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Hearing Transcript

Project:	Mona Offshore Wind Farm
Hearing:	Issue Specific Hearing 3 (ISH3) – Part 3
Date:	16 October 2024

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FULL TRANSCRIPT (with timecode)

00:00:04:20 - 00:00:30:19

Okay. Um. Good afternoon. Now on that and welcome back. Um, could I just check that the live stream has started recording? Thank you. Thanks. Um, it's now, uh, 2:30, and time to resume this hearing. Item five, which is the landscape, seascape and visual effects. And just to note that our fifth panel member, Mr. Corsi, is not present this afternoon as she will be preparing for tomorrow's hearings and watching the live stream soon.

00:00:34:06 - 00:01:00:17

So this agenda item will principally concern seascape effects and the related effects on designated landscapes. And I will be asking questions related to the effects of the development on the special qualities, character and purpose for designation on designated landscapes. Effects on visual amenity and questions related to the seascape landscape and visual impact assessments. Methodology and other matters on submissions received so far.

00:01:03:04 - 00:01:16:06

I will first ask a number of questions to Natural Resources Wales concerning the written submissions provided that deadline one and three. And I will also ensure, obviously, that the applicant has an opportunity to comment at relevant moments.

00:01:20:19 - 00:01:28:07

So with this in mind, I would now like to come to Natural Resources Wales and ask you some questions about your submission.

00:01:29:26 - 00:01:44:02

So I appreciate that these do provide for your written submissions have provided a detailed picture of your views about seascape. Um, and detailed comments have been provided by the applicant on these. So my questions are aimed at further understanding each position.

00:01:46:08 - 00:02:16:13

So to begin the Natural Resources Wales. Can I ask if you can expand upon the concerns that you raised in your deadline? One written submission, which just for reference is 056. And more specifically, the effects of the development on the special qualities and characteristics of the Isle of Anglesey at the Isle of Anglesey Area of Outstanding Natural Beauty, which you raise, with these characteristics being expansive views and peace and tranquillity.

00:02:17:20 - 00:02:23:14

Could you explain how you believe the development may harm those special qualities and characteristics, please?

00:02:27:24 - 00:03:16:22

For now. Good afternoon. Uh, John Jeffcoat here for NRW. So I'm a chartered landscape architect and senior landscape advisor and RW um, so I think it's it's useful to just provide a little bit of context as to how we've reached our judgements before. Uh, before I go into those and expand on them, uh, just by way of context. Uh, so I think so I think one of the key differences, really between the applicant's assessment and our own assessment with certainly with regards to the other angles and the impacts on special qualities, uh, concerns are respective positions on how noticeable and impactful the turbines would be at locations within that AoNB or national landscape as it's now known.

00:03:18:00 - 00:03:53:26

So it's important to confirm our assessment is based on the facts of the application before you and before us, but is also supported by various evidence studies. Uh, there are a great number of which we've referenced throughout our written reps. Uh, but these studies have informed our understanding of various matters, including how noticeable and impactful uh, the turbines are expected to be. So one of the key evidence studies that's informed our understanding of the likely impacts is the evidence reports on seascape and visual sensitivity to offshore wind farms.

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So you have seen this unhelpfully, but we're probably guilty of doing the same thing. It's been referred to by a number of different names, but most commonly I think it's known by the why reports it. It would be helpful to me if you could signal if you know what I'm talking about when I talk about the white reports, or else I could go into a bit more detail as to what what they exactly are. Mhm.

00:04:19:21 - 00:04:26:21

Yeah. I'm familiar with the reference really, um, that they've been referred to through the, the application documents. Yeah.

00:04:27:12 - 00:04:51:15

Uh, sorry to interrupt. Lasdun on behalf of the applicant, there are actually two white reports. There's a 2019 report and the 2020 report. And I think it would be helpful. I think I know the one Mr. Jeff is referring to, but I think there's a white 2019, which I think was the sensitivity report, and there's a white 2020, which is referred to in the national policy statements. And as I understand it, they are different things.

00:04:53:11 - 00:04:54:23

So, Mr. Jeff Cobb.

00:04:55:09 - 00:05:07:06

So the white reports we're referring to are the three white reports that were commissioned by R.W.. So those are the reports that are available publicly on our website.

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I can give you the.

00:05:13:10 - 00:05:16:18

Full, full name. The 2019 report.

00:05:18:21 - 00:05:23:25

Thank you. Um, so they are the 2019 reports, as you say, those three reports. Is that correct?

00:05:25:00 - 00:05:47:17

That's correct. Yes. I think they may have slightly different dates. Uh, I can be. I'll just check and confirm for certain with you. So the first report, the just to avoid any doubt, the first report is called. So there. So it's the stage one ready reckoner of visual effects related to turbine size.

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The second report is.

00:06:00:12 - 00:06:01:12

Yeah, it is a.

00:06:01:14 - 00:06:11:07

Slightly different date. It's 2019, but it's a different month. First was March, the second is May. This second report is the stage two guidance on citing offshore wind farms.

00:06:17:02 - 00:06:24:23

And the third report stage three seascape and visual sensitivity assessment for offshore wind farms.

00:06:40:25 - 00:06:47:06

So those reports that you're referring to then yes. Yeah okay. Thank you. Yeah. Carry on.

00:06:47:29 - 00:07:22:02

So the these are independent reports they were commissioned by NRW. Um, as the name suggests, undertaken by white consultants uh with the consultants involved. But the digest of evidence related to past cases for UK offshore wind turbines in larger eyes, different heights, different distances away. And I think I just want to reinforce this evidence was prepared specifically and commissioned specifically by RW to address the issues that you're grappling with for this type of application.

00:07:22:24 - 00:07:55:15

So I think, you know, if you want further information on that, I'm happy to to answer questions on it. But there's, you know, our, our, um, conclusions on the findings of those reports are set out in our written representations, uh, on page 89. So our reps are rep 1056. But there's going back to what I said around. evidence based studies informing our understanding of various matters and how notable and impactful these turbines would be.

00:07:55:17 - 00:08:26:00

There are some key conclusions from those reports that I think are worth bearing in mind as we go through the session. Um, and those are that based on the work that was undertaken for those reports, particularly the stage one report, that turbines between 300 and 350m in height typically have a low

magnitude of effects, resulting in a moderate and potentially significant effect on high sensitivity receptors up to, on average, a distance of 44km.

00:08:26:25 - 00:09:06:08

Second key point turbines between that same height, so that's 300 to 350m in height, typically have a medium magnitude of effect, resulting in a moderate to major and therefore significant effects on high sensitivity receptors. Up to on average distance of 33km, it's important to stress these distances are only a guide, and they don't fully represent the greater impacts of taller schemes. So obviously that's to be looked at schemes up to three 50m. But we're now into a new realm of turbine height, which is three six, four is the height of the blade tip height, sorry, of um, of the mono array.

00:09:07:14 - 00:09:23:19

They also don't provide an upper limit for these effects. So those effects and those distances are an average. But they do illustrate. And I do think it's helpful that they illustrate the distances where significant effects are, as shown by evidence expected to occur or expected to have the potential to occur.

00:09:25:26 - 00:09:57:29

So I think with that in mind, moving to your question around impacts on the national landscape, just for reference, for any interested parties that are listening as well, it's paragraph 402 onwards in our written representation. So again, rap 1056. So that's where we've gone into detail in terms of the different effects, uh, it's worth highlighting, I think at this point that the statutory purpose of that national landscape designation is to conserve and enhance that area's natural beauty.

00:09:58:01 - 00:10:34:18

Natural beauty of that AoNB or national landscape is described in the management plan describes how the designation relates fundamentally to the coast. That management plan outlines headline qualities such as expansive views and seascapes, which is one of the points you picked up on Peace and Tranquility, which is the other one. But there are other relevant qualities as well that are mentioned, which are islands, and it shines a spotlight on public rights of ways as well, which includes the promoted routes of the Isle of Anglesey Coast Path, which, as the name suggests, hugs the coastline of Anglesey.

00:10:35:20 - 00:10:51:01

So sea views are integral to the character and experience of those qualities, and those which are currently empty or unimpeded by developments are of particular importance to the scenic and perceptual qualities derived from the experience of this undeveloped coast or the undeveloped parts of the coast.

00:10:53:04 - 00:11:27:20

The character of Angus's coastline, but not its value, varies across the designation, and this is to be expected. Those variations are described in various evidence based documents in a lot more detail than the management plan describes them. Um, so you have published studies which include the Isle of Anglesey Landscape Assessment. You have the Isle of Anglesey seascape character assessment, and you also, of course, have, uh, land map as well. So touching on one of those, uh, the, the Isle of Anglesey seascape assessments.

00:11:27:22 - 00:11:41:23

That's the 2013 assessment prepared by a Five Associates. Uh, I'm not sure whether you've seen that, sir, but but that's that's the name of it. Um, and we're very happy to provide a copy. Okay.

