



Planning Inspectorate  
Arolygiaeth Gynllunio

## Event Transcript

<b>Project:</b>	Sea Link
<b>Event:</b>	Issue Specific Hearing 2 (ISH2) - Day 2 - Part 2
<b>Date:</b>	29 January 2026

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File Name: SL\_29JAN\_ISH2\_PART2.mp3

File Length: 01:39:21

FULL TRANSCRIPT (with timecode)

00:00:05:15 - 00:00:15:17

1145 and I've seen the issue of specific hearing. Um, I've just got a few questions to do with public right away. Um. Not many.

00:00:19:14 - 00:00:56:12

James Burton so on behalf of C's, may I just make one plea? Just before you move to public rights of way. Okay. It's simply this, uh, as you're all aware, we not just us, but we and many others have been pointing out the deficiencies in the traffic transport assessments for a long time. It sounds as if some things are now being done. We're very conscious that this examination has a statutory guillotine on it. And what we what we don't know, and we know I know we're going to be told, but we don't know when exactly we're going to get the information.

00:00:56:14 - 00:01:16:07

And it is so important for my clients and others that we do get the information, whatever assessment the applicant is now doing in time for us to really consider it an input to this process. As I as of course, you want to do likewise for your own, for your own sakes. But could I just make that plea? Thank you sir.

00:01:16:11 - 00:01:38:25

Okay. Yes. I mean, I think they've said as soon as possible. I think they've already worked out with Kent. The junction's obviously there's a bit more work with Suffolk. They seem to be engaging on that. Um, so, you know, if what we can get a deadline for would be useful for everyone. Um, or if, if not a deadline for a clear explanation of when this information is going to be submitted.

00:01:38:27 - 00:01:43:06

Thank thank you, sir, for the applicant. We will provide updates as to where we've got to.

00:01:43:08 - 00:01:44:10

Okay. Thank you.

00:01:49:25 - 00:01:57:01

And uh, can see someone online as well. Um, uh, Francis Terrell is it sir?

00:01:57:03 - 00:02:22:03

Thank you. I'm on the gateway of Portland. I just wanted to quickly just check on the administrative matter. The the running order. I know there was a little bit of point made by one of your fellow examiners earlier on, but, um, I just wanted to understand if you had any guidance you could give us as to when the matters on shipping and navigation might be covered. I've got some witnesses who are just trying to plan their day, essentially.

00:02:22:24 - 00:02:27:09

Um, I believe it's going to take place this afternoon, so slightly after 2 p.m..

00:02:28:09 - 00:02:28:29

Thank you.

00:02:29:05 - 00:02:59:19

Okay. Okay. Moving on to public right away. Um, in relation to the recent, uh, change submission, uh, in relation to the public right away order limits so far, County Council stated, is not persuaded that the change goes far enough and proposes that along the be 1119, a sufficient corridor should be established to allow space for the hedge watercourse and generous um route corridor for public right of way and maintenance access.

00:02:59:21 - 00:03:01:21

What is the applicant's response to this?

00:03:02:28 - 00:03:11:02

Uh, Sarah Shaikh, for the applicant, I'm going to ask Mr. Nigel Pilkington to deal with this. And he's the terrestrial air lead for the applicant.

00:03:12:20 - 00:03:39:28

Nigel Pilkington for the applicant. Um, our assessment has been quite wide ranging on public rights of way, uh, taking in a number of topics. Um, we haven't identified at this stage a, um, we've run through the mitigation hierarchy. We've got temporary diversions. Um, and and what have you, but we haven't identified significant effects on the public rights of way in that, in that vicinity other than visual effects.

00:03:40:00 - 00:03:53:03

Sorry. This this is to do with the the widening that came with the change recently. And specifically to that, I think it's about the this is a sufficient width. The county council was talking about.

00:03:54:04 - 00:03:59:15

Um, in terms of whether there's sufficient width to put a public right of way in, I would need to pass to colleagues.

00:03:59:17 - 00:04:00:05

Okay.

00:04:01:19 - 00:04:20:06

Alley leader for the applicant. Um, yes. So we do have a temporary diversion along this route. So. So, yes, there is sufficient width in that area. Um, what we don't have at present is sufficient land, right? Um, so we don't have a permanent, um, land rights along that stretch, but we do have the width.

00:04:20:21 - 00:04:49:11

Okay. And it's the county council in particular is concerned that what they're talking about in terms of the the space allowed for hedge watercourse sufficiently for public right away and maintenance is all

supplied within the the the order limits. Um, maybe if I turn to Suffolk County Council on that and that particular point. Thank you sir. Michael Bedford, Suffolk County Council.

00:04:49:13 - 00:04:50:01

This.

00:04:50:03 - 00:05:20:23

In part came up as part of the compulsory acquisition hearing one earlier this week. In terms of the applicant's approach to whether or not it is proposing to acquire land rights to enable it to deliver such matters. Um, there are two, uh, aspects to this, I think, first of all. First, there is the physicality point, and we, um, know what Miss Leader said, which is helpful.

00:05:20:29 - 00:06:39:26

And I think we were told yesterday that we were going to get some potential cross-sections of that route, which would give us an indication as to the feasibility, in a physical sense of providing a public right of way there. So I'll say nothing more about that at this stage. But on the issue of whether or not there should be a, um, requirement for such a route, and therefore land rights need to be, uh, secured in order to deliver it. So I think the issue, as we said, is we have concerns about the applicant's, um, approach, which essentially would seem to be that if effects in AI terms are assessed by the applicant as not significant, the applicant effectively says there should be no obligation or requirement on them to address those effects, albeit that there have been instances within the scheme overall where the applicant, as it were, as a matter of discretionary choice, has decided to put forward measures even though they are addressing effects which it has identified as non-significant effects.

00:06:40:18 - 00:07:33:29

Um, we don't see, uh, the obligations on the applicant to be that Limited because we do not see either as a matter of policy or as a matter of the legal tests. In section 104 of the 2008 act, that the remit of the examination and the remit of the decision making process should be confined to considering only adverse effects or adverse impacts, which are significant in EIA terms, and we consider that there can be non-significant adverse effects which still do need to be addressed, whether by mitigation or by offsetting or some other form of compensation.

00:07:34:09 - 00:08:09:21

I'll deal with the point briefly now, but in the post hearing submissions, I'll flesh out why we say that. But essentially we consider that when you look at the impacts on public rights of way in the vicinity of London and obviously the B uh 11 uh 19 um, the residual adverse impacts are such that some form of enhancements to the rights of way network in the locality do need to be delivered.

00:08:10:27 - 00:08:37:25

We consider that that enhancement is necessary to make the development acceptable in planning terms, and that therefore provides an adequate justification for the compulsory acquisition. Um, and obviously, if you were to agree with us about that, then we would say it's incumbent really on the applicant to then work out how it's going to secure the rights to deliver such a measure.

00:08:39:13 - 00:09:14:29

Okay. I'm sorry. I'll just end by saying, obviously there are other locations where we've referred to seeking enhancements. Could I just mention, because I noticed from the reading of the documents that I think we didn't perhaps make our position clear enough? There is another public right of way enhancement we've referred to, which is at Sluice Cottage, Thorpe Road, which lies between Thorpe Ness and Aldeburgh.

00:09:15:03 - 00:09:46:05

And I think the way that we've written our comments and the way they've been understood by the applicant, was that we were seeking a new right of way in that location. There is, in fact, an existing right of way in that location. And what we're actually seeking by way of enhancement, and we should have made this clearer, is upgrading in a physical sense, that route, as opposed to creating a new route, because there is already a public right of way in that location. Okay.

00:09:46:07 - 00:09:47:10

Thank you, I understand.

00:09:47:14 - 00:10:18:29

Um, well, in response to that, and I think I would like to add to that in terms of what the right way enhancement is, the issue where, um, from what I can see impacts the public right away. I mean, it addresses a range of different topics, actually. Um, but in the inter cumulative assessment, um, it suggests that there is potential for significant intra into project cumulative effects to occur in construction and decommissioning on public rights of way.

00:10:19:01 - 00:10:54:17

And it does mention a few of those. One's a bridleway I believe um as due to changes to user experience, local travel patterns, that sort of thing. However, no mitigation measures were proposed by the applicant at that stage considering the mitigation hierarchy. Has the applicant been investigating potential compensation enhancement measures to the public right to a network subject to this potential significant adverse cumulative impact. So from an intra cumulative perspective, it does say that there's going to be some significant adverse effect.

00:10:54:19 - 00:11:00:21

Well, if you could answer both my point and the point made by, uh, Suffolk County Council.

00:11:02:18 - 00:11:34:11

Pilkington for the applicant. And there are in fact, uh, two uh, public rights of way where we've identified an intra, uh, significant intra project cumulative effect. Uh, so bridleway 491 ten zero in Suffolk and footpath T 37, in Kent. Um, it's something we'll touch on later today. But really in terms of addressing those cumulative impacts, um, obviously the way that we look to do that is to try and address the contributing factors.

00:11:34:13 - 00:12:14:20

The contributing factors in this case, um, are the overriding contributing factor in that case is the visual effect. um, I think, you know, as we touched upon in issue one, uh, you know, those visual effects have been mitigated as far as reasonably practicable following the mitigation hierarchy. Um, and, and, you know, in terms of the mitigation measures that we've, we've put in, uh, in addition,

we've got, um, uh, the fact that, um, you know, public on the public rights of way, um, bridleways, uh, users will always have priority.

