

Hearing Transcript

Project:	North Falls Offshore Wind Farm
Hearing:	Issue Specific Hearing 2 (ISH2) - Part 5
Date:	09 April 2025

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FULL TRANSCRIPT (with timecode)

00:00:05:03 - 00:00:09:28

It's now 1146, so we'll resume the hearing. Thank you.

00:00:16:20 - 00:00:49:26

So the next question, um, with reference to the formal safety assessment remover of galloper recommended Ferry Route Rep 2025 and the applicants response reference Rep 2020 to written questions SSC 15 .1. 11, which included a reference to the Belgium Directorate General of Shipping, have now confirmed a positive response to the formal safety assessment. So the next question is to the Maritime and Coastguard Agency.

00:00:50:27 - 00:01:19:07

Could you advise what would be the level of interference with the use of recognised sea lanes essential to international navigation, likely to be caused by the proposal to remove the galloper recommended ferry route. And are you satisfied that the consequences are comprehensively set out in the Navigational Risk Assessment Reference app 106 208 and the Formal Safety Assessment RFP 2025

00:01:20:23 - 00:01:21:17

CMC.

00:01:22:12 - 00:01:40:15

Subject to the implementation or subject to the removal of the caliper route and the structures exclusion zone. Uh, we we don't believe that it will interfere with the use of the traffic separation schemes, uh, that surrounds the area.

00:01:42:25 - 00:01:53:28

With regard to the, uh, paper submitted by the Belgian authorities that will be used as part of the joint proposal to the IMO.

00:02:00:15 - 00:02:13:05

Thank you. Um, just on a sort of sub question. Have you got any outstanding concerns regarding the feasibility and timing of the formal removal of the galloper recommended ferry route.

00:02:14:11 - 00:02:46:01

Next to the MTA? We don't have any concerns on the timing. No. Um, it is, as we have, um, described in our written representation. However, I would like to make it, um, make it clear, um, to yourselves

and the applicant that, uh, any proposals submitted to the IMO would have been agreed at at the UK Safety and Navigation Committee. Um, any proposal submitted to the IMO is no guarantee that it would be approved by IMO members.

00:02:46:23 - 00:02:56:24

Um, if um, any IMO members um object or do not agree to the removal of the routes, then we cannot remove it.

00:03:01:08 - 00:03:03:06

Okay. Thank you for clarifying that.

00:03:05:05 - 00:03:07:01

Um, could the applicant respond, please?

00:03:08:17 - 00:03:35:21

Adam Foster for the applicant. I would concur with Mr. Salter there. And that is why we took the step. Uh, including it. Requested the MCA to reach out to the Belgian maritime authorities just to confirm that they were content there. The other key party here that have an interest in the removal of that route, on the basis that the original purpose of that route was from ferries from Ostend, i.e. in Belgium. Now that they've confirmed their content in writing, we would do that as the key obstacle being removed.

00:03:39:05 - 00:03:41:03

Thank you. Any other comments, Mr. Salter?

00:03:43:08 - 00:04:11:20

Uh, Nick sold for DMCA. Yeah. The proposal to remove the root will be a joint paper from the UK and Belgium. Which is why we needed, that prior agreement from the Belgian authorities. I just made the same point again, that that paper, that joint paper will be submitted to IMO members. And if anyone, uh, objects or doesn't agree, then we are unable to remove that IMO routing measure.

00:04:16:12 - 00:04:34:28

But I just asked Mr. Salter. I'm not familiar. Obviously when you are with the IMO process in terms of objection. Would it have to? Would they have to give reasons for that objection? How how is an objection substantiated at that level?

00:04:36:13 - 00:05:05:29

Uh, from the from the MCA? I think it is more a case of if it doesn't if it's not agreed by all members, if, um, all members will be will have the opportunity to comment on the paper, which is why we need to submit it six months in advance to give them time to consider. If anyone does not agree, then there will be. There is a formal process for that which will be provided in writing to the IMO.

00:05:08:04 - 00:05:09:14

Thank you. That's helpful.

00:05:15:14 - 00:05:17:04

Any comments from the applicant?

00:05:17:29 - 00:05:30:00

Adam Foster for the applicant, we would just like to reiterate that the the possibility of someone objecting is another reason why it's in our best interest to progress this as soon as we can, so that we can know the outcome.

00:05:33:17 - 00:05:34:05

Thank you.

00:05:36:21 - 00:05:41:15

Next question. Um, sorry, I'm not saying I haven't seen any hands up in the room or online.

00:05:43:08 - 00:06:00:09

Could the applicant advise in the event that approval for removal of the galloper recommended ferry route was refused at any stage in the process. Is there a revised and more limited form of development that could proceed that retains the galloper recommended ferry route?

00:06:09:27 - 00:06:18:05

Got him governed for the applicant and we do not have an alternative layout route. We need to take that away to consider whether that is something that would be feasible.

00:06:26:06 - 00:06:27:06

Okay. Thank you.

00:06:29:11 - 00:06:31:24

Any comments from Nick Salter?

00:06:35:15 - 00:06:49:06

Uh, Nick sold for the MCA. Um, only that if the galloper recommended route cannot be removed, then we are left in a position where we object to the Northland's offshore wind farm project.

00:07:13:15 - 00:07:19:13

Okay. Thank you. Not seeing any hands up or online. Any comments from the applicant?

00:07:30:09 - 00:07:32:05

Can be given for the applicant. Nothing further sir.

00:07:32:22 - 00:07:33:17

Okay. Thank you.

00:07:41:19 - 00:07:52:17

Okay I'm going to move on to the next section, which is whether there are any outstanding concerns regarding the risks to shipping movements, including the passage of vessels to and from nearby ports.

00:07:58:27 - 00:08:26:09

The first subject area is the deep water routes and safeguarding future depths. So concerns were raised by Harwich Haven Authority are 126 London Gateway Port Limited, Written Representation Rep 2041 and the Port of London Authority Rep 2056, regarding the need to safeguard future depths of 22m below chart datum within the deep water routes.

00:08:28:00 - 00:09:20:01

The applicants response rep 2020 to written questions x q1 Q 15 1.7 states that when crossing the traffic separation scheme south and precautionary area, the water depths of the locations have been selected such that the cable barrier will be below the 22 metre chart datum. The Navigational Risk Assessment part two app 107, paragraph 459 assumes a vessel draft, future case, realistic worst case of 20m, and paragraph seven and three states that it is noted that the current depths over the sunk and Trinity deep water routes do not allow for 20 metre draft vessels, and substantial future dredging operations would be required to accommodate such vessels, regardless of the presence of North Falls.

