



Planning Inspectorate
Arolygiaeth Gynllunio

Hearing Transcript

Project:	Morecambe Offshore Windfarm Generation Assests
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00:00:05:26 - 00:00:28:03

Good afternoon again, everybody. This Asia-Pacific hearing is resumed. Um, we now move on to item seven on the agenda. Other environmental matters. Um, we've grouped together a few topic. Number of topics we'd like to discuss. A few questions about each. And Mr. Willis and I will be leading on them. The first item is human health. And Mr. Willis is leading on.

00:00:28:28 - 00:00:59:03

Thank you. Um, yes. So, as Mr. Jackson says, um. This item on the agenda relates to issues considering human health. I only really have a couple of questions, really, of clarification, so I don't anticipate it will take particularly very long. Um, to assist in the first question, can I ask the applicant, please to bring up table 19.20 of ES chapter 19, which was Rep uh oh at rep 104 and its PDF page 110.

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Robin Hutchison for the applicant, if I may, just while we are bringing that table up, and I'm going to propose a slightly different way of introducing the applicant team for this session, because we have a number of, um, different experts in this agenda item, some of whom are online. Yeah. So, um, I'm going to suggest if it's okay. Uh, we in the legal team will field the question and bring in the necessary specialists from online, or we've got, uh, Sam from, uh, bigger economics, who's our traffic and transport lead in the room.

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But otherwise our experts are online, and they'll perhaps introduce themselves before they speak for the first time as well.

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Yeah. No, that's. That's fine. Yeah, I did note actually got, uh, virtual attendees. So yeah, we approach it that way. That's fine. Okay. Um, so. Okay. Yeah. So thank you, um, for bringing the table up. Um, so, so this table provides a summary of the conclusions made for each of the impacts assessed for all phases of the development, and for each of the identified impacts. The assessments considered the effects on different receptor populations or groups, which are defined as the general population and vulnerable population group.

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Um. The table provides a summary of the sensitivity that's been ascribed to each group, the magnitude of impact, and presents an overall single conclusion in terms of the effect of that impact. So my question really for the applicant was, can I begin really by asking you to clarify or briefly explain how a single conclusion in terms of overall effect has been derived or reached for each impact when two different receptors groups or populations have been assessed? So, for example, is this a combination of a consideration of the individual effects on each group, and if so, what method or approach has been taken to conclude a single effect.

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Robin Hutchison for the applicant. At this point, I will invite Mr. Piper, who is the applicant's human health lead, and we can see on the screen to respond.

00:03:13:28 - 00:04:03:25

Thank you. Regan Piper, on behalf of the applicant and author of chapter 19. Yes. So a key part of the public health impact assessment here is understanding the impact on health inequalities and the the assessment references the Institute of Environmental Management and Assessment guidance. And that is guidance that's been developed through through sort of collaboration between public health leads, um, including the UK Health Security Agency experts and the Office of Health Improvement and Disparities, as well as the sort of impact assessment industry, um, that that methodology describes the need to articulate a sensitivity conclusion for the general population and a sensitivity conclusion for the vulnerable group population.

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And then in the guidance it set out, I think it's paragraph 6.3 of the the IMA guidance that you reach a single overall conclusion. And this this allows the consideration of health inequalities to be reflected in practice. What this means is that we're very much led by the the sensitivity score for the vulnerable group population. So whilst we present both the general population and the vulnerable group population, essentially we're relying on the vulnerable group, the high sensitivity score, um, in order to derive what that combination of sensitivity and magnitude magnitude is that then inform significance.

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So it gives us a slightly conservative assessment. But but that that's essentially the way to read it.

00:04:54:05 - 00:05:08:23

Okay. Thank you for that. So. So just so I'm clear then. So for example, if we can just scroll down the screen to look under the operation phase and the wider societal benefits. Next page I think is the bottom of the next page.

00:05:11:02 - 00:05:11:26

Oh there we go.

00:05:15:26 - 00:05:57:21

So for example, if we're looking at wider societal benefits, we've got a sensitivity for general population of low vulnerable group high with the magnitude of medium. Um, just in terms of then referencing back to the matrix table, I think on table 19.9 in that assessment that obviously using that

matrix determines quite different, um, conclusions in terms of the overall significance. So in that example, I think looking at table 19.9, you would end up with a um significance effect for the vulnerable group of moderate or major, and for the general would result in a minor.

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Significant effect. So my understanding is to try to understand how, when there's quite a difference between those two, how you then conclude a single somewhere between the two. I guess we'll be able to clarify that for me.

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It is. So the matrix is a guide, and it informs the professional judgment and the individual assessment sections set out more context on the particular considerations in terms of vulnerability and sensitivity and indeed on magnitude and the extent to which the severity of the potential impacts and the extent of the population affected. So so the proportion of the population who might be affected also comes into play.

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So, but, but I think it speaks to the previous point that essentially the the impact on vulnerable groups is for public health very important as that reflects the the issue of inequalities and therefore that drives the assessment. So we haven't sort of been overenthusiastic with this. You know, we're not saying this is major, but but we're saying this is a significant benefit. And that reflects the the very important effect on health inequalities.