00:12:14:22 - 00:12:57:13

Yeah. Um, we've got, uh, short on on the first on the, uh, into project, um, uh, our effect that we've got in in Suffolk. Um, we've got a short diversion. It's a temporary diversion, uh, which will be in place for, I think, two, two lots of four weeks. Something along those lines. Um, and it really is a short diversion, So you're taking those things in combination. We although we are identifying a significant effect, the main contributing factor is little that we can do for the other contributing effects, because we have really taken them back as far as possible.

00:12:57:21 - 00:13:05:07

And the priority for, for users and the and the short duration and length of the diversion.

00:13:05:22 - 00:13:29:01

Um, so sorry. I think that's that's kind of my point is if you feel there's no further mitigation that you can do, doesn't that and you're still assessing it as being potentially significant adverse effects, then isn't that when you start to look at potentially compensation, which could be for example, enhancement measures.

00:13:32:09 - 00:14:09:17

Nigel Pilkington for the applicant. What I would say is there's some distance between the, uh, the public right of way that's impacted cumulatively. Um, in Suffolk from where this enhancement or compensation stroke enhancement, uh, right away is being proposed. There's also a separation in time quite considerably because the, um, you know, the impacts will occur on the relatively short term impacts on the public right of way during construction will have ceased, um, by the time that any, you know, permanent, uh, right of way would be, would, would be established.

00:14:10:06 - 00:14:17:10

So as such, we're not really sure that it compensates. It feels much more like that would be an enhancement than a compensation measure.

00:14:20:15 - 00:14:26:12

Okay. Um, does do you want to add that or. Well.

00:14:27:02 - 00:15:01:12

Uh, Michael Bedford, Suffolk County Council, just briefly, we would say it's a right of way network that there are clearly linkages between different parts of the network. Different users use them in different ways for a myriad of journeys and so on. But we certainly don't accept the principle that just because there may be a temporal, um, distinction between when there is an impact and when there could be a means of addressing it, and nor do we accept that there may be a geographic difference, uh, that that necessarily then removes the enhancements.

00:15:01:14 - 00:15:39:27

Obviously, there can be a discussion about particular enhancements and whether it's a preference for one or another. But at the moment, we seem to be in a situation with the applicant that the applicant is

taking the view. We do not need to go there. That's the applicant's position. And so we're not having that dialogue. Uh, but I say we think that there is a legitimate case for offsetting for the residual adverse effects of the on the rights of way network, both those which are identified as being significant effects, but also those which we say are relevant to material, even if they are at the lower than significant category.

00:15:40:15 - 00:15:53:07

And that's what we would want to see some discussion with the applicant about, to find ways in which those matters can be offset, and therefore that may include enhancements to other parts of the network.

00:15:53:20 - 00:16:02:13

Okay. Thank you. Um, in the interest of time again, um, if you would like to respond in writing to to that. Is there something you want to say?

00:16:03:18 - 00:16:36:29

Nigel Pilkington for the applicant. I just thought it would be worth putting, um, into into this hearing, the fact that there are a couple of other enhancements that, um, have been we've been in discussion with Suffolk County Council about which which we are now able to, um, to deliver. And that is permissive access within the landscape planting, um, at the Saxmundham converter station and also permissive access over the Promise Bridge, which will connect the B11 21 Um, uh, into the Saxmundham site.

00:16:37:02 - 00:16:48:11

So in that respect, we've already taken we're already taking the rights, uh, that we, that we would need to deliver those enhancements. And so we are we are happy to deliver those enhancements. Okay.

00:16:48:18 - 00:17:18:28

Thank you. Um, so they might I think there might be 1 or 2 people who still want to, um, uh, make points on this. I think what I would suggest is if you could put them in writing, from what you've heard today, uh, in for deadline for, um, that would be very useful to us. Um, but I think at this point, just because of where we are with the agenda, we should move on at this point. So, um, that brings to the end the, uh, items for traffic and transport and public rights of way.

00:17:19:11 - 00:17:20:04

Thank you.

00:17:23:20 - 00:17:54:29

And we'll move on to, uh, noise. Um, in the interest of time and appreciating that we are programmed to get through noise and vibration and marine physical environment by the lunch break, and I have taken the construction related assessment assumptions. Uh, out of this section, I will stick them into action points and we'll focus. We'll start with the queries about section 61 consents. So paragraph 4.4.

00:17:55:01 - 00:18:42:15

2 to 4 .4.3 of the construction, noise and vibration management plans for Kent and Suffolk set out that where results of the contractor's assessment indicate the potential for significant effects at noise

sensitive receptors, or for working outside of core hours, a section 61 application may be required. May emphasize the may in that sentence. Plans go on to explain that if this is the case, the contractor will liaise with the local authority to discuss the works and determine whether the works would benefit from a section 61 consent. Where applicable. The contractor will then prepare and apply for section 61 consent um for the applicable activities based on this wording, it appears that the section 61 process may be somewhat optional to my mind, and there's a lack of clarity regarding the type of assessment that the contractor would carry out.

00:18:43:05 - 00:19:01:03

So my question is, is the applicant able to provide more robust wording that sets out the specific type of assessment that would be carried out by the contractor, the qualifications, the assessor, the trigger for contracting the relevant local authority and any monitoring that would be required.

00:19:03:05 - 00:19:21:09

For the applicant. Um, I'm going to ask Mr. Lawrence, Adam Lawrence, who's the noise and vibration lead for the applicant to comment on that. And the point that I think we're really looking at is whether or not we can bring in more clarity as to when the assessments will be undertaken under section 61.

00:19:21:11 - 00:19:22:14

That's correct. Thank you.

00:19:22:26 - 00:19:23:15

Hello, Adam.

00:19:23:17 - 00:19:24:02

Lawrence.

00:19:24:04 - 00:19:26:13

For the applicant. I mean, essentially.

00:19:26:15 - 00:19:27:24

Once a contractor is.

00:19:27:26 - 00:19:28:14

Appointed, they.

00:19:28:16 - 00:19:29:01

Will.

00:19:29:03 - 00:20:06:03

Undertake a reassessment. Once they know the plant and technique and approach that they will use to do the works. And from that reassessment, we'll know whether there is any likelihood of significant effects or not. We'll also be in discussion with the local authorities about their requirements for section 61 applications. And if they are preferring that, we would submit a section 61 application, whatever, then that's what we will do, as some local authorities prefer not to have section 61 applications when they can see that their potential for significant effects is low.



00:20:06:10 - 00:20:18:15

But essentially, there's a discussion to be had that will get us to the place where we know what is likely to happen, and then we can put section 61 application in play if necessary.

00:20:20:01 - 00:20:51:09

Okay. Thank you. That's helpful. But the sort of the heart of my point is that at the moment, the wording in the construction noise and vibration management plan is, is much more fluid than that. So it's not necessarily clear whether section 61 would happen, what the assessment, the specific assessments are. So I think there's a need for some kind of mechanism to be more explicit about all of those components, the assessment and what it is that the actual the local authorities can actually, uh, rely on, uh, in a noise assessment context.

00:20:52:09 - 00:21:05:02

Yeah. Accepted. Yes, certainly. We can, we can, we can be more clear on that. You know, assessment reassessment will happen and we will determine whether there will be significant effects or not from that and then liaise with the local authorities. Yeah, I know that.

00:21:05:08 - 00:21:11:26

The the process makes sense. It's just what type of assessment is it. Is it a yes 522.

00:21:11:28 - 00:21:41:15

It would indeed be a very similar assessment to that presented in the environmental statement. But there is a lot more certainty on which particular pieces of equipment will be used and where they will be positioned, and the timing of the works and which days of the week and all these kind of issues would be a lot clearer. So it takes a lot of the assumptions out of the assessment presented so far, gives us more certainty on the result, and then gives us a much better steer for the likelihood of significant effects. So hopefully not.

00:21:41:29 - 00:21:53:07

This. Sorry for the applicant. I think we've understood the point and the clarity that you're looking for. So we'll go back and take that away so that we have that prior step of knowing how and when this would take place.

00:21:53:09 - 00:22:02:22

Okay. Thank you. And just to turn to, uh, East Suffolk Council and District Council, do either of the councils have any comments on the process as it stands?

00:22:04:01 - 00:22:05:22

Amanda berry oh, sorry.

00:22:05:24 - 00:22:22:17

Amanda Berry, environmental health, Atlantic District Council I think it would be helpful if we were consulted when the noise and vibration management plan is carried out, so that we can review the conclusions and determine whether a section 61 application is required.

00:22:25:18 - 00:22:29:24

Noted. Thank you. Did you have any other comments about the process?

00:22:32:07 - 00:22:38:02

Okay. In that case. East Somerset council. East Suffolk council. Sorry.

00:22:39:14 - 00:22:43:19

Thank you sir. That would have required a quick relocation. Mark Weston and.

00:22:43:21 - 00:22:44:08

Smith.

00:22:44:28 - 00:23:16:09

King Kings council. Um, if I could just introduce Mark Kemp, who's our principal principal environmental protection officer and has been dealing with noise and vibration issues in the written submissions, and I'll pass you to him now. Good afternoon, sir. Mark Kemp, principal environmental protection officer for Suffolk Council. Um, yeah. We regard uh, section 61 as fundamental to the ongoing regulation and compliance of the project. Um, it's, uh, it's an opportunity.

00:23:16:13 - 00:23:54:16

Um, as indicated by the, uh, applicant to reassess the significance of impact, but it's also an opportunity to, um, address considerations such as best practical means and show that, uh, indeed, best practical means are going to be used in terms of not only the works themselves, but the mitigation that's required for those works. Um, it's particularly important in the case of, of this application so far. Um, given that the applicant has said that there will be no routine monitoring undertaken, um, and that the monitoring will be undertaken as identified by section 61.

