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FULL TRANSCRIPT (with timecode)

00:00:04:16 - 00:00:09:06

Good morning. Before I begin, can I just confirm that everybody can hear me clearly.

00:00:10:28 - 00:00:42:23

Good morning, Mr. Jones. I can hear and see you clearly on the live stream has started and the live caption is running. Thank you, Mr. Johansson. The time is now 930 on Thursday, the 21st of July 2022. On this 11th issue, specific hearing in relation to the Hornsea project four offshore wind farm is now open at today's issue specific hearing we will be considering marine ornithology. My name is Gavin Jones.

00:00:43:03 - 00:00:55:23

I'm a planning inspector and a charter time planner. Today, I will be managing the event and introductions. My colleague, Mr. Howlin, will be taking notes of any actions. I would now like to ask my colleagues to introduce themselves.

00:00:57:16 - 00:00:58:13

Thank you, Mr. Jones.

00:00:58:15 - 00:01:04:14

My name is Joe, Darling. I'm a chartered town planner, and I've been appointed by the Secretary of State to be the lead panel member.

00:01:07:18 - 00:01:15:18

Good morning. My name's Rod McArthur. I'm a chartered architect and I've been appointed by the Secretary of State to be the member of a panel of inspectors to examine this application.

00:01:17:05 - 00:01:26:14

Good morning. My name is Andrew Marr. I have a background in ecology and Environmental Impact Assessment and I'm a chartered environmentalist and a chartered landscape architect.

00:01:28:06 - 00:01:53:12

Not on screen today, but watching the livestream. We also have Mr. Stephen Bradley. Together we form the examining authority. There were three more colleagues from the Planning Inspectorate here today. You will have all spoken to Mr. K Johansen, the case manager for this project in the Arrangements conference. He is assisted today by Caroline Hopewell and Drey Reyes , who will also from the case team.

00:01:55:13 - 00:02:25:11

If you have any questions regarding the application process in general, could I ask that you please email these to the case team who will be happy to help? I would first like to deal with a few housekeeping matters, although I will be as brief as possible as those of you actively participate in today have attended previous hearings for this examination. Firstly, can I ask that all audible notifications for electronic devices be switched off and remember to make sure your microphone to switch to mute unless you are speaking.

00:02:26:27 - 00:02:35:09

No requests have been made for any special measures or arrangements to enable participation in this hearing. But I would just like to confirm that this is correct.

00:02:38:15 - 00:03:08:22

I'm not seeing anything social proceed. Mr. Johansson will have explained what to do if you lose your connection and we are able to adjourn for a short period if there are any more significant connection problems, if a medical or any other urgent reason anybody requires a break at a specific time, could you please let the case team now and we will, if possible, adjust the program to accommodate you? For the purpose of identification on the benefit of those who may listen to the digital record in later.

00:03:09:00 - 00:03:25:07

Could I ask that at every point at which you speak, could you please give your name? And if you are representing an organisation or individual who which is that you represent? Does anybody have any questions or concerns about the technology or the general management of today's event?

00:03:27:09 - 00:04:06:29

Not seeing anything social proceed. There is a digital recording being made of this hearing. This will be made available on the project page of the National Infrastructure website. If you take part in the hearing, it is important that you understand that your comments will be recorded and that the digital recording will be published and retained usually for a period of five years from the Secretary of State's decision. The Planning Inspectorate is subject to the General Data Protection Regulation. The Examining Authority will not ask you to put sensitive personal information such as email addresses and economic, financial, cultural or health related matters into the public domain.

00:04:09:06 - 00:04:42:13

Please bear in mind that the only official record of the proceedings is the digital recording that will be placed on the project page of the National Infrastructure website. Tweets, blogs and similar communications arising out of this meeting will not be accepted as evidence in the examination of this application. Today's hearing is being held by the examining authority to explore a number of matters all related in respect of marine ornithology. This is a public examination, and if there is a point that you want to make, please raise your hand and switch on your camera.

00:04:43:06 - 00:05:14:09

But please wait to be invited before speaking. The hearing today will be a structured discussion, which Mr. Mann will lead based on the agenda that has already been published. Since the agenda and invitations were issued, we have been informed that natural England and the RSPB will not be with us today. We will nevertheless run through the agenda as issued and we will subsequently issue action points and seek written responses from those organisations in lieu of their participation.

00:05:18:23 - 00:05:50:10

Rule 14, two of the examination procedure rules requires the examining authority to identify matters to be considered at the start of the hearing. The agenda for this hearing was placed on the website with the URL reference IVA 035. The main items for discussion today are the applications of MRC and baseline ornithological data characterization. The applicant's Ornithological Assessment Sensitivity Report, which is 5065.

00:05:50:25 - 00:06:15:04

The applicant's report into indirect indirect effects of forage, fish and Ornithology, which is 5085 and updated conclusions on project and cumulative EIA effects. So before we move on to deal with the items detailed in the agenda. Are there any questions at this stage about the procedural side of today's hearing? All the agenda.

00:06:18:14 - 00:06:42:25

Not saying anything. So I shall move on to the introduction of participants, which is only the applicant site today. I would like now to take the names of those who will be speaking at this hearing. And if you are representative, please state whom you represent and your role within the organisation and also the means by which you would like to be addressed, such as Mr. or Mrs.. Ms.. Dr.. And I'll start with you, Mr. McGovern.

00:06:45:11 - 00:07:00:22

Good morning, sir. My name is Gary McGovern, partner with Pinsent Masons, legal advisors to the applicant. And Mr. McGovern is fine. And there are three other representatives from the applicant here with me today, and I'll ask them to introduce themselves now. Thank you.

00:07:04:18 - 00:07:21:26

They have nothing to say. And my name is Sean Sweeney. You can refer to me as Mr. Sweeney. I'm the lead for Offshore and entitled Ornithology Associate Director and head of Ornithology Consultancy at APM Ltd. I've been working at late for the applicant on this project for just over four years.

00:07:23:14 - 00:07:23:29

Meaning?

00:07:27:19 - 00:07:38:26

Good morning, sir. My name is Matthew Bauer and I am a senior on Apologist APM and have been an advisor to the applicant on Ornithology matters. And you can address myself as Mr. Bauer.

00:07:45:02 - 00:07:49:14

Good morning, Dr. Julian Keon Concerned Project Monitor on behalf of the applicant.

00:07:52:14 - 00:07:53:00

Thank you.