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Okay. Thank you. That's that's helpful and noted.

00:07:18:02 - 00:07:58:09

So that probably leads me on actually to the next point. Uh, so again, just specifically looking at the conclusions that have been made in relation to the wider societal benefits of the project during the operation and maintenance stage, and that's now on the screen. So thank you for that. Um, again, just looking really at the some clarification, um, table 19.8 of this chapter of the year sets out the definitions that are used to define the different levels of magnitude and what? When looking at the definition of medium, we can see that this includes something that results in a moderate change in morbidity and also affects a large minority of the population.

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Whereas in contrast, under the definition of low, the terms minor change to morbidity are used and something that affects a small minority of the population. Now, in terms of the assessment paragraph 19.213 of the year, chapter 19, that states that the magnitude of change in relation to the wider societal benefits have been determined to medium, which is reflected, I believe, in the um, in the table there. And this has been on the basis that there will be a long term and continuous public health benefits to energy security, and that the effects are described as likely to be resulting in a minor reduction in risk to population mortality and morbidity, and that the effects would extend via the national grid to a large majority of the national population.

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And so, again reflected in the table, the overall conclusion is that there would be a moderate beneficial effect.

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Now, I've seen the responses that have been made in submissions. And, um, we note that the energy produced by the development would be that of the equivalent of 500,000 homes. And whilst I understand that the connection of the project to the grid, um, would extend the distribution to a larger population, wouldn't the minor change and reduction in risk to mortality and morbidity identified and attributed as a result of this development only really therefore benefit that proportion of the national population that would utilise the energy produced.

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So, in other words, when considered in the national context, the population that would benefit would arguably a small minority as opposed to the larger minority that's been used for the purposes of assessment. So my question really is having regard to those definitions in table 19.8. If the development results in a minor change in morbidity, would it not really benefit that the benefit the population would benefit? Would that would be a small minority of the population, in which case, using those definitions, the magnitude should not be identified as low rather than medium.

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So I'd invite a response to that point, please.

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Yeah. So the, um, criteria that's set out in in table 19.8, the, the, uh, explanation around that confirms that it's about taking the most relevant criteria from each. So it's not necessarily that all the criteria from a single row have to apply to, to a given effect. Um, I'm, I'm comfortable that this is correct. And, and, you know, I think we shouldn't underestimate the benefit that we have from a, uh, secure and affordable electricity in this country.

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A lot of public health is is very reliant on that. Um, that that extends, you know, not not just to any given housing. In terms of keeping the lights on, but the safe refrigeration of food. The services, um, being up and running, people being able to undertake their their work and education and so on. So it is a wider distributed effect. And and the benefit from that, although perhaps subtle, is experienced across a very large proportion of the country.

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And taking into account our point around sort of the inequalities. You know, we're not trying to to override this. You know, it's acknowledging that, that it is a benefit and important benefit. And and indeed, that's why we do these schemes. You know, if, if that wasn't the case, the whole premise of, of national infrastructure, you know, would be less strong. So this is an effect that that does get experienced, you know. I think I think 500,000 homes equivalent is still a very large and important contribution.

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And the effect actually is that's just a way of thinking about it. You know, the the effect for public health is actually more diffuse affects a larger proportion.

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Okay. Thank you.

00:12:04:28 - 00:12:31:22

So I guess my, my in terms of that point, um, how would that compare, um, to a larger scale project, for example, that's producing more electricity? Um, are you able to to comment as to whether it's comparable in terms of the weighting, if you like, that's been assigned to this particular project? Given the contribution it makes to the national context as opposed to a larger facility or a larger generating station.

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I think one way of looking this is the cumulative assessment where we look at other projects, for example, that are also bringing forward sustainable energy or at scale. And again, we're not overstating it. We're not sort of indicating that it all adds up to to something hugely greater. I think it's about recognising that we have a methodology here that's designed to help inform. What are the material issues here? What is important in terms of public health from this project and other similar energy projects and the categories of significance perhaps aren't um, as, as, uh, you know, there aren't as many options.

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You know, there's a threshold either it sort of becomes a significant effect or not. I think the point is it is a significant effect for public health. It's a significant benefit. And I would say that most energy projects would fall into that Medium magnitude category. Projects of scale.

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Okay. Thank you. That's really the only question I'd got for clarification on this particular item. Obviously, if anybody else wanted to add any comments at this stage. I don't think there is anybody in the room online. Um, in which case might as well swiftly move on. Um, so the next item really I want to focus on is dealing with socioeconomics, tourism and recreation. And again. Um, this shouldn't take too long. Um, yes.

00:14:11:27 - 00:14:47:14

Chapter 13, which is app 057, sets out the applicant's findings in relation to the assessment of impacts on socioeconomics, tourism and recreation. Um section 20.5, which is PDF 56 PDF page 56 summarises the baseline, which includes looking at the potential changes in population and working ages within the study areas. Now, at paragraph 20.98, it states the working population age, which is defined as 16 to 64 years old, comprise 62% of the population.

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And paragraph 20.101 goes on to state that the share of working age population and living in the local economic area is expected to decrease.