00:23:54:21 - 00:24:28:12

Um, to our mind, that leaves a bit of a of a gulf in terms of data collected, because we don't know if the, uh, the, the noise limits, um, under the BES 522 A-b-c methodology that have been agreed are being complied with. If there's no routine monitoring and if section 61 isn't being used as a matter of course, then, um, the no monitoring is agreed, obviously, as part of that process. Um, so it would be. Our, um, preference that section 61 was used for.

00:24:28:14 - 00:25:00:17

For all works, it gives an opportunity to regularly to, to review assessments, for review the works, and for the applicant to demonstrate best practicable means. Um, in doing so, um, it's what, uh, takes place in terms of essentially a one north and two um, and, uh, it works well. Um, and also, um, in terms of E3, towards the end, the ABC methodology was changed. Uh, it was changed the ABC methodology and some 60, 60 ones were. So we've got a precedence in the district.

00:25:00:19 - 00:25:17:24

It works well. It gives the opportunity for ongoing dialogue between us and the developer. Um, and to take opportunities to reduce the impact from noise. Um, you know, regularly throughout the, throughout the project. And so, so just.

00:25:17:26 - 00:25:18:11

Just.

00:25:18:13 - 00:25:52:08

To add to that, so That the broad thrust of what Mr. Camps have said then is captured in our response to your question. One envy eight, which is at rep 3085, at pages 22 to 26, and to circle back to the question, as you originally asked it, which was with reference to paragraph 4.4.2 of the construction, noise, vibration and Management plan and whether May should in fact read will.

00:25:52:25 - 00:26:27:08

Um, there was a little tension, I noted, between the applicant's response to your question and the wording in 4.4.2, and it might be on reflection that the applicant will be able to change May to will, because the conditionality that I think the applicant is relying on is whether or not the contractor's assessment indicates potential significant effects, and not whether in circumstances, whether there's a where there is significant effects.

00:26:27:10 - 00:26:38:18

They will go on to make a section 61 application. So we think it might well be capable of being changed to a will. Thank you.

00:26:38:20 - 00:26:53:14

Thank you. Yes. That was that was my feeling. And I'd just like the applicant to respond briefly on the point around, uh, will um, and then also on the monitoring point and whether routine monitoring could be incorporated into the proposals.

00:26:58:28 - 00:27:00:13

By Adam Lawrence for the applicant.

00:27:00:15 - 00:27:06:14

Yeah. I think we can change the wording. So it says if we show significant effect, then we will submit.

00:27:08:22 - 00:27:10:18

And in terms of the routine monitoring.

00:27:12:22 - 00:27:50:16

So routine monitoring would be in discussion with the local authorities to find out. So if we have potentially significant effects, then it will be identifying where those are and what timing those significant effects may occur, and then what monitoring would be in place to to monitor that. So there would be there's obviously there's procedural monitoring making sure people are doing what they should be doing. That will happen whatever happens. And then there would be the additional for noise monitoring, which we would do by agreement to identify where and when, for how long and what trigger points and other things would happen.

00:27:50:18 - 00:27:53:15

So that would all be part of the discussions with the local authorities.

00:27:57:03 - 00:28:00:03

Okay. Thank you. Um, East Suffolk Council.

00:28:02:26 - 00:28:40:08

Yeah. Good afternoon, sir. Mark Kemp Principal environmental protection Officer. Just going back on the routine monitoring side of things. Um, and the use of section 61, section 61 is to be used all of the time, or there needs to be routine monitoring because otherwise the project can't tell if it's actually being causing significant impacts, whether by necessary or accident. Um, through works that are that they regard to be significant. Um, so there either needs to be routine monitoring to ensure that they're complying with, um, the agreed thresholds, um, from these 52281.

00:28:40:12 - 00:29:04:06

Um, or there needs to be a section 61 for, for all works, um, to show in order to show the need for monitoring um, or where that monitoring is going to be. As I say, there's a bit of a gap at the moment in, in, in monitoring, in terms of being able to show that they are in compliance and not causing significant effects whilst works are underway, not during assessment stages. Thank you.

00:29:05:02 - 00:29:14:28

Thank you. I'm aware that these ones come in, but I just want to put a question back to the applicant. So there is no intention to just do routine monitoring. Monitoring to assess that the

00:29:16:18 - 00:29:21:28

effects of the outcomes of the assessments are standing up to scrutiny on site.

00:29:23:13 - 00:30:00:10

As it stands at the moment, we've not proposed that. I mean, we yesterday we we agreed to having noise monitoring where the noise barrier is going in for the spa. Yeah. And so I think we could look in that context to see whether it would be appropriate to have noise monitoring elsewhere. But as, as the assessment stands, we're not expecting to get significant impacts. And with, uh, with any luck, once the contractor re assesses the no significant impact stands, um, and with the absence of significant impacts, the need for monitoring is smaller.

00:30:01:24 - 00:30:02:12

Okay.

00:30:05:09 - 00:30:06:24

Uh, see?

00:30:07:20 - 00:30:08:05

Yes.

00:30:08:07 - 00:30:08:24

Thank you, sir.

00:30:08:26 - 00:30:22:22

James Burton, on behalf of SES, I just want to take the opportunity to bring Mr. Thornley Taylor in. Who is our noise expert and probably needs no introduction, but his CV is with you. Thank you.

00:30:24:12 - 00:31:03:22

Thank you. Um, Rupert Thornley Taylor foresees, um. I need to raise the question of the meaning of best practicable means. Because it's key to the effect that this proposal will have. I was involved in the drafting of section 61 over 50 years ago, and in those days, major infrastructure projects were not examined in this way. Um, in fact, construction noise was not often considered in projects of large projects. The essential point is that whereas if you're proposing to do building works in a town centre, um, there's a limit plant you can use, methods of working you can apply.

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And the practicability of noise and noise mitigation measures is relevant at this stage of a major project. It is possible to do detailed predictions of the likely noise levels that the proposed construction methods will cause. And if it turns out that there will be a significant effect, even though what for a small project might be considered, best practical means have been used.

00:31:34:05 - 00:32:22:19

There is the opportunity to alter the proposals, change methods of working, change the design of the works to ensure that you don't have significant effects. And it's the way documents have been drafted so far is that. It's quite likely that we will end up with a significant effect and hands will go up in the air saying, but there's nothing more we can do. Best practicable means have been used. Um, if at this stage of the proceedings, the requirements of the national policy statements are fulfilled and detailed predictions are made, and the Secretary of State has to have those in order to be able to make an order, then it's possible to see if there is a problem with practicability and if there's going to be a significant effect.

00:32:22:21 - 00:32:51:09

Despite what engineers might think, well, that's the best we can do. That's that's the best practicable means. The opportunity at this stage of the process is there to change the design of the works, the method of working, the type of work carried out in order to avoid significant effects, and you have to avoid significant effects? Um, according to Ian, one have a lot more to say about operational matters, but that's what I have to say on construction matters.

00:32:53:12 - 00:33:05:05

Thank you, Mr. Taylor. Um, I appreciate the applicant has responded on the point of best practicable means, uh, in written submissions, but is there anything else you'd like to add in response?

00:33:06:01 - 00:33:40:03

Hi, Adam Lawrence for the applicant. I think because the best practical means would be a combination of different measures as required. So there is, as Mr. Thornley Taylor says, there is a selection of plant and equipment that can be used to lower the noise levels at source. We can look at when those works take place, avoiding the more sensitive time periods. We may be able to use barriers or screening or enclosures around particular works, so by combination of measures as appropriate, significant effects can be avoided.

00:33:40:16 - 00:33:52:22

I think I think the process of best practicable means is appreciated. I think the specific point really is, is there a need for something more to be done at this point in time rather than in the future?

00:33:57:26 - 00:34:14:11

I don't know, to the applicant, I'm not sure is the answer to that question. You know, because we have. Once the contractor is appointed and the works begin to get more definition around precisely what is happening, where and when, then the opportunity for best practical means becomes much more apparent.

00:34:15:18 - 00:34:21:20

Thank you. I know we've got a couple of hands up, so I will take a question from Amanda Berry.

00:34:26:12 - 00:34:41:23

Sorry. It was just to reiterate the point that we we need to see the contractor noise impact assessment when it's carried out to inform our decision making around the section 61, unless they're compelled to do so, which, um, would, would be great.

00:34:42:11 - 00:34:46:06

Okay. Thank you. And, uh, we have one hand up in Suffolk.

00:34:49:10 - 00:35:27:05

Thank you. Ladies and gentlemen, Marion Fellows, resident. It was just to reiterate that surely that information is needed by yourselves to be able to make a judgement or a recommendation to the Secretary of State as part of your examination. These matters cannot be left to when a contractor is appointed. Post approval. If you are minded to approve this project. Um, the presumption by the applicant that everything is negligible, that nothing is a problem, that everything can be solved, is not true.

00:35:27:18 - 00:35:43:19

Um, technically, as you know, HDD is extremely difficult. Noise from that alone is a concern. I think the starting point should be the information we have, and we have a lot of information to hand about what noise is created.

00:35:43:21 - 00:35:44:06

By.

00:35:44:10 - 00:35:44:25

You.

00:35:44:26 - 00:35:55:08

Thank you. I am looking for technical submissions at this point in time. I appreciate the points and they have been made well through open floor hearings already. Thank you. Um. Cece, please.

