



Northern Ireland
Assembly

Committee for the Environment

OFFICIAL REPORT (Hansard)

Planning Bill: Council for Nature
Conservation and the Countryside Briefing

11 April 2013

NORTHERN IRELAND ASSEMBLY

Committee for the Environment

Planning Bill: Council for Nature Conservation and the Countryside Briefing

11 April 2013

Members present for all or part of the proceedings:

Ms Anna Lo (Chairperson)
Mr Simon Hamilton (Deputy Chairperson)
Mr Cathal Boylan
Mr Tom Elliott
Mrs Dolores Kelly
Lord Morrow
Mr Alastair Ross
Mr Peter Weir

Witnesses:

Mr Peter Archdale	Council for Nature Conservation and the Countryside
Mr Patrick Casement	Council for Nature Conservation and the Countryside

The Chairperson: Patrick and Peter, you are both very welcome. Members have received a copy of your submission. Would you like to give us a brief presentation?

Mr Patrick Casement (Council for Nature Conservation and the Countryside): It will be very brief, Chairman. Thank you very much indeed for inviting us today. We are very pleased to be here again.

As a preamble, I would like to say that we welcome many of the clauses. We welcome the concept of bringing forward the reforms so that they take effect from now rather than waiting until 2015. The primary issues that we have with the Bill are, as you just mentioned, the changes introduced in clauses 2 and 6, in particular, but we have a couple of further concerns as well.

Our primary concerns focus on three main points. First, we are concerned about the consultation. We do not feel that the method of consultation was appropriate for this sort of change to legislation. Consultation should have been undertaken at a departmental level and not left to the Environment Committee. Apart from anything else, I think that it is a huge burden to place upon the Committee, and it is not the normal way in which democratic business is done in this country. We are concerned about that. Secondly, we feel that these clauses are effectively redundant because the economic factors are already enshrined in the concept of sustainable development. We are also very concerned because they introduce a series of ambiguities, contradictions and difficulties that will, we believe, lead to increased legal challenges to planning decisions and serious delays, and they will undermine the main purpose of this Bill. They will also mean developers and government incurring significant costs. We are seriously concerned about those three primary problems.

Below that, we have two or three other points that I would like to make. One is about how one looks at the sort of data presented with planning applications. Already, we see a significant difference in the

way in which economic, environmental and social data are analysed and assessed. We feel that the extent of that difference will increase with this Bill. If one aspect is given a further importance, there will be a problem in how one evaluates the data. We need to find a better way of evaluating environmental and social data, and a much better way of evaluating economic data. In the past few years, a series of decisions has been taken where the economic data was very scanty, but planning applications were granted on economic grounds that were, we felt, very shaky, especially with the changes to the economy since 2008.

We are very concerned that such changes were not considered for a strategic environmental assessment, which would, we feel, have been the appropriate way to go forward. The changes represent a major shift in the way that planning will be looked at, but a strategic environmental assessment was not even considered. No scoping exercise is being carried out even to assess whether it should have been.

We feel that there is a missed opportunity. There is a need for a much wider land-use strategy for Northern Ireland, which would make all of these planning decisions very much more straightforward and be a much more appropriate way of dealing with the problems in planning and in our economy.

We also have concerns about clause 10 and the appointment of examiners, as you mentioned. We feel that it is not necessary. We have a perfectly good Planning Appeals Commission (PAC), which, we feel, should be allowed to fulfil its function.

Finally, we feel that the timescales for consultation in clause 23 should differ and be set according to the various sorts of development. We have personal experience of looking at some of the incredibly detailed environmental impact assessments for major developments, which take days and days to digest and understand, let alone respond to. That applies even to some not very big developments: there can be several thousand pages of submission even for a wind farm development. Development proposals are coming in at a terrific rate, and to try to deal with those effectively and properly places serious strains on the statutory consultees. We think that there needs to be some sort of appropriate scale of timescales relative to the development.

I hope that our submission was relatively straightforward and understandable and that you have had a chance to have a look at it. We welcome any questions that you have for us.

The Chairperson: As I said, I read through much of the submission last week, when I was at home. On Tuesday, I also met a resident group in south Belfast, at its invitation. Many people seemed to be really concerned about the economic development addition. A lot of the submissions said that adding the promotion of economic development is not understanding the concept of sustainable development, which is that there needs to be a balance of socio-economic and environmental aspects. Therefore, adding that extra duty gives much extra weight to the promotion of economic development. As you say, planners are not economists. Not many will have an understanding of the economy or job creation. Also, it is difficult to ascertain from applications whether they will result in economic gain. How do you monitor that after approving a planning application?