00:11:43:09 - 00:12:31:28

Uh, so this study, uh, in essence, describes those particular qualities in more detail than the headline qualities in the management plan. So it describes both characteristics and qualities of that landscape, uh, and the impacts on those, again, pages 97 to 99 of our written reps. Um, but I think it's probably just worth giving you a, uh, one example from that work that we've done, uh, from our review, uh, which would be seascape character area eight. Uh, and when you look at the description that's contained in that seascape character area assessment, it talks about and highlights valued aspects, uh, including open view keywords to the north, wild qualities of the rocky coast and seascape.

00:12:32:06 - 00:13:07:24

And it shines a light on the sense of remoteness and wildness, particularly in areas of coastal heath. And I think those qualities, those valued aspects are very easy to recognize when you're visiting locations within the seascape character. Create an example of which would be viewpoint to plan fly on ahead, which is located approximately 33km from the Moana Array. So going back to that distance that's approximating the distance where there is an anticipation of a medium magnitude of impact.

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Uh, as per the white reports. And I think if you if you were to bring up and perhaps the, perhaps the, um, the, the person who is at the helm in terms of bringing up documents, uh, from the documents library or to bring up, uh, reference AP 106 figures, 2.1 to 2.2.

00:13:34:24 - 00:13:40:16

I think it's helpful just to have a look at that viewpoint that I was referring to within seascape character area eight.

00:14:23:29 - 00:14:27:19

Cites figure A figure 2.1 I think is the.

00:14:29:23 - 00:14:33:28

The baseline photograph is that one.

00:14:47:04 - 00:15:33:06

So if you remember, we've got that evidence base before us. Uh, not just the wire reports, but also the description of what's important about this landscape. You know, again, that's an independent study. Fiona. Five associates describing seascape character area eight as an example, highlighting these valued aspects. Open views towards the north, these wild qualities of rocky coast and seascape, sense of remoteness and wildness, particularly in areas of coastal heath. And I think when you look at this photograph, you recognize that actually this is taken from an area of coastal heath and in this area and the adjoining sections of the coast path, which I believe you can see in on the right hand side of that photograph, I can't see it on my screen, but we get to get a sense of it there.

00:15:33:15 - 00:15:59:10

Obviously you get a much better sense in person, on site. But from my own experience of walking that coast path and being at this location with these photos montages, it was striking that sense of wildness, remoteness and tranquility, and those qualities in particular are derived in part, at least, from the emptiness of that seascape setting.

00:16:01:03 - 00:16:08:10

So if you go to the next, uh, image, which is the photo montage, I think beyond the white lines, I think it's.

00:16:15:16 - 00:16:16:09

I think that's it.

00:16:21:16 - 00:16:51:28

So within that setting, um, the array, the Mona array is going to appear isolated. And I think the consequences of introducing, uh, the scale of turbines that we're talking about and also into that, uh, otherwise empty and open skyline is that the eye will be drawn to it. And I think whenever you, whenever you introduce something onto an otherwise undeveloped horizon, particularly a vertical structure, the eye is drawn to it.

00:16:52:00 - 00:17:22:01

And I think if you think of a simple analogy, um, of another sort of flat, flat, empty plane with a flat, empty horizon, you know, a desert landscape might spring to mind. And if you were to think of perhaps a tree, a single tree being within that desert, it's quite. Yeah. Your eye will be drawn to it. Your eye is drawn to the to the the disturbance to the otherwise consistent, uh, form or or pattern of that landscape, which is very much an empty horizon at the moment.

00:17:23:11 - 00:18:05:13

Um, so fundamentally development is located at such a distance. Distance is the point that we talked around around the 33km and the scale in terms of that vertical height and also the diameter of the the blades. And their quantity means that they're going to within that view, as well as other views, occupy significant vertical and horizontal field of view. And therefore they will be obvious structures. And that blade rotation will also attract attention. And I think it's helpful just to point out that, you know, for context, in terms of the scale of these turbines, because it's very easy to just, you know, jot out a number, you know, you know, 30km.

00:18:05:15 - 00:18:39:05

Well, what does that mean? You know, 364m. Well, what does that mean? You know, it's very easy to just jot out a number without thinking about what that how big that actually is, putting it into scale. And the shard building is often used as a comparison because that's the tallest building in the UK, and that's 310m tall. So obviously we're talking about turbines bigger again, 54m taller than that. But it's useful to also think that the, the, the blades themselves are 320m in width, so that diameter is 320m.

00:18:39:07 - 00:19:19:00

So the blades are the blades are wider than the shard building is tall. Uh, and, you know, I've looked at one viewpoint here and talked you through it. Uh, but it is really important to stress that these impacts

and the types of impacts I'm talking about here are not limited exclusively to 1 or 2 isolated viewpoints or indeed one character area within the Isle of Anglesey national landscape. Uh, you only need to look at the zone of theoretical visibility analysis. Reference figure a point for app zero 60 to understand that the geographical extent of impacts along the Anglesey coastline is expected to be large.

00:19:20:00 - 00:19:38:22

Uh, you'll see from that Z TV. So again, that's the zone of theoretical visibility analysis. It shows visibility across a large geographical area. And that's also evident in the in the sheer number of, uh, viewpoints that you have in the CIA and their distribution virtually along the entirety of the north coast of the Isle of Anglesey.

00:19:39:25 - 00:20:14:03

So, uh, can I just interrupt you? Can I interrupt you? If you can? Yes. Yeah. Thank you. Um, so if I can just, um, sort of recap a little bit. Um, that's very helpful. Thank you. Um, so essentially what you're doing here, and this is, this is, from my understanding, to, um, is this, um, visualisation would show, you know, an example of what you typically consider to be, um, you know, an aspect of the special qualities and characteristics. And then you were saying that, you know, the fact that the turbines would kind of draw your eye to them.

00:20:14:05 - 00:20:23:12

That's sort of one of those, if you like, that sort of an element of harm that's, um, you presented or, you know, affected against those characteristics. Would that be fair to say?

00:20:23:21 - 00:21:04:02

Absolutely. That's that's spot on. So it's it's it's harming an aspect of the landscape that is, that is fundamentally linked to the quality. So the absence of manmade structures in that view, in that particular direction, is a key contributor to the sense of tranquility, a sense of wildness. There are other contributors, uh, you know, you do feel very exposed to that location, but that is, for example, a place if you were trying to find a sense of tranquility and remoteness and escape modern life, as it were, for a break in, in nature, which is, you know, arguably the fundamental purpose of an AoNB.

00:21:04:04 - 00:21:27:27

This is about natural beauty, uh, you know, very valuable resource for people to escape and appreciate natural beauty within that setting, the introduction of such a large scale and noticeable. And this is the key thing, it's about to be noticeable, uh, within that setting would undermine it. It would undermine those natural qualities. It would undermine the special qualities of of tranquility in that sense of remoteness.

00:21:29:10 - 00:21:31:02

Okay. Um, and I think.

00:21:31:04 - 00:21:53:19

It's important to stress. It's not it's not the it's not the height. It's not the height in isolation. That's that's a concern to us. Or is the reason for the impact. It's it's well, partly the horizontal field of view. So the

number but it's, but it is fundamentally the proximity. It is this proximity to the, to the coast. That's that's an issue.

00:21:57:10 - 00:22:13:22

Thank you. Um, you mentioned um briefly as well earlier there. Um, the seascape character assessment, I think it was in completed in 2013. Is that something that you'd be able to, um, submit into the to the examining authority, please? Absolutely.

00:22:13:24 - 00:22:14:09

Yes.

00:22:14:11 - 00:22:19:29

Yeah. Okay. Would you be able to do that for that nine four, please. Yes. Okay. Thank you. That's fine.

00:22:25:29 - 00:22:29:09

I don't think there was any more points I wanted to make on that. So? So.

00:22:29:27 - 00:22:35:17

Okay. Thank you. I think I will come to I think obviously you've described there sort of, um,

00:22:37:13 - 00:23:08:28

broad elements of the, the seascape assessment and how it's undertaken and referred back to the character areas. Um, you've shown the viewpoints there as well. I think I'm going to come to a few questions about those sort of elements of the assessments individually, individually as well. Um, I did want to ask you is, well, I'm trying to understand, um, in essence, why you believe that, um, you know, some of the effects are under-reported and obviously explained that, but I'm just trying to get behind in a little bit of detail.

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Um, so you have also referred to, um, the magnitude and significance of effects to those qualities, to those qualities. Um, and I'd just like to confirm that I think obviously in the assessments They are assessed as minor to moderate and for designated landscapes on either. Anglesey. Um, I would like to confirm that you believe that those would be greater than minor to moderate effect and therefore significant.

00:23:38:07 - 00:23:54:04

I can confirm that, yes. Uh, we think there would be great greater than that. So we think a range between moderate and moderate major adverse depending on the specific, uh, area. But we most importantly consider that they would be significant those effects.

