



Awel y Môr Offshore Wind Farm

Category 6: Environmental Statement

Volume 4, Annex 10.2: SLVIA Consultation

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Glossary of terms

TERM	DEFINITION
Landscape character	A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
Landscape effects	Effects on the landscape as a resource in its own right.
Seascape	Landscapes with views of the coast or seas, and coasts and adjacent marine environments with cultural, historical and archaeological links with each other.
Visual amenity	The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating or travelling through an area.
Visual effects	Effects on specific views and on the general visual amenity experienced by people.

Abbreviations and acronyms

TERM	DEFINITION
AyM	Awel y Môr offshore wind farm
AONB	Area of Outstanding Natural Beauty
CEA	Cumulative Effects Assessment
CfD	Contract for Difference
DCO	Development Consent Order
ES	Environmental Statement
GyM	Gwynt y Môr offshore wind farm
IoA	Isle of Anglesey
LCA	Landscape Character Area
LPA	Local Planning Authority
MCA	Marine Character Area
MPA	Marine Plan Area
MDS	Maximum Design Scenario
NLCA	National Landscape Character Area
NPS	National Planning Statement
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
SCA	Seascape Character Area
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNP	Snowdonia National Park
TCE	The Crown Estate

TERM	DEFINITION
VP	Viewpoint
WTGs	Wind Turbine Generators
WNMP	Welsh National Marine Plan
ZTV	Zone of theoretical visibility

Units

UNIT	DEFINITION
m	meter
km	kilometer

1 Summary of consultation relating to SLVIA

1.1 Introduction

- 1 Table 1 outlines the consultation that has taken place to inform the assessment included in Chapter 10: Seascape, Landscape and Visual Impact Assessment (SLVIA) (application ref: 6.4.10.2). It sets out the issues that have been raised and where these have been addressed in the Environmental Statement (ES), where relevant.
- 2 Reference is also made to the following annexes that accompany the ES chapter:
 - ▲ Volume 4, Annex 10.1: SLVIA Methodology (application ref: 6.4.10.1);
 - ▲ Volume 4, Annex 10.3: SLVIA Simple Assessment (application ref: 6.4.10.3);
 - ▲ Volume 4, Annex 10.4: SLVIA Visibility Data (application ref: 6.4.10.4);
 - ▲ Volume 6, Annex 10.5: SLVIA Figures (application ref: 6.6.10.5); and
 - ▲ Volume 6, Annex 10.6: SLVIA visualisations (application ref: 6.6.10.6).

Table 1: Summary of consultation relating to SLVIA

DATE AND CONSULTATION PHASE/ TYPE	CONSULTATION AND KEY ISSUES RAISED	SECTION OF ES CHAPTER 10 WHERE MATTER IS ADDRESSED
<p>July 2020 Scoping PINS</p>	<p>PINS is not in a position to agree to scope out impacts on seascape character within English Marine Plan Areas during operation.</p> <p>The ES should include an assessment of these matters or evidence demonstrating agreement with the relevant consultation bodies and the absence of a Likely Significant Effect (LSE).</p>	<p>An assessment of the effects on seascape character within English Marine Plan Areas is contained in Volume 4, Annex 10.3: Simple Assessment.</p>
<p>July 2020 Scoping PINS</p>	<p>PINS is not in a position to agree to scope out impacts on landscape character receptors in Denbighshire, Flintshire and the English parts of the study area. Accordingly, the ES should include an assessment of these matters or evidence demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>	<p>An assessment of the effects on landscape character within Denbighshire, Flintshire and the English parts of the Study Area is contained in Volume 4, Annex 10.3: Simple Assessment and where required in Section 10.11</p>
<p>July 2020 Scoping PINS</p>	<p>PINS is not in a position to agree to scope out impacts during operation on landscape character beyond coastal character types/ areas except where they are also covered by National Park or Area of Outstanding National Beauty designations. Accordingly, the ES should include an assessment of these matters or evidence demonstrating</p>	<p>An assessment of the effects on landscape character within the Welsh parts of the study area is contained in Volume 4, Annex 10.3: Simple Assessment and where required in Section 10.11.</p>

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	agreement with the relevant consultation bodies and the absence of an LSE.	
July 2020 Scoping PINS	PINS does not agree that cumulative impacts should be limited to only other development in the form of offshore wind turbine development. The assessment of cumulative effects should be included in the ES for the reasons provided at paragraph 3.3.3. of the Scoping Opinion i.e. where significant cumulative effects are likely to occur. This should not be limited to one particular development type.	Cumulative effects of AyM with other development types as well as onshore and offshore wind farm development is considered in Section 10.3.
July 2020 Scoping PINS	The Applicant should consider if relying on one worst case scenario will be sufficient to capture the full range of effects. Subject to agreement with other consultees, the ES should present assessments based on a scenario using the largest WTGs allowed under the DCO and one where the maximum number of WTGs is constructed.	The SLVIA has assessed in full the effects of the MDS agreed with stakeholders as being the largest turbines. Additionally, and in agreement with stakeholders, the scenario of the maximum number of WTGs has been presented for a number of key viewpoints and for night-time viewpoints contained in Volume 6, Annex 10.6. SLVIA Visualisations and these have been assessed in Section 10.11.
July 2020 Scoping	The ES should contain an assessment of the sequential effects on users of roads and Public Rights of Way within the study area.	A focused approach to sequential effects on key receptors using routes within the Welsh

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PINS		parts of the study area has been agreed with stakeholders and is included in Section10.11.
11.07.2020 Scoping NRW	Zone of Theoretical Visibility (ZTV) shows that the extent of potential development visibility within Snowdonia National Park (SNP) extends inland. The elevated landform of the Carneddau and hills closer to the coast give panoramic views of foreground land backdropped by coastline, open seascape and open horizons and noted for its remote, wild and tranquil perceptual qualities. Recommends additional viewpoints at: Tal y Fan, Cefn Coch Stone Circle, Foel Fras and North Wales Path at Garreg Fawr in SNP and Graig Fawr in Clwydian Range and Dee Valley AONB.	Final viewpoint list agreed with NRW.
11.07.2020 Scoping NRW	The perceptual qualities assessed by LANDMAP visual and sensory aspects can be used to highlight local variations in the designated landscapes' Special Qualities. Site evaluation during the taking of viewpoint photographs is also recommended.	LANDMAP visual and sensory aspects used to inform assessment of effects on special qualities set out in Section10.11.
11.07.2020 Scoping NRW	The assessment should reference and apply NRW's seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1, 2 and 3 reports. These are the most recent guidance papers for	Reference has been made to NRW's seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1, 2 and 3 reports in the

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	<p>offshore wind farm planning in the UK to date. The review of previous planning decisions provides evidence of visual effects thresholds at which significant effects have been previously assessed.</p>	<p>consideration of mitigation of SLV effects as set out in Section and cognisance has been taken of the findings on thresholds of significance set out therein when undertaking the assessment of effects set out in Section10.11. Whilst the Guidance is useful, all development proposals must be specifically assessed based on the particular aspects of their scale, extent and context as set out in Section10.11.</p>
<p>11.07.2020 Scoping NRW</p>	<p>NRW agree with the use of Met Office definitions for the different ranges of visibility. NRW recommended that 10 years' Met Office data be reviewed to gain an understanding of the regional and seasonal variations in visibility. To help in scaling the magnitude of change NRW recommend correlating visibility with the time of year, to understand for example how spring and summer and autumn visitors to the area might perceive the wind farm.</p>	<p>Met Office visibility data for Rhyl is included in Volume 4, Annex 10.4 and illustrated in Volume 6, Annex 10.5: Figure 20. This information is used throughout the viewpoint assessment contained in Section10.11. to inform the likely frequency of visual effects and considers when long range visibility is most likely to occur with seasonal variation.</p>
<p>11.07.2020 Scoping NRW</p>	<p>Views from the Snowdonia National Park, Isle of Anglesey AONB and the Clwydian Range and Dee Valley AONB lie within 20 km to 24 km of the array site. NRW note that no mitigation is being proposed.</p>	<p>Following stakeholder consultation, embedded mitigation is proposed and set out at Section 10.9. Further information on the rationale for this in relation to the valued</p>

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	<p>Options available to reduce the visual effects of offshore wind development are set out in NRW's seascape and visual sensitivity to offshore wind farms in Wales reports; including specifying smaller WTGs and/ or increasing the distance between the development and the visual receptors.</p> <p>Where the scheme conflicts with guidelines and principles set out in the seascape and visual sensitivity report NRW would expect amendments to be proposed to mitigate the effects on designated landscapes. NRW therefore advise the application of iterative assessment and design given the proximity of several valued national and regionally important designated landscapes that are sensitive to the visual intrusion of development.</p> <p>NRW advise that the ES should explain the options and alternatives considered for the array and how the visual impacts on designated sensitive landscapes and visual receptors within the study area informed the proposed development.</p>	<p>landscape receptors is set out in Volume 1, Chapter 4: Site Selection and Alternatives.</p>
<p>11.07.2020</p> <p>Scoping</p> <p>NRW</p>	<p>Paper copies of the visualisation pack will be required to be able to view these in the correct format and manner. These should comprise high quality visual imagery capturing the worst-case visual effect conditions.</p>	<p>Printed wireline views have been provided to stakeholders during the early consultation process to inform the viewpoint selection.</p>

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	For cumulative visualisations and panoramic views, NRW anticipate images being wider than A3.	The format for the visualisations contained in Volume 6, Annex 10.6: SLVIA Visualisations has been agreed with stakeholders and follows best practice guidelines. Print versions of the ES visualisation figures in Annex 10.6 will be provided on request.
11.07.2020 Scoping NRW	If Graig Fawr is scoped into the assessment the cumulative effects assessment should assess the baseline visual effect of operational offshore wind development on the view from this location before considering the additional effect of the proposed scheme.	The operational offshore wind farms are part of the baseline and their existing cumulative effect is considered in the viewpoint assessment contained in Table 13.
09.07.2020 Scoping Snowdonia National Park	Raised concerns about the scale of the development. In particular the cumulative effect in combination with existing developments at Gwynt y Môr, Rhyl Flats and to a lesser extent North Hoyle. The cone of sight being taken up currently from viewpoints within the National Park will be increased substantially. From certain areas it is likely that the sea horizon will be disrupted by wind WTGs adding to the growing cumulative effect. At what point does the accumulation of WTGs/ cumulative effect become	The effects on the views from SNP are assessed in Section 10.11. and include consideration of the effect of AyM in addition to the operational offshore wind farms.

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	excessive. Further information on this point from the SLVIA will be important.	
09.07.2020 Scoping Snowdonia National Park	The proposed WTG tip height of 332m is more than double the height of the existing WTGs at Gwynt y Môr.	Noted.
09.07.2020 Scoping Snowdonia National Park	The assessment of the impact on Snowdonia National Park should address the Landscape Character SPG note (relating to Carneddau LCA) on the need to protect and enhance key views both to and from other landscapes as well as assessing the significance of effects on the sense of tranquillity, wildness and views from SNP.	The assessment of the effects on SNP is included in Section 10.11.5. and includes consideration of the sense of tranquillity, wildness and views from SNP.
09.07.2020 Scoping Snowdonia National Park	SNP questions if 'the proposed development avoids adversely affecting the National Park's (and Ynys Mon AONB's) purpose of designation and the special qualities?'	Assessment of the effects on the special qualities of the SNP and Ynys Mon AONB is included in Section 10.11.5.
09.07.2020 Scoping Snowdonia National Park	SNP note that within the Wales Offshore Renewable Energy Seascape Assessment, that the seascape sensitivity assessment concluded that the area in question is mostly of	Noted. The mitigation set out in Section 10.9. entirely removes the array area from the high sensitivity area identified within the seascape

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	medium sensitivity (with possibly some parts high and others medium/ low).	and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1, 2 and 3 reports.
09.07.2020 Scoping Snowdonia National Park	Further viewpoint requested around Penmaenmawr/ Sychnant or above Capelulo.	Viewpoint 40 is located on the North Wales Path above Capelulo.
09.07.2020 Scoping Snowdonia National Park	SNP does not agree that the Carneddau LCA can be scoped out, particularly the northern part closest to the coast.	The Carneddau LCA is included in the assessment at Section 10.11.5.
08.07.2020 Scoping Isle of Anglesey County Council	IACC eager to receive further visual representations as soon as these are available.	Wireline visualisations and some wirelines matched to baseline photography were provided to the stakeholders during the early consultation process. This included full-sized printed wireline views to inform viewpoint selection.
08.07.2020 Scoping Isle of Anglesey County Council	Further viewpoints requested at the Wales Coast Path east of Rhôs Mynach Fawr, Mynydd Bodafon and Mynydd y Garn.	Final viewpoint list agreed with IoACC.

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	Some re-siting of VP1, VP2, VP3, VP 4, VP6 also requested with locations subsequently agreed through further consultation.	
08.07.2020 Scoping Isle of Anglesey County Council	Sequential analysis of the effect on views of the seascape from the Wales Coast Path should form part of the assessment.	Assessment of the Wales Coast Path included in Section 10.11.
08.07.2020 Scoping Isle of Anglesey County Council	Information available on the commencement of the Isle of Anglesey AONB Management Plan for the period 2020-2025 should be included.	Information from AONB Management Plan has been considered in the assessment of the effects on the AONB in Section 10.11.13.
08.07.2020 Scoping Isle of Anglesey County Council	The cumulative assessment will need to consider other energy related developments - existing, consented and reasonably foreseeable both off and onshore where they are within the study area i.e. north Anglesey.	The cumulative effect of AyM with other energy-related developments is considered in Section 10.5.6.
08.07.2020 Scoping Isle of Anglesey County Council	Assessment to include likely impacts on landscape character of northern Anglesey outside of the AONB.	The assessment of LCAs in northern Anglesey is included in Volume 4, Annex 10.3: Simple Assessment and Section 10.11.3.

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<p>08.07.2020</p> <p>Scoping</p> <p>Isle of Anglesey County Council</p>	<p>Cumulative assessment to include WTG (two or more) where WTG tips are >40m.</p>	<p>These are included on Figures 1 and 26 (Annex 10.5) and shown in the visualisations contained in Volume 6, Annex 10.6. SLVIA Visualisations.</p> <p>The cumulative effect of AyM with these WTGs is considered in Section 10.5.6.</p>
<p>11.07.2020</p> <p>Scoping received after PINS issue</p> <p>Llandudno Town Council</p>	<p>Concerns raised about the impact on sailing and shipping and the loss of the town's vista across the bay. This proposal would see the entire bay hemmed in by WTGs from the Great Orme to the Little Orme.</p>	<p>Where required the views from Llandudno are assessed in Section 10.11.6.</p> <p>Viewpoints 18, 59 and 61 are in Llandudno Bay and are contained in Volume 6, Annex 10.6. SLVIA Visualisations.</p> <p>Chapter 4, Volume 3, Tourism and Recreation (application ref: 6.3.4) assesses the effects on recreation which includes consideration of people sailing.</p> <p>People working, as they would be on ships, are considered to have low sensitivity to change (GLVIA3) and therefore have not been considered in the SLVIA.</p> <p>Two viewpoints have been included to represent AyM visibility gained by people travelling on the Liverpool – Dublin Ferry. These</p>

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		are viewpoints 66 and 67. They are assessed in Section 10, Table 6 and the visualisations are included in Annex 10.6.
10.06.2020 Scoping Cadw	Further viewpoints requested at Beaumaris Castle, Conwy Castle, Bodafon Mountain, uplands above Llanfairfechan and Penmaenmawr, Bangor Pier, Menai Suspension Bridge, Gwyrch Castle, Gwyrch Castle registered historic park and garden (RHPG), Pen y Dinas Camp, Iron Age Hillfort and Puffin Island.	Final viewpoint list agreed with Cadw.
10.06.2020 Scoping Cadw	The Register of Historic Parks and Gardens should be included in the data sources.	Registered Historic Parks and Gardens in Wales are shown on Figure 18 and considered, where relevant, in the assessments set out in Section 10.11.
02.06.2020 Scoping Clwyd-Powys Archaeological Trust	Further viewpoint requested at Gwyrch Castle and RHPG and high point in Clwydian Range and Dee Valley AONB.	Viewpoints included in final, agreed list. Effects assessed in Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage (application ref: 6.3.8).
01.06.2020 Scoping	Further viewpoints requested at Beaumaris Castle, Conwy Castle, Bodafon Mountain, uplands above Llanfairfechan	Viewpoints included in final, agreed list. Upland above Llanfairfechan and