00:07:55:10 - 00:08:01:12

I'm not seeing it. Pretty sure we don't have anyone else from any other parties, but I'll just do a final call just in case they're here.

00:08:04:00 - 00:08:10:08

Nobody here. I'm not going to hand over to Mr. Martin to lead on items 2 to 6 of the agenda. Thank you.

00:08:13:13 - 00:08:35:07

And Mr. Jones. I asked Mr. Does Mr. Jones highlighted the main purpose of this hearing is to examine environmental issues relating to the assessment of the likely impact of the proposed development on marine ornithology, including populations of seabirds that may nest, feed or winter in and around the area affected by the proposed development.

00:08:37:00 - 00:08:58:10

Now. We looked at other Marine environmental topics yesterday, and we may need to refer back to some of those issues that arose then. And inevitably, we are likely to touch on the habitats, regulations, assessment. But as with our first round of hearings, I would like to defer our detailed discussions and questions and not to issue specific hearing 12 which will be held tomorrow.

00:09:00:20 - 00:09:44:25

As Mr. Jones mentioned in his introduction, we are unfortunately without natural England and the RSPB today, which limits the scope of our oral discussions and questions. This places a much greater

onus on the written process, which, due to the rapid pace at which some of these matters are moving, involves a lag in the content of some party submissions from the examining authorities perspective. And one of the few cases where having to deal with a lack of up to two deadlines as such, I will be making reference to some matters today for the applicant may consider to be clearly set out in its written submissions, but I nevertheless need to place the examining authorities understanding on a firmer footing as we can manage so as to avoid any disconnect.

00:09:45:11 - 00:09:46:28

So please do bear with me.

00:09:49:03 - 00:10:25:12

We received and published additional submissions from Natural England and the RSPB to confirm non-attendance, but they did little more than explain the reasons and confirm that further responses are expected. DEADLINE six Nevertheless, as I mentioned in my preamble yesterday, the examining authority appreciates the work that's been going on in parallel with the examination and in particular the progress that has been made with natural England in relation to the offshore ornithological baseline. Again, can I remind you of the importance of submitting meeting notes or reports into the examination for transparency and for the information of all parties?

00:10:27:03 - 00:10:54:20

Now, late on Tuesday, the Planning Inspectorate unexpectedly received a further submission from Natural England. This was intended to provide updates in relation to our published agendas for issue specific hearings ten, 11 and 12, and was accepted by the examining authority. First thing on Wednesday morning as a late submission, it confirms that natural England's full comments and an updated risk and issues log will be provided at deadline six.

00:10:56:12 - 00:11:25:12

The Planning Inspector team did manage to get this published yesterday and it has now been added to the examination library as as zero 48. The Examining Authority has now had a chance to read it. It arrived too late to be considered fairly and issue specific here in town yesterday. But could the applicant indicate whether the appropriate members of your team have had an opportunity to read the document? And if you would be content to incorporate the relevant matters arising from it into today's discussions.

00:11:28:05 - 00:11:45:29

Canon McGovern for the applicant and yes, the relevant members of the applicant's team have now had the chance to consider the comments relevant to today's hearing, which are set out and is zero 48. So we would be content if you have questions on any matters raised and in the advice to address those today. Thank you.

00:11:46:23 - 00:12:19:19

Thank you, Mr. McGovern. I think we should put on record that under stress this approach of submitting and accepting last minute material representations must be exceptional. But the Examining Authority notes that other parties that have made submission about offshore ornithology are not present today. But they would have five working days from its publication before the next deadline when they are able to provide a submission in response. And given that we are very late into the examination, the examining authority can also see clear benefits from taking account of natural England's representation.

00:12:19:21 - 00:12:28:25

Today in all parties, including the applicant, would have a fair opportunity to provide a response by deadline six and so move matters along.

00:12:31:03 - 00:13:05:21

Thank you. Examining authority also notes that while not present today, the RSPB has outstanding responses to a number of key documents submitted by the applicant at Deadlines five and five. One of the lags I was referring to, therefore, for expediency and to ensure maximum efficiency, cannot suggest that the applicant directly copies in the RSPB on any responses to natural England in relation to the additional submission a0 48 unless these are to be first shared formally through submission into the examination deadlines.

00:13:05:23 - 00:13:09:07

Six. Is that also acceptable, Mr. McGovern.

00:13:11:25 - 00:13:18:05

Got him a government for the Arctic. And yes, sir, if we are responding directly to natural England on any of those matters, we will copy the RSPB.

00:13:19:02 - 00:13:19:29

Thank you very much.

00:13:22:00 - 00:13:34:12

So as you've heard installing, we'll be making a list of action points today and we will be issuing those with a written request for written responses from those parties who were invited today but were unable to attend.

00:13:35:29 - 00:13:48:24

Unless there's any other comments from Mr. McGovern, I'll move straight on to agenda item two. This is the application of MRC and the baseline ornithological data characterization.

00:13:52:18 - 00:14:10:14

Firstly, could the applicant confirm that the problems and clarifications that were identified by Natural England in its review of the deadline five revised ornithology baseline were notified in advance to the applicant and have been fully covered in the applicant's deadline. Five A submission.

00:14:13:04 - 00:14:18:13

You should see even the applicant. Yes, sir. I can confirm that all these matters have been dealt with.

00:14:19:08 - 00:14:19:24

And you?

00:14:22:16 - 00:14:47:21

And secondly, could you confirm that the results that were presented in the Ornithology, EIA and HRC annex are those that used the second round of baseline characterisation that similar C version two were agreed? Unless the design approach, design based approach had been agreed at natural England. So these are the revised outputs that are considered in the annex.

00:14:50:23 - 00:15:04:09

Really for the applicant again? Yes, I can confirm that. Yes, we followed the procedures as outlined by Natural England and agreed for the use of MRC v2, where applicable our auto default to design based dependencies by applicable law as well. Yes, sir.

00:15:04:24 - 00:15:05:19

Thank you very much.

00:15:07:10 - 00:15:23:15

So in that case, is it possible, please, for the applicant to provide a summary of the outputs from MRC version two and indicate whether any sort of comparison has been made between version one and version two of the commentary. And if it has been provided, could you signpost me to that?

00:15:26:17 - 00:16:01:16

Ashanti, of course, yes. Following the last round of the issue specific hearings and in consideration of the request from Natural England to rerun the MRC using the V2, following the additional guidance we received from the developers of the MRC model from Queen and ourselves, we reran the model. So therefore following the advice we used the MRC results then forward the seabird density estimates to provide collision risk modelling for gannets and for birds you like.