00:09:21:07 - 00:09:37:18

From the applicant's comments on written representations. Rep 3037. I understand the meeting was planned with the Port of London Authority for the 19th of March to include what is technically achievable in terms of cable barrier or depth.

00:09:40:09 - 00:09:52:03

Could London Gateway Port Limited for the Port of London Authority or others. Advise of any future plans for the dredging operations required to achieve the future depths.

00:10:00:16 - 00:10:03:15

Mr. Terrill, would you like to comment?

00:10:04:03 - 00:10:15:26

Sir. Thank you. Francis Goddard, on behalf of London Gateway Port Limited, um, we have some specific comments to make on this subject. Would you like me to address those now, or would you just like me to respond to your particular query?

00:10:17:00 - 00:10:20:02

If you could respond to the query first? Thank you.

00:10:21:09 - 00:10:57:04

Sir. I think your query was are there any future plans to dredge? I think the answer will be almost certainly yes. I'll invite Mr. Paul Brooks to talk about this shortly. But I think, uh, as the applicant's own documents recognise, both, um, in, uh, its environmental statement and in its navigational risk assessment. There is a consensus of the need for a 20 metre draft clearance in this area. There is detail set out which we wouldn't disagree with in terms of, uh, the evolution of vessels to that depth.

00:10:57:20 - 00:11:18:22

Um, so I don't think that point that there will be a need is controversial. Uh, London Gateway has existing dredging powers, which, as was pointed out yesterday in this area, essentially will bring it

down to 17.5m, uh, in relation to any further dredge. It would simply be a question of applying for a marine licence, uh, to the MMO for that additional dredge. Uh.

00:11:20:24 - 00:11:53:16

We can't speculate on how the MMO would react to that, but obviously there's no reason to think it wouldn't be given such a licence. The key point here is obviously that presently that dredge could happen and could be consented if a cable is laid, or if cable protection is put on top of a cable at such a depth, which precludes a dredge below a certain depth, then that eventually just stops it. We can't, I presume once this cable is laid, the applicant will not find it acceptable for the cable to be disconnected, essentially for a dredge to take place.

00:11:53:18 - 00:12:37:25

So this is sort of a once and for all decision, hence our concern. Uh, in terms of, uh, I don't know if there's a particular timetable at the moment as to when any future dredge might occur. Uh, we can let you know in terms of the expansion of London Gateway, which is currently underway, and the movement of vessels. I'll ask Mr. Paul Brooks to join in. I see miss miss Russell also would like to comment, but, uh, perhaps I'll ask Mr. Paul Brooks to give some clarity as to the, the, um, uh, evolution that we're seeing in vessels and the likely timings, I suppose, of when vessels of that size would likely to want to be, would want to be able to call, uh, to London ports indeed to any port within the UK, because I think this would be the only one Capable, Mr.

00:12:37:27 - 00:12:38:12

Brooks.

00:12:40:17 - 00:13:16:13

Yeah. Good morning. Good morning. Paul Brooks, DP world, London Gateway. Um, yeah. The evolution of vessels over the years is, uh, they're ever growing. Um, we're seeing vessels requiring, uh, drafts up to 17.5, 18m of water already with under keel clearance. That's already at over 19m uh, water requirement. Uh, 20m is seen as the industry sort of, um, limit, if you like it, when taking the trade lanes around the world, particularly the Straits of Malacca and the, uh, almost impossible solution of dredging in that area.

00:13:16:23 - 00:13:27:11

And, uh, yeah, it's very conceivable that within the next within the life of that wind farm, particularly, uh, that vessels of 20m would be looking to call London Gateway.

00:13:28:26 - 00:13:41:14

And so in that regard, I'd also reference you to paragraph 7.13 of the applicant's, uh, navigation risk assessment, which sets out that general consensus that 20m draught will be necessary during the lifetime of the project.

00:13:47:08 - 00:13:47:27

Thank you.

00:13:49:19 - 00:13:54:13

Um, could we just bring in, um, Julie Russell from the Port of London, please?

00:13:57:10 - 00:14:32:15

Good morning, Julie Russell for the Port of London Authority. Um, in essence, we, um, agree with the submissions made by London Gateway. Um, on on the above point. Um, I understand that the Port of London Authority currently has no timetable for, um, for future dredging, but, um, that they are actively looking at future proofing. Um, over the time, um, over the lifetime of, of this project. And obviously once it wants the cables in that causes a constraint.

00:14:32:28 - 00:14:52:20

Um, and then finally, just to echo, uh, what um, London Gateway has said is that, you know, agreed. Um, between between the ports and, um, the applicant that a need to dredge to 22m to allow for a 20 metre vessel. Is is the agreed position.

00:14:56:09 - 00:14:56:29

Thank you.

00:14:58:22 - 00:15:00:22

Um, could the applicant respond? Thank you.

00:15:01:23 - 00:15:32:11

Adam Foster for the applicant. We would concur with what's been stated about the navigation risk assessment, in that it does identify 20m as a realistic worst case vessel draft. And so we would view the proposals we're making around burial depth that will be outlined in the outline ccep at deadline for as our proposal and how we plan to safeguard in the event that those vessels, uh, do seek to enter the ports and the ports seek to dredge to those depths.

00:15:34:14 - 00:15:54:06

Thank you. Um, an additional question. Again to London Gateway Port or the Port of London Authority. If the dredging is not undertaken before, the cable would be buried for North Wales offshore wind farm. Is it reasonable and technically achievable to require the cables to be buried to this additional depth?

00:16:02:22 - 00:16:04:17

Sorry, sir. Would you mind repeating that question?

00:16:04:19 - 00:16:17:24

Certainly, yes. So if the dredging is not undertaken before, the cable would be buried for North Falls Offshore Wind Farm, is it reasonable and technically achievable to require the cables to be buried to this additional depth?

00:16:21:26 - 00:16:28:18

I'm not sure I entirely understand it. You're saying if it's not done before, is it then feasible to be requiring it to be done after? Is that.

00:16:31:04 - 00:16:54:07

Well, it's about sequencing. So what I'm saying is that if the dredging is not undertaken before, the cable would be buried. Is it a reasonable requirement in terms of sequencing because the dredging is coming afterwards? Um, and is it technically achievable to, uh, require those cables to be buried to that additional depth?