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In light of the this is the applicant question. If the applicant really, um, in light of the continuing increases in life expectancy, the state pension age has recently been increased from 65 to 66, and it's likely to continue to rise in the future. Similarly, there's been an effective raising of school leaving age from 16 to 18 in recent years. So just really inviting comment as to whether the applicant thinks any of these changes may have implications with regard to the baseline projections regarding the working age population that's been presented within the the environmental statement.

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Robin Hutchison for the applicant. And I'm going to introduce at this point, uh, Mr. Cleary and in fact, my sloppy handwriting made uh, and I made earlier, he it is Mr. Cleary that is bigger economics. So apologies for that. I think I said it was it was Mr. Taylor. So I'll invite Mr. Cleary perhaps with the, with the proviso that, um, if this particular question isn't something that we have necessarily considered, I'm sure the panel will be understanding if we replied in writing at a later date.

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If that's not something that we necessarily have taken into account in our assessment to date. But Mr. Cleary, please.

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Yeah. Simon Cleary for the for the applicant and yes, the, the um demographics split that we it's currently used by the ONS um And to to capture

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the kind of working age population, as is the is the 16 to 64 bracket. Um, but we are mindful in the ONS, and the ONS is mindful that that our that our changes in this um, both due to a rising, rising pension age and leaving in a higher, uh, age of leaving school. Um, but it's also mindful of, of the, um, choices that people make regarding early retirement and late retirement and the proportion of the workforce and any, any local authority, um, which is over 65 can can vary significantly in, in some of the London boroughs, it's as low as 2% of the workforce is over 65.

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And places like Shetland, I think 17% of the workforce is over, over the age of 65. Um, so this is something that we're mindful of and I suppose in terms of, in terms of accurate, um, defining, uh, defining the working age population. Um, in that terms is, is is possibly something that, that, that can be discussed. It's, uh, ongoing, um, topic of discussion within the ONS and uh, the those people who use that, those stats.

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Okay. Thank you. Yeah. I mean, as I say, I think we just want to recognize that, as I say, there's there's a potential for people to work work longer, but equal people to enter the workforce later, if you like, at the other end. It's just, um, seeing whether that has any implications in terms of the assessment that's been done so far in terms of accuracy. Um, again, that is, you know, whether you can follow that up, um, in any submission that following the hearing, that'd be helpful. Just to clarify on that point and to perhaps look at that and see whether or not there's a need to to address that within the response.

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That would be helpful. Again, that's the only matter, um, on that particular item I wanted to pick up on and I won't I can see nobody. So I will move on quickly as well. Um, the next thing I want to look at, um, actually is the cumulative benefits. Um, and to a degree, this kind of touches on other elements we've talked about today. But um, in terms of the cumulative benefits again. So, um, is chapter 20 of the environmental statement sets out the conclusions in relation to the cumulative assessment for all projects and plans.

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And this has identified a number of potential benefits that could arise from the presence of multiple offshore wind developments in the local economic area during both the construction, operation and maintenance phase. And it also identifies that the possible development of robust supply chain through the entry of new businesses and the and the expansion of existing ones. Development. Emergence of new skills and higher levels of employment and resultant high spending in the area. Now the Outlying Skills and Employment Plan has been provided as part of the application, which is app 155.

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And this sets out the initiatives and ways in which the applicant posed to work with other stakeholders such as local authorities, education, training providers, key supply chain businesses, etc. to promote and secure those opportunities. Now, obviously, we don't have any local authorities here, and we've received little comment on on the actual content of the outline skills plan at this stage. What I'm really interested in is, um, what action or steps will be taken to secure those cumulative benefits? Um, so can the applicant really summarise and explain how you propose to coordinate and work with the other offshore wing promoters and projects in the area to secure those potential benefits as identified in these.

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Um, as I say, we've noted that we've touched on coordination more broadly about environmental effects earlier, but I'm particularly interested here is about delivery of those, um, identified benefits as a consequence of multiple projects. Um, if you could, in doing so, identify where if it is set out, how it will be secured within the plan. Um, and if not, is there scope for the outline skills and employment plan, for example, to be strengthened to perhaps make it clear that there will be, um, emphasis on trying to secure and coordinate that cumulative benefit to the project.

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Robin Hutchison for the applicant. Um, and I think this is probably a question, not, um, directed at Mr. Cleary. You may be relieved to know, uh, um, but but but touches on, I think, the topic that we covered earlier about, um, the realistic scope for coordination between these projects in particular, because the timing of delivery, um, isn't something that's within any individual projects gift to line up with the others, which I think just places practical limitations on, on what can be done.

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The economic, uh, socio economic chapter will identify what are sort of the inherent benefits of an infrastructure project that are secured by the fact it's going to be delivered rather than necessarily in a, um, you know, a document, a plan that needs to be secured through DCO requirement. Um, the exception to that, obviously, is the, you know, the skills and employment plan. Um, but I think for the

reasons we've explained previously, it will be difficult and disproportionate, I think, to line that up across the the other project.

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Um, Oliver.

00:22:50:02 - 00:22:50:17

Garden.