00:16:02:20 - 00:16:33:12

Whilst we used the design based for the displacement analysis, we defaulted to the revised and updated design based upon its estimates and for great back goal. We assessed using design based upon this estimates as well, working through to the gannet species and we reran the well. The DMC v2 was utilised because it was a 24 month output provided by the MRC for that. So that relied upon the MRC v2 was both razor build and puffin as agreed with natural England.

00:16:33:22 - 00:17:12:05

We would we defaulted and used the revised updated design based abundances for those two species. So that I suppose is a summary of where we were. And for all of the species with regard to the baseline, they already relied upon design based upon, as you said, that there was no requirement for the change on those matters. And with regard to the differences, we are very pleased to see that the actual abundances and the densities that came out of the MRC v2 and were defaulted down to design base that make very little difference or no material difference to the overall baseline characterization for the project.

00:17:12:29 - 00:17:55:18

So the data relied upon to characterise the baseline and then put through into impact assessments at the point of application is only minuscule differences between that and what we've now presented later 3D examinations use and we're very pleased with that because I think that provides confidence that the data at point of application was reliable. So although there were some tweaks and some minor changes, it's not had any material difference in the outputs from the I8 perspective, which is what we're here to discuss today. So with regards to the actual detail and the collision with modelling with regards to Gannets, the resulted in a reduction of well from 20.2 to 17.3.

00:17:55:20 - 00:18:28:09

So we're looking at 2.9 predicted mortalities per annum. So a slight reduction for the collision marlin fault for Gannet following the standardised parameters that we used forgotten agreed in natural England. And then for Gannet displacement it was a minor increase. So we went from that range increasing from between 1.7 to 2.3 and predicted mortalities in addition per annum. So that's gone from 11.3 to 15 to 13 to 17.34 for displacement mortality rates per annum.

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So for that we've got two kittiwake collision risk modelling. There was also a reduction of that as well. So the overall predicted collision mortality per annum went from 93.3 down to 80.6, a reduction of 12.7 predicted mortalities per annum. So and for great let that go it was really was a it's a very, very minor increase going from 4.3 to 4.4 individuals predicted mortalities per hour in the moving on to displacement.

00:19:02:17 - 00:19:41:07

The analysis for guillemots resulted in in a minor increase from 128.1 to 148.5. So it's an increase of 20.4 predicted mortalities per annum, which which may appear slightly larger in comparison to some of the others. But when when reviewing these on an annual basis against the wider population of

several million birds, we see that the increase of twenties is quite, quite minor in that respect. Sir. And then with regards to razor bill, the margin increase of 4.4 predicted mortalities per annum, going from 23.6 up to 28 birds.

00:19:41:18 - 00:20:11:24

And then for Puffin was also a minor increase there from 2.5 to 3.2, which is an increase of 0.7 predicted mortalities per per annum. So really, I suppose in a nutshell, just going back to my first comment, so the minor differences predicted from the impacts here from resulting from the revised and updated baseline did not really materially affect the conclusions that that we believe is, you know, significant adverse effects can be ruled out.

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After all, all logical matters are all ornithological receptors for the project alone.

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That's very useful. Summary. Thank you, Mr. Sweeney. And are you waiting for feedback from Natural England? Before you present that commentary and conclusion to us formally in written form.

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It showed significant in terms of our feedback, providing this to natural England.

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Or.

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Surrey, in terms of providing it to the examination in a written format as a formal submission.

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Yeah, I think we should have the applicant getting the all the details within these are already within the examination into the documentation. So therefore you've been submitted it Friday, the encapsulated within the ornithological baseline characterisation and the all logical EIA and HRA annexes.

00:21:11:16 - 00:21:25:13

Yep. I'm aware that three we've got all of the raw data, but what I haven't been able to find is a sort of succinct conclusion and commentary which provides a comparison between the outputs of the two runs of MRC.

00:21:26:22 - 00:21:39:18

Though perhaps we can confirm quite happy to provide you that succinct summary at deadline six, if that's going to be useful in terms of just listening and burning through the bullet points that I have in front of me here at the end.

00:21:39:28 - 00:22:04:07

That's exactly what would that would be very useful. Thank you, Mr. Sweeney. And and related to that is a comment from Natural England in the Late edition of submission here. So 48 I'll read it out it says has version two. The baseline has been agreed and demonstrated to be a significant improvement against version one. We do not consider it appropriate and or necessary to compare the outputs of the two. And

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for one thing, for me that's a pretty good demonstration. Why? It's important for key parties to attend these hearings because I'm far from clear what they're meaning by this. And I would certainly benefit

from clarification from what you just said. I'm assuming that natural England is also agreeing with you that there's minimal difference between the two and the version two is in fact an improvement on version one. Is that your interpretation of natural England's comment, Mr. Sweeney?

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Sean Sweeney And I'd say obviously without being able to talk on that behalf or reading the letter of submissions that they've most recently provided, sir, I would agree that they now have no, no sort of issues with the revised modelling that was done and the baseline that we rely upon. MRC V to design based abundances. I think in terms of the matches of the baseline characterisation being improved, I think as you can see that the data side of things in terms of the abundances and the densities that feed into the calculations of the impact assessment were very, very minimal.

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I think in terms of the spatial distribution maps that came out of the one of the other outputs, the spatial description, the maps came out, the MRC v2 were an improvement in terms of providing a better

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visualization, if you like, of where birds may be across the different months and the seasons said in that respect, yes, there are sort of improvements from data, but in terms of the the information that's fed through the process, then it's it's minimal difference. In fact, sir.

00:23:46:03 - 00:24:12:14

Thank you. I think we will nevertheless. I mean, there's at least two ways of interpreting that comment from natural England, and I'm not clear how it's possible to conclude the version two can be demonstrated to be an improvement on version one without actually making a comparison. And I'm not clear whether we should be interpreted to mean the natural England believes the version one should be removed from the has to be replaced by version two. So we will make an action point from Natural England to clarify that comment.

00:24:16:05 - 00:24:41:10

And I'll ask my Alaskans, darling, to add that to the list. Similarly, is there a have you made a concise evaluation in the differences and outputs when you use your own approach and natural England's approaches anywhere as identified in the Ornithology, EIA and HRA annex? On the face of it, the Annex does seem to indicate some significant differences and effects in some cases.

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So

00:24:47:09 - 00:24:49:19

sorry. Could you just repeat that again? Yeah.