00:16:56:16 - 00:17:29:13

I think Russell also has the hand up. I mean, we know of no reason why it's not achievable to bury the cables to that depth. Um, nothing to that nature has been suggested by the applicant. I mean, obviously, if the cables have been put at a shallow depth, um, then it is. We would understand not although it's always possible to dig them up, cut them off and put them back down again. Deeper. Uh, we would imagine the consequences of that would mean that that would be seen to be prohibited. Um, it would be unacceptable to the operators of the windfarm at that point. We would suppose This is a once and for all decision.

00:17:29:15 - 00:17:31:21

I think, in terms of the depth to which these cables are put.

00:17:33:13 - 00:17:40:25

And governance for the applicant. Sorry. Perhaps we could intervene here. I think Mr. Reed might be able to, um, assist with this particular query.

00:17:41:00 - 00:17:49:05

Okay. I notice as well we've got a number of hands up online, so I'm just conscious that we'll come back to you online. Uh, Julie Russell.

00:17:51:01 - 00:17:54:12

David Reed for the applicant. So we would concur with what.

00:17:54:14 - 00:18:28:26

Mr. Tyrrell is saying is that we would need to go in effectively first to be able to allow a future dredge over the top of the cables. The exact burial depth that needs to be done for that would need to be defined by the CRA, the cable burial risk assessment that would need to be submitted. So that would allow us to effectively understand the depth that we need to be below the the effectively the 22m that has been discussed and responded to. But in order for that to be occurring, we would need to ensure that our cable burial at the initial start was was sufficiently below that level to be able to do that.

00:18:28:28 - 00:18:50:24

And that is what we will be working on with the ports. That's what will be outlined within the Cobra that we will need to produce as part of the the conditions that will be, um, submitted to the NCA. Um, and so effectively we will need to be able to allow dredging over the top of the cables rather than having the dredging sequence before the cables are installed.

00:18:54:27 - 00:19:04:16

Thank you for clarifying that. Um, we've got two, two hands online. Um. Could we. I'll just go to Mr. Brooks first, if that's okay.

00:19:06:27 - 00:19:07:12

Yeah.

00:19:07:14 - 00:19:42:18

Paul Brooks, DP world, London Gateway. Um, yeah. Just to clarify, um, a couple of points. London, London Gateway, um, is about to become, in throughput terms, the largest container port in the UK and it's importance to UK trade as critical national infrastructure, you know, is ever growing and it's important so and the importance for that to continue and us to be able to handle the largest vessels is vital to us, but also to the UK in terms of trade, over 50% of the fruit and veg that we, uh, we all buy in the supermarkets that comes in containerized, comes through London Gateway.

00:19:42:25 - 00:19:52:18

So I just thought it prudent just to highlight the importance of the port and the importance of us being able to handle these vessels both now and in the future. Thank you.

00:19:53:28 - 00:20:04:28

Thank you. I should just clarify, although Mr. Brooks second, to put his hand up, I wanted to have continuity of London Gateway there. So we'll now go to Julie Russell. Thank you.

00:20:07:13 - 00:20:39:12

Julie Russell for the Port of London Authority. Um, I would just like to echo what Mr. Tyrell's submission, um, that this is effectively a once and for all decision. Um, and so it that highlights really how important it is for Port of London Authority to have the remediation clause in the protective provisions, and also the design parameter requirement to ensure that the 22 metre depth is protected.

00:20:48:05 - 00:20:51:15

Thank you. Um, could the applicant respond to that, please?

00:20:53:05 - 00:21:09:29

Adam Foster for the applicant, the concerns of the ports have been identified and are fully acknowledged by the applicant. And that is why we are, uh, putting forward our proposals at deadline for around how we can get to that 22m to ensure that poor access is maintained.

00:21:18:10 - 00:21:22:22

Thank you. Any further comments from either London Gateway or the Port of London.

00:21:27:10 - 00:21:29:15

I'm not seeing any any hands up.

00:21:30:07 - 00:21:30:22

So

00:21:32:06 - 00:21:34:16

on behalf of London Gateway Port, I don't know if you.

00:21:36:03 - 00:21:47:19

Have further questioning on this point specifically, but um, as we have some general points about, uh, the outstanding concerns on on passengers to and from the port, which we would like to put forward at some point.

00:21:51:07 - 00:21:59:24

Got further questions on the sediment disposal management plan, the cable specification installation plan, the navigation and installation plan.

00:22:02:01 - 00:22:07:00

Um, due to your concerns, align with with those or.

00:22:07:07 - 00:22:40:21

We have points on those as well. I think just before we get there, it might be sort of just me to, I think just make an overarching point, um, which arises really from what we heard yesterday, which is the change in position by the applicant, which obviously hadn't been flagged, was previously both in relation to the changes to the order, the changes to the marine licence, the introduction of an outline clip and the removal without prior notification of London gateways protected provisions. So the consequence we currently have is and obviously we'll come on to the details of this shortly.

00:22:40:25 - 00:23:19:00

Um, but we are to put our faith in an outline which we haven't yet seen. We will see only at deadline for, um, it's not been consulted upon. And there will now be no controls or no inputs by any of the ports, neither gateway nor PLA. Uh, on the content of that actual clip once it goes to the MMO. Uh, and also we've heard from the applicant yesterday that they are opposed to a requirement or presumably any equivalent condition in the DML about securing and being certain of this 20m vessel and the 22 metre draught, sorry, 22 metre dredge that's needed for that.

00:23:19:03 - 00:23:51:07

Notwithstanding the consensus that this is the correct future baseline to be working to. So, I mean, at the moment we're left with significant concerns that, um, the, uh, requirements of the National policy Statement, um, N3 in relation to navigation, shipping, which is set out at paragraphs 28326228340, if that are in fact, uh, secured, um, uh, the site selection has to be done with regard to approaches to ports and strategic routes.

00:23:51:15 - 00:24:29:14

Um, I just thought it'd be useful. I've just gone back through the documentation. Um, uh, if we look at the, uh, applicants tracker, which is rep 1053 on these matters, uh, it simply tells us that chapter 15 of the ES on shipping and navigation and the planning statement, which is A00 four, has considered shipping and navigation and concluded there's no residual impacts after mitigation. Um, and then further on, uh, we're told that the site selection and assessment of alternatives has engaged with the PLA and Harwich Haven.