00:23:55:03 - 00:24:25:00

And in terms of the components of how those effects are assessed or if you like, through the, um, the assessment itself, is it more the the sensitivity of those qualities has been underestimated. Also, the sensitivity of the quality is related to the um, designated landscapes, their special character, um, special characteristics. Sorry. Is it more the sensitivity of those being underestimated, or is it the fact that the magnitude of the effects has been underestimated. Or is it both?

00:24:26:18 - 00:25:01:03

Uh. It's both. It's both. Uh, there's a number of issues with the methodology that have resulted in effects being underestimated consistently throughout the SLV. I mean, I'm happy to run through them now in detail if you would like, but, uh, a very easy, straightforward example of that would be the assessment of special qualities of the A and B. The applicant has decided that they are not of the highest landscape value. They are high rather than very high, which I find to be extraordinary given this is a national landscape.

00:25:01:05 - 00:25:32:22

You know, this is the best we have. Uh, it is universally accepted, except apart from on behalf of the applicant, that whenever you're talking about a national landscape or a national park and you're talking about the special qualities, these ought to be treated as having the highest value and the highest sensitivity within in any Elvia or Salvia. So there's a, there's a, there's a fundamental issue there. And that's, that's found throughout the assessment on uh, the Isle of Anglesey and also Italy National Park.

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Okay. That's clear. Thank you. Um.

00:25:40:22 - 00:26:13:18

I mean, I could I could give you another another example, actually, just just because we were on the we were on viewpoint two, uh, a moment ago. And, you know, that's another example of where the severe has, has reached a conclusion saying that the views and visual amenity at that location are high value rather than their category of very high, which is the highest category they have. But at that location you're on, uh, not only a locally, you're on a nationally promoted route.

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So it's the Isle of Anglesey Coast Path and the Wales Coast Path. You're in an area of open access land you're on. Uh uh, a scheduled monument. You're within an area of Heritage Coast. So by definition, for those, um, lay people that are on the core stretches of undeveloped, uh, uh, sorry, stretches of outstanding, unspoilt coastline which are set up to protect coastlines from insensitive developments and to encourage and help the public to enjoy, understand and appreciate these areas.

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It's also within, obviously, the area of Outstanding Natural Beauty, national Landscape, and that current view is even described in the SLV as an attractive seascape, which is wild and natural and character. So these are all indicators of a receptor that needs to be treated as having the highest value and the highest sensitivity, but it is not in the SLV.

00:27:09:01 - 00:27:48:10

Okay. That's clear. Thank you. And just sticking with the special characteristics and qualities, um, just to come slightly to a slightly different, um, element of those. Um, you have mentioned also in your written submission that dark skies within the Isle of Anglesey contributes to the special quality and peace of tranquillity. Um, and just for my clarity, a couple of questions here. One is the Isle of

Anglesey, a dark sky reserve? Um, and if so, would it therefore need to be considered as a particular receptor or an individual receptor, say, in the study of any nighttime effects on the on the landscape?

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I think the Isle of Anglesey is seeking dark sky reserve status. Very happy to be corrected by anyone else on the call. I think it's seeking dark sky status, and there may be a dark sky site off the coast of either Anglesey but itself as of yet it is not a designated reserve, whereas a really national park is. That's an international dark skies reserve, but it is very much set out in the management plan that that is their ambition to get that status.

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Okay. Thank you. Um, and before we move on, obviously ill and may come back to some of the themes that you mentioned here. I'd just like to, um, provide the applicant with the opportunity just to respond to anything that they would like to please. Thank you.

00:28:42:15 - 00:29:17:06

Let's dawn, on behalf of the applicant, um, and thank you to Mr. Jeffries for taking us through that. Um, it was very useful. Um, I think it is important, um, when looking at, um, impacts on, uh, designated landscapes and protected landscapes. Um, to put those things into context in terms of, um, looking at, um, not just, um, well, looking at the policy tests that apply and also looking at, um, the overall element of that designated landscape.

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Um, in terms of the national policy statement position, we have talked about that, um, this morning, um, National Policy statement in one paragraphs, 5.1.5, talk about virtually all nationally significant energy infrastructure projects having adverse effects on the landscape. I know we've rehearsed some of these before, but I think it is important, um, to put those into context. Ten .5. 10.6 then talks about, um, projects needing to be designed carefully, taking account of the impact on the landscape.

00:29:53:00 - 00:30:27:04

Uh five point uh 10.8 uh, the duty, um, to have regard to the purposes of designation, um, being, uh, not only in relation to, um, projects within those landscapes, but outside. And that's clearly why we're considering those. So it is important, um. five point 10.15 also talks about coastal areas being particularly vulnerable to visual intrusion, and that's clearly why we're focusing on these areas in terms of the opportunities for mitigation.

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Um, five point 10.26 of N1, uh, says reducing the scale of a project can help to mitigate the visual and landscape effects. But it does also say, however, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in significant operational constraint and reduction in function, for example, electricity, uh, generation output. And then it does say there may be exceptional circumstances where mitigation could have a very significant benefit and warrant a small reduction in function.

00:31:02:16 - 00:31:40:29

In those circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape effects outweigh the marginal loss of function, And we will come on to some, um, some submissions around what actually reducing. I think it's been interesting to hear, um, uh, the position from Natural Resources Wales. Um, now, now, because I think up to date in their submissions, there's been very much a focus on. Turbine height, particularly in the context of the white reports which do set those very, um, uh, sort of rigid, specific, um, uh, heights in terms of heights and distances.

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Um, obviously that report produced, um, in 2019, five years ago in Turbine Heights, as we all know, have increased, um, quite significantly since that time. Uh, so, so it's interesting, it's helpful to understand that, that it seems that Natural Resources Wales position is not just around height but also spread, which I think we haven't we haven't really seen in those submissions before. Um, so the I think the key, the key points around, um, around that are that within within that policy context of understanding, um, and also within the national policy statements that there is a, a, a, a policy requirement really to maximise the energy yield from projects.

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It's about making sure that you, you are using sites efficiently whilst also mitigating the effects. That's an important consideration and trying to find that right balance. Um, in terms of the, the um, the location of this project and um, and the, um, the area of Outstanding Natural beauty, it is right that, that we're focusing on those, um, those locations where there are views of the turbines, but we mustn't forget that the angle can be covers the whole of the island of Anglesey.

00:33:00:16 - 00:33:33:09

So what you can see from this northern section, the turbines will be visible from the northern section of the Anglesey coast. But the Anglesey coast AoNB actually runs around the whole of the coast of Anglesey. Um, and it's therefore where you're looking at impacts on special qualities as a result of this scheme. It is over a, a smaller area, um, than over the whole of, of, of the island. And I don't think anybody is arguing that, um, that there will be visibility of the scheme across the whole of the island of Anglesey.

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It's also worth putting into context that that there has been focus on two of the special qualities. There are 14 special qualities that apply to the Isle of Anglesey. Onb. Um and whilst Mr. Jeffreys has raised the public rights of way, so I can't remember what the other one was. Um, it's, it's very much the focus on those two, on peace and tranquility. Um, and on, uh, on, uh, unaffected views. So when we look at these, it is absolutely right that we're focusing on this.

00:34:06:00 - 00:34:21:10

It's right that we're focusing on no significant impacts, but it is also really important that those things are put into context. Um, I think Mr. Carter was going to talk a bit about actually the the issues around scale and siting in terms of that mitigation piece.

00:34:23:17 - 00:34:57:12

Paul Carter, on behalf of the applicant. I just wanted to set some context for how the site was derived and how we've arrived at the boundary site location in the application. Um, so the site selection and

alternatives chapter, which is I think it's as 016 is the latest version, um, does set out the evolution of the offshore array area. Um, what is noticeable from the figures that you can see in that chapter? And I won't go through them, um, and bring them up on the screen.

00:34:57:14 - 00:35:47:21

But what you will, what you will see is that the site started off at the agreement for lease stage, i.e. the site that was identified through the round for Process with the Crown Estate, um, larger than what we have come to application with. Um, and with additional space to the east and to the north, i.e. further away from the Isle of Anglesey. Um, national landscape than in the final application. Um, if you then look at the difference between what we had in our per in our preliminary environmental information and consulted on its section 42 and our application, again, the areas that have reduced between now and, uh or sorry, between section 42 consultation in here and now, our area is predominantly to the north and to the east.

00:35:47:23 - 00:36:30:08

And this is primarily driven by a number of other constraints in the area, and principally shipping and navigation and cumulative shipping and navigation impacts. I don't want to go into those in any detail, because I know we're going to discuss those next week, but in those discussions, I'm sure we will look at what changes have been made to the site boundary with respect to ensuring adequate sea room between this project and other projects that are being proposed in the round four development area, such as Morecambe Offshore Wind and Morgan Offshore Wind, and ensuring that there's adequate sea room to allow for safety of navigation, which is obviously a key concern in the sighting of windfarms.