00:24:50:08 - 00:25:12:06

I was wondering if you've made a concise evaluation of the differences in outputs between your approach and natural England's approaches and has identified in the Ornithology, EIA and HRA annex. You've used both approaches for a lot of parameters, some of which give different outputs, and I wonder if there's a concise summary, some of those differences.

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I assume for and yes, choice. And yes, essentially we provided within the ornithological sensitivity analysis a sort of assessing report which identifies the differences in the variabilities when different parameters are utilised. And within that report it has the applicant's preferred parameters for use for both displacement and collision risk, as well as the applicant, as well as natural England or Irish

assumed parameters of the premises wishing to be natural England's preferred parameters as well as alternate ones relied on on the latest evidence and research.

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So within that report you can see the different variations between the three different methodological choices and then how extremes can be, can result from different parameters going into different modelling approaches.

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And key again, we can certainly see the data and the role modelling and assessment outputs, but I think it would be useful for us again to have a sort of succinct summary and commentary in relation to the assessments of significance of any effects and any knock on effects to mitigation requirements between the two approaches. I leave that with you to take away and see whether you feel anything additional could be useful. It may only be a couple of paragraphs.

00:26:42:18 - 00:26:44:11

Not a chance. Okay, sir.

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Thank you. And is it the intention now? Is it your intention now to update the environmental statement, given that we have this new version to output, notwithstanding the fact you find that the output is very similar?

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But.

00:27:11:17 - 00:27:13:06

Good governance for the applicant.

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So it is not our intention. It's up to the IEA. We're well aware that there's been a considerable volume of paperwork already submitted into the examination that everyone is struggling to keep on top of. And our position is that the annex that's been submitted and contains all of the relevant needs assessments that you would need to see in the other stakeholders we really need to see. So it's not our intention to do it at the EIA stage.

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So

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is it your intention to include that annex as part of the environmental statement or is it a standalone document?

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Guy McGovern on behalf of them. And so that document can be listed in schedule 15 as it sits alongside the eight or as part of the.

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I

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think that would probably be useful procedurally in terms of the regulations. And I think, as I suggested, because it effectively is a raw, raw data and raw output document at the moment, a short summary of it in relation to why you don't feel that the Act needs to be updated would be very useful.

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We'll provide that sort of thing to you.

00:28:25:19 - 00:28:29:17

Which case can I ask Sterling to add that as an action point as well, please?

00:28:34:14 - 00:28:43:09

And our next question really is, could the applicant respond to the comments by Natural England in the late additional submission as saying 48?

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We see there is now an agreement about the updated baseline and the natural. England says this accords with its advice and is now considered fit for purpose.

00:28:55:08 - 00:29:12:09

But there is nevertheless an inconsistency highlighted by Natural England between the density data for Kittiwake and Gannet in the revised ornithology baseline. And the data apparently is collision risk management modelling in the Ornithology, EIA and HRA annex.

00:29:14:04 - 00:29:15:18

Could you comment on that, please?

00:29:19:16 - 00:29:57:17

Anything for the applicant. Of course. Yes. We we noted that response from from natural England. And it was a copy and paste error that we that they had actually approached this and had is submitting this letter to us and there's clarifications and an updated version of that report was presented in the Friday in the deadline Friday submissions and said that they're now in agreement of the baseline being fit for purpose as they stated. So with the green the green box ticked within their letter and the caveat should now have been sorted in terms of that.

00:29:57:19 - 00:30:12:15

We have responded to that. And and I think they now agree that they can see the differences. And it was just a copy and paste there in the CRM table, not the actual modelling which does rely upon the correct super densities from the baseline.

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So despite submitting on Tuesday evening that they thought was an error, they should have already been aware of your updates to that.

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And that would be the case. Yes.

00:30:26:13 - 00:30:29:04

One of the disconnects, Sophia. Thank you, Mr. Sweeney.

00:30:32:12 - 00:30:41:04

So in terms of keeping the RSPB in touch with that, they also would have access to the update in the whole of DEADLINE five submission.

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Shortly. If the applicant does Corexit, the RSPB have access to exactly the same information now, sir.

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So there's nothing remaining to do. And as far as you're concerned too.

00:30:54:08 - 00:31:02:08

For natural England and the RSPB to be in a position to agree with them updated base based on fully accords with the advice and be fit for purpose.

00:31:03:19 - 00:31:33:11

I shouldn't even be up here again. And yes, we're very pleased to meet to agree with you on that one. So we're very pleased that after what's been a prolonged period of time, a lot of hard work from the applicant here and our sporting teams. The baseline was revised and updated following the the guidance that we received in accordance with how we were asked to do it. And all the all parties can now have everything that they need for their disposal for that baseline characterisation, which we're all in agreement with now, sir.

00:31:34:06 - 00:31:37:18

Thank you. We're grateful for that and grateful we got there in the end.

00:31:39:19 - 00:31:56:20

One of the matter, I suppose, related is that there's a hint in Natural England's cover letter of DEADLINE Friday that the assessment situation in relation to counties has changed. I'm interpreting this to mean to relate to an agreement to include an allowance for macro avoidance.

00:31:59:00 - 00:32:09:04

The actual quotes matter. I think you have. Could you confirm you've actually made an allowance for macro violence of 70% in the work that you've just provided?

00:32:13:00 - 00:33:02:25

Shirley Franklin. Yes. Yes, we understand there's been a change in position that is very welcomed by the applicant. And I would also suggest by the industry not not not withstanding the fact that this is in part a result from some of the evidence that the we provided through our evidence review guide displacement of mortality is fed into that decision making which which we are very pleased has been been accounted for from that empirical led review. And yes, we initially presented sort of a mini sort of case of utilising the central point within the displacement range, which could be utilised at a macro level of about 70% that we were since requests by natural England to to then present a whole series of additional assessments.

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So applying macro avoidance of 60, 65, 70, 75 and 80, just to be sure and all those different matter avoidance is all additional application of macro values to the seabird densities within the collision with modelling have now been presented for for natural England to see and for all of the parties to see in the five eight submissions. And yes as can be seen, the result the results of of applying that macro avoidance are effectively more or less reductions in the project alone collision risk modelling our mortality outputs of 60, 65, 70, 75 and 80% reductions to those collisions models.

00:33:47:20 - 00:33:48:25

Yes. Outputs.