Mr Peter Archdale (Council for Nature Conservation and the Countryside): Chair, I will introduce two examples. First, the Special EU Programmes Body (SEUPB) looks in great detail at the economic case for grant applications, and it takes two consultants about six months to do that. If I may draw a parallel, the level of detail required in the specialism is considerable. Secondly, I draw to your attention to what happened in England with the marine conservation zones. I know that this concerns marine planning, but the relevance is that those zones were supposed to mean a sustainable use of the seas. Again, England found that the height of the barrier, if you like, and the level of assessment on the scientific criteria were completely different from those on the economic criteria. So it was acceptable for fishermen to say, "I have always fished here, without providing any supporting economic data, and my business depends on this." The scientists then had to say, "We have surveyed there", or, even worse, "We have not surveyed there, and we do not know what is there." Therefore, there was no counter-evidence. So it is excruciatingly difficult to get a common level for all three legs. On the economic side, at least there will probably be a business plan behind the developer or individual who makes the application. However, we do not have the social baseline data that is necessary in a lot of these cases. Coming back to the central point, we think it an unnecessary and redundant aspect of the Bill that should not be there.

The Chairperson: Many have said that having to get economic assessments could be counterproductive and greatly add to the burden of developers and businessmen who want to make applications. It would also delay approvals and applications.

Mr Casement: If it has any parallel with the environmental impact assessment type of approach, it will put a huge burden on developers, for major developments anyway. With environmental impact assessments, developers have to do significant research and pay specialist consultants to provide them with evidence. All too often, they do not provide the necessary evidence and are asked to provide more. As a result, the process is delayed. I can see the same thing happening if this is brought in. It would be a parallel process with the economic side because the data provided would be deemed inadequate if it were assessed effectively and properly.

The Chairperson: Clause 6 will be so difficult —

Mr Casement: That will be the one where things will fall down.

The Chairperson: It deals with things that are advantageous and disadvantageous, and there are always two sides to a coin. There will be the potential for objections to every application and an opportunity to argue about what is advantageous and disadvantageous.

Mr Casement: We made the point — I stress it again — about the differing timescales involved. One has to be very cautious. Although there may be a very short-term economic gain, it may peter out within a matter of two or three years, whereas, if one damages the environment, it will probably be damaged for very much longer.

I would like to put in a word for what the environment contributes to our economy. That is often not fully recognised or understood. We are not very good at valuing what our environment does for us, whether by storing carbon, filtering our water or simply attracting tourists to come and look at our wonderful landscapes. We need to find a better way of providing some sort of monetary value of our environment and measuring its intangible benefits.

The Chairperson: We need a longer-term view of our environment rather than short-term economic gains.

Mr Casement: That is our view.

Mr Elliott: Gentlemen, thank you very much for your presentation. Will you explain the remit of your organisation in relation to the Department?

Mr Casement: We provide advice to and scrutiny of the Department of the Environment (DOE) with regard to nature and landscape conservation. We were set up in 1989 after nature and countryside conservation bodies in the other three countries of the United Kingdom had been turned into non-departmental public bodies, such as the Countryside Council for Wales and Scottish Natural Heritage. In Northern Ireland, it was decided to retain those functions within government. As what one might call a sop to those who suggested that it should be an independent agency, it was decided to set up an independent advisory group to scrutinise decisions, particularly on designation and wider issues to do with nature conservation.

Mr Elliott: Thanks for that, Patrick. That is useful. Were you asked for any advice by the Department before the Bill was published? I would have thought that, as an advisory body to the Department, it would have sought advice from you before its publication.

Mr Archdale: I will offer a comment on that rather than anything else. We have learned that you can offer advice, but it is not always received. Indeed, the Department knew what our advice would be because our position on this was set out very clearly in response to draft PPS 24. No, the Department did not come to us, which begs the question of why it was put forward in the first place, whether the Department had a role in putting it forward or whether it has come from a completely different angle because, as has been made clear, this is draft PPS 24, and the response to that was very clear.

Mr Elliott: I would like there to be absolute clarity: did the Department not seek any advice from you before the publication of the Bill?