00:24:29:19 - 00:24:35:03

I pause there to note there's been no engagement recorded in relation to the gateway on that. Uh,

00:24:37:03 - 00:25:23:28

and that has resulted in moving the cable slightly within the sink area, but obviously it remains in there. And it says with the implementation of mitigation measures, North ALD is predicted to have a tolerable or broadly acceptable effect on shipping and navigation. Uh, and I suppose there's two key points on this. One is we need to have certainty of the implementation of those mitigation measures. Uh, currently I've done a little bit of the homework for the applicant on this. The only reference in the papers that you currently have before you, uh, to the 20 metre depth being in any way secured is a passing reference in the navigation and installation plan, which is app 259, which says that the cable protection should not compromise the 20 metre depth in the deep water roots.

00:25:25:11 - 00:25:46:29

So that's the outline nip, I should say. There's no other reference anywhere else. And obviously, as we mentioned yesterday, we would suggest that's insufficient securing of that mitigation. Now we're also in the hands of the applicant because it's only going to be a deadline for that. We're going to actually see how that mitigation may be secured more effectively. Uh,

00:25:48:24 - 00:25:51:24

also in relation to that conclusion on navigation and shipping,

00:25:53:16 - 00:26:00:16

uh, if I look at chapter 31 and I appreciate the socioeconomic speak. So people are not here today,

00:26:02:03 - 00:26:38:22

which is when it looks at the impacts on the ports. And that underpins the conclusion about the tolerable impacts or that it's a negligible impacts on the ports. From an economic point of view that is relying on chapter 15 about shipping and navigation, and it says in that reliance that there won't be the impacts of tolerable or the operational impacts are negligible on the ports. That consideration is and this is set out in section 31.5 and 31.65 of that document, which is app 045.

00:26:38:24 - 00:26:43:06

That's chapter 31. It is only considering Felixstowe and Hard Haven.

00:26:44:22 - 00:26:48:29

There is no consideration of the economic impacts on London Gateway in that document.

00:26:50:16 - 00:27:21:02

So I'm not sure that any of those conclusions presently in the MPs tracker are necessarily robust. And like I said, this is all in the context of what we heard yesterday. If we can have guarantee of sufficient mitigation, then perhaps we need be less concerned. But presently we don't have a guarantee of mitigation. And we have an assessment which is non-existent when it comes to the economic impacts of shipping on the London, on the London Gateway and the London ports more widely. And we just heard from Mr. Brooks about the importance of that to the UK as a whole.

00:27:25:01 - 00:27:31:05

Thank you, Mr. Turner. I've noted your concerns. Could the applicant respond on those points, please?

00:27:34:08 - 00:28:06:24

Gary McGovern for the applicant. I'm grateful to Mr. Terrill for his summary of our application documents. And I think the key point that we've heard through the submissions, both today and yesterday is the need for sufficient mitigation. And our understanding is that if we are able to borrow the cable to 22m chart datum to facilitate future dredge to that depth, then the ports will be satisfied with that. There's any issue of how that is secured, which we discussed obviously yesterday.

00:28:06:26 - 00:28:25:17

And we'll make our submissions on that. No doubt Mr. Terrill and others can respond to that. Um, but, um, we will be submitting. As Mr. Foster outlined the outline KSP updated nip and aim at deadline for, and we'll look forward to further engagement with the ports thereafter on the content of those documents.

00:28:29:24 - 00:28:33:26

Thank you. Any further comments from me, the London Gateway or the Port of London?

00:28:35:15 - 00:28:36:12

Julie Russell.

00:28:39:26 - 00:29:10:20

Julie Russell for the Port of London Authority. Um, firstly, I would just like to, um, come out in support again of London gateways submissions and submissions to Mr. Tyrrell. Um, there's two more detail points. Um, firstly, the, um, the outline um, nip talks about. Sorry. Um, it talks about enabling a, um, a vessel of 20m draught.

00:29:11:04 - 00:29:14:27

Um, sorry. Hang on a minute. Um.

00:29:20:07 - 00:29:58:10

Sorry. It is page 30 of the, um, the outline nib that currently seeks to maintain a minimum minimum of 20m water depth, which isn't sufficient. And it's the case that actually it's 22m that's required. Um, and that was the submission that the Port of London Authority made in the, in their written representations. That's the first point. My second point is that Mr. McGovern talks about ensuring a 22 metre, um, dredge, but actually the cable needs to be below that level in order for, for that 22 metre dredge to take place.

00:29:58:24 - 00:30:32:06

Um, and then finally, I just wanted to highlight, And obviously we're talking about the deep water roots. And there's also the sunk Pilot diamond area, which, um, causes the Port of London Authority, um, an overarching concern, um, as well as the deep water routes being used for entry and exit of vessels to and from the Port of London. Pilotage is compulsory for larger vessels within the Port of London districts, and it approaches um.

00:30:32:10 - 00:31:06:07

The sunk pilot diamond is shown in um in the ownership um, and it's marked on there that the reality of um sort of other factors, including traffic density, whether wind speed, direction means that it was we've highlighted, you know, there's highlighted this sort of diamond area that actually goes a lot, a

lot further. Um, and so with the offshore cable corridor Impacting, um, there's some pilot diamond area.

00:31:06:21 - 00:31:19:23

Um, this concern in relation to the deep water also flows through into that pilot diamond area. So that's another area of concern to the Port of London Authority.

00:31:21:18 - 00:31:23:28

Thank you. The applicant respond, please.

00:31:25:29 - 00:31:56:27

Gary McGovern for the applicant. Um, we're grateful to Miss Russell for, um, flagging the issue in paragraph 30 of the outline nip. Um, we will, as Mr. Foss said, be updating the nip, um, and submitting that at deadline for. So we all sweep up that, um, correction. Um, and apologies if I misspoke, but, um, what I was confirming was that the cable would be buried sufficiently below the 22 metre datum, um, level in order to allow dredging to that depth. So the cable would be sufficiently below that.

00:31:56:29 - 00:32:05:06

As Mr. Reed said earlier, I think Mr. Forster Foster would like to come in and make some replies to the points around the pilot boarding area. Thank you.

00:32:06:18 - 00:32:29:07

Adam Foster for the applicant. Yes. We can confirm that the pilot diamond was identified as an area of concern through the consultation that we've undertaken. What we've done is identify and agree with the ports. An area of key concern, which is shown in figure 2.1 of the outline Nip, which is rep 202.