00:33:49:14 - 00:34:08:18

Thank you. I will come back to that a little later on the agenda, if I may, just to get some further clarification from me. But in terms of where we are now so that the you can confirm the combined displacement and collision mortality outputs and assessments have been addressed through what is, as I've seen referred to as the PTO Cook 2021 approach.

00:34:13:22 - 00:34:16:21

She shows very you get out. Yes, I think then that's that's the case with him.

00:34:16:29 - 00:34:35:24

Thank you very much. A further matter raised by Natural England in the letter at Headline five, a highlighted a problem with their recommended population viability analysis tool and a need to rerun the some of the KITTIWAKE analysis. Where are we with those updates?

00:34:38:28 - 00:34:42:12

I'd like to defer to my colleague Madiba and you.

00:34:42:25 - 00:34:43:11

Mr. Bauer.

00:34:45:11 - 00:35:15:16

Five oh for the applicant that was made aware of the potential issue with the model on the 4th of July via email. And we have reviewed all of our PVA modelling that is presented with the video on its Logical Assessment Sensitivity report. As it stands, it is only effective flow essentially affecting the outputs for Kittiwake at the North Sea PD amps, Biogeographic and the FFC, SBA population scale and Natural England.

00:35:15:18 - 00:35:53:18

Within that email, the centre's notifying is of the issue provided as with the solution to work around the potential bug within the tool. The applicant has already subsequently followed natural England's workaround and have provided and revised all modelling, the results of which found that there was no material difference between the outputs presented at current within the assessment sensitivity report. As at most, the results differed by 0.03%, which, when considering a stochastic model is well within natural variability.

00:35:53:20 - 00:36:10:00

You would expect nevertheless to provide yourselves with confidence deadlines. Six We will be submitting the revised modelling and so that you can see that there is no material difference between those already submitted within the Assessment Sensitivity report.

00:36:11:17 - 00:36:12:29

Thank you. Very happy with that.

00:36:16:15 - 00:36:23:14

So in which case I'm presuming there's no implications for mitigation, and we probably have to come back to that tomorrow in terms of HRA compensation.

00:36:25:05 - 00:36:27:11

Is there anything else on item 2.1?

00:36:30:24 - 00:36:38:25

Let me move on to item 2.2, which is the RSPB and Natural England as responses to those documents we've just discussed.

00:36:40:26 - 00:36:53:07

We know Natural England confirmed, as I said, that the revised baseline data were being produced using the agreed combination of model and design based methods, and that outstanding concerns had been addressed.

00:36:57:19 - 00:37:07:21

Are you expecting any further comments from Natural England and I assume you're still expecting comments from the RSPB in relation to your revised ontology baseline? And if so, do you know when those will arrive?

00:37:12:05 - 00:37:47:20

And it shows the need for the applicant. And yes, we we I don't think we're expecting any further from natural England in the the submission is now of the letter that we received confirming there at be content with the baseline that this is now an examination document with as of 4040 845 sorry 48. And I understand that the RSPB are wishing to submit something at deadline six and we would hope that that would follow suit and of agreement with the baseline esa.

00:37:48:14 - 00:37:50:01

Thank you. I will see what happens.

00:37:51:26 - 00:38:16:23

Notwithstanding natural England's agreement for in terms of formal submissions before the examination, they do still have those minor reservations which as you point out, have been clarified by yourselves subsequently. But nevertheless, we will make an action point for both natural England and the RSPB to update their positions on the suitability of the revised Ornithological Baseline and Assessment Act deadline six.

00:38:21:08 - 00:38:40:09

Moving onto 2.3 the applicant. Explain your view on the implications of the revised baseline and the cumulative assessment for the impact assessment and the cumulative assessment. So the document which is produced, do you believe there's any implications for the assessment as presented.

00:38:42:22 - 00:39:18:00

And to you for the applicant and as summarised earlier in terms of the updates to the different impacts, whether that's a collision risk or displacement, the resulting differences between what we presented this application and what we've presented within our revised Ornithology EIA and HRA annex, which is five and 11. And then no, we don't believe that there is any significant changes or all the differences were of no real material difference and then some minor, some in fact even going to be reduced impacts.

00:39:18:04 - 00:39:31:24

So yes, I think in terms of where we are, there are we don't believe there's any implications, both the projects alone or in terms of the cumulative effect levels or any of the different impacts put forward. Sir.

00:39:32:13 - 00:39:32:28

Thank you.

00:39:34:16 - 00:39:58:08

And from the list you just gave me, I think I can predict where we're going with the agenda item 2.4 in that you're not expecting to do any more assessments or introduce any further mitigation or monitoring in relation to that baseline, assess the assessment of that baseline. Are there any further matters which we need to discuss relating to MRC or the revised or one of the baseline?

00:40:00:05 - 00:40:04:07

Well. And shortly before the upcoming set, I believe now.

00:40:04:21 - 00:40:13:03

In which case will await the RSPB and natural England final position on that. And hopefully we'll all be you'll all be in some sort of agreement.

00:40:16:09 - 00:40:28:21

So I'm going to move on to agenda item three, which is the Ornithology Ornithological Assessment Sensitivity Report, which is available as WEP five zero 65.

00:40:31:03 - 00:40:48:18

Is it fair to summarize that the purpose of the Ornithological Assessment Sensitivity report was to explore the tension in offshore wind farm ornithology project alone and cumulative assessments between fairly balancing precaution against presenting a realistic evidence led assessment.

00:40:51:24 - 00:40:57:22

I'd say so. It's safe to say it's a fairly lethal, succinct summary, sir. Yes.

00:40:58:07 - 00:41:26:27

Thank you. I can say that the sensitivity report tests the results of variation across the numerous parameters, but I wasn't quite clear what dataset was used. For example, table six and of the parts of the report for cannot show mortality rates of 17.26 beds from the applicant's methodology and 22.29 birds for natural England's approach. Where are those figures coming from?

00:41:32:10 - 00:41:44:18

Sure. And yet the data then provided within those tables, within the sensitivity report come from either the well, they come from the updated ornithological, EIA and HRA Onyx

00:41:47:18 - 00:41:48:03

again.

00:41:51:07 - 00:41:53:20

Is that made clear in the report? Sweeney.

00:41:57:21 - 00:42:22:05

She shows if the can and I believe in the overview at the start of the report. It does provide a, you know, a I suppose a summary of the data sources of what is being applied in terms of the applicants approach. And that training is approach and then gives. Obviously there are multiple different variables going into some of the sensitivities that are analysed and the sources of those are explained throughout the report itself.