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On behalf of the applicant. Um, and just to touch on a point which I think is, is, um, pertinent for, for the next item on the agenda, um, in relation to the generation projects, a lot of the, um, skills and unemployment benefits will be driven by the location of the um, operational port, which obviously has not yet been selected. So, um, until our project and the other projects have have set on and have identified where those ports are, it's difficult to coordinate, at this stage, because we may well be operating from different parts of the country. So, um, I guess at this stage the coordination is difficult to deliver it until we have reached that decision around where the operational port is going to be, because that's where a lot of the benefit or that's where the long term economic benefit in terms of skills for employment, for the operational phase comes from.

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Um, obviously appreciate that this examination is only for the generation assets, but obviously the transmission assets have a similar piece, and perhaps that's where there is more, um, potential for coordinated benefit, because obviously the Morgan and Morecambe transmission assets are making landfall at the same location. Um, and um will be connecting into the same substation. So there is a much more, um, synergy there in terms of coordination. But obviously that is not part of this examination, although those benefits are tied to this project in the sense that those benefits will not be realized without the generation project also going ahead.

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So, um. Yeah.

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Yeah. Thank you. I think that points understood. I think the reason for raising it really is if the environmental statements identified some of the potential benefits is the fact that there could be, um, benefits more widely because of the number of projects,

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if that's going to be given any weight in terms of support for it, how confident can we be that that's likely to happen? Now, I appreciate what you say about timing. And my question was really about the outline skills and employment plan touches on the actions that will be taken at a project level, which I understand, but is there anything in there that needs to hook into a, um, also looking to coordinate with those projects? I didn't see anything. I missed it, but if I have pointed out, if not, is there anything that could even be included within the outline skills and employment plan to at least reference that point? because as I say, in the absence of that, we question what weight we can attach to those cumulative benefits.

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Robin Hutchison for the applicant. Um, and there's there's a couple of points there. Uh, point one is the, um, weight to be placed on the, um, socio economic benefits of the project. And obviously, weight is a matter for Secretary of state on the recommendation of, of the panel. But I think the applicant applicant's position is that, you know, the overwhelming benefit from this project comes from its contribution to net zero, from the renewable energy produced and security of supply.

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And in fact, you know that that on its own drives the the benefit, need and a sufficient weight to um, in the applicant's view, respectfully, um, underpin a grant of the DCO. The we understand and, you know, Appreciate the inherent limitations in placing a lot of weight on economic benefits when, as Mr. Gardiner explained, you know, we don't know and we can't identify at this point where the port will be. And so we do and accept that there is a limitation to the weight that can be then placed in terms of the cumulative benefits.

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I am specifically, I don't think we are saying that somehow the number of projects are greater than the sum of their parts. More infrastructure means more

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investment in the communities which will service those projects. But I do not think we are saying that necessarily that somehow there is a cumulative benefit that outweighs just the the linear more projects, more benefit

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and would somehow need to be or benefit from being secured. Um, it's tempting for me to commit to go away and revisit our skills and employment plan to try and address this. But equally, I do not want to, you know,

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disingenuously, disingenuously suggest that I think realistically, realistically, there's a lot that could be done in terms of a cumulative commitment. I think the position of the other projects in the area would similarly be that actually it's the individual benefits of the projects individually which create the, um, uh, more significant socio economic benefit for the area, but that trying to coordinate wouldn't, um, materially increase that benefit.

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And practically it is just going to be very difficult to achieve or very difficult to commit to.

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Okay. Thank you.

00:28:07:05 - 00:28:43:23

Okay. Thank you. Um, okay. So focusing, uh, now on that line skills and employment plan itself. And it's probably a little bit of overlap here to issues we discuss on Thursday. Um, so we regard the outline

skills and employment plan. Um, I think requirement 11 of the draft DCO requires that no part of the authorized development may commence until after consultation with relevant authorities. The Skills and Employment Plan has been notified in writing to the relevant authorities, and that the final Skills and Employment Plan must be substantially in accordance with that outline plan.

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Um. Again, the relevant authorities is defined as one that hosts the marshalling point or at port, sorry, or where the operation and maintenance would be located. And we'll come on to that has not yet been identified. Obviously, as I said earlier, we don't actually have any host, um, authorities given this proposal is entirely offshore. Um, and we don't actually have any local authorities attending today or many comments that have been received to date from those to comment on the content of that plan.

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Um, I guess my question really was, um, the Outlier Skills and Employment plan is identified as a certified document within the um DCO. However, um, if the final skills and employment plan is not to be approved because it talks about being notified, um, will it be enforceable and if so, by who? Um, if it's not enforceable, what assurance do we have that the initiatives identified and it will be followed through and implemented. And if they're not secured again? Um, it just raises the question around, uh, how we deal with that in terms of the benefits of the scheme that's been identified through it.

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Uh, Robin Hutchison for the the applicant. Um, I would anticipate we'll return to the the drafting of this, um, uh, condition on, on Thursday. Um, two points. Um, in terms of the, um, slightly unconventional drafting, um, of the plan being notified as opposed to approved. That that is intentional. Uh, the reason being that we do not know which host authority will be hosting the the port infrastructure.