Mr Casement: No, we were part of the consultation process on the planning reform that led to the 2011 Planning Act. We were asked to respond to the public consultation on draft PPS 24 but not specifically to the consultation on the 2013 Planning Bill.

Mr Elliott: Peter, you said that you wondered whether the Bill came from the Department or from some other source. Will you elaborate on that?

Mr Archdale: Only what I said. I am not privy to the political or departmental background to this, but my observation was that I do not understand why, having been turned down in the guise of PPS 24, it has come forward again. I have no evidence on whether it was motivated politically or departmentally, but, as far as I am aware, there is no target in the Planning Service or DOE to promote this. It certainly does not appear in the Programme for Government, other than as a general economic development aspect. That is as much as I can give you on that.

Mr Casement: It is perhaps revealing that it was not included in the equality impact assessment that accompanies the Bill. We found that a bit odd, to be honest, and the fact that it appeared to be an afterthought sowed the seed of our doubt.

Mr Elliott: As an advisory body to the Department, you were, essentially, ignored?

Mr Casement: We were not consulted. We are not much involved in the making of policy. We have suggested that it might be more helpful if we were included at earlier stages of the development of some policies that the Department produces, but we find that we are used more widely with regard to decisions that have already been taken. We are consulted at a later stage than we would prefer to be as an advisory body.

Mr Archdale: On the other hand, there have been occasions when we stimulated the Department to look at a policy that we thought was dated or in need of rewriting, so it is not quite black and white.

Mr Elliott: Your scrutiny role appears to be at a higher level than your advisory role.

Mr Casement: That is probably a very good way of putting it.

Mr Archdale: The Department is required by the legislation to say when it is declaring a designated site, having consulted with the Council for Nature and Conservation of the Countryside.

Mr Elliott: Do you believe that there is a conflict between sustainable development and economic development in the Bill?

Mr Casement: There is a potential conflict, but there is not necessarily a conflict. The risk of conflict is considerable. Sustainable development encompasses a lot more than just economic development and is based on the concept that we will not damage the prospects of future generations by what we do today. Economic development, I am afraid, does not have any of those considerations. It is simply about what suits somebody at a particular moment.

Mr Archdale: Economic development is selling the golden eggs for a while and then deciding that you want to kill the goose as well. At least it can be; it is not always

Mr Casement: There is always that danger. It does not take that into consideration.

Mr Elliott: From what you say, may I take it that CNCC would be opposed to economic development?

Mr Casement: No. I do not think that we could possibly say that. We want economic development to be sustainable development. I have to say that —

Mr Elliott: You say that there is potential conflict. There is potential conflict between any type of development and sustainable development. But we have to get to a point — sorry for labouring this, Patrick — where economic development is sustainable development. So explain that concept to me.

Mr Casement: It is simply development that will not harm the prospects of future generations. We have to be sure that we leave the environment and our world in no worse a condition than they were in when we inherited them. Unfortunately, we are not very successful at doing that. It is a difficult thing to do, but that is the principle or the —

Mr Archdale: Aspiration.

Mr Casement: — aspiration. Unless one has that aspiration, we can see only a decline in the condition of the world. I think that one has to —

Mr Elliott: But accepting that — sorry — there is always, but always, going to be a potential conflict between economic development and sustainable development in every circumstance.

Mr Casement: Yes, but one can take steps to mitigate or avoid that conflict.

Mr Elliott: Yes.

Mr Casement: That is the point. If one has a planning policy that is predicated on sustainable development, one will do everything one can to mitigate. If it is purely on economic development, there will be no onus or requirement to actually do that —

Mr Elliott: Sorry; maybe I am doing your job for you, although I should not be. I am trying to understand. Are you saying that you have no difficulty with the economic development aspect of the Bill provided that there is a protection in it that such economic development should be sustainable?

Mr Casement: That is correct.

Mr Elliott: But that is not there; is that what you are saying?

Mr Casement: In effect, that is what I am saying. I am saying that the Bill already states that the planning system will take account of and be guided by the principles of sustainable development. To put in a clause, then, that suggests that you give some sort of weight to economic development seems redundant. I do not see why that should be done or what the point is, without subverting the idea of sustainable development.