00:42:23:12 - 00:42:35:06

If I could just ask you to review that, and if you are happy with it, that's fine. Having reviewed it, if you think you could clarify it in your post in note as to whether or not data did actually come from just to confirm it. I'd be grateful

00:42:36:26 - 00:42:37:12

that professor.

00:42:40:09 - 00:43:06:27

And we've noted that natural England cannot currently comment in full on this report, pending resolution of the discrepancy that identified intensity data which we discussed earlier and also clarification of any changes to PVA analysis for Kittiwake, which I think you just told me will be receiving a deadline. Six. What's the proposed way forward in terms of obtaining natural England views on this report?

00:43:16:14 - 00:43:27:01

Additionally, we understand that they are due to submit their response to any documents that they haven't currently responded to. DEADLINE six.

00:43:28:27 - 00:43:32:27

And are you happy you then have time to accommodate anything which they raise as part of that.

00:43:40:14 - 00:43:51:26

I just want to see the up going again and obviously we will review the comments that we receive accordingly and provide any responses possible after that.

00:43:53:09 - 00:43:58:27

Thank you very much. And again, if you could keep the RSPB copied in anything that happens in relation to that, I would be very grateful.

00:44:01:28 - 00:44:22:28

Section 3.2. Could you just have a look at it? Potentially a couple of minor typographical errors just to clear those up whilst we are talking about the report. Can I take you to sections three, three, five, one? And asking whether the 42% should read -42%.

00:44:30:24 - 00:44:34:27

That's your 20? Yes, that's correct, sir. And well spotted. Yes.

00:44:35:10 - 00:44:37:14

Otherwise, it would have been quite a major difference.

00:44:38:05 - 00:44:38:22

Indeed.

00:44:40:03 - 00:44:47:06

A gain if that could just be clarified in the post hearing note just the audit trail. And can I take you also to figure.

00:44:49:06 - 00:44:53:24

I ask whether that's been wrongly labeled and refers to razor bill.

00:45:01:27 - 00:45:08:22

She'll be up again. Yes, that's correct. Again, sir. Yes. Well, well spotted. We will ensure amends are provided.

00:45:09:10 - 00:45:10:24

That's right. Thank you.

00:45:13:04 - 00:45:27:16

Okay. Section 3.3 This relates to the collision risk modelling, its implications, conclusion, and the latest evidence. We may have covered quite a lot of the next few items, but let's just run through them.

00:45:30:11 - 00:45:47:13

So Section two of this report, which is on collision risk modelling, just seems to demonstrate that you get different outputs for different inputs. Do you believe it provides any reliable evidence what the inputs should be if one is not to use the recommended standards?

00:45:52:09 - 00:46:33:26

Johnson Yep. Again, I think he does. I think what he what it demonstrates is there are a number of input parameters and they lie on on evidence is perhaps outdated and maybe could be improved upon from the evidence base that we have now at our disposal, sir. And that's why it's very important to realize that when they are applied not simply for a project alone, but when more widely applied, they cumulatively, as demonstrated within the wonderful high sensitivity report, you can see that then creates the issues as one issue then is over, leads into another.

00:46:33:28 - 00:47:18:24

And essentially if you keep using values that are higher than perhaps should be for a project on its own, it's perhaps not that significant when it's added on one and another and another, then you can prevail present these overly inflated potential impacts, and that's demonstrated within the report itself. Just one particular instance of using differences in in-flight speeds. The Kittiwake, for instance. Then if you utilized more recent data, which is actually recorded, flight speeds of birds flying through offshore wind farms rather than relying on data which is from the type birds that are flying simply through the sea, nowhere near offshore wind farms.

00:47:19:03 - 00:47:46:22

And then there is a difference. And that difference, if just applied for a project alone and then applied across the cumulatively for projects, would reduce the cumulative level effect of over 250 mortalities per annum, which which as you'd note, sir is would be quite significant change in terms of the perspective of how we deal with Kittiwake as an issue, particularly the, you know, 250 reduction to 50 in the North Sea would be, you know, significant

00:47:48:11 - 00:47:48:26

day.

00:47:48:28 - 00:47:52:12

Thank you. So, in effect, I think what you're telling me is that.

00:47:54:05 - 00:48:04:20

The parameters are outdated because we have a lot of quite recent monitoring evidence that shows that some of those input values are not as accurate as they might be.

00:48:06:29 - 00:48:33:02

And it shows that if the applicant. Yes. You think, broadly speaking, that that's very correct. And I emphasized again, if what we discussed earlier in terms of the critical review that we did the applicant and put forward that again, it displacement mortality review that also, you know, does provide that evidence that when you look at these things in detail which we appreciate not everyone can do and the resource constraints that

00:48:34:19 - 00:48:51:00

this may be under. But that review, no doubt was undertaken and did provide that evidence that people then take confidence to to apply those additions and provide a sort of a more realistic approach to collision risk, in particular, in that particular instance, beginnings.

00:48:53:08 - 00:49:23:03

So if we, if you will, we hope the world is to persuade statutory nature conservation bodies to amend some of those parameters on the basis of the evidence. That evidence has to be shown to them to be reliable, and they can be significantly less precautionary. And can I take you to section three, three, one one where there's a discussion about gun ID, which I believe shows the variability to about 90% or more.

00:49:28:00 - 00:49:34:07

Joseph Hopkins. Yes, that was the differences. But applying it, well, a higher avoidance razor.

00:49:34:22 - 00:49:49:03

Yeah. And it's your report says this demonstrates that applying precautionary values to all input parameters multiplies up into significantly precautionary CRM outputs. I absolutely understand what you're saying,

00:49:50:24 - 00:50:00:26

but for that to be correct, the evidence that you're using to demonstrate those precautionary values are wrong has to be applicable to the situation we're looking at.

00:50:03:22 - 00:50:07:06

A public Britney say that. Yes, that is correct, sir.

00:50:07:23 - 00:50:13:22

And which particular evidence were you using in that case to show that the precautionary values to all stages were wrong?

00:50:15:26 - 00:50:47:09

And I think what we saw recently I mean, I think what we try to demonstrate is when you look at all the different sources, when they're ready to look at that sort of, I suppose, the extreme value of the or being of taking a different viewpoint, then then you will get a much reduced effect level or level. But in that particular instance, it was actually evidence from the the Crown States funded audit projects where the data sources, you know, were from, you know, UK offshore wind farm seabed monitoring projects.