00:36:30:15 - 00:37:11:04

So part of our site selection for the final project that we've brought forward, as well as a whole host of other aspects that feed into the siting offshore wind farm in terms of wind, wind availability, in terms of water depth, in terms of ground conditions, in terms of other constraints on the seabed, other sea users and activities. Um, uh, we have taken all those into account and concluded that the appropriate place to place the application site and boundary is where we have, and that there is not opportunity to push the site further away, to the north or to the east from the Isle of Anglesey.

00:37:11:14 - 00:37:58:09

Um National landscape or coast, with the exception of coming further west, which would of course extend the views, uh, in a lateral sense from from the Isle of Anglesey. And key viewpoints would also push the site into deeper water. So, um, effectively, whilst we have to balance an awful lot of different constraints in coming up with the final site, we don't see that there's an alternative location for this project. The the round four um leasing area and described by the Crown Estate included areas all the way up to the Isle of Anglesey coastline and other parts of coastlines, and it was for applicants to determine the appropriate place in those.

00:37:58:11 - 00:38:13:09

As far as we are concerned, we have located this as far as we realistically can from the Isle of Anglesey national landscape, whilst taking into account all of the other constraints that I've just listed. Um, sorry.

00:38:14:25 - 00:38:38:00

Uh. Thank you. Just a couple of questions in on what you've said there. Um, related to the obviously the characteristics of Anglesey and the site layout. So on the site layout, is it therefore fair to say that you wouldn't see there being an alternative, um, where, you know, um, the, the viability or the production of the site would be affected?

00:38:40:07 - 00:39:10:18

Uh, Paul Carter, on behalf of the applicant. Um, so in, in the in the final design of the array and the final siting and layout of turbines, we are going to have to take a number of constraints into account. Um, we again next week will come on to discuss the scale of mitigation zone that's been proposed in which we can't site infrastructure within. that takes out some of the area within the boundary. There are other constraints around layout of turbines in relation to existing um telecoms cables. Um, there is no archaeology.

00:39:10:20 - 00:39:59:03

There is of course unknown archaeology from any pre-construction surveys we do. So there are already a lot of constraints that will limit where we can place turbines. And we also have our principles of, of um, layout in terms of our separation distance between turbines so that we can't increase the density to any great degree. And our view is that, um, certainly based against the, um, the thresholds in the white reports in terms of distance from the Isle of Anglesey coast, that to adhere to those in a way that, um, if those thresholds were to be read straight without the sort of additional assessment on top, um, the site would be rendered unusable, certainly for a 1500 megawatt project, but a considerably smaller project would have to be brought forward.

00:39:59:05 - 00:40:29:08

So the NPS test about a small reduction in function to create a large, um, change or a significant change in impact is just not relevant here. There isn't a small change that can be made to this site that would have a threshold change in in impact, albeit we don't see this as significant impact. But if you take the white, um, thresholds as red, we don't see that there is an alternative design here that would tip that threshold without a very significant change in the nature of the project.

00:40:29:19 - 00:40:53:02

And in terms of the height of the turbines and then the distance, I think, as you've alluded to there. So those, you know, essentially those parameters which have an effect, as we've been hearing earlier on, on the landscape and seascape, um, aspects. Um, again, you don't see then there's any real, um, alternative other than what you've, um, proposed.

00:40:53:21 - 00:41:24:02

Uh, Paul Carter, on behalf of the applicant, Uh, no. And in fact, it will have been noted by the examining authority that at the, um, pier stage, we increased the tip heights of our maximum tip heights for our largest turbines. And that was with, um, from feedback from exchanges with our supply chain in terms of what the evolution of the turbine market is going to look like. So it may be worth setting a little bit of context.

00:41:24:04 - 00:42:01:06

We we as a developer who is procuring turbines for a project, we cannot just, um, either ask for a specific design ourselves or pick a turbine off the shelf. We really have to go and get, uh, sort of offers

from turbine manufacturers, of which there are not a huge number. And at any one time they will be producing 1 or 2 models of, of turbines rather than a whole back catalogue. We can't choose to to, to select a much smaller turbine. Um, as well as that, we need to consider, um, the efficiency of turbines and the overall efficiency of the project.

00:42:01:08 - 00:42:36:11

Certainly in terms of cost, it's, uh, it's part of our requirements is to obviously deliver an economic and efficient project. We have to reach a strike price with the government, which is a competitive auction. And one of the government's aims is to bring down overall cost of energy. And therefore, we need to look at efficient ways to bring forward a project so that we can compete efficiently there and and bring down cost of energy. And larger turbines do do achieve that. So what we would maybe draw attention to is that this is not an outlier in terms of the maximum tip height of of offshore wind farms that are being brought forward through development consent orders.

00:42:36:14 - 00:43:14:08

Um, I could point you to to other projects. North falls on the east coast, with a maximum height of 397m. Hornsea Four with a maximum height of 370m west of Orkney, with a maximum height of 359. Not an eco project, but a but a bit a relevant project. Sheringham and Dudgeon with a maximum height of 329. What you can see from that is that developers take a view, based on the conversations that they have with turbine suppliers, based on their expectations of how the market will move, and a risk profile of what risks they're willing to take in terms of a consent envelope that's deliverable.

00:43:14:17 - 00:43:34:21

Um, as to what the maximum tip height of turbines are. Therefore, we don't all or developers don't all coalesce around a single number, but you can see that they're all quite large and in a long, awful lot of cases, over 350m and certainly an awful lot of projects. And there are many more I could have listed there that are over 300m in terms of the maximum tip height.

00:43:35:15 - 00:44:11:20

Okay. Thank you for that. Um, yeah, that's quite clear. Um, I just come back as well to the points that we, we discussed earlier about the Isle of Anglesey, um, essentially how you sort of assessed the, the characteristics of the national landscape, um, or the area of outstanding natural beauty. You said that because obviously part. Can I can I clarify that your position in which. Because obviously part of the coastline. Um, the it's that the, um, Mona wouldn't be visible from that area and therefore that sort of played into your assessment of the sensitivity or if I misunderstood that.

00:44:11:22 - 00:44:12:07

Thank you.

00:44:12:22 - 00:44:52:04

It's done on behalf of the applicant. I will pass over to Mr. Ma, who did undertake the assessment, but that wasn't there wasn't the point I was trying to make. So we haven't done an assessment and looked at viewpoints, um, facing one way and said, actually, um, we've assessed the impact, um, based on the, on the viewpoints that have been considered. But when looking in the round at the effects on the Isle of Anglesey, OMB, in terms of the national landscape, which I think is something that that needs

to be done, it needs to be looked at in the round rather than based on, uh, on Own individual viewpoints or positions.

00:44:52:16 - 00:44:54:02

That was the point I was making.

00:44:54:08 - 00:44:54:29

Okay. Thank you.

00:44:59:00 - 00:45:01:22

Pronouns are Corinna demo for the applicant.

00:45:04:15 - 00:45:34:20

So we agreed the viewpoints with relevant statutory consultees. Um, and uh, we had suggestions and then we took some of the more viewpoints as well. And we expanded that because obviously our study area is different. Um, and we took within the um, n within the national, uh, nationally designated landscapes, we took our study area out to 60km rather than the 50.

00:45:35:12 - 00:45:50:22

Um, so we've looked at study, we've looked at viewpoints, and we looked at landscapes and special qualities within 60km, um, within those nationally designated landscapes, which is why we, uh, the result was that we had, um,

00:45:52:09 - 00:46:25:09

a significant amount of viewpoints and area to cover. So, um, so what we did with the, um, and, and it's worth noting that, um, throughout, throughout the nationally designated landscapes, the, um, the land map, visual and sensory evaluation varies. It varies from outstanding, which will be equivalent to our very high to, um, to lower than that.

00:46:25:11 - 00:47:05:17

But we're concentrating on the high and very high, um, and our W 2023, which is their sensitivity assessment. Their most recent sensitivity assessment actually allows for nationally designated landscapes to be high or very high. And that's set out in their definitions, which accords with our, um, characterization, our evaluation, and our definitions as well. So we can have, um, internationally and nationally designation, uh, designated landscapes as very high, and we can have nationally designated landscapes as high.

00:47:06:02 - 00:47:36:04

So I think it's worth just, um, recognizing that fact that that is sort of, um, within NLP guidance itself on sensitivity. So when we looked at, um, the different values. So, so the other report, which actually supersedes um, white nine 2019 is the 2020, which is in NPS, M-1 2.8.

00:47:36:06 - 00:48:09:26

208I believe. Um, and um, so this this document was an update of the buffer study done by white, 2019. And this document is um, obviously, um, written into the MPs now. So this is the one, um, that

we look at. And it's worth noting as well. Um, with respect to the Wales Coast Path, that actually paragraph 4.47 of that document actually says that the value of the Wales Coast Path varies.

00:48:09:28 - 00:48:44:14

It specifically addresses that it varies and the people walking the path there, um, sensitivity is likely to vary with the landscape that they are walking through. So so that's the sort of approach we took. Um, we took a, if you like, a look at the land map. We took their overall evaluation. And so our sensitivity does vary within the nationally designated landscapes. There's some areas that um, meet the criteria of nr w um for very high.