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And the applicant is nervous that about creating a, a hostage to fortune situation where an unknown authority has an approval which can be leveraged, um, over the, uh, over the applicant and our, um, high value project, which will be well advanced at that stage and need to progress at any cost. Um, it's considered it's it's proportionate to, um, have a plan that is notified rather than having that hook of approval.

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For that reason, the benefits. Socio economic benefits are secured by the Skills and Employment Plan are recognized to be modest. Weight that can be placed on them is accepted. It will be again modest, and the assurance that our plan of high quality will be, um, proposed is there because it needs to be based on and being substantial accordance with the outline. So the content of that and the quality of that is already assured, because we can't deviate, um, from the outline that's been submitted other than being substantial.

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In accordance, there is a point that the panel has raised which occurs to me about the, uh, my co-counsel is nodding, um, about the, uh, ongoing compliance. Um, and clearly it would be appropriate to have a further tailpiece committing to ongoing compliance with that, with that skills and

employment plan that has been submitted And we can commit to make that, um, amendment at deadline for, um.

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Yeah. Thank you. And as I say, I think, you know, we recognize

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not being an onshore element, which would be why we've not had a lot of engagement or response, should I say, from local authorities, because they don't know necessarily that it is them that's relevant at this stage. So we recognize that. But I think it is that latter point around enforceability as well. And so that'll be helpful if we can see that. And we will, as I say no doubt. Come on to this on Thursday as well.

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Um, so I think actually that that concludes all I really had on those two particular matters. I don't again, I'll invite it to the room, but I don't think there's anybody here. So we'll swiftly move on. Um, so I'll pass on to Mr. Jackson, really to deal with questions on the next subtopic, which is traffic and transport.

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And this, I think is going to be quite quick to.

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Um.

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For the reasons you explained

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why you haven't identified a, um, a port as yet. However, the socio in economics, tourism and Recreation chapter in paragraph 20.15 says that though the primary operation and maintenance port has not been identified, it has been assumed that the port will be based within 50km radius of the wind farm site to allow easy and quick access. It's also assumed that the port would be in the UK and would not be located in the Isle of Man.

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Given that. Would it not be appropriate at least to. Yeah, there's only going to be so many ports. Would it therefore not be, at least at high level, an assessment of any ports within that range to allow for a potential significant effects?

00:34:04:06 - 00:34:37:21

Robin Hutchison for the applicant. Um, I think that this question again turns on what's proportionate. Um, I mean, the proposal would be theoretically possible, um, to identify all the ports in the 50 kilometer area and start, um, giving a hypothetical consideration to what the traffic and transport implications would be for those port facilities. Um, I think the the applicant's, uh, position is twofold.

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Uh, firstly, the port facilities themselves are consented and authorized developments when they were authorized. The matters such as how you get to them, the implications on local community for, for and as a as a result of users of those ports will be a factor in that consenting process. You know, essentially the traffic going to a port is part of the baseline environment.

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I would cynically point that some of them have long existed prior to the introduction of the planning regime.

00:35:09:24 - 00:35:40:27

A point that is accepted, but equally, in terms of the causation of the traffic, it's the location of the port and the fact it's there in the first place that that causes us to use it. Um, and the traffic will be the flow to that port, which is otherwise, um, which is currently existing condition ports are used, traffic gets to them. And if we use a port, that existing condition will be perpetuated by our project.

00:35:41:18 - 00:36:13:15

If a port does need to be, um, expanded to facilitate our scheme in any way, that of course would need its own consents and authorizations. And if those gave rise to new traffic conditions that weren't already, you know, if the port was scaled up so that they could take on more traffic than is currently or, you know, more business than is currently can accommodate, resulting in more traffic than it can currently accommodate that would need to be assessed. So we think for those reasons it's it's it would be a disproportionate exercise.

00:36:13:17 - 00:36:31:04

And, you know, one of the guiding principles on EIA is to try and keep these documents within, within reason and are several port assessments of traffic and transport, which would presumably be the case would be a very voluminous and substantial exercise to modest benefit.

00:36:32:12 - 00:37:09:07

Okay. Thank you. Again, I'm going to leave it to just in case anybody else has any comments. There's nobody else here. I'm going to move now on to climate change and greenhouse gas emissions. Um, we've been looking at the analysis for that. And there's a few things we'd like to discuss Prince about, principally about the calculations for the D3 responses. There are four factors that I'd like to go through for discussion, so we can have an understanding of your position. Having said that, before we start, I'm sort of working on the assumption that this and this may or may not be proved to be correct, that the greenhouse gas assessment will be likely to be need to be amended in light of our discussions.

00:37:09:11 - 00:37:39:19

So I'm putting on notice at the outset so you can take appropriate notes. Um, firstly, and some of this will inevitably flow from the discussions we'll be having tomorrow on wake effects and similar rates to how those effects have been taken into account in the greenhouse gas assessment, or in other words, in other words, the final assessed figure for the CO₂ equivalent. If on a without prejudice basis, there's going to be a reduction on those other windfarms.

00:37:39:23 - 00:37:44:14

How has that been factored into the assessment? Because I don't think it has at present.