00:32:32:11 - 00:33:03:02

35359. There will be additional content on the pilot diamond within the outline document submitted at deadline for including the Sediment Disposal plan and the Outline Cable Specification and Installation Plan to ensure that we are maintaining suitable under keel clearance in those areas and the full technical detail will be set out in those plans. And again, we're very happy to chat with the ports on their view on those commitments that we're making once they've had a chance to review them.

00:33:03:04 - 00:33:04:02

Post deadline for.

00:33:06:07 - 00:33:12:14

Thank you, Mr. Foster. Any other comments from either London Gateway or the Port of London?

00:33:16:07 - 00:33:59:13

I am not seeing any hands up. I'll move on to the next question then. So the next subject is the sediment disposal management plan. So the applicants response are Rep 1045 to Port of London's relevant representation. 272 refers to an outline sediment disposal management plan, setting out criteria for dredge disposal locations to be developed and submitted as soon as possible into the examination. Could the applicant outline how this management plan will address concerns that high

spots could be created, which ultimately could impact access to the Port of London by reducing navigable depth and when the sediment disposal Management Plan will be issued.

00:34:02:16 - 00:34:11:20

For the applicant. I'll allow Mr. Reeds to come back on the technical point raised. But in terms of the timing, it's intended to submit the outline sediment disposal plan at deadline for.

00:34:16:27 - 00:34:41:16

David Reed for the applicant. So the sediment disposal plan will mainly focus on the where and the how that the disposal of any materials will be carried out. Um, the first intention to avoid high spots that will be impacting on the shipping and navigation traffic will be to avoid those. And that will be set out within the shipping and within the sediment disposal plan that will be submitted at deadline for.

00:34:45:26 - 00:34:53:15

Thank you. Any comments from either London Gateway or the Port of London or others?

00:34:58:18 - 00:34:59:12

Mr. Tyrone.

00:34:59:22 - 00:35:31:17

Sir Francis Carroll, on behalf of London Gateway Port Limited. Just I do have a procedural, uh, concern about all this in the sense of, uh, there's a lot that we will be seeing for the first time at deadline for, uh, there is going to be an outline sediment disposal plan, which, to my knowledge, doesn't yet exist and hasn't been submitted. So this will be the first time we see that we're going to get an updated in IP with some changes. We don't know quite what they're going to be. We're going to get the outline, see CIP for the first time, which we haven't seen before. And indeed we were told at deadline two wouldn't exist.

00:35:31:28 - 00:36:08:23

Um, uh, I'm concerned firstly, just procedure that this documentation hasn't been put before us previously, and I'm just concerned also whether or not we will have enough time to usefully, uh, for you to respond to that. Uh, if we don't get that to a deadline for then obviously we then responded deadline five. Uh, and we'll come on to these points, I'm sure, on your further questions. But there's then the question of how all this is stitched into the order itself or the marine licence, which also currently, we don't know, uh, currently there's no role for the outline sea CIP in the DML.

00:36:09:05 - 00:36:29:05

Um, I'm not sure what the role will be in the sediment disposal plan. I haven't checked that point, but I'm assuming as it doesn't exist yet, it's not referenced that clearly, uh, in the DML. Um, so, I mean, I think, yeah, there's just a concern that, ah, we as respondents can have enough time to consider this properly. Um, is deadline for too late to wait till this documentation?

00:36:32:29 - 00:36:34:21

Thank you, Mr. McGovern.

00:36:36:03 - 00:36:43:27

I was going to ask, in the light of that comment, uh, is there an opportunity for that to be shared in advance of that deadline?

00:36:49:25 - 00:36:57:11

For the applicant? We'll take that away and consider, but I'm not sure that would give very much more time to Mr. Toro, given that deadline for is only next week.

00:36:57:17 - 00:36:59:29

No, I appreciate that. Yeah.

00:37:03:11 - 00:37:41:00

Adam Foster for the applicant. We would also like to flag that the technical contents of those documents are going to be very similar to what are in the Five Estuaries plans. We aren't expecting any major discrepancies between the two, noting that it's similar cable routes with similar issues in terms of crossing the Deepwater routes being in proximity to the sunk pilotage diamond. We were awaiting the finalization of the Five Estuaries examination, just to make sure that we were in consistency with what those documents say. And so we are hopeful that that is going to mean that the review process is easier on the ports, seeing as how they'll have already seen the same content or much of the same content within the Five Estuaries documents.

00:37:42:23 - 00:37:57:08

That's that's right. But it is a separate application. It is a separate examination. They will still have to consider the full outline plans that are put before them. Um, so there is a timing issue.

00:38:03:19 - 00:38:04:19

Uh, Julie Russell.

00:38:08:01 - 00:38:46:01

Julie Russell for the Port of London Authority. Um, we we are wondering whether, um, it might be possible to programme a meeting, um, with the applicant and the Port of London gateway and the Port of Tilbury potentially as well. Um, after the deadline for, um, information is, uh, submitted and before deadline five. Um, because, um, my client is of the view that they will have questions, it would be useful if the applicant could go through either the, you know, the various documents with the Port of London Authority.

00:38:46:03 - 00:38:48:00

And I just wondered whether that might be possible.

00:38:50:20 - 00:39:10:01

Gary McGovern for the applicant. Yes. We would be very grateful for such a meeting and in fact, pre-empted something that the applicant was proposing to do in between deadlines four and five, to meet with reports and go through the various documents and the detail and address any questions that may arise from those. So very grateful to Miss Russell for that suggestion.

00:39:12:25 - 00:39:13:22

Okay. Thank you.

00:39:16:04 - 00:39:19:19

Not seeing any. Mr. Tyrrell, were you about to speak?

00:39:20:07 - 00:39:54:08

So yes. Thank you sir. On behalf of the report, um, that's all noted. And I think such a meeting would be very useful. Um, I think just two things, really. Um, and just picking up on what Madam chair also just mentioned. Uh, we had a length yesterday from the applicant that this was a different scheme to five estuaries. Uh, and for example, that was the reason why they weren't inclined to mirror the approaches to protective provisions that we see on five estuaries. Today, we hear that they're intending now to accord many of the documents to.

00:39:54:10 - 00:40:25:05

Five estuaries. If that had been the intent, then the structure of the licence and the order could have mirrored five estuaries more closely from day one. And these documents, particularly the outline clip, could have been produced at the outset. Um, it seems the applicant seems to be slightly chopping and changing its story as to whether or not it is similar to that scheme or not. And I just reiterate the point that if this has been the intention of the applicant all along, these documents could have been provided previously. And if it isn't, this change of position is not helpful.