00:48:44:16 - 00:48:49:25

And so these are sort of areas where they're saying that, um.

00:48:52:24 - 00:49:23:11

Uh, that uh, sorry. So where the, where the actual value is, is maybe an iconic image or something like that. So we, um, for example, in the Snowden, the airy massif, we are actually we actually find them to be very high. So, so the Carnegie, um, mountains are actually very high, whereas some sort of areas of lower lying land are not.

00:49:23:16 - 00:49:36:06

So, so, so we've allowed that variation based on evidence base of land map valuation. So that's how we approached it. Um, now the um,

00:49:37:29 - 00:50:20:18

and, and actually in the latest Isle of Anglesey management plan, Um. Annex three. Objective one. CC 1.1. It says land map is used as the process by which the landscape character of the A and B is valued and assessed. So it follows that, um, they concur with with, with. You have to look at the individual land map valuation and that's how you make the difference. And I think this is a lot of why we differ from NSW because, um, that we we've looked at the value individual areas and individual parts of the nationally designated landscapes, and that's how we've come to our conclusions.

00:50:20:20 - 00:50:52:18

I agree that magnitude is another area that we differ on, um, where to go with siting and design. So with um, siting, we have uh, or the Mona array is within the lowest category of sensitivity in in the sea. So it's a low to medium category. Um, we can't get any lower in the Welsh territorial waters that that is it.

00:50:53:11 - 00:51:12:00

Um, in terms of design, um, we are called with all the, um, the design principles that have been brought forward in white, but started off in DTI 2005, um, which.

00:51:14:09 - 00:51:45:07

Uh, so the turbines will not be located within designated seascapes and landscapes. The turbines are located within a medium to low zone. The turbines, um, are not in the close or middle distance. And I think this is important to note what the seascape character zones are called sensitivity zones. So we are in seascape sensitivity zone two and five. So two is offshore and five is outer offshore.

00:51:46:03 - 00:51:57:16

Um, we are not in inshore waters and we are not in coastal waters, and we are not in any of the territorial waters called bays. So.

00:52:00:14 - 00:52:36:18

They so what we're saying is we we're out to sea as far as far out to sea as, as we can go with this size of project. Um, we are not seeing, um, between, you know, inner Bay and or an imbalance. Uh, seascape we are seeing beyond that. We are not, um, we are not seeing, um, at a focal point, which is where the coast, a focal point, um, is where the sort of coast meets the sea, basically.

00:52:36:20 - 00:52:58:17

So we're not seen in that context. Um, so we meet all of these criterias also, we are sort of from uh, many points we are seen end on, if you like, our widest, the widest bit of the Mona array is actually going away from the North Wales coast. Um.

00:53:02:19 - 00:53:04:19

Okay, okay.

00:53:08:12 - 00:53:35:01

Okay. Was there anything further you were going to add that? Um, I have a couple of questions anyway, so I'll just jump in. Um, I just want one question. So you I think back along you mentioned you talked about the sensitivity. Um, and if I, if I understood right, you were saying that it would be a very high receptor would be either an internationally designated landscape. Is that right? Would it be internationally or nationally?

00:53:36:02 - 00:53:52:24

It could be nationally. Um, so both NSW 2023 and our own definition actually allows for a nationally designated landscape to be a very high, um, value. And, um, and that's what we found in some cases.

00:53:54:27 - 00:54:12:23

So thank you. And would you be able to briefly describe, I think, where we were discussing about the siting, um, you know, how how you would apply the mitigation hierarchy? Um, I think that's where it comes in, if I understood correctly.

00:54:16:07 - 00:54:24:04

Coroner demo for the applicant. I think, um, Mr. Carter has explained the difficulty of where we are. We are?

00:54:27:28 - 00:54:49:08

Yeah. Yes. That's right. So? So exactly. So, I mean, actually, um, we that we cannot get any lower and seascape sensitivity. We we are in seascape sensitivity two and five which have the lowest sensitivity of all the territorial waters.

00:54:50:24 - 00:55:06:20

So it's that combination of being in the lowest sensitivity area. And then, as Mr. Carter has described, the elements of these in siting the envelope of the turbines, that sort of is sort of the, the application of that of such as such if I'm, if I'm correct.

00:55:09:08 - 00:55:11:01

Forecaster. On behalf of the applicant. Yes that's correct.

00:55:12:00 - 00:55:12:23

Thank thank you.

00:55:15:13 - 00:55:22:03

Um, could I ask Mr. Jeffcoat, do you have any comments or would you like to add anything to comment on anything we've just heard there?

00:55:23:05 - 00:55:57:08

I would yeah, I've done my best to make some notes because I really don't recognize a lot of what was what was said there and disagree with quite a lot of this, actually. Uh. I'll try and focus on the key points. Um, which would be going back. It's starting off with going back to, uh, the point around horizontal field of view. Our reps do mention this at a number of, uh, instances. I think there's an example that, uh, page, uh, 99 uh, in rep 1056.

00:55:58:21 - 00:56:05:27

Uh, it's not a, it's not a new point that we're raising. We've raised that throughout in terms of the, of the array.

00:56:07:12 - 00:56:39:24

Uh, there was a comment around the whales coast path varying in value or quality, which I think is just obvious, self-evident. I mean, clearly the whales coast path goes all around the coastline of whales. Uh, so I live in Pembrokeshire and you obviously have sections, uh, that combined with the Pembrokeshire Coast Path and it very much does vary. So you have the sections that go outside of the national park, uh, through Milford Haven, which isn't the prettiest, prettiest part of the Coast Path.

00:56:40:06 - 00:57:14:19

Uh, but that's outside of the national park. Those bits that are inside the national park, uh, typically, uh, demonstrate one or more of the qualities which that area is designated. And that would be why the area is designated. Uh, and I think coming to that point as well, around trying to quantify how many qualities are harmed or trying to quantify the overall area of the designation that's harmed in such a way is to support or justify the harm that is before us is completely inappropriate.

00:57:14:21 - 00:57:50:20

There's no policy test for that approach whatsoever. There's no policy that says, well, only, you know, if you're only harming one quality or two qualities, it's fine. Or if you're only harming half of the OMB, it's fine. And that's because, frankly, there isn't such a development. It's it's very difficult to conceive a development that would have an impact on all of the Isle of Anglesey, OMB, or all of the special qualities of the A and B, because those qualities are so varied and you can apply that principle

to all of the designated landscapes, try and picture yourself in a development that's going to have an impact on all of the rural national park.

00:57:50:22 - 00:58:28:18

It's it's inconceivable. So the point that point is irrelevant. And when one does actually look at there's ITV for this. It isn't a small area. It's it's the entire northern coastline of Anglesey that is a significantly large area. This isn't this isn't a small part of the A and B, so that that that needs that context needs to be understood. I, I would put it um, there was a point around, uh, principles, you know, the design of this has been undertaken and is, uh, uh, achieving the good design principles.

00:58:28:20 - 00:58:59:27

I think it was in terms of the stage two report at the wire reports, and I would just refer you to our written reports on that paragraph 177 onwards and 178. Again, it's all well and good to go through all of the principles that it doesn't engage or trigger, but the fundamental principles that it does trigger are the second principle, which is saying that developments need to be located beyond the limit of negligible visual effects for the highest sensitivity National parks and AoNB, which are overlaid with heritage codes.

00:58:59:29 - 00:59:32:21

And this development fails. That test, fails this principle and you know, that was omitted from from the summary there, uh, the seascape sensitivity study that was referenced. Uh, I think it's really worth you having a look at that study. So it's the stage three report and the findings. The, uh, report concluded, I believe, off the top of my head, which I don't like to do, but I have that many documents in front of me. I think it was moderate minor in terms of the sensitivity of that area.

00:59:34:19 - 01:00:10:29

Other areas nearby and close to the Isle of Anglesey, uh, or further west of seascape sensitivity zone two were found to have a higher sensitivity. And if you look at the analysis that was undertaken of those different zones, it's glaringly obvious that the seascape sensitivity zone two made no mention of the Isle of Anglesey whatsoever. There was no mention of it in terms of the baseline or the sensitivities of relevance to that zone. And as a consequence of that, you have a lower you have a lower, uh, sensitivity, sensitivity judgment for that particular zone.

01:00:11:01 - 01:00:49:23

And that's underpinned by the fact that it's it's assumed in the study to all be being viewed from the north coast of Wales, where you'd see it in the context of the existing windfarm clusters. It's not been written or or considered in a way where it would be visible from the Isle of Anglesey, which of course this will will be, and those other sensitivity zones that have a higher, uh, sensitivity. The reason for that elevated sensitivity is, is is a lot in large part due to aspects of the Isle of Anglesey national landscape, and those same aspects would be triggered or harmed by development in seascape sensitivity zone two.

01:00:49:25 - 01:01:04:17

So I really don't think you can attribute much weight to that judgment, because I think it fundamentally Mrs. misses the sensitivity of the Isle of Anglesey. And I mean, I'll leave you to, to look at that report, and I'm very happy to send, send you a copy alongside. Yeah.