00:35:56:01 - 00:36:25:18

James Burton, on behalf of Cece. Thank you. Sir. We're a little concerned that the the applicant isn't understanding your point. And our point. What Mr. Phony Taylor has explained in many written submissions now is that whereas policy seeks prediction. Now, um, we don't have that. And that, I believe, implies construction and operational. And that didn't seem to be addressed by the applicant.

00:36:26:12 - 00:36:36:26

Thank you. I do understand the point. I think we've had a response from the applicant at this point in time, unless the applicant has a further point they wish to make. I'd like to move on to operational noise.

00:36:38:22 - 00:36:39:16

Thank you.

00:36:51:01 - 00:37:38:10

So I'm now turning to the issue of noise limits at operational sites. Um, as I understand it, both councils have been arguing. Both the local authorities have been arguing for a noise rating level from the converter station sites to not exceed five decibels below the background at the nearest residential receptors, and the applicant's comments on the Lear's sorry. The local impact reports in Suffolk and Kent would suggest that this is agreed in principle. However, in the statement of Common Ground between the applicant and East Suffolk Council and as mentioned in SI's rebuttal of the noise and Vibration matters, um, there's reference to applying a 34 decibel rating level at nearby noise sensitive receptors.

00:37:40:29 - 00:38:21:05

Provision MVO seven of the Register of Environmental Actions and Commitments is, as I understand it at the moment, the primary control on noise from operational sites, and this states that where feasible, the substation and converter station designs will seek to achieve noise levels at nearby noise sensitive receptors in line with the aims of the local authorities or otherwise as low as reasonably possible. To my mind. This leaves a lot of latitude and might be better framed as a specific noise limit or as a DCO requirement. Given that 34dB lack of external and free field is below the daytime indoor resting levels set out in BS 8233.

00:38:21:16 - 00:38:36:13

Can the local authorities provide further justification as to why this level would not be acceptable as a maximum level at relevant receptors, with an ambition to achieve better, if possible? And the applicant, can the local authorities respond?

00:38:42:05 - 00:39:05:11

Hi, Amanda Berry from Thanet District Council, I think we asked for five decibels and we were keen on that because of the great Oaks, um, small school, which is um nearest receptor sensitive receptor and to and it's a special needs school, so we were keen to see five DB below background target level in this instance.

00:39:09:06 - 00:39:23:12

But would the local authority accept 34dB as a maximum level? I'm just conscious. If there is no maximum specified, then there's really a sort of a broad principle that a level might be achieved, but nothing to secure that.

00:39:23:18 - 00:39:31:17

Apologies, I don't have the rating data in front of me, but if if if 34 is five decibels below, then we would accept that.

00:39:32:15 - 00:39:34:20

It's not five decibels below.

00:39:35:00 - 00:39:35:15

Right?

00:39:35:24 - 00:39:36:29

I understand it.

00:39:39:29 - 00:39:40:26

But we would.

00:39:42:15 - 00:39:58:12

I suppose it's because it's extremely low level. Um, I default to, um, the applicant to, to, um, go into the details out at the. At this stage we would want the five DB below, but I understand that 34dB is exceptionally low. So that's probably where that's come from.

00:39:59:01 - 00:39:59:21

Yeah.

00:40:00:00 - 00:40:05:22

Uh, can I move on to. Thank you. Can I move on to East Suffolk Council?

00:40:08:00 - 00:40:48:12

Good afternoon, sir Mark Kemp, a council principal environmental protection officer. Um, this is something we'd need to reflect on a little bit, but my initial, um, sort of response to that goes back to base 4142. Um, and the principles of base 4142. Um, now, a a below background, uh, rating level is indicative of a low impact, uh, dependent on context, of course. Um, five DB plus five DB above is a, uh, indicative of a adverse impact, and ten DB above is indicative of a significant adverse impact.

00:40:48:18 - 00:41:19:21

Um, now obviously audibility comes into this, um, and and 8233 and the World Health Organization criteria that underpins that is a consideration. Um, and if this is the lowest that the uh, applicant can reasonably achieve, um, then it's, it's something that would would have to be considered, um, on its merits with that justification. Um, but what we're looking for is a rating level that is the lowest reasonable that you can achieve.

00:41:19:27 - 00:41:53:11



Um, there are amenity issues around the area internally. And in terms of sleep disturbance, I don't think there's there is an issue here. Um, but audibility for a 24 over seven, um, commercial, uh, commercial industrial noise in a location that currently has a noise climate, um, or sound climate that is, um, uh, primarily primarily rural, residential, um, any increase on background is something to be, uh, be reduced to, to a minimum.

00:41:53:13 - 00:42:28:05

This further then brings on to the argument of knowing that there are further projects co-located at this site, and the issue of background sound level creep. Um, and what the the follow on project being line link that we know about um and and but but knowing that the the Saxmundham converter station site um is is also scoped for three although Nautilus has currently gone away. We know from the various news reports there are nine interconnectors proposed.

00:42:28:14 - 00:43:01:15

When something else comes here, we don't know. But background sound level creep is an issue here. Um, and therefore keeping that increase on background sound level to an absolute minimum, um, provides much more of a ceiling for follow on projects. Um, you know, to again, you know, not cause as much uh, um, sort of like impact, um, talking about night time representative backgrounds. The lowest we have agreed is 20 20dB. 34dB is 14dB above that.

00:43:01:17 - 00:43:17:13

Um, if the next project that comes in says, well, we need 14 DB above background, which is now 34. Um, where does that leave the the the, the, the local residents and the background sound level in the area? Um.

00:43:19:09 - 00:43:41:27

So I'm so I appreciate the point about noise creep. Obviously subsequent projects would have to also go through the examination process and be subject to development consent. Um, so there would be the opportunity to secure separate, uh, noise controls in relation to those projects. Um.

00:43:45:13 - 00:44:19:28

To a certain extent, the issue is that obviously the background levels are very low. so a difference. Trying to achieve a difference below a very low level is quite challenging. And perhaps the absolute levels rather than a difference compared to background is more appropriate. And I note that the white noise guidelines, uh, the World Health Organisation white noise guidelines do refer to 40dB all night outside as being a lowest observed adverse effect level.

00:44:20:00 - 00:44:30:12

So we are already achieving a sort of a lower level than that with 34dB at the At receptor locations.

00:44:39:03 - 00:44:39:18

That.

00:44:41:21 - 00:45:24:17

We need to reflect on that. So um, it's a 34 DB if that could be justified as a, as the lowest reasonable level, then it's something we can talk about. But, um, as I say, it's still remains a concern in terms of

background sound level creep for future projects. I understand that future projects will be required, um, to, to, uh, assess things on their own merits and suchlike. Um, the one thing I would also point out is in the, uh, uh, applicant's response to our, uh, leer, they proposed at 34dB as a low, um, and a low as, as you're aware, as the point at which mitigation and minimization of noise impact occurs.

00:45:24:24 - 00:45:47:05

Um, it should be a cell. It should be a noise limit. Um, background should be the the low. It should be mitigating and minimizing anything above background. So it's expressing it as a level does not act as a as a as a noise limit. Um, what we need is a noise limit expressed as a requirement in the DCO, in line with other Dsos that have been recently consented in the area.

00:45:48:20 - 00:45:50:20

Thank you. Yeah, please.

00:45:52:14 - 00:46:34:03

Thank you. Sir. Rupert Taylor says we need to stress the fact that the 34 figure being talked about is a rating level as per PS4 and 42, which means it includes a correction for the additional effect of tonal character in the noise and the applicants pushing back on the matter of tonal character. They don't readily accept that there is a significant risk that the type of equipment involved in this project will leave very clear, pure tones at 100Hz, reaching sensitive receptors, with two effects partly more annoying for the same sound level, which is why up to six decibels has to be.

00:46:34:05 - 00:46:41:11

As I interrupt you, you're pre-empting one of my later questions, so we will come back to this point very well.

00:46:41:13 - 00:47:10:11

Um, so at this stage we need to note that it is a rating level. It's not a physically measured noise level, and there is disagreement on how to apply these for one. For two, in the process of determining the rating level, which is measured level, plus other considerations, including context, which is how we got into BS 8233. Um, and when we come back to tonal matters, I'll continue that um, that theme, sir.

00:47:10:20 - 00:47:11:05

Okay.

00:47:11:09 - 00:47:16:14

Thank you. Uh, with the applicant like to comment at all?

00:47:18:22 - 00:47:30:23

Adam Lawrence for the applicant, our assessment does include some character correction in that 34 because we have four DB correction for tonality in our assessment.

00:47:55:07 - 00:48:02:11

Before I move on. Are there any further points in relation to, uh, the, uh, noise limits? Sorry.

00:48:03:04 - 00:48:20:19

Sir. Yes, it's a consistency. I'm sorry, James Burton. Of course. It's a consistency of decision making point. Of course, you're free to depart from what your colleagues did in the Scottish Power DCO, but my understanding is that they did set a maximum level there. But it wasn't 34. I understand it was lower than 34.

00:48:21:10 - 00:48:24:23

And we are going to come on to that point just now.

00:48:26:17 - 00:48:59:26

So, um, turning to Friston and Kiln Lane substation or sorry, the Friston or Kiln Lane substation, the SPR E1 North development consent orders secured noise limits in respect to Friston Substation in requirement 27. This was a cumulative noise limit applied to the E1 and E2 and proposed National Grid substations, which were all subject to the same SPR consent. Um, I understand why the applicant doesn't consider that an identical cumulative requirement can be applied to Sealink.