00:40:27:09 - 00:40:33:21

Okay. Thank you. Um, I'll come to Mr. Salter in a minute, but if the applicant would respond first, please.

00:40:34:08 - 00:40:59:05

Again, I'm going for the applicant. I'm sorry. I can't accept the submission from Mr. Tyrrell. Um, the documents in five estuaries were changing throughout, uh, their examination right to the final deadlines and have only just recently been settled. And rather than make multiple changes, we were awaiting the final position in order that we could consider that rather than producing documents that may immediately be superseded by further developments in the Five Estuaries Examination. Thank you.

00:41:06:02 - 00:41:06:27

Mr. Salter.

00:41:09:16 - 00:41:46:17

Thank you, sir Nick, from the MCA. Um, I just wanted to to provide our general position on these last couple of agenda items that have been discussed. It is an MTA's position is that we we fully support the ports on on these cabling issues. Um, any documentation submitted to the MMO. Um, we will be looking out for just to make sure that the ports have been consulted, uh, on them. Um, and finally, uh, with regard to to any meeting with the ports after deadline for.

00:41:46:19 - 00:41:54:09

I'd just like to ask if MCO could be invited. Just so, um, we can keep abreast of the issues being discussed.

00:41:56:13 - 00:41:57:00

Thank you. Mr..

00:42:00:03 - 00:42:03:15

McGovern for the applicant. Very happy to extend the invite to the mic.

00:42:04:16 - 00:42:05:05

Thank you.

00:42:07:15 - 00:42:14:03

Okay. I'm not seeing any hands up online or in the room. Any final comments from the applicant?

00:42:18:19 - 00:42:58:12

Okay. Thank you. Next subject is the cable specification and installation plan. Um, and appreciate we've covered, uh, this partly earlier and also yesterday. Um, London gateway port in their written representation rep 2041 regarding protective provisions. Draft DCO schedule 14, part seven noted the need remains for their involvement in the draft cable specification and installation plan, and that their involvement is also required in the Operations and Maintenance Plan, which covers future maintenance activities for cable, remedial burial, cable repairs and replacement and cable protection.

00:42:58:14 - 00:43:22:07

Replenishment condition 13 Draft Marine Licence part one, schedule nine of the DCO. Yesterday, the applicant advised that the outline Cable Specification and installation plan would be provided at deadline for. How will the applicant involve London Gateway Port with their draft cable specification and installation plan and the operations and maintenance plan?

00:43:29:20 - 00:43:47:03

Adam Foster for the applicant. The outline version will be submitted at deadline four. And as we've alluded to. We're very happy to meet with the ports, including London Gateway, to discuss their comments on it. And we're hopeful and certainly confident that we can reach agreement on the technical content of those plans by the end of examination.

00:43:48:07 - 00:43:51:21

Okay. Thank you. And the point about the operations and maintenance plan.

00:43:59:03 - 00:44:05:06

Again, very happy to discuss that plan. If they've got any comments and we'll take those on board and take them away.

00:44:06:15 - 00:44:10:14

Thank you. Any comments from Port of London or London Gateway.

00:44:13:18 - 00:44:44:15

Sir. Thank you. Francis Carroll on behalf of London Gateway Port. Um, your question was about the or our sorry our submissions in the representations and your question therefore was about the actual c

cip we've heard from Mr. Foster in relation to us being having a discussion about the outline KTP. Uh, obviously we don't know, but if we're assuming the structure of this will be similar to five estuaries, Then the DML, I suspect, will be changed at deadline for to provide the actual c CIP will be in accordance with substantially in accordance with.

00:44:44:17 - 00:45:27:04

We don't know, but generally have something to do with the outline C sip. We'll have to wait to see what um, the revised draft says about that. Uh, our point in the representations was not that we want to have a chat now about the outlines, which we do, we very much welcome that. Uh, obviously we're going to see it at deadline for. So I suspect that chat may take place through the the auspices of this examination. Uh, we want involvement in the actual clip that gets submitted to the MMO. Uh, and equally, insofar as it becomes relevant for future maintenance activities, which may include additional cable scour protection, such like we want involvement in the operation and maintenance plan as well, not the outline documents, which you're going to have now, but the actual application documents to the MMO.

00:45:30:20 - 00:45:31:08

Thank you.

00:45:33:20 - 00:45:35:28

The applicant respond to that, please.

00:45:43:18 - 00:46:01:06

Gary McGovern for the applicant. Um, as Mr. Tyrrell says, and I think I confirmed yesterday, the DML condition will be updated, um, for deadline for to require, um, that the final, um, ccep will accord with the outline ccep so I can give that confirmation. Um,

00:46:03:05 - 00:46:23:16

we would expect to be consulting with the ports and other interested stakeholders on the content of the final, um, Ccep and other plans as a matter of good practice. Um, and the MMO and we've just heard the MCA confirm as well, would ensure that the ports would be consulted on the final Ccep plans as well in due course. Thank you.

00:46:29:06 - 00:46:31:08

Mr. Tyrrell. Any further comments?

00:46:32:15 - 00:47:02:27

Uh, not on that point. I mean, I don't know whether it's helpful just to explain that. I mean, part of our concern and needs to be involved in this is what we see would actually, uh, solve this problem, and we wouldn't need to be here at all. We simply that we have a requirement that says 22m to allow for 20m as a base parameter, and then involvement in those documents. And that involvement really then is not looking to secure that depth, but just to ensure that the way things are done, uh, doesn't interfere with operations at London Gateway.

00:47:03:04 - 00:47:40:05

Um, well, such interference is only as reasonable, essentially. Uh, I'm thinking here that obviously London Gateway has statutory powers to come along and just do its own dredging activities in the sunk, um, in relation to those statutory powers. It doesn't need to ask anyone else before exercising them. So it is in all parties interests to make sure that, uh, those plans work properly. Um, and nothing is going to happen to the London Gateway, Port Harbour and Parliament. Order. It will remain in place so that it is not only an gateway's interest, it's also in the applicant's interests to make sure that we are involved in that plan.