01:01:04:19 - 01:01:14:04

So I just interrupt and ask if you could do that for deadline four, please. And that's the seascape sensitivity zone. Stage three report. Is that is that right?

01:01:15:23 - 01:01:17:10

That's right. Yes. Yeah.

01:01:18:03 - 01:01:20:12

Thank you. We'll take that as an action. Carry on. Thank you.

01:01:21:22 - 01:01:59:28

Uh, in terms of there was a comment around different areas being looked at in terms of land map evaluation and how that's informed this variation in in the value of the landscape. Well, visual insensitivity, visual and sensory aspect of land map is only one aspect. The all of the aspects need to be considered together to understand or to indicate value. It isn't just one aspect alone, which is what the applicant was referring to. And when you look at the analysis that's actually before you in terms of the severe, it actually focuses in terms of the character of the Isle of Anglesey.

01:02:00:00 - 01:02:27:16

It actually focuses on the national landscape character area. So it's only looking at it through a very, very high lens. It doesn't look at it or provide any assessment of the impact on those more detailed qualities that come through in the local landscape, character assessment or the seascape character assessment. Those are referenced in the severe, but there's no consideration of their importance or the impact on their importance. And that's that's a really key omission.

01:02:29:06 - 01:03:00:27

Uh, there was a there was another comment around the seascape character, uh, the sensitivity assessment. And W believes, I think it was an assertion around NLP positions that we think national parks aren't necessarily a very high sensitivity. Uh, I think it would be useful just to, just to give us the paragraph reference to, to to what the applicant was referring to so that we can actually provide a response to that. Because I don't I don't recognise the point that's being made.

01:03:05:04 - 01:03:27:22

In a demo for the applicant. So that is the NSW guidance to cease, uh, to landscape sensitivity in Wales. And it's paragraph 5.5 and it's a bottom of that. Pay the page that it's on. I'm sorry, I can't remember the page number. And then if you flip over, it continues on the next page as well.

01:03:31:04 - 01:03:42:06

Where does it say the point? Uh, I would just put, um, to you, sir. Where does it say the point around, uh, national parks and A0 and B's being of lesser than very high value.

01:03:43:10 - 01:03:44:08

And which was the point.

01:03:44:10 - 01:03:45:04

That was made.

01:03:48:17 - 01:04:21:06

Demo for the applicant. It is within that definition that within that document. So it's 5.5. And the definition of very high includes, uh nationally designated landscapes. And the definition of a high includes, uh, nationally dead nationally important landscape designations as well. The difference, um, just reading it verbatim, is that it goes to very high if it occupies a prominent part parts of visible setting.

01:04:22:04 - 01:04:29:04

Sorry. A prominent part of the visible setting. And if it's high, it's just part of the visible setting.

01:04:32:15 - 01:04:44:06

Thank you. I'm perhaps for clarity. Would you be able to perhaps, um, submit the relevant extracts there into the examination of that guidance, too? And that would just help me. Thank you. Um, would you like to respond, Mr. Jeff Cockell?

01:04:47:15 - 01:05:21:00

That the point that was put was, uh, was that they are of very they are of high value. They're not necessarily very high value. And and as that says it can be, it can be either. But there needs to be a clear explanation as to why it's not in the cases where it where it has been deemed to have been less than the highest possible value. And the point that I was making earlier is with view point two, because that was the one that I had on hand. There are numerous indicators of very high value or the highest possible value.

01:05:21:06 - 01:05:39:03

But there isn't an explanation as to why that hasn't been reached. It just there isn't that narrative there. There isn't the explanation as to why is this not the highest possible value in there, Silvia? I think there is also a there is also a slightly different point on the way that very high has been used. But we may come to that later or I can come to it now if that's helpful.

01:05:40:00 - 01:05:40:23

Okay. Let's do it.

01:05:43:03 - 01:05:55:16

So I think, uh, this is, this is this is an issue with the methodology. So it's jumping slightly ahead on your, um, on your agenda. If that's okay, it's fine.

01:05:55:18 - 01:05:56:03

Just carry on.

01:05:57:06 - 01:06:21:13

So I think it's helpful if you, if you or I say you if, if whoever, uh, is in charge of the documents, if they're able to bring up, uh, page 30 in some volume six, annex 8.4 seascape, landscape and visual impact assessment methodology. App 104 is the reference.

01:07:06:06 - 01:07:12:23

List done on behalf the applicant. Could you repeat the page please? Sorry, we've slightly lost the lost we.

01:07:12:27 - 01:07:17:14

Certainly it's it's table 1.14 on page 30.

01:07:30:02 - 01:07:31:29

All right. It's very small on my screen.

01:07:34:15 - 01:08:16:22

Uh. Thank you. That's very that's very helpful. Uh, so, so so this, this very high row, uh, is what we've been talking about with regards to value and also the overall sensitivity of these different receptors. And the way it's been used, it's inclusion, I should say, uh, within this matrix. And just for context, this matrix is how or at least it guides how judgments, the two key judgments on of a fact magnitude of impact and sensitivity receptor, how they're typically combined to give you the product of the overall effect.

01:08:16:27 - 01:08:29:14

So you have magnitude of of impact or magnitude of changes. It's sometimes referred to along the top. And you have sensitivity of the receptor along the side. And with uh,

01:08:31:11 - 01:09:05:29

well, when you look at those, um, columns, you've, uh, five on the top and five on the side. But the issue is that the, the fifth one or on the top, the no change column is not actually necessary because that's the I mean, there's no need for a no change column. That is just that isn't the effect. That's that's if there's no change, there's no change. And you should see you should have two corresponding judgments for magnitude of impacts and sensitivity receptor. So that would be your negligible and negligible. So if you're starting at negligible negligible on the top you're going negligible small medium large.

01:09:06:01 - 01:09:47:28

But there's no very high or very large. Whereas on the side you've got negligible low Medium. High very high. So the whole table is is unbalanced. Effectively you've got five on the along the left hand side, but only for meaningful categories along the top. And the result of that is that there are only 18. Uh, well, there's 18 instances of uh, either a no change effect or an effect containing the phrase negligible or minor, which is not significant, but there's only one instance of a moderate effect and only three instances of a moderate major, uh, effect, which is a split category.

01:09:48:05 - 01:10:19:25

So if you if you remove that very high row, what you would do is you would move the judgments up and that would reflect, uh, best practice that would reflect common practice where you would have an even number of judgments on the top judgments along the side, providing a more balanced, uh, opportunity for the assessment to actually find significant effects. And I think I think rather than me trying to talk to it and explain it, it's better to just look at an example. Uh, and there's two places you can see an example of what I'm talking about.

01:10:20:05 - 01:10:51:11

Uh, the first is table six, and I'm not sure whether we've got a copy available to us. Uh, I'm very happy to share my screen, if that's even feasible. Uh, but it's the DTI report on the guidance on the assessment of the impact of offshore wind farms. And this is also reproduced, which may be more convenient. It's reproduced on page 25 of the white report. So that's, uh, uh, while stage one, I should say stage one white report.

01:10:54:24 - 01:11:00:20

Uh, I'm not sure whether anyone can signal to me whether we've got a copy of that we can bring up or whether I can share my screen on that.

01:11:02:09 - 01:11:04:09

Is that in the examination library?

01:11:05:28 - 01:11:11:06

I'm not, I don't think. Not to my knowledge, but someone may correct me.

01:11:12:12 - 01:11:29:00

Okay, if it's not in the examination library, it's not something that we can accept to be shown today because it would be classed as new evidence. But perhaps if you can just talk to us about that and then submit it as you are. Uh, the other documents that we've asked you to submit, if that's all right.

01:11:31:12 - 01:12:02:16

Absolutely. So it'll be page 25 of that report, and we've yes, we've already agreed will submit those deadline for. But it would be really useful for you to compare what you see on page 25 with what you have in the applicant's SVA methodology, because you'll see straight away that you have this even number of corresponding judgments. Uh, you've got, uh, very large to very small along the top, and you've got very high to very low along the side.

01:12:02:18 - 01:12:37:21

And what that gives you is, amongst other things, it gives you Five occurrences of where you can have a moderate effect, but overall it gives you 15 scenarios which could result in a significant or potentially significant effect, versus exactly 15 scenarios resulting in not significant effects or potentially not significant effects. In contrast, the severe methodology has seven, uh, significant or potentially significant scenarios versus 18 non-significant scenarios.

01:12:37:23 - 01:12:52:01

So it's more than twice the number. I mean, it's the whole the whole assessment is is skewed in effect by that inclusion of the very high and it's use as well to exclude what we say are the most highly sensitive landscapes.

01:12:54:25 - 01:13:03:08

That's the point I wish to make. I mean, I think I've gone through the the main points I noted down, but there may be others that we'll deal with in in written submissions.

01:13:03:25 - 01:13:09:09

Okay. Thank you, Mr. Jeff Cook. I'm with the applicant, sir. Would you like to respond to.