00:50:48:21 - 00:50:57:08

And you believe that sufficiently robust for the statutory nature conservation bodies to revisit their precautionary values.

00:50:59:16 - 00:51:44:19

I shall see if they have cancer. And I think that the content of the report that we put forward, I think would be extremely useful for all SNC bees around the UK to utilise the data that we put forward. Alongside that, as we know, the monitoring projects will have the data sources and government bodies are also working on pieces of work and I think for the industry to move forward, then consideration of which ones are most appropriate to take forward, which ones can be relied upon, will certainly and can certainly lead to the differences which will undoubtedly lead to predictions of lower mortality rates with regards to both collision risk and displacement for all species.

00:51:44:25 - 00:51:45:10

Yes.

00:51:45:28 - 00:51:46:13

Thank you.

00:51:48:18 - 00:52:03:12

Hopefully it will make some difference. Can we move on to displacement, including the latest evidence, which is item 3.4? And if we take agenda item 3.8 alongside this one, please, which is the orca displacement.

00:52:05:22 - 00:52:32:27

We have seen the applicants ornithological assessment sensitivity report and we've seen natural England's additional guidance on the assessment of guillemot and rateable displacement impacts. I believe the latter was intended to assist the applicant with the assessment of potential displacement impacts on guillemots and raise bell during construction operation and maintenance due to a lack of agreement with the approach currently adopted by the applicant.

00:52:35:08 - 00:52:54:18

So for displacement, your sensitivity report compares the applicant's approach, natural England's recommended approach and the latest evidence for Gannet and raised a bill again. Could you specifically remind us of what that latest evidence that you use in varying from natural England's approach is formally placed?

00:53:00:03 - 00:53:37:29

She'll see every applicant. And yes, we submitted a number of reports, namely the research on the empirical led review that was undertaken, organic displacement, human mortality, which is rep to zero for five and for orcs. And that's chiefly around the species raiser bill that was submitted in Rep 2085. And they are the evidence reviews that we presented and put forward in support of our own displacement analysis or preferred at the applicant's third approach, the displacement analysis for those species.

00:53:39:25 - 00:53:48:18

And if I was to go back to those two references, will they tell me how reliable they are as the guide for the Hornsea four project specifically?

00:53:51:12 - 00:54:26:08

And it shows that if it. Yes, we we not only undertook an empirical view of the evidence for the displacement of mortality rates, we also then translated and passed the consultation process of producing those reports that it was through consultation with Natural England and the RSPB, where we identified not only how we would go about reviewing the post consent monitoring and other studies and research going into those reports, but also how we may then apply that to it in the sense of the proposal for Hornsea four, i.e.

00:54:26:10 - 00:54:57:13

the scale and size of the wind turbine generators and the spacing of the wind turbine generators in comparison to those within the post consent monitoring reports that we reviewed. So we do believe that it's a step, I suppose a thorough review of the available evidence for both Gannet and ORC species, as well as a practical review with regard to potential responses from those species sets to the projects that we are the project proposals themselves.

00:54:58:01 - 00:55:17:14

And that as we discussed it, it is very pleasing that in respect to organic report that those data and the review of those data that we put forward have been incorporated within revised additional advice. So so we do think that, you know, that's been useful to have been taken on board by by a natural England.

00:55:18:24 - 00:55:19:25

Indeed. Thank you.

00:55:23:11 - 00:55:59:12

Moving on natural. England has also also noted in its additional submission as zero 48 that there's a continuing disagreement over the use of the core breeding season. But that, and I quote, ultimately, the differences only like to affect organic displacement numbers and it's unlikely to make a material difference to our conclusions relating to significant of impact to site integrity. Again, had natural England been heard of asked for some clarification, this could be interpreted as meaning there's no longer perceived problem in relation to Gannets.

00:56:00:04 - 00:56:31:21

However, the impression I have from the most up to date risk and issues log from natural England which was direct 5112 is that significant concerns remain about Gannet displacement. So I recognised that there was at least one fake hint, as I referred to earlier, when we were discussing agenda item 2.1, that this might change. However, examining the authority can only work from submitted evidence unless the applicant completely in the direction of something we may have overlooked in relation to natural England's formal submissions on Gannet.

00:56:35:09 - 00:56:57:23

Gary McGovern for the Applicant, sir, I think this is another example of of written evidence lagging behind where the parties have actually got to. So our understanding is and our interpretation of of natural England's position now is that their concerns are released again to have been resolved. But of course, now you will have to await their formal written confirmation into an examination of that which will hopefully be forthcoming.

00:56:57:26 - 00:57:02:06

DEADLINE six We both hope that. Mr. MCGOVERN. Thank you.

00:57:03:01 - 00:57:03:16

Thank you.

00:57:03:18 - 00:57:06:12

So let's make an action point just in case for natural England

00:57:08:07 - 00:57:26:28

in relation to the disagreement over the use of the coal breeding season and the comment in S 48 about Gannet displacement, can we ask the natural England clarifies if this is intended to mean that there's no longer a perceived problem in relation to gannets, or if your position on the most up to date risk issues log remains.

00:57:31:03 - 00:57:48:05

It also looks like some other matters remain unresolved, such as the applicant's adoption of a new weighted approach to the calculation of seasonal mean peak abundance estimates. Can I have can briefly review this particular difference as they perceive it?

00:57:54:03 - 00:58:28:09

Hi yourself again. And I suppose the main point we would have here is it's not a new method that we put forward. We consulted on a bespoke approach to displacement for Guillemot, added the application and put forward that methodology through the expert topic groups and through the evidence plan process. So due to what we could potentially be was change in the case officers the nationality that they didn't respond to that ahead of the application.

00:58:29:02 - 00:59:29:18

But we did consider that for a number of different reasons as is presented within the indirect effects. Afforestation Ornithologist and Rep five zero 85. There is no substantial evidence in support of our

case of what we put forward in terms of both the use of a weighted mean approach, but also just the not wishing to change or not proposing to change our assessment of displacement. To decouple to the wider non-GM breeding season into two new bespoke breeding seasons for one specific project, as demonstrated within the indirect effects of forest fishing, ornithology reports that they show that there are pulses of guillemots to raise builds and all species across the both the southern North Sea and the North Sea and all offshore wind farm projects within those waters experience some degree of increase during the period post breeding dispersal and it is a common phenomenon.

