PROFESSOR CHRIS BAINES: STAKEHOLDER ADVISORY GROUP

PROOF OF EVIDENCE

1. QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Chris Baines, and I am a Landscape Architect. I hold an Honours Degree in Horticulture from the University of London (Wye College) and a Postgraduate Diploma in Landscape Architecture from City of Birmingham Polytechnic (now Birmingham City University).
- I am a Fellow of the Royal Society of Biology, Hon Fellow, Chartered Institution of Water and Environmental Management, Freeman of the City of London, Hon Doc from Sheffield Hallam University for contribution to landscape conservation. I was awarded an Honorary personal professorship by the City of Birmingham Polytechnic in 1986 and I am listed in Who's Who. I am also an award-winning environmental writer and broadcaster and was a founding presenter of BBC Countryfile.
- 1.3 In the public sector I have served as a trustee of the Heritage Lottery Fund and the National Heritage Memorial Fund, with a particular focus on landscape and natural heritage. I have also served as a member of the water industry regulator Ofwat's environmental advisory board and as an occasional adviser to the Department for Environment, Food and Rural Affairs (Defra). As a self-employed professional of more than fifty years' standing, I have worked as an independent adviser to senior executives in a wide range of national companies across the energy, water, minerals, built-development, environmental investment, forestry and farming industries. In the not-for-profit sector I have served pro-bono as a trustee or an honorary non-executive (president, patron or vice president) for several national conservation charities including the Royal Society of Wildlife Trusts, the Wildfowl and Wetlands Trust, The Countryside Management Association and the National Trust. I have been awarded lifetime achievement medals by both the RSPB and the British Association of Nature Conservationists.
- I have served continuously as the independent chair of the National Grid Stakeholder Advisory Group ("SAG") which was established in 2013 at the direction of Ofgem. This unique panel of director-level professionals from leading landscape Non-Governmental Organisations (NGOs) and Non-Departmental Public Bodies (NDPBs) was originally established to guide the delivery of National Grid's Visual Impact Provision ("VIP") programme across England and Wales, with a combined budget through Ofgem's latest price control periods, 'RIIO-T1' (2013-2021) and 'RIIO-T2' (2021-2026) of £965 million. I understand that this provision was made available by Ofgem in response to proven stakeholder demand.

2. INTRODUCTION AND SCOPE OF EVIDENCE

This statement has been prepared in support of the Cotswolds Visual Impact Provision Project ("the Project") and the National Grid Electricity Transmission Plc (Cotswolds Visual Impact Provision Project) Compulsory Purchase Order 2025 ("the Order") (CD C1) that has been made by National Grid Electricity Transmission ("NGET") to install approximately 7 kilometres of 400kV underground cables, construct two new cable sealing end compounds ("CSECs") and permanent access roads, connect the new underground cables to existing overhead lines, and dismantle and permanently remove 7 kilometres of existing overhead electricity line ("OHL") including the net removal of 16 pylons. The Order rights will also enable NGET to expand an existing NGET substation in Melksham, Wiltshire, to allow for the siting of a new shunt reactor and thereby facilitate delivery of the Project.

- 2.2 My statement of evidence addresses the role of the Stakeholder Advisory Group in respect of the VIP Schemes and the Project, including its support for NGET's use of compulsory purchase powers in order to acquire the necessary land rights to deliver the Project.
- 2.3 References in my evidence to the core documents are made by the abbreviation, for example, "(CD XX)". The evidence of other witnesses is referred to by the name of the author. There is a glossary of key terms used by all the NGET witnesses at (CD F2) ("the Glossary") and my evidence adopts the terms defined in the glossary.
- 2.4 The remaining part of my statement of evidence is structured as follows:
 - 2.4.1 Section 3 Provides background to the Visual Impact Provision schemes
 - 2.4.2 Section 4 Provides a summary of the role of the Stakeholder Advisory Group
 - 2.4.3 Section 5 Sets out further details about the Stakeholder Advisory Group's role in the development of the Project
 - 2.4.4 Section 6 Provides a response to the objections that have been received, insofar as they relate to my evidence
 - 2.4.5 Section 7 Sets out my summary and conclusion
 - 2.4.6 Section 8 Provides my declaration