01:13:09:21 - 01:13:22:14

The points on behalf of the applicant? I think it's probably best if we reply to that one in writing. Um, given we haven't got the information in front of us to check, and, um, I think it probably merits a written response. Yes.

01:13:22:16 - 01:13:23:12

That's fine. Thank you.

01:13:54:28 - 01:14:01:10

I've just come to yourself. Um, Mr. Jeff Cook with a couple of questions. Um, I just want.

01:14:10:17 - 01:14:40:24

And these concerned the, um, the visual amenity and the landscape visualizations. Um, I think I know that you raised a number of concerns in your, um, written submission about the the quality of, um, some of these visualizations. And I'd just like to understand, um, if I can display some of these, perhaps you could just show me, walk me through, um, where your concerns are. So these would be the, um, just fine, uh, visualizations, viewpoints one and four.

01:14:40:26 - 01:14:47:19

So if we could display those, please. The seascape visualizations. Um, that's app 106.

01:15:01:05 - 01:15:10:14

Thank you. Thank you. Um. you mentioned a number of, um, concerns here. Would you be able to, um, just explain those to me, please? Sort of. Visually.

01:15:22:06 - 01:15:23:15

Um, sorry. Mr.. Sorry.

01:15:23:22 - 01:15:24:17

I was on mute.

01:15:25:09 - 01:15:26:04

Sorry. Thank you.

01:15:27:24 - 01:16:00:25

Uh, John, Jeff and RW. Um, so, so so, uh, I yeah, my understanding of what you're asking is around the, the issues to do with the photography. And I believe perhaps our response to your specific question, uh, on this matter and for those interested parties listening in, I think that's our response in question. Question one point 20.1 in rep 1056.

01:16:00:27 - 01:16:03:22

Actually, there's a dash between 1 and 0 five six.

01:16:06:24 - 01:16:39:24

And it's an issue that you will see, uh, repeated throughout the photography, uh, from the Isle of Anglesey, uh, which is not having been taken in optimum visibility conditions. So there's guidance. Uh, I think possibly the most useful and relevant is the guidance prepared by, uh, nature Scot, uh, called the Visual Representation of Wind Farms, version 2.2 February 2017.

01:16:39:26 - 01:17:11:09

And this sets out the requirements basically for taking baseline photograph, uh, for the preparation of photo montages, which is what this is, and deals specifically with offshore wind turbines and explains that effectively. All photography and it says it stresses it. It's essential that all baseline photographs are taken in good visibility and that there needs to be optimum visibility and clarity. And the key factor.

01:17:11:11 - 01:17:45:24

So this is the point really with this photograph and others. And it says as much a key factor is achieving sufficient contrast between the sky and the area of sea so that the horizon is clear. So you'll see with other applications that you may have come across the photographs for the photo montages of offshore wind farms usually have been captured where there's this, this almost pin sharp line of the horizon. So you have that really clear definition between the surface of the sea and then where that meets the sky, i.e.

01:17:45:26 - 01:18:20:24

the horizon, whereas this one, because obviously that's where the turbines are going to be seen, they're going to be seen on the horizon. Whereas with this example and others that I'm assuming I've referred to are it's blurred, This kind of this, this mist or, uh, some sort of atmospheric condition is affecting the quality of that horizon. And that then has obviously given you or anyone else that's looking at it, uh, an impression which does not reflect optimum visibility and therefore is not in accordance with the guidelines for the preparation of photo montages.

01:18:22:19 - 01:18:25:10

Thank you. Is that the same for visualization? For.

01:18:27:04 - 01:18:29:13

Uh. You'll have to take me to it, please.

01:18:30:22 - 01:18:34:09

These are the just the two that you've, um. Yeah. Previously. Um.

01:18:34:27 - 01:19:11:24

That's the it's the same issue. There was also there was also an issue, uh, when I was out on site with the hardcopy. And you may have seen this yourself, uh, depending on. I'm aware of some of the authority, but not all of the authority went out on this unaccompanied site visit. Forgive me. I forget who went. Um, but if you were to go out with with a hard copy of of the visualizations, you will notice that actually some of the elements well, the view that's portrayed in the hardcopy portrays, uh, a version of the landscape and then a version.

01:19:12:00 - 01:19:43:16

Obviously, it follows a version of the turbines. There's actually smaller than reality. And it's, it's I mean, it was really obvious to me when I was out on site. So there was to me, there's clearly a fault with those visuals in terms of them portraying a smaller version of the landscape than what you would actually see in reality, and I cross-check that against the same viewpoints that were done for all the more. And again, I think this is mentioned in our reps. I don't have the exact paragraph to hand.

01:19:44:05 - 01:20:11:25

Um, but when you compare and I've given it will be it will I'm sure it will be in response to your your question there when you compare the album or photo montage from the same location as the one that's been taken for Mona. There is clearly a difference in the scale of elements in the view. You know both. Both. You can look both of them at 100% scale on screen and you will see a difference. And I think that's also worth bearing in mind.

01:20:13:17 - 01:20:41:18

Thank you. Yeah. Um, yeah, I can confirm I did visit these locations, um, on the unaccompanied site inspection, and I did take a hard copy of these visualisations. Um, could I just ask yourself as well? And do you think do you believe that, um, your view on the these visualizations. This could be a reason for potential reasons for underreporting of effects or those two things different or not linked.

01:20:43:15 - 01:21:28:24

I think it's I think it's one of a number of issues where where the applicant has done things slightly differently or differently, Uh, to, uh, best practice guidance. And the combination of those factors has resulted in an underestimation of effects. I think the visualizations is a key part of that, because naturally you look at the visual material that's that's, you know, it's only one. It's only one piece of evidence that helps you build up a picture of what the impacts are likely to be, but it is a crucial part of that evidence, because, you know, you're using a computer program to actually simulate what they're going to look like, what the scale is going to look like, and you're relying on that to be accurate.

01:21:29:13 - 01:22:04:06

Uh, and I think it's it's equally true that, you know, members of the public and interested parties will naturally rely on the photo montages. That's the most accessible material that they have in trying to understand the effects. And therefore, it's crucially important that it's that they've been prepared in line with best practice, i.e., that they present that maximum optimum visibility scenario and that the scale that they're portraying is accurate. And neither of those are correct for the majority of viewpoints on the island.

01:22:04:08 - 01:22:04:25

Anglesey.

01:22:05:23 - 01:22:10:07

Okay. Thank you. Um, could I come to the applicant, please, to respond? Thank you.

01:22:10:27 - 01:22:46:07

Les Don, on behalf of the applicant. Um, just picking up a few of those points. Um, in respect of the baseline photography. Um, I think the applicants accepted that it has had some difficulty, um, getting that baseline photography, um, as, um, pinpoint as Mr. Jeffcoat was talking about in terms of getting the horizon. Uh, it is challenging when you are focusing on the horizon as opposed to, um, the nearer area. So, for example, with the hourly, more photo montages, the turbines are obviously much closer to shore and the focus is there.

01:22:46:09 - 01:23:40:25

This is seeking to take photographs that effectively, clearly, um, capture that horizon point. Um, we, the applicant recognizes been out a number of times to seek to do those. Um, if it is considered that it would be helpful to try and redo those for the purposes of the examination, then we can look at doing that. That's obviously subject to a suitable weather window. Um, but numerous efforts have been made to do that. Um, I think it is also worth remembering, um, that the photo montages are only part of the materials that, um, that, uh, both the public and examining authority have, uh, and indeed, um, uh, key bodies have in terms of assessing the effect, all of those photo montages have also presented with wire lines where the, um, turbines are shown in that wireline format.

01:23:40:27 - 01:24:16:03

So there is, you know, there's no question as to actually being able to sort of look at those together. And as Mr. Cox said, they are taken out into the field where you look and see in the field. And, um, I'm not the only person who will have taken properly produced photo montages out into the field to hold them where they're supposed to be held. Um, and they still don't really particularly accurately, accurately represent what the IC is and how you perceive that. So they are a tool that is used for the purposes of understanding those landscape and visual effects.

01:24:16:05 - 01:24:55:05

So you will have been out on that unaccompanied site visit. You will have seen the visibility in good conditions. You will have seen the extent to which uh, on the day that you went, you could or couldn't see the horizon, whether you could or couldn't see the glinting turbines, the extension turbines, all of those that are actually showing up on the the wire lines. And, and it's that total consideration of the visual materials plus the work in the field, plus the plus the wire lines that, that make up your ability to to understand what the likely effects of a project are, and that's the basis on which the applicant has undertaken its assessment.

01:24:56:18 - 01:25:18:22

Okay. That's very helpful. Thank you. And perhaps on the point about, um, you know, essentially redoing some of the photo montages, I do appreciate, obviously, it's subject to certain conditions, but I think it might be useful, you know, at least to have a comparison with one of those. Um, so perhaps point 1 or 4, you know, if you can get that clearer so that we can sort of have a good comparison.