00:59:30:12 - 01:00:06:06

So to isolate one particular project outwith from the others we did failed would be to prejudice the impacts. And again, this sort of provided uplift and create an overly precautionary approach on particular projects and in terms of just our desire to keep, you know, both projects alone, but also cumulatively or as we may speak more at length tomorrow from the HRA and in accommodation perspective, it is all about trying to provide assessments that are apples and apples and not apples and pears.

01:00:06:08 - 01:00:30:19

And we feel that, you know, to have an approach that takes something so fundamentally different to all of the projects, particularly when they all experience pulses of birds during that base breeding season, it does seem to be a method that we would not wish to go down and we provide our opinions to yourself. Says is that that wouldn't make biological sense either.

01:00:31:26 - 01:00:59:07

So is there anything new in terms of displacement in the 80 or 48 response because I think natural England suggesting that they'll get we'll get a full response deadline six but are some interim responses. And then I note, for example natural England is strongly refuting your suggestion that the advice you received on seasonality and all displacement represents a departure from the Joint Sense sensibly guidance.

01:01:02:09 - 01:01:25:05

I shouldn't even have to say. And yet, I suppose in terms of quoting the guidance itself, they then they have put it word for word that they can be departing from that advice. But obviously, as we notes throughout the evidence plan process, we did discuss this different, very different approaches. We also agreed

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to follow the guidance

01:01:29:23 - 01:01:56:09

back in topic nine and and during during the process there naturally that he did advises that we should not isolate or take out and assess separately those particular bonds that they've now said that we should assess separately. So within their own advice to us on this project of the application, they did advise that we shouldn't take that approach because it would overly inflate the potential impacts with regards to or displacements.

01:01:57:24 - 01:01:59:29

So I suppose you'll say.

01:02:02:05 - 01:02:02:20

I.

01:02:04:02 - 01:02:04:17

I think we're.

01:02:08:24 - 01:02:24:24

Yeah we had that provided all the responses didn't get 5G. With regards to natural England's comments but we, we, we don't, we haven't had anything else since that apart from there that quote back on to you that that guidance. Okay.

01:02:25:20 - 01:02:42:06

Okay. Well need to see what comes of deadline six, but just to sort of summarize this one for me. Can I take it you disagree with natural England's observation that there is a sea of the Flamborough and Filey Coast hosts an unusually large number of orcs in August and September.

01:02:49:24 - 01:03:18:25

It shows that if you ask and I think it's fair to say that there are there are high fluctuations here of birds within the Hornsea four array area. But it's it's not dissimilar to pulses of birds proportionately throughout other offshore wind farms across the southern North Sea and northern North Sea as well. So certainly not to the extent that there should be a change in the approach to impact assessment for this in isolation.

01:03:20:22 - 01:03:21:07

Yeah.

01:03:31:21 - 01:03:32:06

Okay.

01:03:32:08 - 01:03:45:26

In the applicant's view, then, to what degree to the outputs in the assessment vary when applying its preferred approach compared to using that advocated by natural England. And we're talking still here about the displacement of orcs and the different approaches.

01:03:52:18 - 01:04:01:07

He answered if napkin and yes I mean in terms of if we followed that process through and this is really with regards to

01:04:02:26 - 01:04:45:16

well, it is an EIA matter or HRA matter. So by isolate, even just by isolating the two months and assessing separately, then there's a significant increase in the potential impact levels. If we add an additional season just by default, if you're splitting season up, you're essentially assessing something twice, whereas previously there was one extended non breeding by season. So you have one assessment, one figure that goes into that displacement matrix and one valued of with regards to displacement and mortality from that by having two different values and assessing those, then you then have two different figures that come out to be that are added up for an additional impact, if you like.

01:04:45:18 - 01:05:03:16

So this this is exactly where we would go back to the advice that was provided by Natural England during the evidence planning process. The expert topic groups, which was do not do that as it would apply an additional layer to the impact assessment would not be a wise course to take.

01:05:04:13 - 01:05:12:27

And you just clarify something he said, I completely understand your overall comment. You said something about counting something twice. Does that mean the.

01:05:15:08 - 01:05:19:11

The data for the two months will be double counted in terms of an overall annual assessment.

01:05:21:16 - 01:05:52:07

I should say. Yes, that does grace a bit. Despite it, the assessment process when you utilize the displacement matrix approach, relies upon a season to the main peak. Within that season, it typically or our approach was the weighted mean approach which took different peaks and apportion within those two to counterbalance the effect of a very short lived increase during that little pulse of birds during the post breeding months.

01:05:53:02 - 01:06:24:27

By being a simplistic approach to displacement analysis, then you do simply add one number into a displacement matrix and then look at where the value of the displacement and the value for mortality comes out. So if you simply take another and create another matrix. So in this case, it would be going from a breeding season matrix plus a non breeding season matrix. And then if we were to take the approach natural England suggesting we would then have a breeding season matrix plus a post breeding season matrix and the non breeding season mates.

01:06:24:29 - 01:06:58:19

It would then be three matrices and therefore three different values being added rather than two. So yes, essentially there is an additional layer being added which is certainly is not going to apply to any of the projects across the UK for the species, despite numbers being fairly similar in some of the projects north of the border and also being you know, when we look at that again from the evidence from your different affection for education, ornithology, you know, this is a phenomena that happens.

01:06:59:01 - 01:07:22:25

All birds move from their colonies out into the North Sea and indeed out of the North Sea during the breeding dispersal period, which again is it is a short lived process. And as evidence within even the what's naturally indicated in terms of the, you know, reference to the first 2015 report, you also stipulate that it's a short lived process where birds need through quite quickly. Yeah.

01:07:23:29 - 01:07:54:14

Thank you. That's very clear. So can we make an action point, please? To remind Natural England, we're expecting an update on its position on the assessment of climate unreasonable displacement impacts a deadline six and including whether that position changes in the light of the applicant's ornithological assessment sensitivity report. And then we'd like to understand its opinion on the degree to which those outputs from the assessment vary between its preferred approach and that used by the applicant.

01:07:55:26 - 01:08:17:14

It seems to me also that the advocated upper limit does seem particularly at odds with the real, likely real life situation in the applicant's evaluation. So we will make a further action point for natural England to comment specifically on the outputs of the applicant's Ornithological Assessments and Symmetry report in relation to its advocated upper limit for displacement of all.

01:08:20:27 - 01:08:38:17

If there's nothing to add on that, we're going to move on to the population viability analysis. I think actually, given the time, that might be worth taking a short break before we do move on to that. So could we reconvene at 1050, please?