3. BACKGROUND TO THE VISUAL IMPACT PROVISION SCHEMES

- 3.1 Ofgem has made funding available to electricity transmission owners to mitigate the visual impact of existing transmission infrastructure in designated landscapes. As detailed in Mr Amardeep Malhi's evidence, following consumer research and stakeholder feedback, Ofgem set aside £500 million for the 'RIIO-T1' period from 1 April 2013 to 31 March 2021, and a further £465 million for the 'RIIO-T2' period from 1 April 2021 to 31 March 2026. NGET's VIP schemes use this funding mechanism to reduce the impact of existing electricity lines in English and Welsh National Landscapes and National Parks.
- 3.2 Members of the Stakeholder Advisory Group believe that the natural beauty of these special places must be conserved and improved for everyone to enjoy both now and in the future and we, therefore, want to see as much as possible done to enhance biodiversity and reduce the negative impacts of transmission infrastructure in National Landscapes (like the Cotswolds) and National Parks. Both Ofgem and National Grid must also take these issues seriously in line with their environmental responsibilities under various legislation in both England and Wales including the Electricity Act 1989, the Well-being of Future Generations (Wales) Act 2015 and the Environment Act 2021 and their statutory duties relating to the purposes of Protected Landscapes.
- 3.3 My understanding is that these latter duties were recently strengthened in England, with legislation emphasising the need for bodies to which they apply (which includes both Ofgem and statutory undertakers such as National Grid) to take appropriate action to support the purposes of Protected Landscapes. I understand that changes in the Levelling Up and Regeneration Act 2023 mean that the previous duty "to have regard to" the statutory purposes of National Parks is now a duty "to seek to further" these purposes. I believe this is a clear indication of the encouraging national and international direction of travel.

4. THE STAKEHOLDER ADVISORY GROUP

- 4.1 The VIP Policy is the cornerstone of NGET's approach to visual amenity project selection (**CD D6**). It sets out the approach to achieving visual amenity objectives, including identifying a set of guiding principles, the creation of the SAG consisting of stakeholders with national remits for England and Wales, and ways of engaging other stakeholders.
- 4.2 The policy emphasises a collaborative process, developed in consultation with stakeholders, to ensure that identified VIP projects are not only aligned with stakeholder expectations but are also optimised to deliver enduring value for consumers. This includes working closely with environmental groups, local communities, and statutory bodies to determine where visual impact improvements will have the most meaningful effect.
- 4.3 The Guiding Principles of the VIP project (set out at section 4 of the VIP Policy (**CD D6**)), against which potential projects are measured, reflect its stakeholder-driven nature and focus on benefits not only to the landscape, but to the community and wider public. They state:

"Working with stakeholders, we have prioritised proposals which will:

- o result in greatest landscape enhancement benefits
- o result in greatest opportunities to conserve and enhance natural beauty, wildlife and cultural heritage whilst avoiding unacceptable environmental impacts
- o result in greatest opportunities to encourage public understanding and enjoyment of the protected landscapes, including positive socio-economic impacts
- o are technically feasible in context of the wider transmission system
- o are economical and efficient"
- 4.4 To enable NGET to maximise the potential landscape enhancement from the available funds and to identify where those should most appropriately be used, it invited a group of stakeholders with national remits for England and Wales to guide the project's development as a SAG, under an independent chair.
- In 2013, I was approached by NGET and agreed to take on the role as the group's independent chair. I had previously chaired similar stakeholder advisory groups in the regulated water industry. The first meeting of the SAG took place on 1st April 2014 and originally comprised senior representation from 15 stakeholder bodies, namely: Cadw, Campaign for National Parks, Campaign to Protect Rural England (CPRE), The Campaign for the Protection of Rural Wales (CPRW), Historic England, the Landscape Institute, the National Landscapes Association, National Parks England, National Parks Wales, the National Trust, Natural England, Natural Resources Wales, The Ramblers, VisitEngland and Visit Wales. Today this group has expanded and the RSPB, the Wildlife Trusts and the Coastal Partnerships Network are also represented on the SAG.
- 4.6 These organisations are dedicated to enhancing landscapes, nature and countryside throughout England and Wales. They advise not only on identifying and developing individual projects, but also on the most effective ways to engage with stakeholders at a local level. Senior representatives from NGET and Ofgem are also members of the Group.