00:47:40:23 - 00:48:04:29

Nothing about a marine licence granted or a consent granted under a marine licence by the MMO interferes with the exercise by the gateway of its powers. So this is this is where we're at. We are a statutory we have statutory powers in this area. Now we can talk about depth as was alluded to yesterday. But either way, we are present there and we just need to make sure that at the applicant's presence, there is the right one.

00:48:07:24 - 00:48:09:24

Thank you. Any comments from the applicant?

00:48:11:29 - 00:48:23:09

Government for the applicant. And just to note, Mr. Turtle's earlier submissions, that they do not currently have the power to dredge to the depths that we've been discussing and would need a further marine licence in order to do that.

00:48:28:28 - 00:48:31:13

Any further comment, Mr. Terrill?

00:48:33:13 - 00:48:45:09

No, that's correct. But I think the point is we can still come along and dredge the 17.5m at any point in time, essentially. Um, so I think, uh, this is the reason why, from the ccep point of view, we need to be involved. Uh.

00:48:47:28 - 00:48:53:25

Thank you. I'm not seeing any other hands in the room or online. Any further comments from the applicant?

00:48:54:00 - 00:49:16:12

Yes. Adam Foster for the applicant. Uh, we just in reference to what's just been stated about the the dredging abilities over the existing deep water routes. Just to flag that the water depths in the areas where North Falls crosses the the deep water routes is already in excess of the depths that are allowable under the Harbor Empowerment Order. They are around 19m, so in excess of the 17.5.

00:49:21:10 - 00:49:26:21

Thank you. I'm going to move on to the next subject, which is the navigation and installation plan.

00:49:28:25 - 00:50:07:10

Of London Authority in response to exec 15 .1.5. Reference rep 2058 has requested that amendments are required to the outline, Navigation and Installation Plan, and an updated plan needs to be submitted into the examination. Port of London Authority has included comments on the navigation and installation plan as part of their written representation. Rep 2056, which includes recommending a meeting between the interested parties to refine the navigation and installation plan. Port of London Authority has also raised concerns about the potential for simultaneous operations with third party schemes during installation and maintenance.

00:50:08:06 - 00:50:44:22

With reference to the Port of London Authority's comments on any submissions received at the previous deadline, rep 3067 updates are therefore required to the outline, navigation and installation plan to properly deal with the issues associated with the concurrent activities. The Port of London Authority also requires approval of the navigation and installation plan before it is approved by the Marine Management Organisation. Could the applicant advise if a meeting has been held, and if so, what are the proposed next steps to include engagement with key stakeholders for updates to the navigation and installation plan.

00:50:47:22 - 00:51:25:01

McGovern for the applicant. I think as we've just been discussing, some of the timetable is that we will submit an updated version of the navigation and installation plan deadline for and updating that plan. We will have considered the comments to date from the ports in making those updates. We would be having a further meeting, um, in between deadlines four and five, to go through the content of the Nip and the other plans and take on board any further feedback and try and address any further questions or concerns they may be. And depending on, um, what comes out of that meeting, then there may be further updates to the management plans as we progress through the examination.

00:51:27:05 - 00:51:27:24

Thank you.

00:51:30:22 - 00:51:34:15

Any comments from the Port of London or London Gateway?

00:51:39:05 - 00:51:42:10

I'm not seeing any other. Hands up, Mr. Tyrrell.

00:51:43:09 - 00:52:17:13

So I just thank you, Sir Francis Tyrrell on behalf London Gateway port. Uh, just wanting to flag, uh, as I mentioned before, we're in the applicant's hands as to what the deal is going to look like on these points at the moment. But, um, uh, I confess I'm a little unclear as the interaction will be between the cable specification and installation plan, um, which we're told is going to see an outline one and that that will reference this 22 metre depth point. And, and that's going to be dealt with at condition 22 each of the DML, I presume.

00:52:18:01 - 00:52:48:07

Um, condition 22 in the DML talks about the navigation installation plan, and we do know that the outline Nipp does have that one statement, which we're currently hanging our hopes on in saying that

any protection will not compromise a minimum 20 meter depth. I don't know what the attraction is going to be for those two plans, under the under the conditions and how it's going to work together. What one governs, what one doesn't. It seems we've got a strange overlap. So I just lay that down as a point I think needs to be dealt with.

00:52:50:19 - 00:52:51:08

Thank you.

00:52:52:26 - 00:52:54:18

Could the applicant respond, please?

00:52:55:18 - 00:53:20:29

Adam Foster for the applicant, we can confirm that all the relevant content around burial depth, cable protection, water reduction, etc. at deadline for will be in the outline c CIP so it won't be in the navigation installation plan. The outline, navigation and installation plan will look purely at the temporary impact of cable installation and maintenance. The other technical components of burial depth, under keel, etc. will be included in the outline. Ccep.

00:53:24:18 - 00:53:25:07

Thank you.

00:53:27:19 - 00:53:31:23

Not seeing any hands up online or in the room.

00:53:33:08 - 00:53:54:21

So we'll move on to the next question. So the next question is for the Maritime and Coastguard Agency. Could you advise whether the mitigation for risks to shipping movements are adequate for the project in isolation and cumulatively with other projects, so that this links to the discussion that we've just been having? Um, about the plans.

00:54:00:18 - 00:54:16:12

For the MCO. Um, subject to agreement of the post consent plans, um, and the conditions within DML. Uh, we wouldn't have any further comments to make, and we would say that we would be content.

00:54:19:02 - 00:54:23:00

Thank you, Mr. Salter. Any comments from the applicant, please?

00:54:26:07 - 00:54:49:27

Adam Foster for the applicant, I would say that the view expressed by Mr. Salter there is reflective of the comprehensive navigation risk assessment that we've undertaken that has looked to identify all the hazards and the stakeholder concerns throughout the consultation process, and that NRA has concluded that with the mitigations in place and that includes the relevant post consent plans, that those hazards are as low as reasonably practicable.

00:54:54:21 - 00:54:55:12

Thank you.

00:55:01:16 - 00:55:03:01

Okay. So I'm going to move on

00:55:04:22 - 00:55:17:17

to move on to the final section now, which is whether the assessment, sorry, whether the estimate of the effects from disruption to navigation and shipping in the assessment of Socioeconomics is sufficiently robust.

00:55:20:18 - 00:56:02:05

Environmental statement. Chapter 31 socioeconomics reference AP zero 45, paragraph 200. As Mr. Terrill raised, this earlier, includes that the assessment of wider economic effects from disruption to shipping and navigation is related to the potential for North Falls to impact negatively on the economic value associated with major local ports, Felixstowe and Harwich. All other ports have been scoped out of the assessment due to the proximity ports to North Falls, shipping lane patterns and the level of economic activity associated with other local ports in comparison to the ports of Felixstowe and Harwich.