I am a little uncomfortable about having to argue the case for sustainable development, because this is not our primary role at all. Nevertheless, we have increasingly, over the past four or five years, been forced into the role, with one or two others, of being the champions, if you like, for sustainable development. That has happened since the demise of the Sustainable Development Commission and since we lost our Sustainable Development Commissioner for Northern Ireland. It is a role that we are not entirely happy with, because it is a bit beyond our real expertise. We are here primarily to talk about the natural environment, and looking after that is a cornerstone of sustainable development but only one aspect of it. So, I am a little uncomfortable about that, and I think that I ought to make that point because there is no longer an official champion for sustainable development in Northern Ireland.

Mr Elliott: Well, I am sorry, Patrick, but, when you come here and put a paper to us that effectively deals with sustainable development issues, which this does —

Mr Casement: Yes.

Mr Elliott: — I do not see why you should be uncomfortable about having a discussion around it, and —

Mr Casement: No, I am not uncomfortable about it. I am perfectly comfortable about it. I am sorry; I am saying that we are perhaps not the best people to talk about it. It is part of our remit, but it is not the driving force behind our remit. OK? That is all I am saying. I am quite happy to present it, but we are not experts in all of the aspects of sustainable development.

The Chairperson: But sustainable development really tries to strike a balance between the many aspects — economic, environmental and others. So, economic development is already included in sustainable development.

Mr Archdale: Yes, and that is the point that we very much wish to make.

Mr Elliott: Chair, I have a number of other issues to raise, but I will ask about just one if that is OK. In your paper, you indicate that you do not know why that economic part of it should be in the Bill, because it is already in other aspects of planning. If it is in other aspects of planning, what is the difficulty of it being in the Bill?

Mr Casement: We are concerned about it being singled out for special mention. It implies — it certainly gives us the impression — that it is going to be the overriding factor among the three aspects of sustainable development. We think that the principle of sustainable development is that all three should be given equal consideration. Therefore, to single it out and mention it suggests very strongly to us, and probably to most of the other respondents to the Bill, that it is being given special consideration above the other two and is, therefore, not true to the principle of sustainable development.

The Chairperson: The duty of planning is about land use and land development. It is not about promotion of economic development. If you ask planners to think beyond their role, that is going to be a difficulty, in my mind.

Mr Casement: I agree with that. We have not stressed that in our submission. That is looking at it from a planning point of view rather than an environmental point of view, if you like, but we share that concern that it is beyond the skills and remit of our planning system to do that. That is what an economic Department should be doing.

Mr Boylan: I am sorry that I missed the start of the presentation. You are very welcome, and, to be fair, I know that you have made a lot of good contributions to the Committee on different policies. However, I am on the other side of this argument, because I am not convinced, to be honest with you. The Chair has just made a statement about planning and economic development. We could say that it is not the duty of planning to look after the environment either; it is about land use. Either way, there is an economic aspect of it, whether you like it or not, and there is an economic aspect of sustainability and creating jobs.

I have been dealing with planning for many years at council level and now. You get the impression that people who argue the case on economic grounds think that everything will be built on an economic argument. That is not the case. I do not think there is a burden on developers, because you bring your business plan to the table. It is you bringing it, especially in the private development sector, and if it works, it works. I am not hearing enough at the moment to convince me. If you remove the issue from the draft PPS 24, which was a determining factor in relation to the economics, it is slightly different. I will use this example: if a company comes in — Tesco, or whatever it is — it has to prove both the advantages and the disadvantages in terms of displacement of jobs or anything else. I think that is up to those people; they are the developers, and it is up to them to prove the case. That needs to be stated exactly in the application process. That is how I look at the whole process. That is my view on it.

Mr Archdale: Can I come back with a recent judicial ruling on a wind farm? I am not going to go into all the detail, but, in essence, the judge overturned the commissioner's decision on the basis that the commissioner had not given correct consideration to the economic aspects. In the ruling itself, the way in which the information is presented makes it very clear that the timescale over which the economic case is being considered is completely different to the timescale and impact of any environmental issues. The judgement itself was around economic aspects and whether the commissioner had been correct in the way in which she looked at it. The particular point that is very clear in the judgement is that there was not a common baseline for the timescales over which the economic considerations were judged — ie the life of the wind farm. That is one of the fundamental problems when you start saying, "Of course there is going to be a business case", because it does not look at the same timescales as the environmental case in a lot of issues.