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Gwynedd Archaeological Planning Service/ HENEB	and Penmaenmawr, Bangor Pier and Menai Suspension Bridge.	Penmaenmawr represented by Viewpoint 37: Cefn Coch Stone Circle following agreement.
01.06.2020 Scoping Gwynedd Archaeological Planning Service/ HENEB	The Register of Historic Parks and Gardens should be included in the data sources.	Registered Historic Parks and Gardens in Wales are shown on Figure 18 and considered, where relevant, in the assessments set out in Section 10.11.
01.10.2020 Archaeology, Cultural Heritage, Seascape, Landscape & Visual (SLV) Expert Topic Group (ETG)	<p>Landscape character effects within Denbighshire, Flintshire and non-coastal parts of Conwy, SNP and loA not to be scoped out without further consideration. Applicant to prepare a long list of LCAs with justification for scoping out. loA LCA 7 noted by loA as a sensitive historic landscape area.</p> <p>Assessment of effects of MDS containing maximum size of WTGs and maximum number of WTGs to be considered further once more design information available.</p> <p>Assessment of effects on Wales Coast Path key between VPs 17, 18 and 25 and to include Marine Drive around the Great Orme.</p>	<p>Long list of LCAs and justification for scoping out is contained in Volume 4, Annex 10.3: Simple Assessment.</p> <p>Effects on sequential receptors assessed in Section 10.11.</p> <p>LANDMAP Visual and Sensory Data utilised in the consideration of perceptual special qualities in Section 10.11.</p> <p>Long viewpoint list discussed with agreement to reduce and consolidate by removing similar or otherwise represented locations or reducing the requirement for visualisation materials and SLV assessment requirements.</p>

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	<p>Focus of sequential effects on users of the A55, the Wales Coast Path, Offa's Dyke Long Distance Route (LDR) and National Cycle Route (NCR) 5.</p> <p>LANDMAP Visual and Sensory Data to be utilised in the consideration of perceptual special qualities.</p> <p>Number of viewpoints proposed by different parties.</p> <p>NRW noted that there had been no discussion around the siting of the array or the development of offshore options and alternatives and asked that this be confirmed.</p>	<p>Final list of viewpoints for assessment agreed with stakeholders as set out in Table 4.</p> <p>Visualisations presented in Volume 6, Annex 10.6. SLVIA Visualisations.</p> <p>ETG followed on 25.01.2021 to address the matter of the siting of the array and the options for alternatives.</p>
<p>12.01.2021</p> <p>Email</p> <p>NRW</p>	<p>NRW agrees that 50 km is acceptable as maximum extent of ZTV.</p>	<p>Agreement of Study Area noted.</p>
<p>12.01.2021</p> <p>Email</p> <p>NRW</p>	<p>Advise that cumulative Table 4.6 should be updated to include existing, consented and proposed onshore wind farms that are potentially visible from viewpoints or sequentially when travelling through designated landscapes.</p>	<p>The onshore wind farms within the study area along with their current status are shown on Figure 1 and considered in the cumulative assessment Section 10.13.</p>
<p>12.01.2021</p> <p>Email</p>	<p>In respect of landscape character within the Clwydian Range & Dee Valley AONB, the focus of the assessment should be on the special qualities of tranquility, space and freedom within</p>	<p>Only VP 24 Graig Fawr is included as a representative viewpoint with assessment included as per the spreadsheet noted below</p>

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NRW	the Hillside LCT areas that would have visibility of the proposed development and include the three representative viewpoints. An assessment of visual effects from the three viewpoints is already included and would inform the assessment of effects on the special quality.	and subsequent email correspondence with NRW of 10 February 2021. Assessment of the effects on the Special Qualities of the AONB is included in Section 10.11.7.
12.01.2021 Email NRW	No further comment on the spreadsheet of potential viewpoint output other than to query whether a night-time visualisation from Snowdonia National Park has been considered? This may have already been discounted on health & safety grounds due to the difficulties of accessing viewpoints after dark. The highest minor road in the visible area appears to be on the lower slopes of Cefn Maen Mawr, to the north of Tal y Fan vp36.	Viewpoint list and outputs noted as agreed. A further night-time view included subsequently at VP 60: Foel Lus.
25.01.2021 Archaeology, Cultural Heritage, SLVIA Expert Topic Group (ETG)	Discussion around the offshore area and how it has been defined within a boundary of an Agreement for Lease (AfL) as an extension to Gwynt y Mor (GyM) and must have a shared boundary with it. There is no scope to move it due to other constraints.	The role of the site selection and the consideration of alternatives process in minimising seascape, landscape and visual effects is presented in Volume 1, Chapter 4 (application ref: 6.1.4). Seascape, landscape and visual effects are minimised through embedded mitigation

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	<p>Focus of ETG meeting around reduction on array area to mitigate SLV effects whilst also considering other technical and environmental factors.</p> <p>Options presented a balance of need to reduce environmental impacts on sensitive receptors whilst also need to achieve a low Levelised Cost of Energy (LCoE) to ensure maximum efficiency and contribute to UK and Welsh government renewable energy targets.</p> <p>Only options for mitigation available are reduction in array area or reduction in WTG size.</p> <p>Difficult to look ahead 5-6 years to know what the available WTG technology will be and therefore a reduction in the maximum WTG height is not an option for mitigation at this stage.</p> <p>Significant SLVIA effects likely to occur. Consideration given to minimizing the effects on the most sensitive receptors. Reference made to designated landscapes, LANDMAP visual and sensory evaluation data, the NRW (2019) White Consultant's guidance and cumulative effects on settled coastline.</p> <p>Options for a revised western boundary were presented and discussed with the focus around a boundary that would</p>	<p>measures as presented in Section 10.9. which include a revised array area boundary, which reduces its westerly extent and entirely removes the array area from the high sensitivity area identified in the seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1, 2 and 3 reports.</p> <p>SLVIA is based on Maximum Design Scenarios set out in Section 10.8.</p>

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	<p>remove the array area largely from the high sensitivity area identified in the NRW (2019) White Consultant's guidance but with some potential slight realignment with the potential to the benefit both western and southerly receptors.</p> <p>Matter raised about maximum number of largest WTGs proposed now and if that has been reduced from scoping. NRW considered a more cluttered appearance within the array area could be worse than a larger extent.</p> <p>It was reiterated that the layout will not be defined until post consent and that the ES follows a standard approach of assessing a realistic maximum design scenario and not a fixed layout.</p>	
<p>09.02.2021</p> <p>Email</p> <p>NRW</p>	<p>The amendments suggested in the various scenarios are likely to reduce visual effects to a marginal degree, but not sufficiently to avoid likely significant effects at the various views within the Isle of Anglesey AONB and Snowdonia National Park.</p> <p>Without a substantial reduction in array area and/or scale of turbines, a medium magnitude of visual effect at highly sensitive viewpoints within Designated Landscapes is likely to occur.</p>	<p>Due to the location of the AfL, in compliance with The Crown Estate Extensions (TCE) leasing process and acknowledged in the draft National Policy Statement EN-3, adherence to the NRW (2019) guidance would preclude the development of most of the area awarded by TCE for AyM and conflict with the draft NPS EN-3.</p>

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	<p>Such effects are likely to be significant and adverse. Therefore, we advise a further reduction in area and scale (over and above those suggested in the various scenarios) to minimise significant effects on Designated Landscapes, taking into account our evidence base, Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment & guidance.</p> <p>The evidence base is divided into 3 reports, which should be read together:</p>	<p>WTGs of less than 175m to tip are unlikely to be available or economically viable at the time when AyM may be constructed.</p> <p>The UK Government's financial mechanism that facilitates offshore wind farms to be built, Contract for Difference (CfD), requires the project to be economically competitive with other proposed OWFs in order to have a chance of successfully achieving funding and this drives the required project area and WTG dimensions as well as other factors.</p>
<p>09.02.2021</p> <p>Email and reiterated in 11.20.2021 Section 42 NRW</p>	<p>Stage 1 Report, Ready Reckoner</p> <p>Table 1 of the report places the proposal (332m turbines) within the 301-350m range, where a buffer of 32.8 km is required to avoid medium magnitude effects on high sensitivity receptors, which are of major-moderate significance and a buffer of 44 km is required to avoid low magnitude effects on high sensitivity receptors, which are of moderate significance.</p>	<p>As noted previously, as a result of the constraints placed on the extensions projects by The Crown Estate Extensions Round, and as acknowledged in the draft NPS EN-3, the AfL is located within closer proximity to the coast than the thresholds suggested by the NRW (2019) Guidance to result in major-moderate significance or moderate significance.</p> <p>The draft NPS acknowledges that applications will be constrained by these requirements, and as such it is not possible for AyM to comply</p>

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	<p>Unfortunately, the whole array appears to be located within 32.8 km of viewpoints where there are high sensitivity receptors.</p>	<p>with the Ready Reckoner guidance whilst also meeting the climate emergency and Welsh Government targets.</p> <p>Whilst the thresholds may be a helpful reference for potential effects each proposal should be considered on its own merits and the assessments contained in the SLVIA.</p>
<p>09.02.2021 Email and reiterated in 11.20.2021 Section 42 NRW</p>	<p>Stage 2 Report, Guidance on siting offshore windfarms Table 4.1 identifies measures to avoid or minimise seascape & visual effects, including:</p> <p>3. Locate developments beyond the limit of negligible visual effects, particularly for the highest sensitivity area National Parks/AONBs overlaid with Heritage Coasts and</p> <p>4. if the above is not possible, locate development beyond the Stage 1 Report low magnitude buffer distances of the highest potential turbine proposed from National Parks & AONBs (44 km in this case).</p> <p>6. Locate developments in areas identified as lower sensitivity in the Stage 3 Report</p> <p>13. Avoid developments being visible in juxtaposition with sensitive views to headlands.</p>	<p>It is not possible to locate the AyM beyond the limit of negligible visual effects, low magnitude buffer distances or buffer distances to several separate designations, for the reasons already stated.</p> <p>The mitigation proposed ensures that the AyM array area is located within an area identified as Medium and Medium/Low sensitivity (Annex 10.5: Figure 2c).</p> <p>Notably the Guidance has not identified any part of the Welsh Marine Plan Area as having Low sensitivity with the majority being identified as High or Medium/High sensitivity.</p> <p>Large parts of the areas identified as being of Medium/low or Medium sensitivity have other</p>

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	<p>14. Particularly avoid developments within buffer distances of several separate designations.</p> <p>16. Example 1 avoid locations offshore from Islands.</p> <p>18. Example 3 avoid locations filling or almost filling framed views.</p> <p>19. Avoid potential cumulative impacts by extending the width of arrays visible through extensions for additional wind farms.</p>	<p>constraints associated with them including Marine Special Areas of Conservation, Special Protection Areas and restrictions due to shipping.</p> <p>AyM is visible in juxtaposition with sensitive headlands in some views. The location of the AfL makes it impossible for this to be avoided. Existing OWFs within the Study Area are also seen in views to headlands.</p> <p>The mitigation set out in Section 10.9 reduces the degree to which framed views are filled.</p> <p>The AfL area has been defined as an extension to GyM. Extension of the width of arrays visible is unavoidable.</p> <p>In any situation where a new wind farm is proposed alongside an operational wind farm, the overall width of the array is likely to be extended in some views. Essentially, to avoid this would mean spreading out wind farms more widely within the seascape. Whilst this may reduce cumulative effects locally it would result in an increase in cumulative effects</p>

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		strategically with more widespread cumulative wind farm influence around the Welsh coast, much of which is also designated.
<p>09.02.2021</p> <p>Email and reiterated in 11.20.2021 Section 42 NRW</p>	<p>Stage 3 Report, Seascape & visual sensitivity assessment for offshore wind farms Part 1 identifies zones within the offshore area with differing levels of sensitivity. The majority of the proposal lies within Zone 1 (Medium Sensitivity), a section to the north east in Zone 2 (Medium/Low Sensitivity) & the western section in Zone 3 (High Sensitivity). Zone 3 is an area of high sensitivity that is unable to accommodate the relevant type of development without significant character change or adverse effects. Zone 1, adjacent to Gwynt y Môr is of medium sensitivity, with potential for a small extension, but scope is limited. The scale of turbines in relation to distance buffers needs to be considered in relation to the sensitivity of zones.</p> <p>Part 2 provides a detailed sensitivity & capacity assessment for each zone. Within Zone 3 & Zone 1, turbines over 175m are likely to exceed the medium magnitude of effect on high sensitivity receptors.</p>	<p>The mitigation set out in Section 10.9 ensures that no part of AyM lies within Zone 3 (High Sensitivity), see Annex 10.5: Figure 2c.</p> <p>WTGs of less than 175 m are unlikely to be economically viable or available at the time when AyM may be constructed.</p> <p>Notably smaller scale turbines such as these are rapidly going out of production and are also less economically efficient as technology improves.</p> <p>Financial viability and competitiveness are key drivers in achieving a CfD, which is the UK Government's finance mechanism and route to market for OWFs. The cost per megawatt (the strike price) is the deciding factor in determining whether an offshore wind farm can be developed and thereby produce renewable energy to meet ambitious carbon reduction targets. In the timescale for AyM</p>

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		<p>being developed it is vital that there remains maximum flexibility of turbine height balanced with environmental effects that are acceptable to the Secretary of State, in order for the development to have any chance of being built and contributing to UK and Welsh targets.</p>
<p>09.02.2021 Email NRW</p>	<p>Advice in respect of viewpoints with presented wireline scenarios (WTGS contained within Areas A, C, M, H and J) for VP2, 7, 8, 10, 36.</p> <p>Visual effects of the different scenarios vary with the changing angle and elevation of view in the different viewpoints. Reducing the horizontal spread occurs to a greater or lesser extent with the different scenarios, but other visual effects are created such as increased density and overlapping of turbines in parts of the view and bunching of groups of turbines with large intermittent gaps, or more balanced views with individual turbines evenly spaced to form a coherent group. The differences between the scenarios are variable and marginal.</p> <p>Overall, scenario C appears to reduce both spread to a greater extent at viewpoints to the west (Isle of Anglesey),</p>	<p>For PEIR, the array area was reduced with the western boundary broadly according with Area J which offered a compromise between the benefits of Area C from the west (IoA) and the benefits of Areas H and A from the south and south-east.</p> <p>The area has been reduced further following formal consultation responses, and the envelope reduced from a maximum number of 91 turbines to 50 turbines; the largest turbines having reduced in number from a maximum of 50 to 34. This reduction in the AyM array area has increased the distance of the AfL from the IoA AONB coastline and reduced the horizontal field of view affected by the AyM</p>

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	<p>with A providing less density. To the east (Snowdonia) scenario J appears to reduce spread & density to a greater extent. For these scenarios, a combination of C & A with J is likely to reduce the overall effects across the spread of viewpoints to a greater extent.</p>	<p>array area in views from large parts of the SLVIA study area. These factors have collectively reduced the impacts of AyM.</p>
<p>09.02.2021 Email Conwy County Borough Council</p>	<p>The project would involve the extending the present cluster of offshore windfarms significantly further west than the existing arrays, and would be considerably larger than the present turbines. The additional turbines would have significant visual impacts on the settings of designated landscape and heritage designations and on the landscape character from key tourism destinations, and the cumulative impacts with existing arrays would result in result in the windfarms becoming the dominant landscape feature from a number of these locations.</p> <p>The wireframe diagrams presented for Options A, C, H, J and M indicate fairly similar impacts from viewpoints in Conwy, and we do not therefore wish to indicate a preference for any of these options.</p> <p>We feel that it would be beneficial to undertake a comparative assessment of a wider range of options, including those which consist of lower tip heights/blade</p>	<p>Noted.</p> <p>Larger WTGs and regular layout assessed as MDS A for all receptors. MDS B (smallest WTGs proposed) is also assessed in Section 10.10 for 'key viewpoints' as agreed with ETG members.</p> <p>As a result of consultation, a further reduction in the array area of the AyM has been included as mitigation of SLV effects as set out in Section 10.9.</p>

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	<p>diameters and a reduced number of turbines (especially at the western end). This would enable a more meaningful range of options to be presented to inform the selection of the final scheme.</p>	
<p>10.02.2021 Archaeology, Cultural Heritage, SLVIA Expert Topic Group (ETG)</p>	<p>Aims of meeting were to:</p> <ul style="list-style-type: none"> ▲ Present and discuss a number of potential alternative Maximum Design Scenario (MDS); ▲ Discuss initial thoughts; and ▲ Agree next steps for information provision. ▲ The objectives of the meeting were to: ▲ Gain feedback on the primary question – Which of the variants presented represents the design that will result in the greatest potential effect? <p>Rochdale Envelope approach was explained along with need to establish the relevant parameters for assessment. The parameters are secured through the Development Consent Order (DCO). This will mean that the as-built design will not result in any significant effects beyond those which were assessed within the ES.</p> <p>Presentation of options also included reduction in array area and number of WTGs compared with the scoping stage.</p>	<p>The array area is reduced with the western boundary broadly according with Area J which offers a compromise between the benefits of Area C from the west (IoA) and the benefits of Areas H and A from the south and south east.</p> <p>This mitigation is set out in Section 10.9.</p> <p>SLVIA is based on Maximum Design Scenarios set out in Section 10.8.</p> <p>The MDS that includes the largest number of WTGs is presented and assessed in relation to an agreed selection of key viewpoints.</p> <p>An additional night-time viewpoint is included at Viewpoint 60: Foel Lus (Annex 10.6).</p> <p>Final list of viewpoints for assessment agreed with stakeholders as set out in Table 4.</p>

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	<p>Reduced area boundary based on feedback from previous ETG. Area A and Area H/ J are the better of the options presented (except from loA County Council perspective where C is preferred) although feedback also that there is still a need to look at other WTG parameters (e.g. WTG height) and from loA County Council to keeping the WTGs as far east as possible.</p> <p>The meeting included a review of comparative wirelines from key viewpoints showing perimeter and regular layouts within the Area A and Area H boundaries with 49 x 300m and 91 x 220m Rotor Diameter (RD) WTGs.</p> <p>Further wirelines were provided after the meeting in response to requests from the ETG.</p> <p>Viewpoint list final draft discussed and issued for agreement of visualisations and assessments to be prepared following discussion on visualisation format and night-time views.</p> <p>Proposal to include further cumulative wirelines for MDS with largest number of WTGs for selected 12 key viewpoints as set out in viewpoint list.</p> <p>Post meeting feedback was that on the whole the 49 x 300m RD WTGs in the regular layout is the MDS for assessment.</p>	<p>Visualisations presented in Volume 6, Annex 10.6. SLVIA Visualisations.</p>

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	Further feedback from NRW requested a night-time viewpoint to be included in SNP. All other parties agreed to the proposed Viewpoint list.	
NRW Email 23.02.2021	<p>Advice in respect of ETG 10 February 2021 and email regarding actions from the meeting sent on 17 February 2021.</p> <p>NRW request an additional night-time Visualisation from Viewpoint 37 Cefn Coch Stone Circle to represent views from Snowdonia National Park. The viewpoint is just outside the National Park but would be representative of views northwards towards the western part of the array, which would lie within a dark area of seascape and edged by the comparatively dark landscapes of the Great Orme and Anglesey. The National Park itself is an International Dark Sky Reserve. The main sources of light pollution visible from the National Park lie to the north east (Conwy/Llandudno & settlements further east). Although there may be some light pollution along the coastal strip around Penmaenmawr & Llanfairfechan, this is likely to be separated from new light sources out to sea.</p>	Additional night-time viewpoint in SNP subsequently agreed as Viewpoint 60: Foel Lus (Annex 10.6) due to health and safety issues associated with accessing other suggested locations in darkness.