- 4.7 The SAG provides a collaborative forum to evaluate projects based on principles established in the VIP Policy (**CD D6**). The SAG typically convenes on a six-monthly basis. Minutes of these meetings are taken and made publicly available on NGET's website.
- 4.8 Critically, the calibre and seniority of those represented on the SAG has been vital to the quality of the decision making. Many of the individuals are at Director level within their organisations. Moreover at least six individuals within the SAG have been members from the start of the process and the SAG has amassed considerable knowledge of the challenges facing the electricity industry, to complement their core specialisms of landscape, nature conservation, environmental protection and community engagement.
- 4.9 NGET has worked in collaboration with the SAG to develop its approach to wider consultation. This now involves proactively reaching out to consult with stakeholders through a broad engagement programme underpinned by open and transparent communications. The SAG continues to monitor and advise as well as making key decisions throughout the lifetime of each VIP project.
- 4.10 Among some of the more notable individuals to give their support to the aims of the VIP projects and their achievements are the then Prince Charles, now King Charles III and Sir David Attenborough. I have kept Sir David updated on the progress of the projects and their successes since their inception, and he has always responded enthusiastically.

5. DEVELOPING THE COTSWOLDS VIP SCHEME

- 5.1 The SAG's input has guided the prioritisation of the Project as a candidate project during Ofgem's current price control period (known officially as 'RIIO-T2' which runs from April 2021 to March 2026). In consideration of the VIP Guiding Principles, the SAG confirmed in June 2020 that the Project should be progressed during this period, leading to extensive further development work.
- 5.2 The Project is one of only five projects in England and Wales alongside two completed schemes in the Dorset National Landscape and Peak District National Park, and two other projects currently in construction in the North Wessex Downs National Landscape and Eryri (Snowdonia) National Park.
- 5.3 From the outset, the SAG has recognised the need to take forward projects which have the most positive impacts on members of the public and which have the greatest chance of enhancing public enjoyment for the largest numbers of people. In Dorset and the Peak District both projects are close to national trails. In the North Wessex Downs, the project is close to the market town of Devizes and the area targeted has both promoted trails (including the White Horse Trail) and is also very popular with the local community for leisure activity. In Eryri, not only does the section of line identified run close to the Wales Coastal Path, the National Cycle Route 8, the popular Ffestiniog railway and the very scenic North Wales coastal railway route, but it sits at the heart of a tourist hotspot and a UNESCO World Heritage Site.
- 5.4 The Project has perhaps the greatest potential of all the VIP projects for positive impact on people. It runs parallel to the Cotswold Way National Trail (the most walked in England according to Natural England) for much of its length. Cleeve Hill Common, over which it runs, is popular with long-distance walkers, cyclists, horse-riders as well as dog-walkers from the communities in Cheltenham and Winchcombe, and national and international visitors to the Cotswolds.
- 5.5 The selection process for all of the VIP projects which have been taken forward was a rigorous one. Initially, an independent assessment of all 571km of National Grid's high voltage overhead

transmission line (within National Parks and National Landscapes) was undertaken by a small team comprising experienced landscape architects from two specialist firms, Land Use Consultants (LUC) and Gillespies. The methodology they used was devised and overseen by Professor Carys Swanwick of Sheffield University. Professor Swanwick is a Fellow of the Landscape Institute and an acknowledged expert in the field of Landscape appraisal. The methodology was based on a reverse Landscape and Visual Assessment and is summarised in the Landscape and Visual Impact Methodology document available on the National Grid website. The assessment was carried out over an intensive period during the summer of 2014. The report which was produced following the work – Landscape and Visual Impact Assessment of Existing Electricity Transmission Infrastructure in Nationally Protected Landscapes in England and Wales – is also available on the project website and has been publicly available in the location for over 10 years. The methodology involved dividing up all 571km into subsections by landscape character producing some 120 subsections for analysis.