The social aspect is difficult, and I am not suggesting for a second that we know where we are going to be, as a society, in 25 years' time. That is an issue that we just have to put there and say, "That is really difficult". The tendency with the economic argument is to look at the very short term or much shorter term than you do with the environmental one. I am bringing that back to the point that we still feel that the economic argument puts undue weight on one of the legs of the three-legged stool.

Mr Casement: I go back to the point that the Chairman made about clause 6. Clause 2 is redundant, because economic development is considered as part of sustainable development. That is fine. Clause 6 goes much further, in that the economic advantages or disadvantages likely to result from the granting or refusal of planning permission have to be considered. That effectively raises the provision to the same level as PPS 24. That is where I have a particular problem, because, although that has been rejected already, here it is reappearing.

Mr Boylan: I respect that, Patrick. There are other policies that control wind farms and everything else. If it is the case that we need to look at policies, that is a different matter. There are other factors involved in the process for a planning application.

From the papers that I have read, there seems to be a presumption that everything that is applied for will be granted permission. You are talking about sustainability and the protection of the countryside, but I am not getting the examples to show whether the policies that are there will not protect it. Do you understand? To be honest, I have not been convinced by the argument. We are going to have other presentations.

Mr Casement: I could probably wheel out quite a few arguments —

Mr Boylan: I respect that 100%. I am just not convinced, to be honest with you. I have seen applications turned down, regardless of their economic value. I do not want a building in every field. The community plan idea in area plans in the future will protect a lot of that.

Mr Casement: I share your optimism.

Mr Boylan: The sooner we get to a process where communities are more involved, especially when it comes to neighbour notification and all of those things that I am trying to get in the Planning Bill, the better. We will listen to more economic arguments, but the examples and the belief are not out there. People may come to this Committee, take their caps off and say that they believe that every application will be given permission due to its economic weight, but that is not the case. There is enough policy. That is my opinion.

Mr Casement: I can see that we are not going to change your mind.

Mr Boylan: Not at this moment in time.

The Chairperson: It is going to give extra weight to the PAC as well as to planners. Then, the decision will be subject to challenge if an application is turned down and will go to the PAC, which will delay the process.

Mr Boylan: That is the sad factor: we are sitting here talking about economic growth, jobs, promotion and everything else, yet behind all of it is the threat of judicial reviews and everything else. That is the wrong way to go about things. If we are serious about things, that is a bigger argument.

Mr Casement: My fear is that this will lead to that sort of hold-up and delay and legal challenge. That is why I am worried.

Mr Archdale: To take your point and turn it right around, although we are not sustainability experts, I do not think that there is a single person on CNCC who believes that the current economic model, as being peddled by politicians in Europe, not just here, is sustainable. You cannot have exponential growth, or even continual growth. Anyone who believes that you can is completely deluded.

Mr Boylan: That is why it is great to have the presentation, and that is why the argument is here. All I am saying, as a representative of a big rural area, is that I see young people leaving every single day to go to America and to Australia for work, and there is nothing. Do you understand me? We want a proper policy. I am on the environmental side because I want protection of the countryside and everything else, but I am not getting the argument that is coming forward. No disrespect to what the Chair said about planning policy, but you have to give some economic thought to it. There is no doubt about that.

Mr Casement: It is already written into the planning system. PPS 4 sets that out absolutely clearly.

Mr Boylan: There is a bit of difference between the words "sustainability" and "economics". I could make this argument all day. I see young children in here, and we want to make sure that —

Mr Weir: We do not want to be making any comments that might be past the watershed.

Mr Boylan: It is their future as well, and we are trying to protect the countryside. That is my only concern in relation to what you are saying. Urban settings and settlements have their own area plans and everything else within that. The open countryside —

Mr Casement: To be honest, we would feel a lot happier about this if we had area plans, but, unfortunately, we do not. We have chaos.

Mr Archdale: I live in Omagh. Our area plan was written in 1985.

Mr Casement: I fall within the northern area plan, and it is still in draft form and is about to expire next year, before it has even been adopted. What sort of planning system is that?

Mr Archdale: The plan-led system? Oh, yes.

The Chairperson: We need overall strategic planning development so that the planners can follow through. Cathal, economic development is not just about planning. Planning is part of it. Economic development encompasses so many issues, such as better education and qualifications for young people.

Mr Boylan: There are loads of policies there, Chair. There are loads of factors as well as economics.