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NRW Email 23.02.2021	Viewpoint 24 Graig Fawr – NRW advise that alternative scenarios should be included for this viewpoint.	Both MDS A and MDS B are included for VP 24 in Annex 10.6.
NRW Email 23.02.2021	<p>Maximum Design Scenario. Advice with reference to presented wirelines for areas A & H variants and the 300mRD (49 turbines) & 220m RD (92 turbines) in regular and perimeter layouts.</p> <p>Marginal differences between areas A & H, with A perhaps having the slightly larger horizontal extent in more views.</p> <p>Regular layout slightly worse from more viewpoints than the perimeter layout.</p> <p>The 300m RD turbines are more visually prominent in nearly all views, especially when seen against the landform and existing windfarms. However, the smaller turbines often appear more dense, presumably due to the greater number.</p> <p>Therefore, the worst case scenario of the variants presented are likely to be area A, regular layout & 300m RD turbines.</p> <p>The potential reduction in effects from a reduction in size of turbine is limited by their greater number.</p>	<p>For PEIR, the array area was reduced with the western boundary broadly according with Area J which offers a compromise between the benefits of Area C from the west (IoA) and the benefits of Areas H and A from the south and south-east.</p> <p>As a result of the formal consultation on the PEIR, a further reduction in the array area of the AyM has been included as mitigation of SLV effects as set out in Section 10.9. This results in a reduction in the number of turbines from a maximum of 91 to a maximum of 50 of the smaller turbines; the number of larger turbines has reduced from 50 to 34.</p>

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	<p>This worst case scenario is highly likely to lead to significant adverse effects on Designated Landscapes. We advise a substantial reduction in the area and scale of the proposal to minimise adverse visual effects on National Parks and AONBs.</p>	
<p>23.02.2021 Email Isle of Anglesey County Council</p>	<p>Overview</p> <p>The Maximum Design Scenario approach is based on PINS Advice Note 9 and establishes a 'maximum adverse case scenario' or 'worst case scenario' for the purposes of the ES.</p> <p>The scenarios aim for maximum output from the site rather than the avoidance of significant adverse effects on seascape, landscape and visual receptors, although it accepted that some adverse effects are likely due to the location and extent of the site boundary.</p> <p>At this early stage it is unclear how any of the scenarios presented could conform with the Welsh National Marine Plan's policies SOC 06 for Designated landscapes and SOC 07 for Seascapes and the need to demonstrate how potential impacts have been taken into consideration and whether it has:</p> <p>a. avoided adverse impacts; and/or</p>	<p>The aim of the scenarios is not as stated by IoA. The scenarios presented to the ETG as mitigated areas for PEIR reduce the output from the site's maximum potential.</p> <p>The aim of defining a worst-case scenario for each topic area is in order to ensure that the ES identifies all the likely significant effects that may be associated with the development envelope applied for.</p> <p>For PEIR, the array area was reduced with the western boundary broadly according with Area J which offers a compromise between the benefits of Area C from the west (IoA) and the benefits of Areas H and A from the south and south-east.</p>

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	<p>b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised.</p> <p>Given the sensitivity of the receptor, the Council considers that the magnitude of change associated with all of the scenarios will result in significant adverse effects contrary to the guidelines included in the NRW (2019) commissioned report from White Consultants.</p> <p>Due to the orientation of the AyM when seen from the Ynys Môn coast, MDS 'C' has a reduced horizontal spread which means that this scenario is perceptibly different to the others and appears to represent the best (potentially least harmful) of the 'worse case scenarios' under consideration for the ES.</p> <p>The taller turbines (300 meter rotor diameter) in either of the layouts (regular/perimeter) also represent a worst case scenario for the purposes of the MDS.</p> <p>While there are changes in the grouping (density and stacking) these are more difficult to differentiate. It has been explained that the Development Consent Order (DCO) and Marine Licence do not fix a WTG layout and do not fix locations of individual turbines, only the number and dimensions of turbines. With this in mind the final layout may not represent any of the scenarios.</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>The taller WTGs have been used in the MDS A.</p> <p>Noted that the DCO does not fix a WTG layout at consent.</p>

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<p>23.02.2021</p> <p>Email</p> <p>Isle of Anglesey County Council</p>	<p>Turbine height (200 and 300 metres RDs) and layout scenarios (perimeter and regular)</p> <p>The larger turbines represented a worst case in the viewpoint wireframes due to their ability to visually compete in views of the coastal landform, whether on Ynys Môn or in borrowed views from the mainland.</p> <p>Marginal differences between the perimeter and regular layouts such that we did not perceive a difference that would result in a potentially measurable effect and are happy that the regular layout as recommended in the meeting of 10 February 2021 is suitable for the assessment.</p> <p>We are concerned that the selection of a MDS which includes the larger turbines (without an assessment of the smaller turbines) will mean that measures to address policy considerations from the Welsh National Marine Plan along with recommendation from the NRW (2019) commissioned White Consultants report, are not being given sufficient weight at this stage of the EIA process, and the potential to avoid significant adverse effects is not being adequately considered.</p>	<p>Larger WTGs and regular layout assessed as MDS A for all receptors. MDS B (smallest WTGs proposed) is also assessed for 'key viewpoints' as agreed with ETG members.</p>

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<p>24.03.2021</p> <p>Email</p> <p>SNP</p>	<p>Response in relation to ETG of 25.01.2021 - Layout and site boundaries</p> <p>We welcome the site boundary considerations as a means of attempting to minimise the impact of the development. Of the options displayed in the Comparative Wires document presented during the January meeting, it would seem that options J and H (H more so than J) would be the least impactful from a National Park's point of view (for Tal y Fan, Conwy Mountain and Carnedd Llywelyn).</p> <p>However, this being said we don't feel that there is a great deal of difference in the options overall in terms of the impact of the proposal and that the visual impact of the development will likely still be high regardless of the options.</p>	<p>For PEIR, the array area was reduced with the western boundary broadly according with Area J which offers a compromise between the benefits of Area C from the west (IoA) and the benefits of Areas H and A from the south and south-east.</p> <p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>There is now a reduction from 88 km² at PEIR to 78 km² for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application.</p>
<p>24.03.2021</p> <p>Email</p> <p>SNP</p>	<p>Response in relation to ETG of 10.02.2021 - Turbine height design scenarios presented for area options H and A</p> <p>In terms of the information provided in the February meeting, the larger turbines certainly present the worst-case scenario and would have the biggest impact, partly due to their relationship with the current smaller turbines in the bay.</p> <p>Similarly to the above answer, H would likely be the least impactful we believe from the National Park's point of view</p>	<p>Largest WTGs used in main assessment of MDS A.</p> <p>Regular layouts used in both MDS A and MDS B assessments.</p> <p>Noted.</p> <p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. There is now</p>

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	<p>(in comparison with option A) as it had a slightly reduced horizontal field of view.</p> <p>Again we don't believe there is a huge amount of difference between the options, however the smaller turbines (200m) and the regular option of H would seem to be the best on offer here.</p> <p>The Authority maintains concerns about the scale of this development and in particular the cumulative effect in combination with existing developments at Gwynt y Môr, Rhyl Flats and to a lesser extent North Hoyle. The cone of sight being taken up currently from viewpoints within the National Park will be increased substantially regardless of the options chosen.</p>	<p>a reduction from 88 km² at PEIR to 78 km² for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application.</p>
<p>8 March 2021 Email NRW</p>	<p>We are content with the inclusion of a photomontage at Viewpoint 24 Graig Fawr, this viewpoint to be fully represented by photography, cumulative wireline and photomontage and assessed in detail in the SLVIA as a representative viewpoint.</p> <p>Viewpoints 26 & 54 to be cumulative wirelines only.</p> <p>The effects on the relevant special qualities of the AONB (Special Quality of the AONB which would potentially be affected by the development is 'Landscape Character &</p>	<p>Relevant assessments are included in Section 10.11.7.</p>

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	<p>Quality'. Components of this Special Quality include Tranquility and Remoteness & Wildness, Space & Freedom. The aims are to 1) Conserve & enhance the special quality; 2) Safeguard panoramic views & tranquility.) would be informed by the visualisations prepared for all three viewpoints but only Viewpoint 24 would be assessed in detail.</p>	
<p>8 March 2021 Email NRW</p>	<p>Representative viewpoint to be included in the vicinity of VP37 and VP47 confirmed as VP 37 Cefn Coch Stone Circle.</p>	<p>Assessment of effects is included in Section 10.11.5 with visualisations included in Annex 10.6.</p>
<p>8 March 2021 Email NRW</p>	<p>We fully understand the safety concerns with VP37 as a night time viewpoint. The viewpoint we previously suggested, for clarity was on a minor road on slopes of Cefn Maen Amor (not Mawr), same approximate location as suggested at SH74479 74607. Another possible location is a car park on Mountain Lane, the slopes of Foel Lus SH73038 75992. We have not been able to visit the site & are content for the consultants to determine which location is most suitable for the SLVIA & microsite during field work.</p>	<p>VP 60 Foel Lus included as night time VP in SNP.</p>
<p>30.09.2021 Section 47</p>	<p>The scale of turbines detracts from the natural beauty of the visual impact of the Orme when viewed from Llanfairfechan.</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the</p>

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J &M Jones	<p>The turbine height appears almost the same as the Orme itself. There are two turbines to the far left of the installation which look out of place in views from Llanfairfechan.</p> <p>It is possible at present because of a dark Northern horizon to view and photograph the Northern Lights from the jetty here in Llanfairfechan,</p> <p>The necessary lighting of the turbines at night will prevent views across the dark northern horizon and photography of the Northern Lights for future generations, as well as change the nightscape forever.</p>	<p>AyM MDSs following consultation. This includes a reduction in the extent of the array area in views from Llanfairfechan and a reduction in lighting intensity to 10% of that shown in the PEIR (200 candela) when visibility from the WTGs is greater than 5 km, which is the majority of the time.</p> <p>The Development Consent Order (DCO) and Marine Licence(s) do not fix a WTG layout. The final layout may not be as represented in Annex 10.5 and Annex 10.6.</p>
06.10.2021 Section 42 S Wacock	<p>Concern over further accumulation of wind farms off Llandudno and the coast which are considered an eye sore and industrialisation of views.</p> <p>Suggest look at tidal infrastructure along the Menai Straits instead.</p>	<p>Noted.</p> <p>A combination of tidal <u>and</u> offshore wind projects, as well as other low carbon technologies, are considered necessary to meet the climate change targets, with an extension to the existing Gwnyt y Mor being an important contributor to those targets.</p>
11.10.2021 Section 42 Mostyn Estates	<p>A review of the approach and contents of a Seascape, Landscape and Visual Impact Assessment (SLVIA) which has been undertaken as part of a Preliminary Environmental</p>	<p>Noted.</p>

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	<p>Information Report has been undertaken by Bright & Associates. A copy of the full report is included at Appendix 2.</p> <p>This review examines the SLVIA regarding offshore matters, namely, the turbines rather than the cable routing, substations or other infrastructure on land (i.e. onshore). It focuses on the methodology adopted, approach and results relevant to the environs of Llandudno as well as the landscape character and designations applicable to the Conwy area. Seascape Character Areas which might be directly affected by the development and those adjacent to this part of the coast have been considered.</p>	
<p>11.10.2021 Section 42 Mostyn Estates</p>	<p>Our review of the SLVIA concludes that we have concerns regarding current Natural Resources Wales and GLVIA3 guidance and how it has been applied to the SLVIA. Therefore, the results appear to be biased to conclusions of lower impacts.</p>	<p>It is not possible for the AyM to apply many of the criteria suggested by the NRW (2019) Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance due to the site location, which is fixed. The draft NPS EN-3 acknowledges that certain constraints on the location of extension projects mean that applicants have a limited ability to select alternative sites. The Applicant has nonetheless sought to minimise effects, most recently by reducing the project extent</p>

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		<p>from 88 km² at PEIR to 78 km² for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application.</p> <p>The NRW (2019) Guidance provides information about the possible threshold distances for different magnitudes of change based on different WTG heights based on a very small sample of previously-submitted SLVIAs.</p> <p>It also provides guidance on how higher or lower magnitudes of change may arise based on a range of factors.</p> <p>In relation to seascape sensitivity, it provides relative levels of sensitivity to wind farm development occurring within an area of seascape largely based on distance from designated landscapes.</p> <p>Whilst this is useful to guide the understanding of the likely effects of an OWF it does not constitute policy or supersede or replace the understanding provided by a project-specific</p>

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		<p>SLVIA and the capacity of a seascape/ landscape to accommodate the development in question.</p> <p>Any divergence in the SLVIA from the stated sensitivity levels in the NRW Guidance has been explained.</p>
<p>11.10.2021 Section 42 Mostyn Estates</p>	<p>The reference to significant or not-significant is not an appropriate approach nor is it adopted in the majority of other environmental topics for the development.</p> <p>Overall, it is considered that the SLVIA does not comply with GLVIA3 as it does not clearly differentiate between the significant effects that are likely to have some bearing on the eventual decision and those of lesser concern.</p>	<p>The reference only to significant or non-significant effects is acceptable under GLVIA3 paragraph 3.33.</p> <p>Nevertheless, the ES methodology has changed to include assessment of levels of significance following consultation.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>The methodology does not include as references the NRW (2019) Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance (Parts 1-3) or Review and Update of Seascape and Visual Buffer study for Offshore Wind farms, Final Report for Hartley Anderson, White Consultants with Northumbria University, March 2020</p>	<p>The NRW (2019) Guidance is referenced extensively within the SLVIA and is listed as a reference in the EA Annex 10.1.</p> <p>The White Consultants with Northumbria University (2020) is a study and not best practice guidance. It has not been used as a reference in undertaking the SLVIA and therefore it is not included in the reference list.</p>

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		No members of the ETG have requested that it is considered in the course of the SLVIA consultation.
11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021	The SLVIA does not give an explanation of the different categories of Representative Viewpoints, Key Viewpoints and Illustrative Viewpoints nor their treatment in the SLVIA and is a key omission.	This is included in Section 10.7.4 – Visual Resource.
11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021	Often, in the SLVIA, other factors which should be considered under magnitude of impacts such as distance are taken into account under susceptibility to change which in turn forms part of the receptor sensitivity. This creates the likelihood of undervaluing/ assessing potential effects. The defined sensitivity level should be a stated situation irrespective of the Development in question. This potentially results in reducing the sensitivity rating and may further decrease the overall magnitude of impact concluding that the results are lower than they actually are.	The methodology in Annex 10.1 sets out the degree to which susceptibility should and does take into account the susceptibility to the proposed development in accordance with GLVIA3.
11.10.2021 Section 42 Mostyn Estates	It is not possible to gauge whether the landscape or visual receptor is actually within close range etc. to the Array Area.	Distances between the Array Area and each receptor are provided in the SLVIA at Sections 10.10 and 10.11 or are as shown on the

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Bright & Associates Review of SLVIA at PEIR October 2021		numerous Figures/ visualisations included in Annex 10.5 and 10.6.
11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021	NRW guidance referred to earlier includes the Stage 1 - Ready reckoner of visual effects related to turbine size (March 2019). Table 1 Summary of SVIA analysis findings provides a range of turbine heights to blade tip (m) and what constitutes a low or medium magnitude of effect.	Whilst the Guidance sets out some useful possible thresholds for potential effects of OWFs based on a small sample of SLVIA findings for two OWFs of different scale and contexts (of which one example was prepared by the author of this SLVIA) the AyM should be considered in relation to the specific findings of the SLVIA.
11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021	The lack of differentiation between different groups of a 'settlement' means that there is a danger of the assessment being too broad and potentially recording a lower significance of effect for certain receptors. Furthermore, tourist activities such as beach users, people engaged in recreational amusements, sitting/viewing from seafront benches etc. are not treated as sub-groups in PEIR Volume 2, Chapter 10.	To avoid confusion between different user groups and viewers within a settlement the Methodology in Annex 10.1 and the assessments of the effects on settlements have been updated in Section 10.11.
11.10.2021 Section 42 Mostyn Estates	It is acknowledged that the photographs were not taken in favourable weather conditions (PEIR Volume 2, Chapter 10, paragraph 116).	It is acknowledged that a small number of the photographs were taken in less favourable weather conditions.