00:49:00:13 - 00:49:17:01

Uh, because unlike the SPR projects, National Grid is only seeking a standalone consent for the proposed Kill Lane substation and would have no control over the SPR substations. But can the applicant explain how this requirement was being applied or shared as part of the transfer of benefit discussions with SPR?

00:49:23:11 - 00:49:27:17

Yes. Could I ask for the applicant, Mr. Buckley, to deal with that, please?

00:49:29:05 - 00:49:57:13

Uh, James Buckley, uh, on behalf of the applicant, um, we have been given all of our noise data for the Friston substation as part of the current RDD process. Um, to Scottish Power as part of their discharge of their conditions. Um, and we don't have any transformers on our site, so there's no. Therefore no noise making equipment. I'm not sure I'd need to check back in the exact terms of the transfer of benefit on what the noise level is, but we can come back to you on that one.

00:49:59:10 - 00:50:26:27

Um, I suppose if a separate threshold level was set for Kinane substation, my question is, what would be the implications for the SPR consent and their discharge requirements and achieving the original EA one consent? Uh the requirements Da one requirement in terms of noise rating level at properties.

00:50:28:28 - 00:50:53:02

James Barclay on behalf of applicant, I'll have to take that one away and come back to you. Um, I don't see in principle why we couldn't accept a lower limit at Friston than what we're talking about at Saxmundham because, as I say, the Friston substation doesn't have any significant noise making equipment that contributes towards that maximum level that we are. We have with Scottish Power. But we'll come back to you on that point.

00:50:58:14 - 00:51:01:14

Can you just confirm when that would be?

00:51:03:23 - 00:51:06:11

Come back to you by deadline for you.

00:51:06:13 - 00:51:09:21

So can I just comment on that? Yes, because I was very much involved.

00:51:09:29 - 00:51:10:14

With the.

00:51:10:16 - 00:51:52:25

Scottish Power examination and in fact, was, um, Mr. Thornley Taylor. Um, this was a very. You mentioned requirement 17. I pleased you're aware of it. This was a very hard fought requirement in the Scottish power examinations. And certainly we were concerned to include the National Grid substation in the noise requirement. Um, and I agree with you. I'm not sure how this requirement will work going forward, but my recollection was that in the end, National Grid did agree to include the substation in the overall noise requirement on the basis essentially, which is what they really said in this examination is the equipment at Friston does not make any noise.

00:51:53:10 - 00:51:58:16

Um, so if that is the case, presumably that is the requirement they could accept.

00:52:02:23 - 00:52:03:11

Thank you.

00:52:04:18 - 00:52:06:01

Yeah. Let's respond.

00:52:07:11 - 00:52:14:24

Uh, James of the applicant. I'll take that on board and we'll we'll take that away and come back by deadline for.

00:52:15:25 - 00:52:21:25

Thank you. Are there any other points relating to Friston Kiln Lane substation?

00:52:28:06 - 00:52:29:11

Okay. Thank you.

00:52:33:03 - 00:52:54:27

Um, I suppose as part of your part of the applicant's considerations, then, on the basis that the Secretary of State may wish to secure a similar noise threshold for Kiln Lane substation to his previous decision. Is the applicant able to provide a form of wording coordinated with SPR, that would enable the previous requirement to be satisfied? Is the wrap up to that point?

00:52:55:18 - 00:52:58:21

Sara Sheikh. Yes, sir. We can do that.

00:53:03:29 - 00:53:38:04

Um. Suffolk Energy Action Solutions representation of noise and vibration, highlighted that the potential for low frequency noise impacts and room resonance. Uh, sorry, highlighted the potential for low frequency noise impacts from room resonance and nearby properties. I appreciate the applicant has responded to some of these comments in its responses to relevant reps. My question is, how would the detailed design of the converter station take into account the effect of low frequency noise emissions, and should specific consideration of low frequency noise form part of noise requirements or react measure to ensure that the required internal noise levels are achieved.

00:53:41:27 - 00:54:16:05

Adam Laurence on behalf of the applicant. So the assessment that we have done at the moment includes octave bands from 63 up to eight kilohertz, which includes the 100Hz key frequency. So the assessments that take place have that key frequency as part of their as an important part of their consideration. And certainly the transformers and the other equipment will have. So basically, as the design develops, that very important frequency is a key part of the assessment.

00:54:16:07 - 00:54:26:12

So the assessment carries on and the noise predictions are verified to make sure that we are within whatever level we need to be.

00:54:29:10 - 00:54:29:28

Um.

00:54:34:27 - 00:54:35:25

And how?

00:54:38:12 - 00:54:43:27

Could low frequency noise form part of a specific noise requirement or a react control?

00:54:48:01 - 00:55:14:16

Adam launched the applicant. I think if because we have the frequency as part of the overall noise assessment, I don't think there is a need to have an additional low frequency control as well. I think it would be because the frequency is built in, and the assessment will consider frequency as an important component. I don't I don't think there is a need to have an additional control for low frequency on top of everything else.

00:55:21:27 - 00:55:55:09

Thank you sir. Um, your question that you've just asked is an extremely important one because there is a way of dealing with low frequency noise explicitly. Um, although that was not in the DCO for East Anglia one North and East Anglia two. But the method is as well as calculating the level in DBA. You also calculate the level in DBC, which has hardly any adverse weighting at low frequencies, and you look at the difference between the two and when it is more than something like ten different than.

00:55:55:11 - 00:56:47:13

It's indicative that from a human perception point of view, there is a low frequency problem. People like me receive phone calls from the public, and the most frequent calls I get are about people who have problems with low frequency noise. Sometimes they get into the press and are called the hum. Um, that probably has many different origins. Um, but your question was very much to the point. And it brings us back to the need to do a detailed prediction at this stage. Um, the applicants have made very broad brush assumptions that an enclosure around a transformer can give either 10 or 20 or maybe more DBX sound reduction without looking specifically at the plant proposed for this particular site, and without looking specifically, um, in enough detail to determine what the effect will be at the receptor.

00:56:47:15 - 00:57:30:16

Looking at some typical room dimensions at the houses of receptors to see whether the room modes will include a predominance of at 100Hz, which will mean that sometimes you can get higher sound levels inside the house than outside the house for that reason. And it's the same problem that the applicants have not done detailed enough predictions, and they don't fulfill the requirements of N1 and N3. And the things most worrying is, one of the responses we've had from the applicants is suggesting that when you have two transformers and you get constructive interference that the effect is plus three decibels.

00:57:30:18 - 00:57:52:27

It's not. It's plus six decibels. It's a doubling of pressure. And if the applicants are not grasping the issues sufficiently to deal with that, it is a matter of great concern and needs to be addressed by inserting really enforceable limits and controls into the DCO itself, rather than into the Reac.

00:57:54:10 - 00:57:56:22

Thank you, Mr. Taylor. Um,

00:57:58:15 - 00:58:14:27

my understanding is at the moment we have a situation. The applicant has prepared an indicative design based on the level of information that is available at the present time. So is there any potential to do this? A more detailed assessment comparing DBA, DBC.

00:58:16:09 - 00:58:32:18

Adam Lawrence to the applicant. We could certainly look to see what the current assessment would look like in terms of DBC, because we can calculate that on the data that we have available for the indicative design. Um, so we can do that. No problem.

00:58:32:24 - 00:58:37:15

I think that would be very helpful. Uh, which deadline would you be able to do that for?

00:58:54:07 - 00:58:57:00

Uh, Adam Lawrence, the applicant. We can do that by deadline five.

00:58:57:17 - 00:59:27:20

Thank you. Um, obviously, where this potentially leads to is there would there is still an outstanding question as to whether the final detailed design would need a form of assessment. So what we may

need to lead to is some form of wording, uh, within either the development consent order or within the react to revisit that assessment once additional level of detail is provided. But let's see the outcomes of that assessment first and then we can make a judgment.

00:59:27:22 - 00:59:32:22

And Mr. Thornley Taylor, I'd welcome your comments on that assessment when we receive it.

00:59:34:08 - 00:59:35:24

I'll be glad to provide them. So thank.

00:59:35:26 - 00:59:36:11

You.

00:59:36:13 - 00:59:46:08

And before I move on, can the do the local authorities have any additional comments that I'd like to make? Uh, if we go to East Somerset.

00:59:49:03 - 00:59:52:18

Sorry, neighbours. Uh, East Suffolk Council.

00:59:52:21 - 00:59:53:06

Yeah.

00:59:54:13 - 00:59:59:12

Uh, thank you, sir. Mark Westerman. Smith. Um. No, sir. We're we're happy.

00:59:59:14 - 01:00:05:18

Um, with the points you've heard this morning. Thank you, thank you. And to the district council.

01:00:06:25 - 01:00:08:15

No further comments. Thank you.

01:00:10:08 - 01:00:17:08

Thanks. So I've just got one more comment in relation to the Scottish Party. So that question about, um, design, um.

01:00:17:10 - 01:00:17:25

That.

01:00:17:27 - 01:00:34:21

Was addressed in the Scottish Party echoes its requirement 12 two, Which required details of more noise mitigation, etc. to be provided as part of the design process, which you might find helpful if you've not already seen it. Yeah. That's useful. Thank you.

01:00:36:20 - 01:00:40:06

Were there any further comments on Operation Noise before we move on?

01:00:49:26 - 01:00:55:00

In that case, I would like to move on to a marine physical environment.

01:01:01:18 - 01:01:17:06

As the Marine Management Organisation are not attending, I've cut out item 38.3 from the agenda, and I'll defer this question to written questions at a later stage. So sorry, uh, Mr. Harrington.