- The findings of the report were shared with the Stakeholder Advisory Group at a meeting in October 2014. 23 subsections of overhead line were identified as having high or very high visual impact in the report. Stakeholder Advisory Group members were able to question both of the independent consultants about the findings, and it was agreed at this stage to open consultations in the eight designated landscapes where the 12 highest-scoring overhead lines were located. These consultations involved assembling a group of local technical stakeholders in each area and hosting a workshop with them. Alongside this, open public events were held in each of the areas with members of the public invited to give their views on possible mitigation to reduce the impact of the existing line. Members of the Stakeholder Advisory Group including myself attended some of these workshops and public events.
- 5.7 At its next meeting in September 2015, the Stakeholder Advisory Group considered the feedback from this consultation alongside the landscape and visual report and various other factors such as impacts on the natural and historic environment, impacts on communities, access, potential for negative impact of undergrounding, engineering constraints and potential costs. Over a two-day independently facilitated workshop, the Stakeholder Advisory Group, discussed the evidence alongside views from local stakeholders and the local community and selected four projects to be taken forward in the Peak District, New Forest and Eryri National Parks and the Dorset Area of Outstanding Natural Beauty ("AONB") now known as Dorset National Landscape. This selection was agreed unanimously by the Stakeholders.
- 5.8 Updates were provided by National Grid to the Stakeholder Advisory Group at its twice-yearly meetings and in September 2018, ahead of the next price control period which would start in 2021, the Group revisited the remaining eight very high scoring locations from the original survey alongside the next 11 line subsections that had received a high score in the original landscape and visual impact study. These additional 11 lines included both the North Wessex Downs project near Devizes and the Cotswolds project, both of which are now being taken forward. At this meeting, the Group re-considered the evidence presented back in 2015 alongside new material based on the original landscape and visual research but including broader information on environmental constraints, impact on communities, engineering complexity, etc. covering the additional 11 line sections. The Group divided into subgroups to discuss the relative merits of the line sections and narrowed this list of 19 line sections down to seven for further work. This included both North Wessex Downs project in Devizes and the line in the Cotswolds AONB.
- 5.9 At the SAG meeting in December 2018, National Grid reported back to the SAG on the detailed work it had undertaken into the seven lines identified by the SAG in September. Further to this feedback, the Group agreed to prioritise North Wessex Downs AONB, Cotswolds AONB and the Tamar Valley AONB for further work with a watching brief to be kept on the western

- section of the Peak District National Park and Anglesey AONB. The SAG restated this position during its meeting of November 2019.
- 5.10 The SAG meeting of June 2020 was held online via Microsoft Teams due to the Covid-19 pandemic (the Group met virtually throughout lockdown), and updates were given on the projects being looked at for future price control periods. During this meeting the decision to divide the line in the Cotswolds was discussed due to its 22km length being considered too big for a single project. Landscape architects, Gillespies were instructed to do the work and concluded that the selected Cotswold line could be divided into three clear subsections.
- 5.11 The central section of the three was identified as having the most adverse impact and the SAG asked National Grid to proceed with development work on this section after first consulting with the senior leadership team, including the CEO, at the Cotswolds AONB Partnership (known as the Cotswolds National Landscape). He agreed with the selection of the central section. The Cotswolds National Landscape is an independent statutory body that works with two leading purposes, defined by law, to conserve and enhance the natural beauty of the Cotswolds and to increase the understanding and enjoyment of its special qualities.
- 5.12 Representatives of the Cotswolds National Landscape were taken to the Dorset project. This was under construction at the time. They were asked if they would support a similar project in the Cotswolds. Given their positive response, the SAG asked National Grid to proceed.
- 5.13 The Project was again raised in the November 2020 meeting of the SAG, by which time the positive reaction of the senior leadership team from the Cotswold National Landscape (AONB Partnership) had endorsed a project in the area and specifically the middle section. A further update on the project was given in the September 2021 meeting where a workshop with the senior leadership from the Cotswolds AONB Partnership team in October 2021 was referenced. This meeting took place at the live project in Dorset to enable representatives from the Cotswolds AONB Partnership team to see the short-term impact of construction work at first hand. They remained very supportive and invited National Grid to present at their partnership board at its Annual General Meeting. The proposals were welcomed.
- 5.14 The Project has been discussed at every meeting of the SAG since then and the discussions can be found in the minutes. The minutes for all the meetings referenced above have been publicly available on the National Grid website, usually given their level of detail a few months after the meetings take place.
- 5.15 More recently, the SAG was given a detailed update on the Project at its meeting in March 2024, including in respect of the relevant planning consents which are detailed in the evidence of Mr Juan Murray.
- 5.16 Following this, in May 2024, members of the SAG were asked for their views on the Project and the use of compulsory purchase powers. The SAG agreed that they would support NGET in pursuing this option if it was deemed necessary as a way of securing all the land rights that are needed to deliver the Project. The SAG expressed the view that the public interest in delivering the Project was sufficiently strong to justify the use of compulsory purchase powers.
- 5.17 The SAG maintains its support for NGET's exercise of its compulsory purchase powers to acquire the necessary land rights required for Project delivery. Whilst the SAG recognises that the decision to use such powers is ultimately a matter for NGET, the SAG has expressed that it is very supportive of NGET using these powers as it has on other VIP schemes given the strength of the public interest case for the Project. This is detailed in the evidence of Mr Amardeep Malhi.