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Bright & Associates Review of SLVIA at PEIR October 2021		<p>The viewpoint photography was described in the LUC Review for the North Wales Local Planning Authorities as being 'of high quality, and has been undertaken in good weather conditions for the most part. Restrictions on site visits are cited as the reason for taking photography in less-than-ideal conditions at VP 17: Penrhyn Castle and VP 50: Gwrych Castle. Some other images are slightly hazy. However, given the number of viewpoints assessed, reasonable efforts appear to have been made to secure good photographs, and we have not identified any examples where new photography would be required'.</p> <p>ETG members have not requested any substitute photographs, with agreement reached that the photographs are fit for purpose.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>The Landscape Institute (2019) advice suggests a Technical Methodology should be provided as an Appendix to Type 4 visualisations. Furthermore, this would help the reader understand the level of technical approach and also</p>	<p>A Technical Methodology is included in Annex 10.1.</p> <p>Annex 10.1 also makes reference to the use of the tripod and photography of its position.</p>

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	<p>explain reasoning for any departures from standards (Technical Guidance Note 06/19, paragraph 7.2.2).</p> <p>Reference is made to photographs of the tripod location to confirm the camera/ tripod location and is also repeated in the NatureScot guidance (Annex B - Standard requirements which all visualisations should comply with). This is not included in the SLVIA.</p>	
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>The choice why two Viewpoints on the Wales Coast Path have been chosen for night-time views is not explained. It is expected that few walkers would be using the footpath at night when compared to other Viewpoints which may be representative of a larger number of people, such as from settlement areas.</p>	<p>Night time viewpoint locations were agreed with consultees and represent a variety of receptors and distances.</p> <p>A further night-time visualisation has been prepared for VP 61: Llandudno Promenade near Venue Cymru.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Not all Viewpoints are fully assessed. Whilst the EIA may well ultimately present these images and assessments, it is vital for them to be available at this PEIR stage.</p>	<p>Not all viewpoints are assessed in Section 10.10 and 10.11. The assessment and visualisation outputs for each viewpoint (for PEIR and ES) have been agreed with the ETG with the rationale for this explained in Section 10.7.4.</p>
<p>11.10.2021 Section 42 Mostyn Estates</p>	<p>The Great Orme Heritage Coast and Great Orme & Creuddyn Peninsula SLA are not assessed and instead, are referred to under specific Viewpoints and Landscape</p>	<p>Section 10.11.6 includes an assessment of the effects on the Great Orme Heritage Coast.</p>

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Bright & Associates Review of SLVIA at PEIR October 2021	Character Areas when determining the value of landscape/seascape character and value of views for visual receptors. Regional Landscape Character Areas which correspond with landscape designations are examined separately in Section 7 of this review. This is a significant omission.	<p>The Conwy Borough Council, Great Orme Country Park and Local Nature Reserve Management Plan 2011-2016 does not set out any specific Special Qualities associated with its Heritage Coast status however it notes aspects of the Great Orme landscape that are considered important.</p> <p>The associated LCA C10 assessment in Section 10.11.16 includes consideration of these.</p> <p>The LCA C10 assessment in Section 10.11.6 considers the value attributed to it through its local designation as an SLA. This approach has been agreed with Conwy Borough District Council.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	The SLVIA does not assess the direct and indirect effects on Marine Character Areas and this needs to be clearly stated along with the reasons why, given that Marine Character Areas form part of the desk study.	Within Wales the approach to assessing the effects on seascape character in relation to regional level Seascape Character Areas (SCAs) and not Marine Character Areas was agreed through scoping and early ETG meetings.

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<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Conwy, Denbighshire and Flintshire - SCA A Llandudno Bay (4.63 km): We do not agree with the assessment. The SLVIA notes a Medium-high sensitivity but we advocate that this should be a High sensitivity to reflect the value and susceptibility to change of this SCA. We also suggest that there is a Medium-high magnitude of change for construction, operation and decommissioning. Residual effects are significant (adverse);</p>	<p>The effects are assessed as Significant, adverse. The effects on SCA A in Section 10.11.6 have been reviewed and are considered to reflect the sensitivity and magnitude of change of the mitigated AyM as set out in Section 10.9. The LUC Review concurs with this finding.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Conwy, Denbighshire and Flintshire - SCA B Colwyn Bay (4.56 km): We do not agree with the assessment. The SLVIA notes a Medium-high sensitivity but we advocate that this should be a High sensitivity to reflect the value and susceptibility to change of this SCA. We also suggest that there is a Medium-high magnitude of change for construction, operation and decommissioning. Residual effects are significant (adverse) for construction, operation and decommissioning.</p>	<p>The effects on SCA B in Section 10.11.6 have been reviewed and the assessment clarified. It is considered to reflect the sensitivity and magnitude of change of the mitigated AyM as set out in Section 10.9. No change has been made to the finding of Non-significant effect in this instance.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>As with the Marine Character Areas previously referred to, the SLVIA does not assess the direct and indirect effects on National Character Areas within Wales. This needs to be clearly stated along with the reasons why given that National Character Areas are part of the desk study.</p>	<p>Within Wales the approach to assessing the effects on landscape character in relation to regional level Landscape Character Areas and Types with reference to specific baseline documents (SCAs) and not National</p>

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		Character Areas was agreed through scoping and early ETG meetings.
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>We request that the assessments for LCA C10 and C9 are reviewed. We would suggest that the character area is more sensitive to change than described and defined in the SLVIA.</p>	<p>The effects on LCA C10 and C9 in Section 10.11.6 have been reviewed. The assessments are considered to reflect the sensitivity and magnitude of change of the mitigated AyM as set out in Section 10.9.</p> <p>No change has been made to the finding of locally Significant for LCA C10 and Non-significant for LCA C9 in this instance.</p> <p>The LUC Review concurs with the SLVIA findings for these receptors.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Night-time impacts (Conwy): It is understood that night-time effects east of Conwy have been scoped out (paragraph 23). However, this suggests that other areas including to the west should be reviewed. Having conducted this review, B&A advocate that the SLVIA should assess locations from Llandudno and also Great Orme at night.</p>	<p>A night-time viewpoint on the Great Orme (VP13) was included and assessed in the PEIR and is assessed in Table 16, Section 10.12.5.</p> <p>A new night time viewpoint has been added at VP 61: Llandudno Promenade near Venue Cymru.</p> <p>Consideration of night-time effects within the wider Conwy area is included in Section 10.12.5.</p>

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<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Current Viewpoint Locations: B&A has carried out a review of Viewpoints in Llandudno and its surrounding environs. Based on this study, there are definite grounds to suggest that improved exact positions should be identified. Additional viewpoints should be included where there is a clear lack of visual interpretation with photomontage and wireframes in order to fully understand the consequences of visual effect from known areas of high sensitivity for example in Llandudno and Great Orme.</p>	<p>The viewpoint locations and the associated outputs in terms of the visualisations and assessment included in the SLVIA were agreed with the ETG.</p> <p>New viewpoints have been added at 61: Llandudno Promenade near Venue Cymru and 62: Great Orme – Marine Drive, Wales Coast Path near Toll Booth.</p> <p>Baseline photography and visualisations have been provided for relocated VP 58: Little Orme at Trig Point.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Cultural heritage/tourism Viewpoints: Reference is made to Representative and Illustrative Viewpoints relevant to the assessment of cultural heritage or tourism matters. We would suggest that all Viewpoints should be assessed in the SLVIA as this will ensure that a robust assessment is carried out regarding landscape and visual issues. This will then help to inform cultural heritage or tourism factors (paragraph 107);</p>	<p>The viewpoint locations and the associated outputs in terms of the visualisations and assessment included in the SLVIA were agreed with the ETG, which includes Cultural Heritage consultees.</p>
<p>11.10.2021 Section 42 Mostyn Estates</p>	<p>Theoretical visibility of WTGs: Reference is made throughout the SLVIA to the theoretical visibility of the WTGs, for example 41-48 (MDS A) in paragraph 164. This appears to</p>	<p>The theoretical visibility of a number of WTGs is one part of the objective information provided in relation to the scale and size of change. It is</p>

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Bright & Associates Review of SLVIA at PEIR October 2021	underestimate the visual consequence of coastal views and a limited ZTV should not be a reflection on overall assumptions of magnitude.	does not, on its own, provide the basis for the definition of the magnitude of change.
11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021	Viewpoint 11 – Llanfairfechan Based on this initial review we expect that there is likely to be a Medium (upper level) magnitude of impact and a Moderate (adverse) significance of effect during operation.	Agreement with SLVIA noted.
11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021	Viewpoint 13 – Great Orme – Near Summit Complex (Array Area: 11.7 km) B&A advocate that the visual receptor sensitivity is undervalued and a High or potentially Very High is more appropriate. Using the distance tables and predicted magnitude set out in the NRW Stage 1 - Ready reckoner of visual effects related to turbine size (March 2019), this would be beyond the scale of a Low or Medium magnitude of impact. Thus, there is potential for a Large or possibly Very Large magnitude of impact and equates to a Major (adverse) significance of effect during operation.	The SLVIA finds the effects to be Significant. The NRW Stage 1 - ready reckoner is not an appropriate tool for defining the magnitude of change at a specific viewpoint, particularly where there are other factors that may influence this. The magnitude of change at this viewpoint has been reviewed (including for MDS B) and is considered appropriate. The assessment in Table 12, Section 10.11.6. considers the effects of the mitigated AyM as set out in Section 10.9.

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<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 15 – Great Orme – Café (Array Area: 11.1 km) is defined as an Illustrative Viewpoint and is not fully assessed in the SLVIA.</p>	<p>The assessment in Table 12, Section 10.11.6. considers the effects of the mitigated AyM on this viewpoint as set out in Section 10.9.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 18 – Llandudno Paddling Pool (Array Area: 11.7 km). Having conducted field work as part of this review we advise that this is not a good choice of Viewpoint location as it is taken within the paddling pool area. Therefore, the context of this view is very much related to the pool, recreation and activity.</p> <p>We have provided a photograph (B&A Figure 1) which has been taken from the slipway opposite the theatre. It is mid-way along the promenade which is a key and recognised feature of Llandudno. It offers a more open view which is reliant upon and responds to the sea and sky.</p>	<p>This viewpoint was selected as it is a gathering point at the eastern end of the promenade and beach and for this reason is considered suitable.</p> <p>The viewpoints were agreed with the ETG.</p> <p>A new viewpoint has been added at 61: Llandudno Promenade near Venue Cymru</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 19 – Rhos-on-Sea (Array Area: 12.2 km) This is defined as an Illustrative Viewpoint and is not fully assessed in the SLVIA. Is referenced under the evaluation of effects for settlement areas, the Wales Coast Path and National Cycle Route (NCR 5).</p>	<p>The viewpoint locations and the associated outputs in terms of the visualisations and assessment included in the SLVIA were agreed with the ETG.</p> <p>The position of the Viewpoint is considered appropriate as it shows the AyM connecting</p>

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	<p>It would seem this location is one from the assessment of the Gwynt y Môr Offshore Wind Farm and is not appropriate for the Development. We have also identified an alternative Viewpoint which is discussed later in this Section.</p>	<p>with and partially oversailing the coastal development in views ahead of people travelling along this section of the coast, which may be considered worse than a view of AyM out in the open sea.</p>
<p>11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 20 – Bryn Euryn (Array Area: 13.2 km) We agree with the receptor sensitivity denoted in the SLVIA (i.e. Medium-high. Using the NRW Stage 1 - Ready reckoner of visual effects related to turbine size (March 2019), there is the likelihood of a Large magnitude of impact and likely Major/Moderate (adverse) significance of effect during operation.</p>	<p>The SLVIA finds the effects to be Significant. The NRW Stage 1 - ready reckoner is not an appropriate tool for defining the magnitude of change at a specific viewpoint, particularly where there are other factors that may influence this. The magnitude of change at this viewpoint has been reviewed and is considered appropriate. The assessment in Table 12, Section 10.11.6. considers the effects of the mitigated AyM as set out in Section 10.9.</p>
<p>11.10.2021 Section 42 Mostyn Estates</p>	<p>Viewpoint 29 – Colwyn Bay Promenade (Array Area: 13.9 km) We do not agree with the SLVIA assigned sensitivity, rather, we suggest that it should be High. Based on the NRW Stage</p>	<p>The SLVIA finds the effects to be Significant. The NRW Stage 1 - ready reckoner is not an appropriate tool for defining the magnitude of change at a specific viewpoint, particularly</p>

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Bright & Associates Review of SLVIA at PEIR October 2021	1 - Ready reckoner of visual effects related to turbine size (March 2019), there will be a Large magnitude and Major (adverse) significance of effect during operation.	<p>where there are other factors that may influence this.</p> <p>The sensitivity and magnitude of change at this viewpoint have been reviewed and is considered appropriate.</p> <p>The assessment in Table 12, Section 10.11.6. considers the effects of the mitigated AyM as set out in Section 10.9.</p>
<p>11.10.2021 Section 42</p> <p>Mostyn Estates</p> <p>Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 37 – Cefn Coch Stone Circle (Array Area: 21.4 km) B&A agree with the Medium-high visual receptor sensitivity.</p> <p>Distance, intervening terrain and the context of the view also partly mitigate the magnitude of impact which is likely to be Medium. Using the NRW Stage 1 - Ready reckoner of visual effects related to turbine size (March 2019), there would likely be a Major/Moderate (potentially adverse) significance of effect. Albeit, the Development is not as dominant and intrusive as from other closer views.</p>	<p>The SLVIA finds the effects to be Significant.</p> <p>The NRW Stage 1 - ready reckoner is not an appropriate tool for defining the magnitude of change at a specific viewpoint, particularly where there are other factors that may influence this.</p> <p>The magnitude of change at this viewpoint has been reviewed (including for MDS B) and is considered appropriate.</p> <p>The assessment in Table 12, Section 10.11.6. considers the effects of the mitigated AyM as set out in Section 10.9.</p>

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<p>11.10.2021 Section 42</p> <p>Mostyn Estates</p> <p>Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 52 – Pen-y-Dinas Camp at Interpretation Sign (Array Area: 11.6 km) Viewpoint 52 is a Cultural Heritage Viewpoint and is not assessed in the SLVIA.</p> <p>We would also suggest that the road view around the Great Orme is an important feature and that a Viewpoint should be used where cars are known to stop and footpath users will enjoy the same view (B&A Figures 3 and 6).</p>	<p>The viewpoint locations and the associated outputs in terms of the visualisations and assessment included in the SLVIA were agreed with the ETG.</p> <p>An additional Viewpoint 62: Great Orme – Marine Drive, Wales Coast Path near Toll Booth has been included to illustrate views from Marine Drive.</p>
<p>11.10.2021 Section 42</p> <p>Mostyn Estates</p> <p>Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 55 – Footpath Above Cilgwyn Mawr (Array Area: 16.8 km) is an illustrative viewpoint and not assessed in the SLVIA.</p>	<p>The viewpoint locations and the associated outputs in terms of the visualisations and assessment included in the SLVIA were agreed with the ETG.</p>
<p>11.10.2021 Section 42</p> <p>Mostyn Estates</p> <p>Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 58 – Little Orme on the Wales Coast Path (Array Area: 10.8 km) Viewpoint 58 is an Illustrative Viewpoint and is not assessed in the SLVIA. Following our review, we have identified a better viewpoint location from the trig point on the Little Orme (B&A Figure 7). This provides impressive open views across the seascape and a panorama which has the key features of Llandudno to the left and Colwyn Bay to the right of the viewer. Existing WTGs do not intrude or dominate from this suggested location.</p>	<p>The viewpoint locations and the associated outputs in terms of the visualisations and assessment included in the SLVIA were agreed with the ETG.</p> <p>Baseline photography and visualisations have been provided for relocated VP 58: Little Orme at Trig Point.</p>

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<p>11.10.2021 Section 42</p> <p>Mostyn Estates</p> <p>Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Viewpoint 59 – Llandudno Promenade – Lifeboat Slipway (Array Area: 11.9 km) Following our review, it is apparent that the pier will hide much of the Array Area. However, this is a view held in sequence rather than isolation and a short walk along the sea front promenade reveals a more direct and open view.</p> <p>Using the NRW Stage 1 - Ready reckoner of visual effects related to turbine size (March 2019), the proximity of proposed higher turbines will be notable. This is likely to result in a Large magnitude of impact and Major (adverse) significance of effect during operation.</p>	<p>The potential for the AyM WTGs to be seen above and immediately adjacent to the Llandudno Pier, from the promenade in front of the Conservation Area and in contrast to the more open views presented within other Llandudno viewpoints was the purpose of this viewpoint location.</p> <p>The NRW Stage 1 - ready reckoner is not an appropriate tool for defining the magnitude of change at a specific viewpoint, particularly where there are other factors that may influence this.</p>
<p>11.10.2021 Section 42</p> <p>Mostyn Estates</p> <p>Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Settlements of Llandudno, Penrhyn Bay and Rhos-on-Sea</p>	<p>We note that B&A generally agree with the findings of partial significant effects for these settlements.</p>
<p>11.10.2021 Section 42</p> <p>Mostyn Estates</p> <p>Bright & Associates Review of SLVIA at PEIR October 2021</p>	<p>Wales Coast Path Section L Great Orme. We suggest that the receptor sensitivity is higher than the Medium-High sensitivity applied in the SLVIA. Other Viewpoints along the coast suggest a higher level in part, due to a greater recognition of valued locations which is lacking in the assessment.</p>	<p>The SLVIA finds the effects to be Significant.</p> <p>The NRW Stage 1 - ready reckoner is not an appropriate tool for defining the magnitude of change at a specific viewpoint or along a</p>

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	Applying the NRW Stage1 - Ready reckoner of visual effects related to turbine size (March 2019), there will be a Large magnitude of impact and Major (adverse) significance of effect during operation would occur.	route, particularly where there are other factors that may influence this.
11.10.2021 Section 42 Mostyn Estates Bright & Associates Review of SLVIA at PEIR October 2021	Assessment of cumulative effects in the SLVIA. The narrative provided in the SLVIA in regards to landscape and visual cumulative effects throughout is very confusing and it does not assess cumulative effects in line with current guidance nor as requested by consultees.	Noted. The cumulative assessment Section 10.13 has been revised.
11.20.2021 Section 42 NRW	NRW advice relates to the potential impacts on the Snowdonia National Park, the Isle of Anglesey AONB and the Clwydian Range and Dee Valley AONB. The proposals would have numerous and extensive significant adverse effects on seascape, landscape, and visual receptors, including within the Isle of Anglesey AONB and Snowdonia National Park and within their settings. There would also be non-significant, but adverse effects on the Clwydian Range and Dee Valley AONB. NRW are concerned that there has been an under-estimation of some seascape, landscape and visual effects on these receptors within the SLVIA.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. See responses to issues also raised in NRW Email of 09.02.2021 not repeated here.