00:37:48:06 - 00:37:53:18

Robin Hutchison for the applicant. Um, are we going to presume we're going to take the four points?

00:37:54:04 - 00:37:56:11

They're quite substantive, so we'll do one by one.

00:37:56:13 - 00:38:08:16

Absolutely. Fine. That works very well for us. Short term memory is not over exercising. Great. Um, I am understand. We are joined by Mr. Parson. Our climate change lead.

00:38:12:02 - 00:38:36:20

Up. There we go. Excellent. Um. Online. Uh, I think I can give an initial response to this question. And then perhaps bring in Mr. Parson, who can introduce himself at that point before he, uh, starts to speak. I'm seeing him nodding. That's that's that's that's good. Um, so, um, in terms of weak effects and, um, there's obviously the.

00:38:36:22 - 00:38:40:29

This is the principle of it rather than the necessarily the calculation thereafter.

00:38:41:05 - 00:39:02:13

Exactly. Although, um, the two go hand in hand to an extent and I don't mind being drawn ever so slightly on our on our position tomorrow, which is that, um, the, um, we have before the examination and assessment of work not produced by the applicant, but, but produced by, by an interested party. Um,

00:39:03:29 - 00:39:37:25

the status of that is for a discussion in terms of the content of that, um, our position is that it's naturally, as you would expect, a conservative document. But, um, our primary position tomorrow will not be to push back or argue the substantive content of it. If those were the figures, you know, they're probably not a million miles off. What a report that we produced ourselves would, would come up with. I'm looking down the bench and I'm seeing nodding not being kicked on that point.

00:39:37:27 - 00:40:12:09

So I think, you know, we're largely, um, accepting of the position, which means that we do have figures to work from. To stress test the greenhouse gas emissions savings in the in the EAS, which is an exercise that we have done, albeit not one that we felt we wanted to disclose. I don't mean to disclose submit because again, um, on the principle of trying to keep things proportionate.

00:40:12:28 - 00:40:44:12

It's a revised chapter. It's more assessment. And, you know, our conclusion is that the the levels of impact when you net off weight loss at sort of less than 1%, or just around the 1% figure for, uh, wind farms of that age and that scale, you know, it's it's around the margins for error on the edges of the overall assessment figure. I do appreciate, as I'm saying this, we're going to need to submit those figures because, um, yes.

00:40:44:14 - 00:40:51:28

The CEA figure could command over 5% according to according to the, uh, interest. According to the automated IPS.

00:40:54:13 - 00:41:05:12

It's 5.39%. It's the percentage I can remember. Cumulative or cumulative. It's a brilliant scheme, but this assessment has got to be both single and and cumulative.

00:41:05:14 - 00:41:24:28

Yeah I think ah. And again, maybe, um, Mr. Patterson will come in on this specifically. But in terms of the cumulative again it's it's about summing the benefit. It's not about something greater than the sum of the parts. So, um, um, we don't

00:41:26:22 - 00:41:57:11

the appropriate approach in our view, is to consider, um, in terms of the greenhouse gas benefits for our project and net of any weak impacts and loss of Existing greenhouse gas benefits from our project, and the cumulative would then just be adding those up from the other projects. But essentially those are project alone benefits because obviously cumulative for greenhouse gases. You know, the receptor is all of us. We're in this one together.

00:41:57:25 - 00:42:14:13

Um, so the figure of 5.5% wouldn't be the the right figure to look at in terms of the impact on, on our individual project and our project alone basis. It's it's a lot smaller than that. Um, I feel I'm straying into the case here.

00:42:14:22 - 00:42:15:17

Let's have Mr. Pass.

00:42:15:19 - 00:42:16:04

Yeah.

00:42:16:28 - 00:42:44:10

Oh, yeah. Good afternoon. Uh, Mr. Parsons, speaking on behalf of the applicant. Um, yeah, I mean, I kind of. I've not really got much further to add. Uh, there. Really? Um, kind of. We can look at the, um, the effects of kind of weak effects. Um, but, yeah, just to raise the point, if we're going to use the cumulative figure of 5%, then we have to look at also or acknowledge the, um, cumulative benefit of all the other projects as well.

00:42:46:00 - 00:43:25:14

Thank you. Okay. Thank you for that one then. Uh, the second one. Second point is the analysis of energy offsetting, which is set out in paragraph 2.21 .267. I think that's right, because there's definitely a typographical error in my note. Um, in chapter 21 of the s, there are two scenarios given scenario one, where it's assumed that electricity from the project displaces generation from nonrenewable fuel sources. Uh, this is the approach that has been advocated for offshore wind farms by the UK in 2022,

and is considered to account for the UK's transition from fossil fuel based generation to sources of renewables.

00:43:26:00 - 00:43:51:02

In scenario two, where it's been assumed that electricity from the project displaces all forms of generation as part of the future UK grid mix, using the long run marginal emission factors as set out by Disney's from 2023, I'm wondering whether scenario one is still valid in light of the, uh, subsequent to the assessment. What happened? Decision of the High Court and the friends of the Earth case.