5.18 Updates on the project have since been given to the SAG at its meetings in October 2024, January 2025 and September 2025 and support remains unanimous, especially in the light of the fact that Ofgem will not be making a provision for further undergrounding projects in the next price control period starting in 2026.

6. RESPONSE TO OBJECTIONS

- 6.1 I am instructed that a total of 7 objections were initially made to the Order (**CD C5** to **C11**), but that 3 objections have since been withdrawn.
- 6.2 I understand that one of these objections raises issues that relate to my evidence, and I have responded to these issues below.

Mr Jonathan Morton Stanley and Corinium Construction Limited (CD C7)

- 6.3 This objection challenges why this particular section of overhead line in the Cotswolds National Landscape was selected for the Project. I do not accept their assertion that the selection process has been opaque; quite the reverse, as I have evidenced in Section 5 above. In fact, I believe that it is among the most comprehensive and highly consultative selection process that I have ever encountered. This is a view shared by other SAG members and local and regional stakeholders. It has also been documented in extensive detail in technical reports and the minutes of meetings and shared with stakeholders and members of the public on regular occasions. All the extensive discussions that the SAG have undertaken have been well documented since 2015. Significantly, all the relevant reports and minutes of the SAG meetings have been publicly available, at all times, on the National Grid website.
- 6.4 Further, the objection also suggests that the Project will in fact have a harmful impact on part of the Cotswold National Landscape. I recognise that the short-term impacts will be significant and National Grid has always made it clear to stakeholders and communities that this would be the case. However, the impact of this short-term disruption and the construction of two new cable sealing end compounds the presence of which can be effectively mitigated through careful screening is dwarfed by the positive impact of the net removal of 16 highly-intrusive pylons across open, common land. I believe as do many local and national stakeholders, I think that the landscape needs to be viewed holistically and that this Project will deliver enormous landscape enhancement. Furthermore, in terms of the short-term impacts, I have seen at first hand the completed project in the Peak District National Park and imagery from the completed project in the Dorset National Landscape and after only a short period of time the landscape and nature recovery evident in these areas is impressive.
- 6.5 It is my professional view that the project being promoted by National Grid will comprise a significant improvement for the Cotswold AONB, principally in landscape and visual terms. There will also be positive benefits in terms of the opportunities for nature recovery and biodiversity net gain, as well as deepening our understanding of the historic environment in the area. A combination of all of these factors will enhance the experience for everyone, from locals to the international visitors that come to this exceptional landscape.

7. SUMMARY AND CONCLUSIONS

7.1 My name is Chris Baines, and I am a Landscape Architect. I hold an Honours Degree in Horticulture from the University of London (Wye College) and a Post Graduate Diploma in Landscape Architecture from City of Birmingham Polytechnic (now Birmingham City University).