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	<p>The embedded mitigation of the reduced western extent of the array is likely to reduce visual effects to a marginal degree, but not sufficiently to avoid likely significant effects at the numerous views within the Isle of Anglesey AONB and Snowdonia National Park, as identified in the PEIR. The visual effects in turn lead to significant adverse effects on landscape character within these Nationally Designated Landscapes and within their seascape settings.</p> <p>Without a substantial reduction in array area and/or scale of turbines, many significant and adverse effects on these Designated Landscapes are likely to occur as well as effects that are not significant, but nevertheless adverse. This conflicts with the purpose of these landscapes to conserve and enhance natural beauty, as set out in PPW11.</p> <p>Therefore, NRW advise a substantial reduction in array area and/or scale of turbines to reduce localised adverse effects on the Isle of Anglesey AONB and Snowdonia National Park.</p> <p>NRW advise that further consideration should be given to NRW's evidence base: "Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance". The evidence base is divided into 3 reports, which should be read together.</p>	

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11.20.2021 Section 42 NRW	Within the 32.8 km buffer, the array is located between 17.99 km and 32.67 km of 14 high sensitivity receptor viewpoints where all 48 turbines would be visible, and a further two such viewpoints where lower numbers of turbines would be visible.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.
11.20.2021 Section 42 NRW	<p>In relation to these points:</p> <p>3& 4. The array is within the Stage 1 Report's low magnitude buffer distances and within the medium magnitude buffer distance of 32.8 km.</p> <p>6. The array is located primarily in an area of medium sensitivity (Zone 1) as defined in the Stage 3 Report, with a small part to the west appearing to be in an area of high sensitivity (Zone 3) and a part to the north-east in an area of medium/low sensitivity (Zone 2).</p> <p>13. The array is visible in juxtaposition with sensitive views to headlands.</p> <p>14. The array is within buffer distances of three Designated Landscapes.</p> <p>16. The array is located offshore from Islands.</p> <p>18. The array includes locations where it fills or almost fills framed views.</p>	<p>It is not possible to relocate the AyM to beyond the 32.8 km buffer distance set out in the Guidance or to ensure that all of the suggested siting criteria are met.</p> <p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>No part of the AyM array area is now proposed as being located in an area of high sensitivity (Zone 3).</p> <p>Whilst the Guidance sets out some useful thresholds for potential effects of OWFs based on a small sample of SLVIA findings, the AyM should be considered in relation to the specific findings of the SLVIA.</p>

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	19. The array extends the width of arrays visible through an extension to Gwynt y Môr.	
11.20.2021 Section 42 NRW	<p>Stage 3 Report, Seascape & visual sensitivity assessment for offshore wind farms</p> <p>In summary, Part 1 identifies zones within the offshore area with differing levels of sensitivity (see above point 6). Zone 3 is an area of high sensitivity that is unable to accommodate the relevant type of development without significant character change or adverse effects. Zone 1, adjacent to Gwynt y Môr is of medium sensitivity, with potential for a small extension, but scope is limited. The scale of turbines in relation to distance buffers needs to be considered with regard to the sensitivity of zones. Zone 2 is of medium/low sensitivity and the evidence base indicates that development beyond Gwynt y Môr would tend to limit harm.</p> <p>Part 2 provides a detailed sensitivity and capacity assessment for each zone. Within Zone 3 and Zone 1, turbines over 175m are likely to exceed the medium magnitude of effect on high sensitivity receptors.</p>	<p>The mitigation set out in Section 10.9 ensures that no part of the AyM lies within Zone 3 (High Sensitivity), see Annex 10.5: Figure 2c.</p> <p>WTGs of less than 175 m are unlikely to be available or economically viable at the time when the AyM may be constructed.</p> <p>Notably smaller-scale turbines such as these are rapidly going out of production and are also less economically efficient as technology improves.</p> <p>Financial viability and competitiveness are key drivers in achieving a CfD, which is the UK Government's finance mechanism and route to market for OWFs. The cost per megawatt (the strike price) is the deciding factor in determining whether an offshore wind farm can be developed and thereby produce renewable energy to meet ambitious carbon reduction targets. In the timescale for AyM being developed it is vital that there remains</p>

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		<p>maximum flexibility of turbine height balanced with environmental effects that are acceptable to the Secretary of State, in order for the development to have any chance of being built and contributing to UK and Welsh targets.</p>
<p>11.20.2021 Section 42 NRW</p>	<p>Section 10.1: we note that NPS EN-3 states that “the IPC [now the Planning Inspectorate and the Secretary of State] should not refuse to grant consent for a development solely on the ground of an adverse effect on the seascape or visual amenity unless it considers that an alternative layout within the identified site could be reasonably proposed which would localize any harm”. The Welsh National Marine Plan SOC-06, notes that with regard to Seascapes and Designated Landscapes significant adverse impacts should be</p> <ul style="list-style-type: none"> a) avoided, b) where they cannot be avoided, minimised and c) where they cannot be minimised, mitigated. <p>NRW do not consider that sufficient evidence has been provided to demonstrate that seascape, landscape, and</p>	<p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions. The Applicant has introduced a further reduction from 88 km² at PEIR to 78 km² for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application. Ongoing consultation has concluded that the project is not able to further avoid and minimise effects, and as such alternative mitigation is being considered which may include off-set mitigation.</p>

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	visual impacts have been minimised in this case. Further work on this aspect is advised in the ES.	
11.20.2021 Section 42 NRW	Para. 25 notes that the viewpoints and visualisations have been agreed and reducing the array area from the maximum extent of the lease area to the boundary (defined as options Areas A, J or H) would be beneficial, but would not mitigate all the effects. The feedback from the ETG should be reflected here (see previous comment on Chapter 4, above).	This table now includes the feedback on this matter received from the ETG.
11.20.2021 Section 42 NRW	Table 2 and Section 10.9 refer in detail to the ETG comments and states (25/1/21) that the SLVIA effects have been recognised through embedded mitigation, reducing the westerly extent and removing from a high sensitivity area in the Seascape & Visual Sensitivity to Offshore Wind Farms in Wales guidance. As outlined at the beginning of this report, NRW do not consider that effects have been recognised. Reducing the number of turbines in the high sensitivity area is insufficient to achieve this, due to the scale of the turbines and proximity to the shore. NRW therefore advise that the guidance needs to be applied in full.	The refinement set out in Section 10.9 ensures that no part of the AyM lies within Zone 3 (High Sensitivity), see Annex 10.5: Figure 2c. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions. It is not possible to 'apply the guidance in full' due to the location of the AfL and the scale of

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		<p>OWF WTGs that are likely to be available or economically viable in the required timescale.</p> <p>Where possible, with consideration of the Guidance, the effects have been minimised.</p>
<p>11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>Section 10.4.1, Desk Study: NRW and LUC consider the sources of data and guidance used in the assessment to be appropriate.</p>	<p>Agreement noted.</p>
<p>11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>Section 10.10 SCA F is described as having an industrialised character, due to existing offshore wind farms, oil and gas platforms, dredging and shipping routes and lack of landscape designation. Sensitivity is described as medium-low, with the proposal reinforcing the industrialised character and effects as non-significant. The area is considered seascape and has no landscape designation but lies within the setting of the Great Orme Heritage Coast and Anglesey AONB and is described in the Seascape & Visual Sensitivity to Offshore Wind Farms in Wales guidance as medium sensitivity. NRW</p>	<p>Agreement noted.</p>

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	and LUC agree that the effects are likely to be non-significant.	
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	SCA 28 is described as having medium sensitivity, although the guidance notes high sensitivity. Given it forms part of the setting of Anglesey AONB and Snowdonia National Park we consider it to be of high sensitivity and agree that effects are likely to be Significant.	Agreement with finding of significant effects noted. The difference in the attribution of the level of sensitivity to this area in the SLVIA compared with the Guidance is explained in Section 10.10.
11.20.2021 Section 42 NRW, 08.10.2021 Section 42 Conwy and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	Section 10.11 SCA 2: NRW agree that effects on this area are likely to be Significant. The SLVIA considers the significant effects to be limited to the Great Orme. However, NRW and LUC consider the significant effects are likely to extend over a greater area, given ZTV coverage and that it forms part of the setting of Anglesey AONB and Snowdonia National Park.	Agreement with finding of significant effects noted. Assessment of extent of significant effects on SCA 2 reviewed and revised in Section 10.11.5.
11.20.2021 Section 42 NRW and	SCA 3-7: NRW agree that effects are likely to be Significant. The SLVIA considers the significant effects on SCA 5 and 6	Agreement with finding of significant effects on SCA 3 and SCA 7 noted.

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September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	would be limited in extent, however NRW consider significant effects are likely to occur across the whole of the SCAs.	The Applicant has reviewed the assessments for SCA 5 and SCA 6 and revised as it considers appropriate taking into account the mitigation set out in Section 10.9. It does not consider that significant effects would occur over the whole of these SCAs.
11.20.2021 Section 42 NRW	SCA C & D: NRW agree that effects on these areas are likely to be non-significant, although the effect would be adverse and intensify the effect of wind farms by filling in a gap between existing arrays.	Agreement noted.
11.20.2021 Section 42 NRW	The proposal would have significant adverse effects on 7 SCAs and would occur over a greater extent of the SCAs than indicated in the SLVIA.	The Applicant has reviewed the assessments and revised them in Section 10.10 and 10.11 as it considers appropriate taking into account the mitigation set out in Section 10.9.
11.20.2021 Section 42 NRW	There appears to be some under-estimation of sensitivity and significance in the seascape assessment, in our opinion. There are no visualisations of the seascape character from the sea with views to land e.g. from recreational vessels, which are mentioned in the report and would also be receptors of visual effects. NRW advise that visualisations of the seascape character from the sea should be included in	Noted and addressed as noted previously in relation to SCA 2. Visualisations have been prepared from two locations in the seascape to represent views from the Liverpool to Dublin ferry towards Snowdonia National Park and the Isle of

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	<p>the ES, along with an assessment of the visual effects on recreational users who are most likely to be receptors of the appreciation of landscape/seascape views in the setting of Designated Landscapes.</p>	<p>Anglesey AONB as agreed with NRW. These are VPs 66 and 67 included in Annex 10.6.</p>
<p>11.20.2021 Section 42 NRW</p>	<p>Viewpoints 1-3: the SLVIA describes the effects as Non-significant. We are concerned that the effects have been under-estimated and that effects may be Significant. Susceptibility is described as medium-high due to the distance from the receptor. However, we consider that distance is an aspect of magnitude of change, as described in GLVIA3, not of susceptibility or sensitivity of the receptor. Although large-scale sea views, the scale and nature of the development makes it very noticeable and will focus attention on it, sea views are the key focus in the predominantly coastal AONB and are currently empty and untrammelled by development, apart from the occasional transient ship.</p>	<p>The methodology in Annex 10.1 sets out the considerations when assessing susceptibility. The Applicant has reviewed Viewpoints 1-3 and is satisfied that their assessment as Non-significant is valid, particularly in view of the mitigation set out in Section 10.9, which has increased the distance of the Array Area in these views where it is also seen across a narrow extent of the horizontal field of view as part of the very large scale views from these locations.</p> <p>We note that LUC does not concur with NRW with respect to these viewpoints.</p>
<p>11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of</p>	<p>Viewpoints 4-8 & 14, 16, & 28: NRW agree that the effects at these viewpoints are likely to be Significant.</p>	<p>Agreement noted.</p>

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11.20.2021 Section 42 NRW	Viewpoints 41-43: NRW agree that the effects at these viewpoints are likely to be non- significant. However, they do not appear to have been assessed in detail.	Table 3 in Section 10.7 sets out which viewpoints are assessed in detail as agreed with the ETG.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	Viewpoint 44; Beaumaris Castle: NRW are concerned that the effects have been under- estimated and may be Significant. This is a highly sensitive location from an important historic monument within the AONB. Whilst a small part of the view, the scale and location of the turbines interferes with the view of the landform.	The Applicant has reviewed the assessment of Viewpoint 44 and considers the effects to be Non-significant as assessed in Section 10.11.3 Table 7.
11.20.2021 Section 42 NRW	Viewpoint 53; Puffin Island: this does not appear to have been assessed in detail.	Table 3 in Section 10.7 sets out which viewpoints are assessed in detail as agreed with the ETG.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of	The village of Moelfre lies within the AONB and effects are described as Non-significant. Given the strong coastal associations, likely views of the coast and sea and proximity to viewpoint 4, NRW consider the effects on this community are likely to be Significant.	The Methodology in Annex 10.1 has been updated to reflect that the assessment of the effects on settlements relates to people in properties. The effects on people using sea front areas and amenities are assessed in

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North Wales Local Planning Authorities		relation to the viewpoints and the Wales Coast Path in order to avoid duplication. Assessment in Section 10.11.3 reviewed and revised to include Significant effects on some properties within the settlement.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	The village of Beaumaris lies within the AONB and effects are described as Non-significant. Whilst much of the village appears to be orientated away from the view of the turbines, NRW are concerned that the effects may be significant, given the high sensitivity and proximity to viewpoints 8 and 44.	Assessment in Section 10.11.3 reviewed and revised to include further reasoned justification for why the effects are considered Non-significant.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	WCP Sections A, B & G & NCR 5: NRW agree that effects along these sections are likely to be non-significant.	Agreement noted.
11.20.2021 Section 42 NRW and	WCP Sections C, D, E & F: NRW agree that effects along these sections are likely to be Significant. Reduced susceptibility is described due to the transient nature of the	Agreement noted.

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September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	viewers. However, these are slow-moving receptors and likely to stop and rest to appreciate scenic views. NRW consider these receptors within an AONB to be of high susceptibility and sensitivity.	Reference to pace of movement added to assessments in Section 10.11.3
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	LCA 6: NRW agree that effects on this area are likely to be non-significant.	Agreement noted.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	LCA 8, 9, 10, 11: NRW agree that effects on these areas are likely to be Significant. Within LCAs 8, 9 & 10 significant effects are described as limited in extent to the coastline and non-significant elsewhere. NRW consider that the extent of significant effects is likely to extend further across these LCAs, as indicated by the ZTV.	The Applicant has reviewed and revised the geographical extent of the areas where Significant effects may arise within LCAs 8, 9 & 10 and provided further justification for this within Section 10.11.3.
11.20.2021 Section 42 NRW	The Special Qualities requiring detailed assessment do not appear to have been identified in the Simple Assessment. However, NRW agree that the Special Qualities requiring	The Simple Assessment in Annex 10.3 identifies the Special Qualities of the IoA AONB that require detailed assessment.