01:01:20:27 - 01:01:47:25

Morgan Heyman, on behalf of the Environment Agency. A small ask R geomorphologist is only available up until 130. And I'm just wondering, is it possible to bring forward the Pequot Bay? Um, morphological change and depth table burial item item under item 8.1, just so we can get his input if we need it on that item.

01:01:49:22 - 01:02:23:09

Um, so there are two questions I had in relation to Pequot Bay. The first was, um, a deadline to the Environment Agency. Comments on deadline one and deadline one a submissions action, issue 1.22 explained that it had no concerns with the proposed HDD. Facilities within Pequot Bay, provided original materials were reinstated in the intertidal mudflat. In contrast, Natural England's Deadline three a response on the Kent landfall expresses concern regarding the coastal process impacts of the presence of a cofferdam in the intertidal area.

01:02:23:27 - 01:02:31:02

Can the Environment Agency expand on its reasons for concluding that it has no concerns about the reception facilities?

01:02:43:00 - 01:02:47:17

I think that's one we might have to take away for you. And get back to your written response.

01:02:49:02 - 01:02:55:25

Okay. Thank you. Um, I would also be putting this question to Natural England if they were attending today,

01:02:57:11 - 01:02:59:21

and I will put it to them in an action point.

01:03:02:08 - 01:03:40:01

My second question was about the depth of burial measures in Bedwell Bay. The Environment Agency's comments on D1 and D1. A material item, EA 032, expressed concern relating to the depth of burial and the likelihood of long term migration of the River Stour channel, a concern reflected by Natural England in its deadline. Three marine physical environment advice on D1 and D1 documents. The Environment Agency suggested that a depth of burial three metres below the bed of low flow channel would be required in Bedwell Bay to avoid future exposure of the cable.

01:03:40:13 - 01:03:53:22



In contrast, the applicant's conclusions in its Landfill Sediment modelling report can the applicant explain whether a three metre depth of burial is feasible in Bagwell Bay, and what the implications would be for the impact assessment?

01:03:53:25 - 01:04:07:18

Thank you, Sir Sarah Shaikh, for the applicant, sir, for Mr. Paul Norton, who's a physical environmental lead for the applicant, is going to assist you with that, potentially with help from Mr. Andrew Homewood, who you've heard from before.

01:04:12:22 - 01:04:13:07

Thank you.

01:04:13:15 - 01:04:15:28

Paul Naughton for the applicant.

01:04:16:25 - 01:04:18:03

Uh, I think, um.

01:04:18:28 - 01:04:20:08

As proposed, the.

01:04:20:10 - 01:04:20:25

Intention.

01:04:20:27 - 01:04:50:11

Is to go ahead with the the depth of lowering at 1.5m because we feel justified from our assessment work that no further deepening will be required. We have, um, no, uh, expectation that the river channel will migrate to this kind of distance to the north from its present position to cause an issue requiring further, um, lowering of the cable.

01:04:52:22 - 01:04:58:06

Uh, there is a figure. I don't know if you wanted to, to share that. Um.

01:04:59:03 - 01:04:59:18

Yeah.

01:05:02:00 - 01:05:32:08

We have the one I think that was referenced. Yeah, we'll go with this one. Um, so this this is, um, something I'd like to use to substantiate, uh, the conclusion about, uh, the presence of the the river channel. Um, this is representing an envelope of variation in bathymetric or bathymetric and topographic levels derived from lidar data over a number of years.

01:05:32:10 - 01:06:02:09

So the yellow colors of the yellowish shades are indicating where there's much less variability in those levels. So you can see, um, across the the marine cable corridor. Uh, we're pretty much always in the,

the sort of yellow and perhaps some orange shaded areas. Um, separate to that, though, where we've got the existing River star Channel, we're into the sort of more purple colors there.

01:06:02:11 - 01:06:42:28

So that's where all the activity is. Uh, and I know there are some, um, plots in the sediment modeling report that suggest the channel might have taken a more northerly position. But I think this, this plot, um, uh, tells us where where the, uh, the deep water channel is. It's a steep sided channel. It's not a shallow, um, uh, with gentle, um, side slopes. It's a fairly incised channel. And, uh, from this, there's no evidence that I can see that suggests that it has an inclination to move further to the north.

01:06:43:24 - 01:07:21:20

Um, there are sections, perhaps lower, uh, down the intertidal, um, which suggests there was a previous, uh, river channel position. Uh, these are believed to be, uh, features of remnant, um, river channel or, um, uh, an old drainage channel, not, um, a migration of the channel feature that, um, we know and it exists currently, which is maintained as a navigable channel, which also helps maintain its position.

01:07:21:22 - 01:07:35:12

So, uh, yeah, the view is that we've taken in our assessment that, um, the likelihood of any, uh, migration of this channel to the north is, is, um, highly unlikely and not a concern.

01:07:36:05 - 01:07:39:29

Thank you. I'd like to ask Mr. Charman to come in.

01:07:44:04 - 01:07:45:21

Hello. Thank you. Uh, Richard Sharman.

01:07:45:23 - 01:07:56:21

The Environment Agency, uh, geomorphologist. Um, so the the response on this is my my text that's been edited by, um, uh, Morgan. Um.

01:07:59:05 - 01:08:30:03

We we don't believe that is likely to halt in, in its movement northwards. Uh, based on the evidence provided, um, the channels move 700m northwards since 1900, and that drawing that was shown a moment ago doesn't really allude to that information. Um, the coastal uh modeling report also explains that the rate of movement northwards has increased over time.

01:08:30:16 - 01:08:50:07

Um, I don't have those figures. Here we go on my page before, uh, four metres. It was previously four metres per year and it's increased to 7.8m, uh, per year. Uh, more recently, I'd have to get you the exact date of those before and after figures. Um.

01:08:54:13 - 01:09:14:06

The paleo channels that are shown, I note that they are probably a different channel. Uh, that's what the report stated. So I think that's probably not enough evidence. But my knowledge of estuarine processes, uh, and that's my specialism, is that. with sea level rise. Ah. Um.

01:09:16:26 - 01:09:49:08

An increased tidal water going into estuarine environments with, uh, flood embankments. Is that our, uh, total amount of water that goes into and out of an estuary, which is called a tidal prism, will likely decrease, uh, with sea level rise. And the relationship between the tidal prism and the length of the mouth is, is a direct relationship. And so it's likely that this estuary will want to lengthen its mouth, that the shingle material moving from the south will continue to push that mouth further north.

01:09:49:10 - 01:10:22:09

And there isn't anything to constrain it, uh, based on the geology. So I think it will continue to increase. And within the lifetime of 50 years of the project that moves the cable directly into, uh, the sorry, it moves the mouth of the channel directly into the cable, which is 300m north. And an easy solution, which is our request, is to make sure that the cable is deep enough. Otherwise, there's a high risk that some form of retaining structure will need to be placed across in front of the cable.

01:10:22:26 - 01:10:23:14

Um,

01:10:25:14 - 01:10:51:09

the dynamics of a natural mouth of an estuary produces a myriad of habitats, as I'm sure you've you're aware, the different gravels, the different muds, the different vegetation types. There aren't very many estuary mouths that are unconstrained within the southeast. So it's very important from our water Framework Directive perspective that the mouth remains unconstrained and there's no navigation either to need it to be constrained.

01:10:53:06 - 01:10:54:00

Thank you.

01:10:55:01 - 01:11:05:10

Thank you. Um, I'd like the applicant to respond on the influence of climate change, uh, on the migration process. And, um.

01:11:07:06 - 01:11:15:16

Also, to go back to my original point. How feasible would it be to bury the cable to three meters depth, and what would be the implications?

01:11:17:22 - 01:11:55:19

Paul Norton for for the applicant. So regarding the influence of climate change, I see probably the fluvial influence as more influential, perhaps than than sea level rise over the 50 year period. And I think what we have seen in in the information that's presented in, in the technical report we referred to earlier, uh, the, the channel can cope with significant, uh, northward movement of material that's building shell mass.

01:11:55:26 - 01:12:03:23

But presumably that there's also a material falling into the channel itself. And, uh, rather than,

01:12:06:01 - 01:12:41:27

Causing the channel to migrate. As a result of that, it um. The maintenance, the self maintenance of the channel that we've seen from the evidence that we've got, um, suggest that the flows in that channel are more than capable of basically, um, keeping it clear and maintaining its position. Uh, and as you can expect, um, climate change, there will be increased fluvial discharge rates. Uh, projections are of the order of 30 to 50% for a mid range scenario.

01:12:41:29 - 01:13:13:07

And beyond that. So I still take the view that, um, climate change, um, may potentially or is more likely to have a beneficial effect in terms of helping to maintain the channel position where it is or where it wants to be at the moment, and unlikely to cause it to deviate from that. Um, I think I'd need some input from an alternative colleague. Uh, Andrew Homewood will take this one regarding the depths of lowering.

01:13:15:26 - 01:13:16:20

Andrew Homewood for.

01:13:16:22 - 01:13:17:07

The.

01:13:17:09 - 01:13:17:24

Applicant.

01:13:17:26 - 01:13:46:12

Just a point of clarification on the three metres. I think that is three metres below the base of the future. The future channel. And therefore, the ask is not for a depth of lowering of three metres in the bay, but three metres plus the necessary protection on the cable, which could be an additional 1.5. So we're talking about a total depth of lowering from existing seabed of 4.5 as an indicative, um, depth of lowering.

01:13:48:02 - 01:13:49:27

Apologies. I'm going.

01:13:49:29 - 01:13:50:14

To have.