00:43:52:18 - 00:44:10:29

I was wondering whether you had any points. Any thoughts on that? It's not the Dean. I'll speed it up slightly. It's not the downside. The downstream effects, the substitution argument, which was the second point in the friends of the Earth judgment, which was

00:44:12:27 - 00:44:17:18

Holgate J as he then was, was what didn't accept as an argument.

00:44:20:09 - 00:44:24:27

Robin Hutchison for the applicant. I think this is one we'll need to respond on in writing if that's okay.

00:44:24:29 - 00:44:30:25

Yeah, it's the substitution argument. This is the one that is the issue.

00:44:32:13 - 00:44:46:18

If the all I could add to that is Um, if Mr. Parson has, Mr. Parson has any comment on a scenario where or an event where scenario two is used?

00:44:46:27 - 00:44:51:12

Scenario two was assessed. Well, that's not the point. It's just whether scenario one is still valid.

00:44:51:18 - 00:44:56:21

But if we were only relying on scenario two, is there an implication to that?

00:45:00:06 - 00:45:04:28

I think we should respond on writing given that we'll take this one away.

00:45:06:17 - 00:45:36:28

Okay. Um, the third one is about the proportions of CO2 emissions from the Morgan and Morgan Asset transmission assets. Um, chapter 3121 does that on a 1 to 3 ratio, on the basis that Morecambe would normally be have one third of the capacity of Morgan. However, it appears from a very quick perusal of the transmission assets application as has now been submitted. They're effectively two separate proposals.

00:45:37:04 - 00:45:58:27

Just happened to run through a similar. Occasionally the same but often distinct land. It's also the case that the Morgan and Morgan elements may or may not be delivered at the same time. In light of that, what would you say that it would be to the proposition that a better apportionment should be 5050 rather than 2575?

00:46:23:28 - 00:47:00:01

Robin Hutchison for the applicant. Um, the intention has always been that there would be electrically separate transmission works. So the, um, uh, nature of the, uh, transmission application is, is is essentially what was always intended. And that goes back to the, the holistic network design, which is the, the yes or. Yeah. Yeah, exactly. And it's showing on the plan is two parallel red lines to the coordination is side by side rather than in some way one big cable servicing everybody.

00:47:00:09 - 00:47:11:15

So the, the, the scale and um, apportionment was based on the expected scale of the infrastructure to deliver a project of um.

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But when you actually see the project as opposed to what it was envisaged to be, it might be it appears to be somewhat different in what I'm seeing on the actual proposal as to what I read in the. Yes.

00:47:25:13 - 00:47:38:06

I think we might need to once again take it away. Thank you. All I can say for comfort is that nothing. That there is no new information in the submitted application. It was always intended, but we can all.

00:47:38:08 - 00:48:09:01

All these questions are about is the CO2 equivalent final figure. It's not whether or not it's to do with the accuracy of those figures. It's just about anything. Any anything else? Um, and the final one was the question of the additional distance that would need to be undertaken by vessels unconnected with the proposed development. Diverting around the wind farms, both in the individual and the cumulative assessment, and the fuel that would be utilized for any additional distances leading to emissions.

00:48:10:18 - 00:48:41:17

You'll be aware that there are two different distances for variation between play and initial 1.6 nautical miles, an additional 5.5 nautical miles. Chapter 21 gives a figure for the CO2 equivalent, but as far as I can make out, the derivation has not been shown. I'm also conscious that there may be different figures for the different fuels in play, both existing, which I believe is fuel oil, and and as Senna has reported in their one of their submissions.

00:48:41:23 - 00:49:13:29

In the future when they're using methanol which and both of those will have different CO2 equivalents recently changed to methanol. Um, I had been here at this point. I would have asked them, when's the transition going to happen? But so but having gone back to that, to not here, going back and through that additional fuel built through the additional distances travelled and how that was factored into the greenhouse gas calculation and how it was calculated has been derived.

00:49:14:03 - 00:49:44:24

As I say, the response is that it's been there, it's been done, but I just haven't seen the calculation behind it. And I think that in the interest of transparency, we should have that in the exam. So again, you're not Mr. Hutchison's nodding. So that goes into the list of action points from there, which we'll come to in a minute. Um, and also in your response to our question, one, CC for you indicated that it was a quality of assessment will be submitted.

00:49:45:06 - 00:50:01:17

What is a quantitative assessment assessment. So if you could have a look at your response to one SEC four and say we want your say you're going to do a new assessment on qualitative. We want it on quantitative please.

00:50:07:18 - 00:50:38:10

Okay. So in light of that I think we've got four points which are the wake effects friends of the Earth substitution argument. I'm very interested to hear what you say about the substitution. It might you know I don't. It's recent recent High Court case. There may well be distinctions, um, apportionment of the more massive transmission emissions and, uh, the calculation calculation behind the additional travel distance.

00:50:39:09 - 00:50:45:24

Okay. So all I'm saying is you may need to have to look at chapter 21 and its appendices in light of that. That's all.

00:50:46:06 - 00:50:53:25

Yeah. Robin Hutchison for the applicant that that that is fine. We do have some of those calculations available. So we will update that chapter accordingly.