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	detailed assessment are: Expansive views, Peace & Tranquility, Islands around Anglesey. NRW agree that there would be significant adverse effects on these Special Qualities.	Agreement noted.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	In conclusion, there would be likely significant adverse effects at 8 viewpoints within the AONB and potentially 4 others. There would be likely significant adverse effects on the community of Moelfre and potentially Beaumaris, within the AONB. There would be likely significant adverse effects along 4 sections of the Wales Coast Path within the AONB. There would be likely significant adverse effects on 4 LCAs within the AONB. There would be likely significant adverse effects on the three relevant Special Qualities of the AONB.	The Applicant agrees that there would be significant adverse effects at eight viewpoints, in views from limited properties within Moelfre, along four sections of the WCP, across parts of four LCAs and on three relevant Special Qualities within the IoA AONB. The SLVIA Section 10.11.3 does not concur that there would be significant effects on VPs 1, 2, 3, 44 or in views from properties in Beaumaris.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	Viewpoints 10, 12, 38, 40: NRW agree that effects at these viewpoints are likely to be Significant.	Agreement noted.

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<p>11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>Viewpoint 34; Snowdon Summit: NRW agree that effects at this viewpoint are likely to be non-significant. NRW are concerned that susceptibility (described as medium) and sensitivity (medium-high) have been underestimated at this viewpoint, which is one of the most important in a National Park in Wales. NRW consider sensitivity to be very high at this location (high in the assessment categories). It is noted that whilst the extent of visibility at Snowdon summit is limited, there is a larger area with visibility along Crib y Ddysgul, a popular summit approach.</p>	<p>Agreement noted. Assessment amended to give further weight to importance within SNP and number of visitors.</p>
<p>11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>Viewpoint 36; Tal y Fan: NRW consider that the effects at this viewpoint have been under- estimated and are Significant. Sensitivity at this summit is likely to be high, viewers are not transient, and the sea view draws the eye. The wind farm would be prominent, and the scale would interfere with appreciation of the views of the Great Orme landform and the relationship between the sea, Conwy Bay and the headland.</p> <p>LUC- The strong vertical forms of the WTGs would contrast strongly with the landform of Great Orme and both their presence and perceived scale would alter the relationship between land, extending out from SNP, and sea. The</p>	<p>Assessment in Table 10, Section 10.11.5 reviewed and revised to include further reasoned justification for why the effects are considered Non-significant.</p>

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	<p>contrasting scale between AyM and GyM is very noticeable here. This would all suggest a significant effect at this viewpoint.</p>	
<p>11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>WCP Section I: NRW agree that effects along this section are likely to be Significant.</p>	<p>Effects are assessed as significant along a total of 3 km of this 16 km section of the WCP as acknowledged and agreed in the LUC Review.</p>
<p>11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>LCA 01 Northern Uplands: NRW consider that the effects on this LCA have been under- estimated and are likely to be significant. Viewpoints 12, 36, 38 and 40 are within this LCA and effects at all these views are significant, in our opinion. The scale of the turbines in views and the likely extent of effects, as indicated by the ZTV, indicate likely significant adverse effects over a large part of this LCA.</p> <p>LUC – ZTV coverage and the SLVIA assessment of viewpoints localized that impacts would be more widespread than the northerly areas of the LCA. Upland areas such as Tal y Fan, Foel-fras and slopes above the Conwy Valley (including Meol Elio and Cefn Cyfarwydd) would be affected by a</p>	<p>Assessment in Section 10.11.5 reviewed and revised to include further reasoned justification for why the effects are considered Non-significant.</p>

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	scale of development not evident in the baseline landscape character and there is potential for significant landscape effects, either locally or generally, to result from the proposed development.	
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	LCA 02: NRW agree that effects on this area are likely to be non-significant.	Agreement noted.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	The Special Qualities requiring detailed assessment are: Diverse Landscapes and Tranquility & Solitude – Peaceful Areas. NRW agree that the likely effects on these Special Qualities is non-significant. However, NRW consider that the effects are adverse on scenic views, which are a characteristic of Snowdonia's landscapes (as noted in the SNP Partnership Plan 2020), and on relative tranquility.	Agreement noted in relation to effects on identified Special Qualities. Scenery is mentioned numerous times within the SNP Partnership Plan 2020. However, 'Scenic views' are not an identified Special Quality or specifically mentioned as a characteristic of Snowdonia's landscapes.
11.20.2021 Section 42 NRW and	In conclusion, there would be likely significant adverse effects at 5 viewpoints within the National Park, in our opinion. There would be likely significant adverse effects	Noted agreement in relation to Non-significant adverse effects on the two relevant Special Qualities of SNP.

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September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	along a section of the Wales Coast Path within the National Park. There would be a likely significant adverse effect on LCA01 within the National Park, in NRW's opinion. There would be non-significant, but adverse effects on two relevant Special Qualities of the National Park.	The Applicant agrees that there would be significant adverse visual effects at four viewpoints, and along a part of Section I of the WCP. The SLVIA Section 10.11.5 does not concur that there would be significant effects on VP 36 or on LCA 01.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	Viewpoint 24; Graig Fawr & 26: NRW agree that effects at these viewpoints are likely to be non-significant. However, NRW consider that there would be adverse impacts on views through an intensification of wind farm development in the views.	Agreement noted.
11.20.2021 Section 42 NRW	Viewpoint 26 and Viewpoint 54; Y Foel: these do not appear to have been assessed in detail.	Table 3 in Section 10.7 sets out which viewpoints are assessed in detail as agreed with the ETG.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of	Offa's Dyke National Trail Long Distance Path: NRW agree that effects along this path within the AONB are likely to be non-significant.	Agreement noted.

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11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	LCT 2 and 5: NRW agree that effects on these areas are likely to be non-significant.	Agreement noted.
11.20.2021 Section 42 NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities	The Special Qualities requiring detailed assessment are: Landscape Character and Quality – Tranquility and Landscape Character and Quality – Remoteness & Wildness. NRW agree that the likely effects on these Special Qualities would be non-significant. However, NRW consider that there would be adverse effects through an intensification of windfarm development within views from the AONB and erosion of the Special Qualities.	Agreement noted.
11.10.2021 Section 42 NRW	In conclusion, there would be no significant adverse effects on viewpoints, the Offa's Dyke path, landscape character areas or the Special Qualities of the AONB. There would be non-significant but adverse effects on some views and two	Agreement noted.

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	<p>Special Qualities of the AONB. Panoramic views are a noted feature of the AONB, as referenced in the Supplementary Planning Guidance (SPG).</p>	
<p>11.20.2021 Section 42 NRW</p>	<p>The proposal would have likely adverse night-time visual effects on the Anglesey AONB, including from viewpoints at Moelfre (4), Point Lynas (2), Red Wharf Bay (5), Benllech Bay (16), Penmon Point (7), Trwyn y Penrhyn (28) and Beaumaris (8), and from beaches at Traeth Lligwy, Traeth Bycant, Penrhyn.</p> <p>Dark skies are a noted feature of the Peace & Tranquility Special Quality within the Anglesey AONB. Please note the information at the following link regarding a recent Dark Skies study in Wales, commissioned by NRW: Natural Resources Wales / New map casts light on Wales' dark skies.</p>	<p>Agreement noted in relation to VPs 2, 4, 5, 7, 8. However, the Applicant notes that VP 28 is relatively remote and accessible only along a narrow section of the WCP and via other PRow.</p>
<p>11.20.2021 Section 42 NRW</p>	<p>The proposal would have likely adverse night-time visual effects on some views within the Snowdonia National Park, through intensification of light pollution e.g. from viewpoint 60, where red lights would be visible in an otherwise dark sea beyond the Great Orme. However, there would be no adverse effect on the Core Areas of the Dark Sky Reserve.</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. This includes a reduction in the extent of the array area in views from Llanfairfechan and a reduction in lighting intensity to 10% of that shown in the PEIR (200 candela) when visibility from the</p>

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		WTGs is greater than 5 km, which is the majority of the time.
11.20.2021 Section 42 NRW	Volume 2, Section 10.13 and Volume 3, Annex 3.1: Cumulative Effects Assessment: The long list includes operational wind farms that are part of the baseline but have an ongoing impact and are considered relevant to the cumulative impact assessment, namely: Gwynt y Môr, Rhyl Flats, North Hoyle, Burbo Bank and Burbo Bank Extension.	The operational OWFs are considered within the assessment as part of the baseline context to which the AyM would be added. They are also considered as part of the existing cumulative situation to which other cumulative development would be added as assessed in the cumulative assessment.
11.20.2021 Section 42 NRW	Onshore wind farms on Anglesey and in Denbighshire are included in the baseline and onshore cumulative impacts with Clocaenog Forest windfarm are included in the CEA.	Noted.
11.20.2021 Section 42 NRW	NRW note that the Morlais tidal energy scheme is screened out and outside the Area of Search. However, NRW advise that in terms of incremental, combined cumulative SLVIA effects on the Isle of Anglesey AONB, its cumulative effects should be considered.	Morlais tidal energy scheme is considered in the CEA in Section 10.13.
11.20.2021 Section 42 NRW	NRW note that weight is attached to proposals according to the three tiers identified under EIA, with Tier 2 relating to projects with a Scoping Report submitted and Tier 3 relating	The Pre-assessed Areas for Wind Energy (PAWE) and the Round 4 leasing areas are considered in the CEA in Section 10.13.

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	<p>to programmes and frameworks. However, it should be recognized that given the policy context, proposals within pre-assessed areas for wind energy developments (onshore) identified in Future Wales: 2040 are highly likely to be progressed. There are two pre- assessed areas to the east of Snowdonia, with Area 1 close to the coast near Colwyn Bay. Similarly, proposals with the Crown Estate Round 4 leasing areas to the north of this proposal are also highly likely to progress and should be afforded some weight.</p>	
<p>11.20.2021 Section 42 NRW</p>	<p>It is stated (Vol. 2, para. 1361) that any additional onshore windfarms will have minimal influence. However, we consider that this is dependent on their scale. Onshore windfarms are being progressed to Scoping stage that are 250m height to blade tip and likely to have significant adverse visual effects at some distance.</p>	<p>The tallest scoping stage WTGs within the Study Area are at Alwen Forest and are 200 m to blade tip.</p> <p>The CEA considers the effects of the additional consented onshore wind farms and the potential for further wind farm development within the two PAWE areas in Section 10.13.</p>
<p>11.20.2021 Section 42 NRW</p>	<p>NRW agree that the methodology is sound and appropriate. However, NRW have some concerns regarding how the methodology and some judgements have been applied. These concerns particularly relate to the assessment of susceptibility and extent of effects.</p>	<p>Agreement of methodology noted.</p> <p>Concerns relating to assessment of susceptibility and extent of effects have been addressed in relation to the specific receptors mentioned.</p>

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11.20.2021 Section 42 NRW	NRW are generally in agreement with the contents of Table 2 regarding the scoping out of SCAs and LCAs.	Agreement noted.
11.10.2021 Section 42 North Wales Local Authorities Joint Response	<p>Please find below our collective response to the Preliminary Environmental Information Report (PEIR) for the proposed Awel y Môr Offshore Wind Farm (AyM).</p> <p>Following a funding opportunity presented by RWE, the LUC was appointed by a group of seven North Wales Local Planning Authorities in July 2021 to undertake a review of the PEIR. The proposed wind farm comprises of onshore and offshore elements and potential effects resulting from these are reported separately in the PEIR. The LUC review considered the method, scope, process and findings of both the Landscape and Visual Impact Assessment (LVIA) and the Seascape, Landscape and Visual Impact Assessment (SLVIA). A copy of this report is included with this letter.</p> <p>In their report the LUC concluded that the SLVIA is thorough and contains comprehensive assessments of the key seascape, landscape and visual receptors within the planning authorities and the designated landscapes of Snowdonia National Park, the Isle of Anglesey AONB and the Clwydian Range and Dee Valley AONB.</p>	Noted – specific responses provided below.

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	<p>However, while the method is sound and comprehensive, there are issues with its application and judgements, which the LUC consider to result in under reporting of significant effects. These include assessments of sensitivity of the landscape and visual receptors and the magnitude of change brought about by the proposed AyM.</p>	
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response</p>	<p>The LUC note that the non-technical summary identifies the landscape and visual effects in par 151 – <i>“In the construction, O&M and decommissioning phases, a range of effects on seascape character, landscape character, designated areas and viewpoints have been predicted, ranging from non-significant to significant in EIA terms.”</i> The LUC review considers this summary to rather dilute the full range of effects and does not help identify the significant effects that need to be considered as part of the planning balance.</p>	<p>Noted, the NTS has been updated accordingly to provide a better account of the significant effects associated with the proposed project.</p>
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response</p>	<p>As noted previously, the LUC review considers the SLVIA and LVIA to be competent and robust assessments that correctly identify significant effects, however there are a number of findings that their review indicates disagreement with (these are set out in Appendix A of the attached report). The LUC recommend that the following areas are explored;</p>	<p>Noted.</p>

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	<ul style="list-style-type: none"> ▶ The application of magnitude of change criteria to the assessments of effects on views. The LUC particularly note the emphasis in the SLVIA that the AyM will 'intensify' the existing effect of operational wind farms. In their view (and a view shared by the Expert Topic Group) this does not accurately reflect the appearance of the AyM and the contrast in scale between it and the operational schemes. ▶ The extent to which significant effects are found to occur across receptors. There is emphasis throughout the SLVIA on effects being localized. While in many cases this is justified, in some instances the LUC review indicates that significant effects may extend further than stated in the SLVIA ▶ This point is particularly the case in the assessment of effects on settlements, where sea views may be affected across the built-up area, not just at the sea front. Similarly, sea views from routes may be affected even where the route is not immediately coastal in location 	
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response</p>	<p>In terms of mitigation, it is acknowledged that no mitigation of the significant effects of the offshore wind farm is feasible, other than further changes to the design. It is acknowledged by the expert topic group and the LUC that the applicant has reduced the extent of the turbine array, which has reduced effects on the Isle of Anglesey and the AONB, however the SLVIA still finds significant adverse effects on</p>	<p>Noted. There is now a reduction from 88 km² at PEIR to 78 km² for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application.</p>

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	<p>landscape character and views within the AONB. It would require a further reduction in the extent of the array to achieve effective mitigation of these effects.</p>	
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response</p>	<p>The LUC note that reduction in turbine height has not been discussed in the SLVIA as a means of mitigating impact, despite this being a key concern for stakeholders and the expert topic group.</p> <p>The SLVIA has assessed two alternative turbine heights as set out in the MDS (see chapter 1 of the LUC report). The review of the SLVIA indicates that findings of significant effect do not vary according to which MDS is considered. This suggests that turbines of 252m in height would have the same spread of significant effects as turbines of 332m, and that turbines would have to be substantively smaller to achieve effective mitigation. AyM is described as an extension (throughout the SLVIA), or as a 'sister project' (PEIR vol 2, chap 1, par 24) to the existing Gwynt y Môr. However the operational development at Gwynt y Môr can be summarized as;</p> <ul style="list-style-type: none"> ▲ 160 WTGs with blade tip 133m above MHWS and 107m rotor diameter. 	<p>Noted. For the reasons presented previously in this document, it is not possible to reduce the height of the proposed turbines further as smaller models are not anticipated to be available and/ or economically viable.</p>

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	<p>Therefore, with such a vast difference in scale it is hard to see how the project can be described as an extension to the current developments.</p>	
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response</p>	<p>As noted in chapter 2 of the LUC review, at PEIR stage it is accepted that mitigation proposals are at a relatively early stage. Further development of this section will be required for the environmental statement, but the principles set out are sound and appear capable of being developed into an effective mitigation scheme.</p> <p>The North Wales Authorities Expert Topic Group collectively have significant concerns regarding the impact of the proposal on the regional interests. The turbines proposed in the array are significantly larger than those comprised in the existing Rhyl Flats and Gwynt y Môr offshore windfarms, and owing to siting and scale, the AyM would be noticeable and distinct from existing developments, and would be viewed as an entirely new windfarm, rather than an extension to existing.</p>	<p>Noted. Please see previous responses for the constraints placed on the Applicant with regards placement of the array, and the likely turbines available that will allow an economically viable project to be developed.</p>
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response</p>	<p>The PEIR SLVIA concludes no significant effects on a number of viewpoints. However, as stated in the appended LUC report at Appendix A this identifies a number of points of disagreement. Thus resulting in significant concerns</p>	<p>Noted. Please see previous responses for the constraints placed on the Applicant with regards placement of the array, and the likely turbines available that will allow an</p>

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	<p>regarding the impact of the proposal on the regional interests particularly associated with the landscape and visual impact of the proposal which may have an indirect negative impact on tourism for the region, and associated socio-economic impacts.</p> <p>At PEIR stage, it is accepted that mitigation proposals are at a relatively early stage, and therefore reduction in height of turbine should not be discounted at this stage.</p>	<p>economically viable project to be developed. In the absence of a reduced turbine height, the Applicant has introduced a reduction from 88 km² at PEIR to 78 km² for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application.</p>

THE RESPONSES OF THE RESPECTIVE WELSH LOCAL PLANNING AUTHORITIES (LPA) AND THE DEE VALLEY AND CLWYDIAN RANGE AONB PARTNERSHIP ARE PRESENTED BELOW IN THE SAME ORDER AS THE ASSESSMENTS ARE PRESENTED IN THE SLVIA – IE FROM WEST TO EAST. WHERE THE LUC REVIEW CONCURS WITH THE LPA'S RESPONSE (OR VICE VERSA) THIS IS ALSO NOTED. WHERE LUC REVIEW COMMENTS HAVE BEEN RECEIVED IN RELATION TO EFFECTS ON THE LPA AREA, BUT ARE NOT INCLUDED SPECIFICALLY IN THE LPA'S RESPONSE (OR IN THE NRW RESPONSE), THESE ARE ALSO INCLUDED UNDER THE HEADING OF THE LPA.

