former involving a greater amount of soil disturbance, and reduced success in restoration of measures for landscapes and wildlife; and for soil structure on agricultural land. At last we have a Secretary of State for the Environment with a 25 year Environment Plan squarely aimed at, amongst many other very important issues, a green reform for agriculture, benefitting both our domestic water supply and wildlife. We respectfully suggest that BEIS and the offshore wind farm companies should not be rowing in the opposite direction with HVAC; and that PINS can intervene at this stage to advise the companies to drop the HVAC option; or if not, at least make it clear that the parameters in the Envelope are in fact simply HVAC versus HVDC, and that residents, farmers and landowners, can respond accordingly.

Yours sincerely,

Constituency residents, and members of FNN,

Godfrey Sayers, Ian Shepherd c/o Ian Shepherd, [redacted]

Appendix. Further quotes and comments on The Planning Inspectorate Advice Note Nine: Using the 'Rochdale Envelope'

The documents paragraphs are not numbered but we use page and column number to make partial quotes and comment, the comment in italics.

Page 2, column 2. There are a number of key areas when preparing an application for development consent where the level of detail and amount of flexibility are particularly relevant. These are during consultation at the pre-application stage; when preparing the environmental impact assessment; and in the description of the project within the application documents*. The PEIR (Preliminary Environment Impact Report) is the within the pre-application stage; it is the first stage in preparing the environmental impact assessment; this includes the first descriptions of the project , with a specific chapter on this but also running across a number of other specialist topics. The Project Description Chapter, and all others, should make clear that the parameters for onshore cabling are HVDC and HVAC; at present there is deliberate obscurity, no reference to the fact that the HVAC is the worst case scenario. No data on the difference between the two; and in the environmental impact assessments made, before and after mitigation, that gives any clear indication that the flexibility is two fixed systems. HVDC should be treated as an embedded mitigation, as is horizontal directional drilling where open trenching is virtually impossible.*

Page 3, column 2. The outline application should acknowledge the need for details of a project to evolve over a number of years, within clearly defined parameters…..The permission must create 'clearly defined parameters' within which the framework of development must take place……The more detailed the proposal, the easier it will be to ensure compliance with the regulations. *The parameters for open cut trenching, which will be used along near all the 55-60 km, are not stated for what they are, HVAC vs HVDC. In our view to continue with this approach the applications will not see compliance with the PINS advice note.*

Page 4, column 1. In assessing the 'likely' effects, it is entirely consistent with the Directive to adopt a cautious 'worst case' approach. Such an approach will then feed through into the mitigation measures envisaged. It is important that these should be adequate to deal with the worst case, **in order to optimise the effects of the development on the effects of the development on the environment** (para.122 of the Judgement). *The worst case scenario is not part of a cautious approach. It is a known (but not shown or explained) deliberate approach and contrary to what a consultation requires. The statement in bold above in effect looks to minimise the effects on the environment, and the use of a baseline which is the worst case scenario is contrary to this requirement.*

Page 5, column 1. The importance of consultation during the pre-application phase cannot be overemphasised, given the 'front-loaded' processes….. Consultation must be undertaken on issues that are easy to identify on a project that is as detailed as possible. The bodies consulted need to be able to understand the proposals. Therefore the project and details need to be explained as clearly and simply as possible. *None of this is happening with open cut trenching for the cabling, or that HVAC is the worst case scenario. While conceding that HVAC requires cable relay stations, the cabling remains a critical and highly important issue.*