00:56:02:23 - 00:56:24:10

Could the applicant advise to what extent has the socio economic assessment in environmental statement? Chapter 31 app 045 considered the range of stakeholders and routes presented in the navigational Risk Assessment from appendix 15.1 of the Environmental Statement. Reference app 1062108.

00:56:28:16 - 00:57:02:07

Gary McGovern for the applicant. And sir, as I think I signalled at the opening of proceedings today, we don't have the author of the socio economic chapter with us today. In order to address that point in detail. We're quite happy to follow up in writing on that point. What I would add to that, those stories, I think the evidence that we've heard over the last few days is that subject to securing the commitments around burial depth and the other related issues in relation to pilotage in the various management plans? And I accept there's a disagreement as to how that is best secured.

00:57:02:09 - 00:57:11:13

But subject to those commitments, then there should be no impact on the operations of the ports that could then manifest into socio economic impacts. Thank you.

00:57:11:15 - 00:57:20:25

Q Mr. McGovern, could I just ask why you don't have a socio economics witness available today?

00:57:24:19 - 00:57:38:11

And Gary McGovern for the applicant. It was only when the agendas were released that we realised that there were going to be questions around the socio economics, and at that stage, we weren't able to procure that in order to be able to address that. Before you today, ma'am.

00:57:47:27 - 00:57:49:13

Um, Julie Russell.

00:57:54:06 - 00:58:25:07

Julie Russell, on behalf of the Court of London Authority, um, the Port of London Authority's position is that, um, the, uh, socioeconomics could be, uh, sufficiently robust, um, if the Port of London Authority have the necessary mitigations and measures in place. Um, and for this we say we need the requirement and, um, protective provisions. And it is those elements that will be in the Port of London Authority are comfortable.

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

Um, our view is that, um, those elements are fundamental, um, and secure the mitigation that the Port of London Authority require.

00:58:38:26 - 00:58:39:17

Thank you.

00:58:41:06 - 00:58:43:23

Um. Mr. Terrill, do you want to come in as well?

00:58:44:27 - 00:59:17:15

Thanks. Francis Terrill, on behalf of London Gateway Port. Um, just to add a further gloss to what Miss Russell has just said. Uh, this can be fixed. Um, I think the link to the socio economic is also that we need to know now. We need to have certainty now that that 22 metre depth is guaranteed. There will be a socio economic, or at least an economic effect. If the ports on the Thames do not know until the CIP itself is submitted and approved by the MMO.

00:59:17:28 - 00:59:51:01

What the situation will be. In fact, they will be hesitant. They won't know whether they can supply deeper vessels, whether they can go ahead with dredging programmes, what they'll be planning. Their business planning is called into question. If they don't know sooner rather than later what the ultimate position will be. And this is why we do need that requirement now in the order. So we have clarity. Everyone is happy and we can know what we're doing rather than waiting and hoping. I think the language that was used on behalf of the applicant earlier was that we would know that the CIP, the final form, CIP, would accord with the outline.

00:59:51:21 - 01:00:03:08

Now, this is the sort of annoying thing that lawyers spend too much time debating. But what is in accord, what accords with and what doesn't accord with them is a bit vague. So as we have uncertainty, we need to get certainty to avoid economic impacts now.

01:00:06:02 - 01:00:06:23

Thank you.

01:00:08:20 - 01:00:13:24

I'm not seeing any other hands up in the room or online. Could the applicant respond, please?

01:00:19:20 - 01:00:24:24

Get him government for the applicant. And we've noted. Mr.. For the comments. We've got nothing further to add. Thank you.

01:00:31:23 - 01:00:33:26

Thank you. I'll move on to the next question.

01:00:36:16 - 01:01:11:17

Um, I appreciate you said that you, socio economics specialist isn't here, but I think I think I'll read the question. So you've got advance notice of what's coming when we present them as written questions. Uh, could the applicant advise if the cable is buried to allow for water depths of 22m rather than the 19m? Um, which is referred to in the environmental statement for the deep water routes. How would this affect the disruption to shipping and navigation for the construction stage assumed in the socio economic assessment in environmental.

01:01:11:19 - 01:01:14:25

Chapter 31 app 045.

01:01:25:28 - 01:01:27:24

Sorry. Yeah. Could you respond? Thank you.

01:01:28:12 - 01:01:35:28

Karen McGovern for the applicant. We're grateful to you for him giving us advance warning of what's coming. And we'll address that question. Writing. Thank you.

01:01:38:11 - 01:01:42:18

Thank you. Any comments from London Gateway or the Port of London?

01:01:47:18 - 01:02:24:24

Not seeing any. Hands up. Um, no. Hands up in the room either. Um, so the final question on shipping and navigation. Um, the question is to the UK Chamber of Shipping, um, who aren't in attendance today, but had they been in attendance, then I would have asked them the following question. Given the economic importance of the shipping and navigational industries, has the proposed mitigation for shipping and navigation been developed sufficiently to minimise disruption or economic loss for the project alone and cumulative effects? If not, what further work or additional mitigation measures or safeguards would be required

01:02:26:24 - 01:02:33:15

as they are not present. Can I ask the applicant whether they have any comments, and can this point be covered in the statement of common ground?

01:02:35:23 - 01:03:02:21

Adam Foster for the applicant, we are hopeful and expecting to be able to submit the first iteration of the draft statement of Common Ground, with the chamber shipping a deadline for, broadly speaking, they are happy with the array area. The changes that have been made in terms of the site restriction, the site reductions and the structural exclusion zone, and they've indicated they'll defer to the ports

around the export cable corridor concerns. And that's what we're expecting that drafts of Common Ground to indicate.

01:03:10:01 - 01:03:15:19

Thank you. Any further comments from either London Gateway or the Port of London?

01:03:20:00 - 01:03:23:18

No, I'm not seeing any any hands up online or in the room.

01:03:27:19 - 01:03:30:23

Just check with panel members whether there are any further questions.

01:03:36:23 - 01:03:53:12

Okay. Thank you. The time is now at 1250. I'm adjourning the issue specific hearing, and this will resume again tomorrow with item 3.5 Offshore Landscape Visual and Seascape. Thank you.