Isle of Anglesey County Council

<p>11.10.2021 Section 42 Isle of Anglesey County Council and North Wales Local Authorities Joint Response</p>	<p>The Seascape, Landscape and Visual Assessment (SLVIA) that forms part of the PEIR consultation confirms that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscape and leisure, tourism and heritage receptors (see further details in the next section of our response below).</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or</p>
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	<p>This results in significant concerns regarding the potential indirect negative impacts that the landscape and visual impacts of the proposal may have on Anglesey and the wider region as a key tourist destination as well as associated socio-economic impacts. It is requested that this is given further consideration in terms of further potential mitigation measures that can be designed into the project to recognise potential impacts.</p>	<p>minimised) through a reduction in the AyM array area and WTG dimensions.</p>
<p>11.10.2021 Section 42 Isle of Anglesey County Council and North Wales Local Authorities Joint Response</p>	<p>Land Use Consultants (LUC) have been commissioned to independently review the Seascape, Landscape and Visual Impact Assessment on behalf of the seven North Wales Planning Authorities, and the Authorities collectively have significant concerns regarding the impact of the proposal on the regional interests. The IACC confirms that it fully endorses the findings and recommendations of this report with regards to potential impacts on receptors and designated landscapes on Anglesey.</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.</p>
<p>11.10.2021 Section 42 Isle of Anglesey County Council and North Wales Local Authorities Joint Response</p>	<p>The SLVIA identifies significant effects on seascape, landscape and visual receptors. In relation to the designated landscape, the SLVIA has adequately</p>	<p>See specific responses to comments made by NRW (and LUC) above in relation to effects on receptors within the IoA AONB.</p>

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	<p>investigated and evaluated its potential impacts on the AONBs, including impacts on the special qualities.</p> <p>The LUC report queries the level of effect on some of these and identifies additional receptors where effects are judged significant, and/or more widespread than predicted in the SLVIA.</p> <p>Both the SLVIA and LUC report confirm that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscape and leisure, tourism and heritage receptors.</p>	
<p>11.10.2021 Section 42 Isle of Anglesey County Council and North Wales Local Authorities Joint Response</p>	<p>While the IACC acknowledge that reducing the extent of the array to the west has potentially reduced significant effects to the north east coast of Ynys Môn, this is a short section of the east coast and it is considered that significant effects need to be further reduced.</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p>
<p>11.10.2021 Section 42 Isle of Anglesey County Council and North Wales Local Authorities Joint Response</p>	<p>As confirmed in the report prepared by LUC minor amendments will not reduce effects to the extent set out in the Welsh National Marine Plan Policy SOC_06 for Designated Landscapes and it requires further measures to</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of</p>

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	<p>avoid or mitigate the identified impacts in a proportionate manner.</p> <p>As noted in the LUC report, effective reduction would require substantial changes to the height and spread of the array.</p> <p>To confirm, the IACC requests that the design of the proposals are re-visited in order to reduce adverse impacts on designated landscape and leisure, tourism and heritage receptors through reducing the scale and making changes to the spread of the proposed array.</p> <p>The Council requests that a meeting takes place between the Awel y Mor Project Team and the North Wales Local Authorities Expert Group to further discuss matters concerning Seascape, Landscape and Visual Impacts.</p>	<p>alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.</p> <p>Further ETG meetings were held on 14 December 2021 and 27 January 2022 at which times the above matters were discussed.</p>
<p>11.10.2021 Section 42 September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>Effects on viewpoints 1, 2 and 3 are assessed in the SLVIA as Non-significant and the effect on VP 16 Benlech Bay View Road is assessed as Significant. LUC Review agrees with these findings.</p>	<p>Agreement noted.</p>
<p>11.10.2021 Section 42 September 2021 SLVIA LUC Review (Draft) on behalf of</p>	<p>Effects on Amlwch and Llanddona are assessed in the SLVIA as Non-significant. LUC Review agrees with these findings.</p>	<p>Agreement noted.</p>

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North Wales Local Planning Authorities		
<p>11.10.2021 Section 42</p> <p>September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>Effects on Benllech are assessed in the SLVIA as Non-significant. Not agreed: the SLVIA acknowledges the screening effect of buildings, but also states that <i>“Benllech is a popular holiday destination due to its sandy beach that looks out towards Penmon Point and the Great Orme”</i>. Given the significant visual effect assessed at Viewpoint 16 nearby, and the settlement’s association with open, surrounding features, effects on the visual resource associated with Benllech would be significant (or locally significant).</p>	<p>The Methodology in annex 10.1 has been updated to reflect that the assessment of the effects on settlements relates to people in properties. The effects on people using sea front areas and amenities are assessed in relation to the viewpoints and the Wales Coast Path in order to avoid duplication.</p> <p>Assessment in Section 10.11.3 reviewed and revised to include Significant effects on views from a small number of properties along the coastal edge where they have open, undeveloped views towards the AyM array area.</p>
Gwynedd Council		
<p>11.10.2021 Section 42</p> <p>North Wales Local Authorities Joint Response – Gwynedd Council and</p>	<p>The Council agree with the findings within the LUC report regarding the significant effects reported in the SLVIA at the viewpoint at Bangor Pier.</p>	<p>Agreement noted.</p>

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September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities		
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response – Gwynedd Council and</p> <p>September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>The Council also concurs with LUC's findings that there will be significant effects at Penrhyn Castle Terrace, where there is an open vista across Conwy Bay, the sensitivity of which is now higher due to the recent designation of the surrounding area as a World Heritage Site.</p> <p>This concern reflects the comments of the group as a whole and LUC's findings in that significant effects have been underreported due to the application and judgements made. Despite this it is considered that the SLVIA methodology is sound and comprehensive.</p>	<p>The assessment of the effects on VP 17: Penrhyn Castle Terrace in Table 9, Section 10.11.4 have been reviewed and amended in response to the comments and further consideration of the World Heritage Site status. Following this, the assessment has found there may be a Significant effect.</p>
Snowdonia National Park Authority		
11.10.2021 Section 42 North Wales Local Authorities Joint Response – Snowdonia National Park Authority and	The LUC conclude the impact on the National Park to be the following;	See specific responses to comments made by NRW (and LUC) above in relation to effects on receptors within the SNP.

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<p>September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<ul style="list-style-type: none"> ▶ Significant effects reported in the SLVIA at 2 viewpoints at Carnedd Llywelyn and Conwy Mountain. In addition we suggest that there will be a significant effect at Tal y Fan where the views to the turbines will contrast with Great Orme, and the different scale of turbines at AyM and Gwynt y Môr (GyM) would be very noticeable; ▶ Locally significant effects along section I of the Wales Coast Path; ▶ No significant effect on LCAs identified in the SLVIA, although we suggest that LCA01 (Northern Uplands) would potentially have significant effects; ▶ Locally significant effects are reported in the SLVIA on seascape character (SCA Conwy Bay). We would argue that these effects are more widespread across this area as the turbines would alter the perceived scale of the Great Orme from much of the SCA; ▶ In terms of special qualities, seascape and sea views are not one of the special qualities relevant to the SNPA designation, and we agree that there would be no significant effects on the relevant special qualities of 'diverse landscapes' and 'tranquility and solitude'; and ▶ We agree there will be no significant effects on views from the Dark Sky Reserve due to the distance and influence of existing lighting outside the SNP. 	

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<p>11.10.2021 Section 42</p> <p>North Wales Local Authorities Joint Response - Snowdonia National Park Authority</p>	<p>Additionally, in chapter 4 of the LUC SLVIA review (under the heading Wales Marine Plan (WMP)) it is noted that Policy SOC_06 – Designated Landscapes (from the WMP) states that;</p> <p>Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration.</p> <p>It also states that proposals should;</p> <ul style="list-style-type: none"> ▲ Avoid adverse impacts on designated landscapes; and/or ▲ Minimise impacts where they cannot be avoided; and/or ▲ Mitigate impacts where they cannot be minimised 	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>A key factor when reviewing the potential for mitigation of SLV effects has been to try to reduce the impacts on the purpose and special qualities for which the SNP and AONBs have been designated.</p> <p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.</p>
<p>11.10.2021 Section 42</p> <p>North Wales Local Authorities Joint Response - Snowdonia National Park Authority</p>	<p>In their review of the SLVIA, the LUC note that “it is clear from this review of the SLVIA that there will be significant adverse impacts on designated landscapes of Anglesey AONB and Snowdonia National Park...Efforts have been made to localized these effects through reducing the site area, however further mitigation is unlikely to be possible”.</p> <p>In terms of potential mitigation, it is noted that no mitigation of the significant effects is feasible other than further</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>Section 10.8 sets out the key parameters for assessment and the consideration of mitigation of SLV effects through a reduction in WTG height.</p>

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	<p>changes to the design. The applicant (RWE) has reduced the extent of the turbine array however the SLVIA still finds significant adverse effects on landscape character and views. It would require a further reduction in the extent of the array to achieve effective mitigation.</p> <p>Reduction in turbine height has not been discussed in the SLVIA as a means of mitigating impacts, despite it being a key concern. The LUC review indicates that findings of significant effects do not vary according to which Maximum Development Scenario is considered. This suggests that turbines of 252m in height would have the same spread of significant effects as turbines of 332m, and that turbines would have to be substantively smaller to achieve effective mitigation.</p>	
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response - Snowdonia National Park Authority</p>	<p>The cumulative effect of the new proposed wind farm alongside the current ones seen at Gwynt y Môr and Rhyl Flats would mean that the cone of sight and sea horizon will be disrupted even further by wind turbines, particularly when considering that the proposed turbines would be double the height of those nearby currently. These impacts will include significant adverse effects from certain viewpoints and parts of the landscape in the National Park.</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>A key factor when reviewing the potential for mitigation of SLV effects has been to try to reduce the impacts on the purpose and special qualities for which the SNP and AONBs have been designated.</p>

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	<p>A report will be presented to the Authority's Planning and Access Committee on October 20 2021 to give a background to the project so far and to express concerns on the proposed development in its current form, and to recommend that further mitigation measures are explored, whether those are in terms of reducing the extent of the array; the reduction of the turbine height; or both.</p>	<p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.</p>
Conwy County Borough Council		
<p>08.10.2021 Section 42 Conwy County Borough Council</p>	<p>The LUC Report concludes that the SLVIA is thorough and contains comprehensive assessments of the key seascape, landscape and visual receptors. Although the method is sound and comprehensive, there are issues with its application and judgements, which it considers to result in under reporting of significant effects. These include assessments of sensitivity of the landscape and visual receptors and the magnitude of change.</p> <p>Whilst LUC agrees with the SLVIA's conclusions in respect of the significance of impacts from the representative viewpoints and on the Landscape Character Areas, it does not agree with its conclusions in respect of the significance</p>	<p>Noted.</p> <p>The LUC Review agrees with the majority of the assessments made in the SLVIA.</p>

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	of impacts from a number of settlements and sections of the Wales Coastal Path and on the Seascape Character Areas.	
<p>08.10.2021 Section 42</p> <p>Conwy County Borough Council and</p> <p>September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>In respect of settlements, LUC does not agree with the SLVIA that the effects on Penrhyn Bay, Rhos on Sea and Colwyn Bay would be 'locally significant, but otherwise non-significant'. It considers that the high proportion of bungalows in Penrhyn Bay and of flats and taller buildings in Rhos on Sea, and the varied topography of Colwyn Bay, would each give rise to significant effects over a greater proportion of the settlements. Whilst it concurs that the significant effects are likely to remain local, it considers that their extent should be clarified.</p>	<p>The Methodology in Annex 10.1 has been updated to reflect that the assessment of the effects on settlements relates to people in properties. The effects on people using sea front areas and amenities are assessed in relation to the viewpoints and the Wales Coast Path in order to avoid duplication.</p> <p>The LUC Review does agree that the effects on Penrhyn Bay, Rhos on Sea and Colwyn Bay would be locally significant but seeks clarification on the extent of the area identified as local.</p> <p>The assessment of the effects on properties in Penrhyn Bay, Rhos on Sea and Colwyn Bay have been reviewed and the geographical extent of the significant effects clarified and revised as set out in Section 10.11.6.</p>
<p>08.10.2021 Section 42</p>	<p>LUC disagrees with the SLVIA that the effect on the settlement of Llanddulas would be 'non-significant'. LUC</p>	<p>The assessment of the effects on Llanddulas has been reviewed and revised to include</p>

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<p>Conwy County Borough Council and</p> <p>September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>considers that the SLVIA gives too much weight to the screening impacts of intervening properties, whereas in fact Llanddulas has developed on a north-facing slope and a large proportion of properties have open, coastal views. It considers that significant effects, potentially locally, are likely.</p>	<p>significant effects in views from some properties (Section 10.11.6).</p>
<p>08.10.2021 Section 42</p> <p>Conwy County Borough Council and</p> <p>September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>LUC disagrees with the finding that the effects on four other sections of the Wales Coastal Path would be 'locally significant, but otherwise non-significant'. These comprise Sections L (Great Orme), M (Llandudno), N (Penrhyn Bay) and O (Colwyn Bay). LUC considers that, given the extent to which they would be affected, significant effects should be recorded for the whole of each of the respective sections.</p>	<p>The assessments of the effects on the WCP have been reviewed and revised as appropriate to confirm and clarify the extent of the significant effects. This has been informed by further field work.</p>
<p>08.10.2021 Section 42</p> <p>Conwy County Borough Council and</p> <p>September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>LUC disagrees with the SLVIA's findings that the effect on Seascape Character Area B (Colwyn Bay) and C (Vale of Clwyd) would be 'non-significant'. It considers that the scale of the Awel y Môr WTGs when compared to the existing WTGs, as well as the wide panoramic view from the coast, would result in significant effects on both seascape character areas.</p>	<p>The assessment of the effects on SCA B and SCA C have been reviewed and the assessments clarified in Section 10.11.6. No change has been made to the finding of Non-significant effects in these instances.</p>

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<p>08.10.2021 Section 42 September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities</p>	<p>LUC agrees with the SLVIA's assessment and findings of a significant effect or SCA A.</p>	<p>Agreement noted.</p>
<p>08.10.2021 Section 42 Conwy County Borough Council</p>	<p>The Council concurs with most of the findings in the LUC report but considers that the impact on receptors along the A55 should not be recorded as 'insignificant'.</p> <p>The Gwynt y Môr offshore windfarm is particularly prominent on the eastbound section of the A55 east of Penmaenbach tunnel, from where it projects above the townscape of Llandudno and breaches the otherwise flat profile between the Great Orme and the Little Orme. The addition of the Awel y Môr offshore windfarm would be seen by eastbound travellers further west along the A55 and would therefore give rise to the possibility of significant sequential (and potentially, in-combination) impacts.</p> <p>Similarly, westbound receptors on the A55 between Llanddulas and Colwyn Bay would be subject in-combination effects of the Awel y Môr offshore windfarm with the existing offshore windfarms.</p>	<p>The assessment of the effects on the A55 in Section 10.11.6 have been reviewed. This has included further field work, on-site assessment and preparation of additional visualisations (VPs 63-65). It remains the opinion of the assessors that whilst there will be adverse effects on views from parts of the A55 these would be Non-significant. This is partly as a result of the lower relative sensitivity that people travelling at speed along this route have to the proposed changes in their views.</p>

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	For these reasons, the Council considers that the impact on the A55 should be recorded as 'locally significant, but otherwise non-significant'.	
08.10.2021 Section 42 Conwy County Borough Council and 11.10.2021 Section 42 North Wales Local Authorities Joint Response	The Council the support given for the expansion of offshore wind energy in national policy documents, and that this would inevitably result in significant changes to coastal seascapes and views. However, the Council has concerns over four aspects of the proposal. First, the scale of both the individual WTGs and of the extent of the Awel y Môr array as a whole would result in a significantly greater visual impact from a number of viewpoints than views of the existing offshore wind farms. This in turn would cause the offshore windfarms to become the dominant feature of the seascape.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.
08.10.2021 Section 42 Conwy County Borough Council and 11.10.2021 Section 42 North Wales Local Authorities Joint Response	Second, the Awel y Môr array would lie close to, and affect the setting of, a number of coastal landscape features. These include the Great Orme (Heritage Coast and part of a Special Landscape Area and Historic Landscape) and the Little Orme (which also forms part of a Special Landscape Area and Historic Landscape). Both of these form prominent landscape features which effectively act as 'book-ends', enclosing both the town of Llandudno and its North Shore.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.