00:50:53:27 - 00:51:19:10

Right. So I think that leads us to the end. So we move on to item eight other matters and action points. We haven't got any other matters. Uh, but we I do have a little list of action points, most of which came from bright and early this morning. Um, firstly, the response to the various the written written ministerial statement of the 29th of January on the marine environment.

00:51:20:27 - 00:51:47:00

Um, second, They're all for d4. Unless otherwise stated. Oliver got on that one. Can I just take. You're just referring to that ministerial statement, or do you want us to sort of wrap up the other things that have come around the same time? The other ones are the same and the same times. The 21st was the other one. Yeah. And there's and and and associated announcements.

00:51:51:10 - 00:52:17:18

Katherine Nolan, on behalf of the applicant, I think what we would do, um, subject to any comments the panel would have, would be we'll do that in a standalone document. There are obviously points where it overlaps into marine mammals, ornithology. So we will have it in one response. And then it will also be picked up in the associated documents as necessary. So there is a kind of one stop shop for where you can see we've dealt with that guidance. Yeah.

00:52:17:20 - 00:52:51:26

Okay. Secondly was Is a submission of an outline construction method statement. Hopefully the default but possible if not default, um, risk response or y bioscience are not required in relation to gravity foundations. And if anti fouling might be required, why explain why it might be necessary. Um, an amendment of the last bullet in paragraph 17 of the principal monitoring plan to replace the word supportive with a somewhat different and more positive term

00:52:53:20 - 00:53:04:04

um, update the Marine Mammals Management Plan and the Underwater Sound Management strategy in light of the new Defra guidance and JNC guidelines in relation to unexploded ordnance.

00:53:06:08 - 00:53:41:21

Uh clarification as to working age in light of the raising of both the school leaving and retirement ages, and the relevant assessment of effects, and finally, the updating of the carbon assessment in light of the discussions that we've had in relation to wake effects which will flow out of tomorrow. Um, the substitution question over from the friends of the Earth case. Um, the apportionment of the Morgan and Morgan transmission assets, emissions and the and further clarification on the additional travel distance for various in relation and also in relation to fuel type.

00:53:42:19 - 00:53:45:18

Okay. Any did you have any others?

00:53:52:09 - 00:54:10:08

Uh, Robin Hutchinson for the applicant, I think the update to the MP and the underwater sound management strategy would also encompass, um, piling as well as UXO. Um, and, uh, the homework offered just after lunch break as well. We will add.

00:54:12:05 - 00:54:16:24

Richard West for the applicant. Just a reminder as well about contacting Nature's got.

00:54:17:18 - 00:54:30:11

Yes. We've got. We've got a separate list of. Discussions. Yes. You've got a bit of contact. Rather we've got a separate list of for for later Scott MMO and. Okay. Thank you. Yeah. Uh.

00:54:31:11 - 00:54:36:12

Today we have a separate, um, list of, uh, questions. Yeah.

00:54:36:14 - 00:54:58:20

Oliver got on. Both happened. Um, I had something down related to the UX. Oh. Charge weights. And just to confirm that the, um, there's no change to the conclusions of the assessment. Oh, yes, there was there was a point. Yeah, there was a point. So that's in response to BM 29. There was a there was there was. We've said that it isn't. But you want us to confirm that in writing. Yes, please.

00:55:04:22 - 00:55:13:22

That's enough of a note there in my notes. Okay. In which case I go there boom boom boom. Oh good.

00:55:15:20 - 00:55:50:08

Right. So I believe that completes our business for today, which at quarter five I think is quite good. Um, thank you very much, everybody, for your contributions, patience and and participation today. Uh, your sponsors have been very useful and encouraged parties to try to continue to meet and discuss matters outside of the hearing, if at all possible, to try and resolve issues and reach agreement where possible. We we, the Secretary of State, does try to expect that all matters should be resolved as best they're able within the exam period and not left for the Secretary of State to carry out consultations after the exam is closed.

00:55:51:00 - 00:56:18:23

Um, we have further hearing scheduled for tomorrow and for Thursday, and we have also a programme time for potentially another round of hearings in the week commencing the 31st of March. We can't say categorically at this stage whether we'll be holding those hearings, but we will give appropriate notice on the way and nearer the time and as soon as possible, and equally well, whether they're held physically or whether they're held virtually, which will depend on the subject matter. Given what was discussed at the preliminary meeting

00:56:20:13 - 00:56:52:29

from now, can I conclude by reminding all parties the digital recording and transcript for this hearing will be added to the project page of the Planning Inspectorate National Infrastructure website as soon as possible after close of the hearing. The next session is tomorrow morning at 10 a.m. for the specific hearing on other Sea users and aviation for those online. The The Arrangements conference will start at 930, and we've given ourselves all day for that hearing. That is both morning and afternoon. So be aware of that. Hopefully you'll give us plenty of time to complete the items set out in that agenda.

00:56:53:13 - 00:57:05:13

So the time is now 1647 and the second. Second issue specific hearing for the Morecambe Offshore Wind Project Generation Assets project is now closed. We look forward to seeing some of you tomorrow. Thank you.

00:57:05:24 - 00:57:09:04

Thank you.