The Chairperson: It is not just down to planners to sign off, saying yes to every single development.

Mr Weir: To be fair, that is taking the argument to an absurd level. Economic development can be about all of those things, but, at the end of the day, if there is not physically somewhere and, indeed, a job for someone to work in because there is not that level of economic development, all of the training in the world will not make a button of difference.

The Chairperson: Planning applications are not always about economic development.

Mr Weir: With respect —

The Chairperson: Every developer can say that building a block of flats on a site would benefit the economy.

Mr Weir: Far be it from me to defend the Minister, who can defend himself, but, if the proposal were that economic development would be the sole factor and would exclude everything else, you would have an argument. To be fair, I appreciate that we will be coming back to this, and there is not much point in thrashing it to death. It is simply about saying that economic development should be a factor in making decisions.

Mr Boylan: In the presentation, the issue of the aftermath or end of life was mentioned. It is an interesting debate and one that we need to have. Say that there was a development and, in two years time, some people move out, which we have seen. Conditions should be put on that, and we need to look at that now in planning. We are looking now at some of the sites, such as for mineral extraction and how we recover them. On a new development, there needs to be an end factor. That needs to be put on the table as well. That is quite reasonable.

Mr Archdale: It is extremely difficult. If a developer goes bust, there may be nobody you can get hold of to ask whether the development could go ahead. If you say that there should be a bond, developers may think, "Oh, I cannot afford to have it if I have got to have £100,000 or £10 million sitting in the bank or whatever."

I wanted to come back to one point that we touched on: we have hooked a lot of the points in our submission into various planning policy statements. Although that is not in this Bill proposal, I will take the opportunity to raise the grave concerns we have that, first, PPS 2 has languished now for two years, I think — bloody nearly two years, anyway — without being issued, and what is there at the moment is seriously out of date, but, more worryingly —

The Chairperson: What is PPS 2?

Mr Archdale: PPS 2 is on wildlife and natural heritage. What worried me was listening to Angus Kerr telling you that they intend to review all the planning policy statements and that there will be a single PPS for the new planning system. Now, the points about how much weight to give and the counterarguments that we have made depend on those planning policy statements. We have serious concerns about a very streamlined set of planning policy statements that frankly will not give the protection and the guidance that has already been established if those are swept away or amended.

Mr Casement: We have a system that has evolved to deal with changes in our society and our environment, and to sweep them away for a single, very simplified system causes us grave concern.

The Chairperson: One single statement will not be able to —

Mr Casement: There will have to be a very large number of supplementary statements, and we do not quite understand what the difference is between having specific planning policy statements and having a series of supplementary ones. It seems to me that it is just making a lot of work for a lot of people within the planning system or for a very few people —

Mr Archdale: Or maybe making lots of work for lawyers, to take your judicial review point and turn it around.

Mr Casement: Yes, ultimately for lawyers.

The Chairperson: What is your recommendation for the Planning Bill?

Mr Casement: We would like to see clauses 2 and 6 dropped. We also wish to see an amendment to clause 23 about the timescales for responses, and we would prefer to see clause 10, which is about the appointment of an external commissioners, dropped as well.

The Chairperson: There have been a lot of responses on that.

Mr Casement: Those are the key points that we would like to see emerge from this Committee consideration of this Bill. I should say consultation, because I expect it is a real problem for you, but this is not something that you are seeking —

The Chairperson: Do you have a structure of regular meetings with DOE?

Mr Casement: Yes, we have regular meetings of our own that are attended by senior officials from DOE. We also meet regularly with the Northern Ireland Environment Agency (NIEA) board, and we have other meetings scheduled with other parts of DOE. We regularly meet Angus Kerr from planning policy, and we meet with the environmental policy people on a very regular basis; they often attend our meetings as well.

Mr Archdale: It is very much an open door; we do not have to go and hammer on their doors. Most of those examples were on the NIEA side; the same applies on the marine side.

Mr Casement: Yes, we have a very good relationship with the new marine division as well. We met several of their people just earlier this week.

The Chairperson: Have you met the new NIEA person?

Mr Archdale: Yes. He is coming to our meeting in May as well.

Mr Casement: Yes.

The Chairperson: Very good. There are no other questions. Thank you very much indeed.

Mr Casement: Thank you for the opportunity, we appreciate it very much.

The Chairperson: We will hear from other people next week at our stakeholder event. Thank you.