01:13:50:16 - 01:14:21:27

To take that one away on the feasibility that would involve, um, a sort of trenching expert, but, um, our initial view, um, through the CBR, which considers the specialist report commissioned through ABP mer and the quiet depth of lowering a 1.5 we think is entirely reasonable, um, for the design scenarios that we've outlined, notwithstanding the extreme event which is being discussed, and it is an extreme event.

01:14:21:29 - 01:14:32:03

But I'll take that away in terms of, um, the methods that might be used to lower the cable, um, to the depths proposed.

01:14:32:23 - 01:14:39:06

If you could, please. And, uh, can you confirm when you'd be able to come back to me with that detail deadline for.

01:14:39:10 - 01:14:41:29

We could provide an initial response, a deadline for.

01:14:42:04 - 01:14:44:03

Okay. Thank you, Mr. Chairman.

01:14:49:18 - 01:15:13:22

Thank you. It's a slight delay every time in switching the camera on the microphone. No problem. Um, the the the fluvial discharge in response to to the person speaking to before, uh, this point. Uh, I don't believe there's a relationship between an increase in fluvial discharge with climate change and the position of the mouth. Uh.

01:15:16:01 - 01:15:24:06

It's a fine balance between the shingle movement from the south and the tidal prism. Uh, and.

01:15:26:11 - 01:15:31:19

Yes. Fluvial discharge will be in there somewhere, but it's it's not the predominant driver.

01:15:34:15 - 01:15:52:03

So that's why we're still, uh, very nervous that even within 30 or 40 years time, we might have to be thinking about a retaining sheet, steel pile wall built to protect that cable and, um, prevent the mouth moving.

01:15:56:27 - 01:16:08:01

I just asked the applicant if that eventuality occurred. What actually would be your remedial solution? Would it be a sheet, pile wall.

01:16:09:08 - 01:16:40:27

And a home for the applicant? It wouldn't be a sheet PA wall. I'll just read out from the project description some typical remedial measures, which might be typical solutions to cable exposure, which is set out in project description. Chapter 4.1 16. Uh, typical remedial works that might be required during operations, operations and maintenance. So in this case, cable exposure during operation uh would be placement of mattresses, rock or rock berms, grout bags or additional thinking.

01:16:40:29 - 01:17:10:24

I think it's a very specific case, this one that's very much the general approach to exposure, where you've got a cable trench and you're en route, whereas here you've got the erosion coming in from the side of the cable and effectively creating an under hang, if that was to occur, and so would you use one of those standard methods, or would you have to do something more significant by way of an intervention, such as sheet piling and creating some kind of wall to defend the cable?

01:17:11:02 - 01:17:29:14

Yeah, the answer to the sheet pile is a definitive no. It will be one of the typical means of remedial for a typical exposure. Um, but I will come back to you specifically on that point, whether something different to the suite of typical remedial measures mentioned would be required.

01:17:30:18 - 01:17:33:01

Thank you again for deadline for.

01:17:39:07 - 01:17:40:00

Um, Emma.

01:17:43:03 - 01:18:14:24

Emma. Well, I'm sorry, can I just, um, clarify whether we are referring to areas where HDD along the salt marsh is being used or if we're talking about the mudflats where open cut trenching is being used. Or if it's like the entirety of the cable at Pequot Bay. Um, and then also, if the depth recommendation by the Environment Agency is taken forward, um, with further ground condition surveys be required to ensure that HDD is still possible.

01:18:17:12 - 01:18:19:16

Uh, with the applicant like to respond.

01:18:21:07 - 01:18:37:25

Andrew Homewood for the applicant, we are talking about the length of route from the HDD exit, uh, along the intertidal, but specifically, um, a seaward off the HDD exit. So we're not talking about the trenches crossing of the saltmarsh.

01:18:43:05 - 01:18:43:25

Thank you.

01:18:51:01 - 01:19:18:27

Unless there are any further points on that, I think I'd like to move on. Um, I had two further questions. Um, in relation to the national. Sorry, National coastal erosion risk mapping or enzyme two. Can the applicant comment on whether the landfill sediment modelling assessment should be updated to take account of the 2025 National Coastal Erosion Risk Mapping two data set, the currently based on 2018 to 2021 data.

01:19:21:24 - 01:20:01:27

Paul Naughton for the applicant. Um, yes. I'd like to confirm that, um, we did make use of the NZME two data in the main ES chapter. Um, but as you pointed out, there are some figures in the supporting report, um, undertaken by ABP, marine Environmental Research, which does still display the previous version of the interim data set, which, is quite different from the latest version, but I can confirm that that information didn't make its way into our iOS chapter.

01:20:01:29 - 01:20:40:22

That assessment was done completely separately and includes the Insemm two data, as with its limitations. Um, taken into consideration as well. Um, the I guess the the key point is that I don't think

there are any major conclusions from the the Abby Meyer report, um, that we've taken through into our assessment, but, uh, require anything to be reevaluated, and I'm confident that our assessment is valid.

01:20:40:24 - 01:21:08:18

The main reason for, um, using the Inerm two data is to provide, um, an indication of what the future baseline condition is. So it's merely, um, brought into the our report, um, to, to provide that and to, uh, yeah. As I said, give us that baseline for the assessment of potential impacts, not just present day, but also in the future.

01:21:09:22 - 01:21:16:03

Thank you. Uh, did the Environment Agency or either of the local authorities want to comment on that point?

01:21:20:05 - 01:21:21:05

At Luke Taylor.

01:21:24:18 - 01:21:26:02

Thank you sir. Um.

01:21:26:14 - 01:21:32:12

We welcome the addition of the latest data, I suppose.

01:21:32:22 - 01:21:36:10

Sorry. You are you from the Environment Agency?

01:21:36:12 - 01:22:14:15

Oh, sorry. Yeah. Environment agency. Apologies. Um, just to reiterate, we welcome the use of the latest data, I suppose. Um, whilst we note that in paragraphs 4.3.24 and 4.3.34 of the flood risk assessment. The applicant alludes to erosion. Um, they talk about the lifetime of the development and the effects of climate change, but none of the conclusions that can be found within table 1.17 are reiterated in this context.

01:22:14:22 - 01:23:00:26

So we would expect to see these estimates, uh, to form part of the flood risk assessment itself as a standalone document and to understand the implications. Um, the applicant has stated that there are no major concerns, but this hasn't been stated within the flood risk assessment, to my knowledge. So, um, we were seeking further assessment, um, based off the answer to estimates, but it seems that these have been incorporated and, additionally, we are looking for a requirement in the context of ensuring that the marine environment is not adversely affected post decommissioning.

01:23:00:28 - 01:23:10:25

For example, if the cables were to be left in situ, they might become exposed, especially in the context of the discussions that we've had here. Thank you.

01:23:14:02 - 01:23:17:14

Thank you. With the outcome light to quickly respond.

01:23:20:07 - 01:23:23:08

In particular on whether a standalone assessment is necessary.

01:23:24:12 - 01:23:30:14

Paul Naughton for the applicant. The comments there seem to be related to the flood risk assessment.

01:23:30:16 - 01:23:33:26

It had drifted away from coastal erosion. Um,

01:23:35:17 - 01:23:40:00

maybe it's one we'll return to later on this afternoon. Um.

01:23:42:25 - 01:23:47:28

Mr. Taylor was was there anything explicitly relating to coastal erosion.

01:23:51:15 - 01:24:08:14

Well, I suppose, uh, coastal erosion and flood risk are often inherently linked. Um, our expectation is that coastal erosion is considered as part of a flood risk assessment, which I would say hasn't been achieved thus far.

01:24:08:27 - 01:24:12:20

Okay. Thank you. That's noted. Um, East Suffolk Council.

01:24:15:03 - 01:24:22:01

Thank you sir. Mark. Westminster for East Suffolk Council. Um, we welcome the clarity.

01:24:22:03 - 01:24:22:18

That.

01:24:22:20 - 01:24:24:00

The issues the NZME.

01:24:24:02 - 01:24:25:15

Two data.

01:24:25:17 - 01:24:55:19

That's helpful. Um but further clarity as to uh data used would be um of additional held. Um, that figure 6.4.4. 1.13, uh, which is the Suffolk estimated future Erosion and it's in rep 3024 is is really the summary of the position. And some of the data is based on enzyme. We now understand that's in some two.

01:24:55:21 - 01:25:31:28



That's good. But other data is um based in relation to estimated average erosion. And that's all we know about it. We don't know about the underlying data. We don't know about the average erosion per year rates that have been, uh, used. And we understand the figure to show the horizontal, uh, coastal erosion for particular time frames. But there's nothing in relation to, uh, vertical erosion, which of course, is relevant to, uh, cable and depth.

01:25:32:00 - 01:25:43:06

So at the short point is we welcome that clarification, but the data could be, um, further clarified and that would aid our understanding in terms of cable depth. Thank you.

01:25:47:17 - 01:25:52:12

I'd like to wrap this up by just asking whether the applicant could provide that clarification. Note.

01:25:57:14 - 01:26:03:00

For the applicant? Yes. We'd be happy to provide a clarification note on that issue.

01:26:03:13 - 01:26:06:09

Thank you. Um, Mr. Harrington.

01:26:11:15 - 01:26:18:23

Morgan Harriman, on behalf of the Environment Agency, I do see that Lynn Walker has her hand raised before me. If the walker wants to speak first.

01:26:20:00 - 01:26:21:02

Uh, Miss Walker.