- 7.2 In the public sector I have served as a trustee of the Heritage Lottery Fund and the National Heritage Memorial Fund, with a particular focus on landscape and natural heritage. I have also served as a member of the water industry regulator Ofwat's environmental advisory board and as an occasional adviser to the Department for Environment, Food and Rural Affairs (Defra). As a self-employed professional of more than fifty years standing, I have worked as an independent adviser to senior executives in a wide range of national companies across the energy, water, minerals, built-development, environmental investment, forestry and farming industries. In the not-for-profit sector I have served pro-bono as a trustee or an honorary non-executive (president, patron or vice president) for several national conservation charities including the Royal Society of Wildlife Trusts, the Wildfowl and Wetlands Trust, The Countryside Management Association and the National Trust. I have been awarded lifetime achievement medals by both the RSPB and the British Association of Nature Conservationists
- 7.3 I have served continuously as the independent chair of the National Grid Stakeholders' Advisory Group ("SAG") which was established in 2013 at the direction of Ofgem. This unique panel of director-level professionals from leading landscape Non-Governmental Organisations (NGOs) and Non-Departmental Public Bodies (NDPBs) was originally established to guide the delivery of National Grid's Visual Impact Provision ("VIP") programme across England and Wales.
- 7.4 Members of the Stakeholder Advisory Group believe that the natural beauty of designated landscapes in England and Wales must be conserved and improved for everyone to enjoy both now and in the future. We, therefore, want to see as much as possible done to enhance biodiversity and reduce the negative impacts of transmission infrastructure in National Landscapes (like the Cotswolds) and National Parks.
- 7.5 The SAG provides a collaborative forum to evaluate projects based on principles established in the VIP Policy (**CD D6**). The SAG typically convenes on a six-monthly basis. Minutes of these meetings are taken and made publicly available on NGET's website.
- 7.6 The selection process for all of the VIP projects which have been taken forward was a rigorous one. Initially, an independent assessment of all 571km of National Grid's high voltage overhead transmission line (within National Parks and National Landscapes) was undertaken by a small team comprising experienced landscape architects. The methodology involved dividing up all 571km into subsections by landscape character producing some 120 subsections for analysis.
- 7.7 The SAG's input has guided the prioritisation of the Project as a candidate project during Ofgem's current price control period (known officially as 'RIIO-T2' which runs from April 2021 to March 2026). In consideration of the VIP Guiding Principles, the SAG confirmed at a meeting in June 2020 that the Project should be progressed during this period.
- 7.8 During this meeting, the decision to divide the line in the Cotswolds was also discussed due to its 22km length being considered too big for a single project. Landscape architects, Gillespies were instructed to do the work and concluded that the selected Cotswold line could be divided into three clear subsections.
- 7.9 The central section of the three was identified as having the most adverse impact and the SAG asked National Grid to proceed with development work on this section after first consulting with the senior leadership team, including the CEO, at the Cotswolds AONB Partnership (known as the Cotswolds National Landscape). He agreed with the selection of the central section. The Cotswolds National Landscape is an independent statutory body that works with two leading purposes, defined by law, to conserve and enhance the natural beauty of the Cotswolds and to increase the understanding and enjoyment of its special qualities.

- 7.10 There has been objection made to the order which directly challenges why this particular section of overhead line in the Cotswolds National Landscape was selected for the Project. Mr Jonathan Morton Stanley and Corinium Construction Limited (CD C7) assert that the selection process has been opaque, which I do not accept. I believe that the Project's selection process is among the most comprehensive and highly consultative that I have ever encountered. This is a view shared by other SAG members and local and regional stakeholders. It has also been documented in extensive detail in technical reports and the minutes of meetings. All the extensive work that the SAG has undertaken has been well documented since 2015, and has been publicly available on the National Grid website.
- 7.11 Further, the objection also suggests that the Project will in fact have a harmful impact on part of the Cotswold National Landscape. I recognise that the short-term impacts will be significant and National Grid has always made it clear to stakeholders and communities that this would be the case. However, the impact of this short-term disruption and the construction of two new cable sealing end compounds the presence of which can be effectively mitigated through careful screening is dwarfed by the positive impact of the net removal of 16 highly-intrusive pylons across open, common land. I believe and I think as do many local and national stakeholders that the landscape needs to be viewed holistically and that this Project will deliver enormous landscape enhancement. Furthermore, in terms of the short-term impacts, I have seen at first hand the completed project in the Peak District National Park and imagery from the completed project in the Dorset National Landscape and after only a short period of time the landscape and nature recovery evident in these areas is impressive.
- 7.12 It is my professional view that the project being promoted by National Grid will be a significant improvement principally in landscape and visual terms. There will also be positive benefits in terms of the opportunities for nature recovery and biodiversity net gain, as well as deepening our understanding of the historic environment in the area. A combination of all these factors will enhance the experience for everyone, from locals to the international visitors that come to this exceptional landscape.

8. WITNESS DECLARATION

- 8.1 I confirm that the evidence prepared for this Inquiry and contained within this statement of evidence are my true and professional opinions. I confirm that I have understood and complied with my duty to the Inquiry as an Expert Witness and have provided my evidence impartially and objectively. I confirm that I have no conflicts of interest.
- 8.2 I confirm that artificial intelligence has not been used to produce this statement of evidence.

CHRIS BAINES

10 OCTOBER 2025