01:25:19:27 - 01:25:39:00

Is done on behalf of the applicant. Uh, all I can say is we will try. It's obviously dependent on suitable weather conditions, but we will seek to do that and to have that in, um, I'm not going to promise on a date yet because they do take quite a long time to produce. But, um, we could maybe come back to you on when when that can be done. Yes.

01:25:39:02 - 01:25:40:07

Okay. Yeah. That's fine. Thank you.

01:26:10:27 - 01:26:48:05

Okay. Thank you. I'm aware of the time as well. I think at last, um, a couple of questions regarding Isle of Anglesey. Um, and then we'll potentially take a break after that. So I'd just like to come now, um, back to, um, and our Natural Resources Wales, Mr. Jeff Cook. Um, and just consider your view, um, on the effect of the development potentially on, on the designation of the Isle of Anglesey as a national landscape. Um, just sort of bringing together what we've been discussing and your concerns, um, you know, does your, in your view, does the development potentially of harm or compromise the purpose of that designation.

01:26:53:03 - 01:27:25:01

I think I mean, I think I could be quite succinct. Uh, well, yes, it harms, uh, it harms characteristics and qualities of that designation that relate fundamentally to its reason for protection, i.e. the conservation of its natural beauty. And in doing so, the scheme as it is at the moment, it neither conserves nor enhances the natural beauty of that area. It fails in both accounts. And I mean, that really goes to the heart of it.

01:27:25:03 - 01:27:55:02

And it goes to the heart of why we're saying that. Well, if you can't avoid the harm or you're not willing to do so, uh, which is the message that's been communicated very clearly to you today, uh, on behalf of the applicants. And what I mean by that is you're not able to push the turbines any further offshore or make them significantly smaller. Then the only avenue you're left with is compensation. And that's reflected in the national policy statement as well.

01:27:55:04 - 01:28:36:09

In terms of the definition of that mitigation hierarchy. Uh, off the top of my head, it's avoid, reduce, mitigate, compensate. We don't have, avoid, reduce or mitigate in regards to the harm that we've identified. So the only channel you're left with is is the is the compensate or the enhancement. Um, and that's what and that's what we're seeking. If there is no, uh, what if, if your mind is to approve it and if, uh, if there are no changes, material changes to the scale of the turbines or their location, then that's, uh, the only avenue that's left to accord with the MPs in the regard of the mitigation hierarchy.

01:28:37:12 - 01:29:08:25

I appreciate that straight slightly into a different aspect there. So but I thought it was relevant to link that to actually the the purpose of the designation because obviously it's, it's the conserve, which is what we're talking about here. This is not conserving, it's harming. So then the second aspect, the second strand of that purpose is the enhancement. And that's where we say, well, actually there is something you can do here. It won't mitigate those effects that we've talked about. It won't remove that harm. But there is a channel there for you to actually meet the purpose, or at least meet it in some way by enhancing the enhancing the A and B.

01:29:11:03 - 01:29:17:29

Thank you. Yeah, I think that brings me to um, well, one of the questions I had, I think miss, um, Mrs. Jones also would like to come in on that too.

01:29:18:01 - 01:29:55:03

Thank you. Yeah. I think just before asking the applicant to respond to that, I would like to put it in a couple of different ways. Obviously, we have two very different views on how we should be concluding it's going to be for potentially for us if the applicant, if you stick by your conclusions and stick by theirs, and it will come down to us as an exile to make that recommendation. So two questions really. One is, uh, along the lines of what? Uh, Mr. Jeff just said, how can you tell us that the mitigation hierarchy has been followed in this case, which Mr..

01:29:55:05 - 01:30:25:29

Jeff Cox right. Compensation follows mitigation. Um, that's on the one hand. On the other hand, if we were when it came to our recommendation report, agree with the conclusions drawn by, uh, Mr. Jeff Clark, then how can we at that point then say that the mitigation hierarchy has been followed? Is there anything that the applicant could put to us on or without prejudice basis?

01:30:29:21 - 01:30:38:18

That we could recommend to the Secretary of State if we were to agree with Mr. Jeff Clark? Not on w sorry, I should say.

01:30:42:06 - 01:31:20:21

It's done on behalf of the applicant. Um, you won't be surprised. I think it's something we need to take away and reflect on. Um, I think, um, it's it's right to say that, um, I'm not sure the party's positions are going to change much on this in terms of views of of of each party's position. Um, and it is the applicant's position that there are no significant effects on the Isle of Anglesey as a result of this project. So I think fundamentally, um, um, the question of, of the need for, um, compensation enhancement from the applicants perspective isn't triggered.

01:31:20:23 - 01:31:29:21

Appreciate. You've asked the question about if on or without prejudice basis that is not the conclusion. And that is something we would we would take away and and consider.

01:31:30:06 - 01:32:00:17

I can see that Mr. Oakman wants to come in, but if I could just follow up on that again, sort of leads on from it. We talked at the start of this hearing about how it's the application of policy, it's the mitigation hierarchy, but it's also the application of statutory, statutory and legal tests. And we do have a statutory duty when it comes to national landscapes. And that duty is that you must have had regard to conserving and enhancing. And that's an effect that's not a significant effect, it's any effect.

01:32:00:19 - 01:32:35:23

And I don't think there's any disagreement between the parties at all that there is an effect. I think you've identified moderate adverse. And obviously we know you think that's significant. But I think when it comes to the statutory test, there is no distinction between what that effect is. And it does require enhancement that statutory duty. It might be something that you need to take away because I do think it is interlinked into everything else. But we need to ensure that that statutory duty has been complied with. And how can we be sure and how can how can we say it's been complied with if there is no enhancement, even though there is an effect.

01:32:37:06 - 01:33:19:06

It is done on behalf of the applicant. I think, um, there is there is also the consideration of the, of the wider NPS policy in terms of how you look at that test and the reality of the extent to which projects like this can conserve and enhance natural beauty of those landscapes. So I think there is a that we recognise the statutory policy test, but the reality is that for a number of projects and we mustn't forget that this isn't a development within the, within the, um, within the, the national park or the national landscape.

01:33:19:08 - 01:33:44:05

It's, it's at some distance from it. Um, and whilst there will be an impact, um, again, come back to the point around needing to consider the, the designation as a whole as opposed to those points on, on, you know, individual elements of it. So I think we'll be making some further submissions on this and tying this together and do take points around, um, looking at whether there's.

01:33:46:15 - 01:33:52:16

Whether without prejudice position would be something we'd be able to put forward or want to just.

01:33:52:18 - 01:34:17:18

If I can just make myself clear when I'm referring to the statutory duty, I'm not referring to anything within the NPS policy. It's a separate statutory duty which is placed upon authorities under section 85 of the Crow act, and that that is a statutory duty that that's placed upon authorities. That's that's what I'm referring to when I say where it just uses the word effect, it doesn't use significance. And there is a duty within that to conserve and enhance.

01:34:21:02 - 01:34:23:09

Is done on behalf of the applicant. That's understood.

01:34:27:18 - 01:34:32:13

Thank you. Um, I see Mr. Eichmann has you have your hand up. You don't see you, um, coming?

01:34:33:00 - 01:34:33:25

Yeah. Ben Oakman.

01:34:33:27 - 01:34:35:12

On behalf of Isle of Anglesey.

01:34:35:14 - 01:34:36:27

Council. Yeah. I just wanted.

01:34:36:29 - 01:34:37:15

To, um.

01:34:37:23 - 01:34:38:08

Add my.

01:34:38:10 - 01:34:39:00

Support to.

01:34:39:06 - 01:35:15:10

Our point in, on behalf of the council that we agree that there, um, may or may not be a significant, um, level of harm on the national landscape, subject to, um, uh, the discussions underway. Um, the the point that, um, Mr. Jones made is that is right also that there would be a level of harm on the national landscape and that that deserves in itself mitigation and or, um, compensation or offsetting. Uh, it's obviously, um, difficult or not impossible to provide landscape, um, mitigation, um, for more mitigation for landscape and views off site.

01:35:15:12 - 01:35:46:01

Um, that would be effective and the, um, on site rather um, that would be effective in that respect and therefore probably the most, um, appropriate solution, there would be, um, off site compensation and something in related to, as I mentioned earlier, um, Alma's agreement for compensatory, uh, measures to be, um, provided in order to enhance and preserve the characteristics of the A and B and Anglesey. So just add our agreement to that point.

01:35:46:03 - 01:35:46:18

Thank you.

01:35:47:14 - 01:35:50:24

Thank you. Um, the applicant need to respond to that at all.

01:35:51:29 - 01:35:54:09

We haven't got any response to that. Okay.

01:35:54:11 - 01:35:54:26

Thank you.

01:36:01:02 - 01:36:07:14

Um, does anybody else have any questions on, um, seascape matters related to Anglesey?

01:36:11:02 - 01:36:24:15

I can't see any hands up. So I think in that case, it's an appropriate moment. Um, to take a break. Um, I suggest that we come back at quarter past. Sorry. Um, 24, um, shortly. Thank you.