01:26:25:06 - 01:27:05:08

Hopefully you can. Yes. Lynn Walker, representing C's. Um, yes. We face some similar issues to those raised. Uh, in regard to Peg will be about cable depth issues, but we want to highlight the rapid accelerating of coastal erosion that we can see from recent tidal surges and storms that are reshaping this coastline. Um, we, uh, given that pace of change, we'd urge the examining authority to consider the possibility of an urgent site inspection so that current conditions can be seen firsthand.

01:27:05:10 - 01:27:36:07

And we're thinking, for example, of the Suffolk horizontal directional drilling locations. And we also question whether sea links existing marine and landfill surveys remain adequate considering what is now happening on the ground. We've got a lot of unpredictability, and, uh, the scouring of the beach is already impacting on Aldeburgh, where the requested sea landing of HDD cables on a potentially eroding beach is of concern to us.

01:27:36:09 - 01:28:19:16

And we wonder about the need, the need or the requirement to, uh, redoing the surveys, um, now and not after consent. We'd ask that those energy projects, um, uh, especially ceiling and be, uh, be required to undertake some, some new surveys. Uh, anybody who saw BBC Evening News on Tuesday night will have seen the damage that's being done on our albeit it is in Thorpe ness, but all

that material is moving and two meters of land was predicted to move and 27m of cliff have actually been lost.

01:28:19:27 - 01:28:53:06

Now, all that, uh, activity is exposing historic cabins that were buried for decades, revealing sand levels that many residents have never seen before in Aldeburgh, and no certainty that the shingle now shifting south in Aldeburgh, will return, increasing the likelihood of permanent sediment loss and faster erosion. Now all but is famous for its single shingle beach, but it's now showing areas of sandy beach and long buried beach groynes.

01:28:53:08 - 01:29:05:18

So this is the context for major energy projects at Sea Link and potentially Line link. These schemes involve onshore and offshore cabling, horizontal direction drilling.

01:29:06:12 - 01:29:17:09

I am aware of the representation that you have submitted, so unless it was a specific technical point about the points we were discussing, um, then I think I'd like to move on to Mr. Harrington.

01:29:18:09 - 01:29:19:25

Okay. Thank you.

01:29:20:15 - 01:29:21:15

Mr. Harrington.

01:29:23:21 - 01:30:09:11

Thank you sir. Morgan Hagman, on behalf of the Environment Agency. Uh, just to pick up on something that Luke Taylor was saying earlier that we are currently working on a landfill Decommissioning requirement. This is for specifically the Suffolk East Suffolk area, um, for ensuring that when infrastructure land for infrastructure is to be conditioned, that there's an assessment done on whether leaving that infrastructure in place will be more beneficial, or if it's less beneficial that it should be removed, and ensure that all aspects of the structure are taken out, are not left in situ.

01:30:09:13 - 01:30:45:28

We're currently having the wording for that requirement reviewed with East Suffolk Council. Once they have approved of it, then we will request for that wording to be put into the draft DCO. I guess the question I have for you is the examining authorities knowing where we are with the timeline, uh, with the examination table, would you want the draft of that wording to be requested to be input into the draft DCO now, or shall we wait until it's been finalized and reviewed?

01:30:49:06 - 01:30:53:06

Um, if you can just give me a moment, I'll confer with a colleague.

01:30:53:08 - 01:30:54:00

Yeah, sure.

01:31:05:02 - 01:31:14:21

I think we'd prefer to see a, uh, a draft requirement and see how it's developing. So the sooner the better. Effectively. So if you could submit that in.

01:31:17:12 - 01:31:33:24

Okay. We can ensure it's submitted with our deadline for response. Uh, okay. Similarly to this, I know it's nice to have a coastal version, but there is also a draft requirement we're working on for the river crossing. We can also submit that at deadline for as well.

01:31:34:05 - 01:31:35:16

That'd be helpful. Thank you.

01:31:36:15 - 01:31:38:00

No worries. Thank you very much.

01:31:45:27 - 01:31:48:05

So I'll just take a moment to confer with my colleague again.

01:31:57:18 - 01:32:25:17

I'd like to apologize to everyone for holding off your lunch. Um, but I do have one last question I'd like to cover around the Coralline Crag. Um, so the Marine Physical Environment chapter and applicant's react provision, ch 14, explained that horizontal directional drills at Suffolk will exit east of the continual Coralline Crag outcrop. Can the applicant explain how it defines what is meant by continual or continuous outcrop in this context?

01:32:30:13 - 01:32:34:26

So for the applicant, I'd like to ask Mr. Riggle to. Mr.. Timberwolves with that.

01:32:34:29 - 01:32:40:12

Might also be helpful to display figure 6.4.4.1.15.

01:32:42:17 - 01:32:43:17

Thank you, Tim Riggle.

01:32:43:19 - 01:32:44:04

For.

01:32:44:06 - 01:33:21:08

The applicant. Um, yeah. You should be able to see the figure up there at the moment. The, um, outlines of that are defined by CFS, uh, mapping, I believe. Um, and not sure whether we can zoom in to the exits of the HDD on the on the figure. Um, but these are the indicative HDD designs produced a year and a half or two years ago. Um, and you can see that there's a thin, um, continuation of Craig coming from the south that the HDD exits beyond those.

01:33:21:27 - 01:33:27:17

Um, so the intention is to exit beyond those. I'm sorry.

01:33:27:19 - 01:33:33:06

I'm going to be very cheeky. Can I ask you just to actually point to this on the. Sure. Yeah.

01:33:46:26 - 01:33:54:27

Yes. Actually, perhaps you also use a cursor just to indicate for those watching online. No, sorry. You're fine to stand there and.

01:34:07:16 - 01:34:08:01

Okay.

01:34:31:09 - 01:34:35:24

So yeah, if you wouldn't mind returning. And then we can make sure that's picked up on the recording.

01:34:37:23 - 01:35:08:06

Sorry. So, uh, yes, the the design chain is a conceptual design. So the, the detailed design stage, the, um, the contractor will, uh, look at the depth that the HDD is beneath the crag outcrop as it's coming up. Um, those links there, they might need to be extended by 20 or 30m, I think, just to make sure that we've got enough depth between surface outcrop of the crag so that there's no risk of any settlement in the in the crag.

01:35:08:08 - 01:35:22:24

The crag itself is a weakly cemented, uh, sand. Um, and we've also got ground investigations planned, uh, for the area just to get a better idea of the strength of it, so that we know that the the borehole will be stable through that area.

01:35:22:26 - 01:35:31:28

And that was going to be my next question in terms of the actual, uh, response to the coralline crag material to drilling. How competent is it as a material.

01:35:32:21 - 01:36:01:16

Miracle for the applicant? Yes, it's it's a good stable, um, uh, material. Um, if it wasn't weakly cemented, it would still be very good. Good drilling because it's medium dense. Um, and it's got a range of grain sizes that allow it to support itself. Uh, and in addition to that, you've got the drilling fluid which supports it. So it only needs to be supported temporarily while the while the drill goes through. And then before the duct gets pulled into the, into the ball.

01:36:02:00 - 01:36:39:19

And can you just confirm in terms of the, the figure that we're seeing, there is obviously a very high level figure. It doesn't provide a huge degree of accuracy in terms of constraining where the exit locations are. Are you able to provide something at this point in time that would give us more certainty as to exactly where the sort of the minimum exit location was, and also to give us certainty that there's at least a sort of 45 meter offset from the the crag. Given that 45m seems to be expressed as the the area where fracking sorry frack out may occur and then obviously damage to the crag material.

01:36:40:06 - 01:36:44:25

Okay. I think that's something we can take away and and provide a deadline for for you.

01:36:45:00 - 01:36:48:19

Thank you. Um, we've got a hand up in Suffolk.

01:36:51:26 - 01:36:52:20

Thank you sir.

01:36:52:22 - 01:36:54:18

Marianne Fellowes, Aldeburgh resident.

01:36:54:20 - 01:36:56:24

One very brief sentence for you.

01:36:56:26 - 01:37:09:10

The coralline Crag of Aldeburgh is actually protected as part of the SSI due to the immense geological and planetary political importance. Thank you.

01:37:09:20 - 01:37:10:18

Thank you.

01:37:11:14 - 01:37:20:26

Oh, and during the earlier consultation days, the applicant said that it was going to go south and avoid it completely. Thank you.

01:37:21:15 - 01:37:37:26

Thank you. That's helpful. Um, I think I'll ask a final question to the applicant then, just in terms of the the reasons for not moving to the south of the Coralline Crag and completely avoiding that area. Uh, are you able to expand on that?

01:37:38:21 - 01:37:51:23

Andrew Homewood for the applicant, I think that's one we'll have to take away in terms of the routing development and the background to the siting of the landfill to provide a, you know, explanatory note, a deadline for.

01:37:52:15 - 01:37:54:11

Okay. Thank you.

01:37:56:26 - 01:38:29:21

Um, so sorry. Just to be clear. So we've got the two actions in terms of one was the provision of a a clearer map. Um, and and location. And the other is just the detail about the, the rerouting. Um, the the final piece. And I think we might come back to this tomorrow potentially, is that there may need to

be some exploration of whether there is a specific requirement around the location of exit, so that there is some more certainty around where that happens.

01:38:30:06 - 01:38:34:21

So I'd like to potentially come back to that. Okay.

01:38:36:07 - 01:38:41:23

Were there any comments from the local authorities before we wrap up for lunch?

01:38:53:06 - 01:39:11:09

Nope. And no further comments in the room, in which case you'll be relieved to hear that we are adjourning this session for lunch. For those of you watching the live stream, do remember to refresh your browser when you return for the purpose of the recording of the live stream. Thanks.

01:39:13:03 - 01:39:15:07

And we will return at 2:00.