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	<p>Other coastal landscape features include Rhos Point, which is not subject to any landscape designation, but which forms a distinctive boundary, demarcating the bays of Colwyn Bay to the east and Penrhyn Bay to the west. The Council is concerned that the Awel y Môr offshore windfarm would significantly affect the seascape character, and detract from the appreciation of the coastal landscape features when viewed both from coastal viewpoints and seaward views from inland viewpoints.</p>	
<p>08.10.2021 Section 42 Conwy County Borough Council and 11.10.2021 Section 42 North Wales Local Authorities Joint Response</p>	<p>Third, the proposal would cause both sequential and in-combination cumulative effects with other offshore wind farms, including existing offshore wind farms, and this would increase the dominance and saturation of wind farms as a seascape feature.</p>	<p>Noted. Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p>
<p>08.10.2021 Section 42 Conwy County Borough Council and 11.10.2021 Section 42</p>	<p>Fourth, in the absence of a cumulative assessment with any future onshore wind farms (including the Pre-Assessed Areas for Wind Energy identified in Future Wales: The National Plan 2040), there are concerns that the SLVIA does not fully evaluate the cumulative effects as required by Planning</p>	<p>Section 10.10-10.12 consider the effects of the addition of AyM to the baseline cumulative context as shown on Figure 1 and some of the effects assessed relate to the accumulation of wind farm development.</p>

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<p>North Wales Local Authorities Joint Response</p>	<p>Inspectorate Advice Note 17: Cumulative Environmental Effects.</p> <p>Due to these concerns, the Council considers that the proposal would have unacceptable impacts on landscape and seascape character and on visual amenity.”</p>	<p>Section 10.13 assesses the cumulative effects of the addition of AyM to the baseline cumulative context plus the reasonably foreseeable cumulative developments shown on Figure 1. This also takes account of the potential for future onshore wind farms within PAWE 1 and 2 identified on Figure 1.</p> <p>It cannot consider cumulative effects of AyM in the context of a more general ‘any future onshore wind farms’ due to the lack of information about these. This accords with PINS Advice Note 17.</p> <p>As well as applying other policy considerations the seascape, landscape and visual effects of AyM must be balanced with other factors, such as the contribution of the renewable energy produced, in mitigating the effects of climate change, when considering acceptability</p> <p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p>

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Denbighshire County Council		
<p>11.10.2021 Section 42 Denbighshire County Council and North Wales Local Authorities Joint Response and</p> <p>07.10.2021 Section 42 Clwydian Range and Dee Valley AONB Board</p>	<p>The ZTVI diagrams confirm that both the Scenario A (48 x 332m blade tip height) and Scenario B (91x 252m height) proposals will be visible from a substantial area of the AONB. When viewed from the AONB the proposed windfarm will visually connect the existing Rhyl Flats and Gwynt Y Mor wind farms to create a much larger, continuously developed skyline/seascape across much of the horizon. One of the special qualities of the AONB is the opportunity to experience wide ranging panoramic views, including those out to sea, and the Council and Joint Committee are becoming increasingly concerned that the protected landscape is being visually 'hemmed in' by both onshore and offshore windfarm development to the detriment of this special quality. Views from the AONB will be increasingly characterised by wind farm dominated landscapes and seascapes.</p> <p>The AONB viewpoints (24 Graig Fawr, 26 Prestatyn Hillside Viewpoint Car Park, and 54 Y Foel, Dyserth) selected for assessment in the SLVIA are representative of the impact on key views from the northern part of the AONB but the committee would emphasise that, given the scale of the</p>	<p>MDS A and MDS B scenarios are shown in the visualisations for VP 24. This was agreed through ETG consultation in advance of the PEIR and confirmed for ES.</p> <p>The effects on the Special Qualities of the Clwdian Range and Dee Valley AONB are assessed in Section 10.11.7.</p> <p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>The review of the SLVIA undertaken by LUC on behalf of the North Wales Planning Authorities and the landscape officer at NRW both concur with the findings of the SLVIA in relation to the effects on the AONB which although adverse are assessed as Non-significant.</p>

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	<p>proposals, the development will be visible from a much larger area of the protected landscape. A critical consideration in relation to the potential visual impact of the development will be whether Scenario A (48 x 332m turbines) or B (91x 252m turbines) is pursued. The SLVIA viewpoint diagrams illustrate Scenario A, but it may be that the greater number of smaller turbines proposed in Scenario B would have less impact overall on views out to sea given that less turbine would be visible above the horizon. In this context the AONB would suggest that SLVIA viewpoint diagrams/photomontages should also be produced to illustrate Scenario B.</p>	
<p>11.10.2021 Section 42 Denbighshire County Council</p>	<p>Land Use Consultants (LUC) have been commissioned to independently review the Seascape, Landscape and Visual Impact Assessment on behalf of the seven North Wales Planning Authorities, and the Authorities collectively have significant concerns regarding the impact of the proposal on the regional interests. The Council fully endorses the findings and recommendations.</p> <p>The turbines proposed in the array are significantly larger than those comprised in the existing Rhyl Flats, North Hoyle or Gwynt y Mor offshore windfarms, and owing to siting and</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>In the views from Denbighshire the AyM, whilst larger in scale than some of the operational OWFs appear, it would be seen at greater distance and would be apparent within the part of the view that is currently affected by views of OWFs rather than extending it.</p>

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	<p>scale, the AyM offshore windfarm would be noticeable and distinct from existing developments, and would be viewed as an entirely new windfarm, rather than an extension to existing.</p>	
<p>11.10.2021 Section 42 Denbighshire County Council and North Wales Local Authorities Joint Response</p>	<p>The PEIR concludes no significant effects on Denbighshire interests, however the Council is in disagreement with the assessment on the following receptors:</p> <ul style="list-style-type: none"> ▶ No significant effects are reported for any Denbighshire viewpoints in the SLVIA. This is not agreed for viewpoint 23 at Rhyl Aquarium it is considered that there will be significant effects. The addition of AyM turbines on the horizon will fill in gaps, accentuate the differences between existing and proposed developments and result in greater incidence of stacking and visual clutter. ▶ No significant effects are reported in the SLVIA for any of the Denbighshire settlements along the coast. This is not agreed and it is considered that there will be significant effect at Rhyl along the sea front promenade. ▶ The SLVIA identifies no significant effect for SCA C Vale of Clwyd. This is not agreed and it is considered that significant effect would be likely here due to the prominence of the turbines in views from the coastal parts of this SCA. 	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>The Applicant has reviewed the assessments for VP 23, for the town of Rhyl and for SCA C – Vale of Clwyd and considers that the effects would be Non-significant as assessed in Section 10.11.7.</p>

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11.10.2021 Section 42 Denbighshire County Council	Whilst the offshore array has limited significant effects on Denbighshire interests, from a regional perspective, the Council has concerns about the number of significant effects identified, and the effect a proposal of the scale proposed would have on regional seascape and landscape character and visual amenity.	Noted.
11.10.2021 Section 42 Denbighshire County Council	<p>LUC Review indicates disagreement with a number of the conclusions in the PEIR, which raises concerns that the significance of effect has been underplayed. LUC have recommended the following areas are explored:</p> <ul style="list-style-type: none"> ▶ The application of magnitude of change criteria to the assessments of effects on views. LUC particularly note the emphasis in the SLVIA that the AyM will ‘intensify’ the existing effect of operational wind farms. LUC have advised this does not accurately reflect the appearance of the AyM and the contrast in scale between it and the operational schemes. ▶ The extent to which significant effects are found to occur across receptors. There is emphasis throughout the SLVIA on effects being localized. While in many cases this is justified, in some instances the LUC review indicates that significant effects may extend further than stated in the SLVIA. 	<p>The review of the SLVIA undertaken by LUC on behalf of the North Wales Planning Authorities notes agreement with the majority of the SLVIA findings.</p> <p>NRW has used the term intensification to describe the addition of the AyM to the operational OWF seascape views in its consultation response.</p> <p>The Applicant has reviewed the SLVIA in relation to the aspects where disagreement was highlighted and revised it, where appropriate, taking into account of the mitigation as set out in Section 10.9.</p>

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	<p>▲ This point is particularly the case in the assessment of effects on settlements, where sea views may be affected across the built-up area, not just at the sea front. Similarly, sea views from routes may be affected even where the route is not immediately coastal in location.</p>	
<p>11.10.2021 Section 42 Denbighshire County Council</p>	<p>In terms of mitigation, it is acknowledged that no mitigation of the significant effects of the offshore wind farm is feasible, other than further changes to the design.</p> <p>Whilst the extent of the turbine array has been reduced to reduce the effects on Anglesey interests, a reduction in turbine height has not been discussed in the SLVIA as a means of mitigating impacts. The SLVIA has assessed two alternative turbine heights as set out in the MDS. The LUC review of the SLVIA indicates that findings of significant effect do not vary according to which MDS is considered. This suggests that turbines of 252m in height would have the same spread of significant effects as turbines of 332m, and that turbines would have to be substantively smaller to achieve effective mitigation.</p> <p>At PEIR stage, it is accepted that mitigation proposals are at a relatively early stage, and therefore reduction in height of turbine should not be discounted at this stage. The Council</p>	<p>A reduction in WTG height from the maximum 332m (above MHWS) to blade tip is not proposed as mitigation, as set out in Section 10.9. In the absence of a reduced turbine height the Applicant has introduced a reduction from 88 km² at PEIR to 78 km² for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application. The Applicant is not able to further avoid or minimise the project, and as such is seeking consideration of landscape enhancement as compensation, as provided for within SOC_06 of the Welsh National Marine Plan (WNMP).</p>

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	consider further development of this mitigation section will be required for the ES.	
Flintshire County Council		
11.10.2021 Section 42 North Wales Local Authorities Joint Response – Flintshire	From a regional perspective it is considered that there are issues with its application and judgements which is considered to result in under reporting of significant effects in parts of the region. These includes assessments of sensitivity of the landscape and visual receptors and the magnitude of change brought about by the proposed development.	The Applicant has reviewed the SLVIA in relation to the aspects where disagreement was highlighted and revised it, where appropriate, taking into account the mitigation as set out in Section 10.9.
11.10.2021 Section 42 North Wales Local Authorities Joint Response – Flintshire	Whilst Flintshire County Council are in agreement that the visual impact on Flintshire, and its receptors would not be significant, it is noted that the SLVIA does identify significant effects on seascape and landscape and visual receptors throughout the North Wales region. Furthermore, in relation to designated landscapes in the region, the LUC report queries the level of effect on some of these and identifies additional receptors where effects are judged significant, and/or more widespread than predicted in the SLVIA. As stated above, both the SLVIA and LUC report confirm that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to	Noted. Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.

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	<p>several special qualities associated with the designated landscapes of North Wales and the National Park.</p> <p>This in turn, may have an indirect negative effect on tourism for the region as a result of the offshore arrays and the potential significant impact from certain key tourist destinations in North Wales, particularly parts of the Isle of Anglesey, Snowdonia National Park, Gwynedd with its recent status of World Heritage Status, and parts of Conwy. This may have an indirect negative impact on the number of visitors travelling to North Wales. Many travelling to North Wales will need to travel through Flintshire on the A55 so this may have an indirect impact on tourism and other shops and services.</p>	
<p>11.10.2021 Section 42 Flintshire County Council and North Wales Local Authorities Joint Response – Flintshire County Council</p>	<p>The proposed development site is over 20 km from Flintshire and only likely to be visible from the very western coastal strip in Flintshire and also from higher ground; particularly the Clwydian Range and Dee Valley AONB. Therefore, due to the distance the proposed development is from Flintshire, the development is unlikely to have any direct visual or seascape/landscape effects on Flintshire.</p>	<p>Agreement with SLVIA findings noted.</p>

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	<p>The LUC report commissioned by the North Wales Planning Authorities to undertake a detailed review of the SLVIA on behalf of the North Wales Authorities concludes that overall, the SLVIA is thorough and contains a comprehensive assessment of the key seascape, landscape and visual receptors. It is considered that the SLVIA methodology is sound and comprehensive.</p> <p>The SLVIA identifies 60 assessment viewpoints, two of which are within Flintshire. These viewpoints have been reviewed and impacts on the receptors identified are assessed to be non-significant which are considered to be appropriate by LUC. LUC agree with the judgements in the SLVIA in relation to the viewpoints from Flintshire, concluding that the proposed development would result in no significant effects on the landscape and visual receptors within Flintshire.</p> <p>Due to the distance the proposed development is in relation to Flintshire, it is considered that the visual impact on Flintshire and its receptors would not be significant. The Flintshire County Council agrees with both the conclusions of the SLVIA for the proposal with regards to the viewpoints within Flintshire, and the conclusions of the LUC report.</p>	

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<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response – Flintshire County Council</p>	<p>In relation to the Clwydian Range and Dee Valley AONB, the SLVIA identifies no significant effects on the relevant special qualities of the AONB, namely Tranquility, Remoteness and Wildness. The LUC report agree with this conclusion, seascape and coastal views are not a special quality or reason for designation of this AONB. Flintshire County Council would also agree with this conclusion with respects to the impact on the AONB in Flintshire.</p>	<p>Agreement with SLVIA findings noted.</p>
<p>11.10.2021 Section 42 North Wales Local Authorities Joint Response – Wrexham County Borough Council</p>	<p>No additional comments</p>	<p>Noted.</p>
<p>13.12.21 Email Conwy County Borough Council</p>	<p>Conwy County Borough Council requested three further VPs from the A55 to address concerns regarding the effects on the views of road users.</p> <p>25) On the eastbound carriageway in the vicinity of eastern portal to the Pen-y-Clip tunnel west of Penmaenmawr (roughly where the eastbound carriageway rejoins the line of the westbound carriageway);</p>	<p>See below.</p>

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	<p>ii) On the eastbound carriageway in the vicinity of the Puffin roundabout (Junction 16);</p> <p>iii) On the westbound carriageway west of Junction 24 (Llanddulas) around where the carriageway crosses over the railway.</p> <p>If it proves impracticable to take photographs on the A55 itself, we suggest that they should be taken from neighbouring roads or footpaths.</p>	
<p>25.11.2021</p> <p>SLVIA ETG (NRW)</p>	<p>NRW request for two further VPs from within the seascape. Discussed as representative of views from ferry travelers towards the SNP and IoA AONB.</p> <p>Suitable locations discussed as north of Great Orme and north of Conwy Bay on southern extents of Liverpool to Dublin ferry routes identified in Shipping and Navigation Chapter.</p> <p>Impracticalities of winter photography from ferry in a southerly direction were discussed. Potential option of digitally created visualisation proposed by Applicant and an example provided.</p>	<p>Digitally created VPs 66: Offshore – Liverpool to Dublin Ferry route north of Great Orme; and 67: Offshore – Liverpool to Dublin Ferry route north of Conwy Bay included in Annex 10.6.</p>

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<p>25.11.2021</p> <p>Email</p> <p>Conwy Borough District Council</p>	<p>Comments relating to meeting of 4 November 2021 with reference to slides presented.</p> <p>Definition of significance should be amended to distinguish between major and moderate.</p> <p>We consider that a specific assessment should be made of the impact on the Great Orme Heritage Coast (but did not request an assessment of the effects on Special Landscape Areas when asked specifically about this).</p> <p>Cumulative effects with Pre-Assessed Area should be based on the extent of the projects that could be included within PAA (rather than specifically project which have been submitted for scoping) in accordance with the approach in PINS Advice Note 17.</p>	<p>Levels of significance, e.g. major or moderate, have been added to the methodology in Annex 10.1 and to the assessment of the effects throughout the SLVIA.</p> <p>The assessment of the effects on the Great Orme Heritage Coast is included in Section 10.11.6.</p> <p>The assessment of cumulative effects Section 10.13 considers the potential for onshore wind farm development within 2 Pre-assessed Areas for Wind Energy (PAWE).</p>
<p>14.12.21</p> <p>SLVIA ETG</p>	<p>ETG members agreed the VP list and proposed outputs for the ES. This was with the exception of:</p> <p>VP 60 was highlighted by NRW as having been confirmed for a night time VP as Foel Lus.</p> <p>NRW confirmed request for visualisations representing views towards SNP and the IoA AONB available to people in vessels within the seascape.</p>	<p>VP 60: Foel Lus night time viewpoint and assessment included in PEIR and ES in Annex 10.6.</p> <p>Digitally created VPs 66: Offshore – Liverpool to Dublin Ferry route north of Great Orme; and 67: Offshore – Liverpool to Dublin Ferry route north of Conwy Bay included in Annex 10.6.</p>

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	Further discussion with Conwy on the specific, suitable locations of the three suggested VPs on the A55 as not possible to take photographs from the road corridor itself for health and safety reasons.	
16.12.21 Email NRW	NRW advised it was content with the proposed montage approach to the ferry/ offshore viewpoints as illustrated in the example VP36 Fig 63h (draped aerial photography over the DTM). We advise that there will likely need to be some adjustments for colours and contrast in the terrain to make the visualisation readable and reasonably realistic.	Digitally created VPs 66: Offshore – Liverpool to Dublin Ferry route north of Great Orme; and 67: Offshore – Liverpool to Dublin Ferry route north of Conwy Bay included in Annex 10.6.
11.01.2022 Email Conwy County Borough Council	Conwy confirmed alternative viewpoint on A55 where the cycle track crosses the conveyor belt serving Raynes Quarry jetty (NGR 288690 378580).	Annex 10.6 includes illustrative VPs as follows which are representative of views from sections of the A55 and accord with the suggestions made by Conwy: 63 A55 at Penmaenmawr 64 A55 at Puffin Roundabout, Dwygyfylch 65 A55 at jetty north of Penmaen Rhôs
12.01.2022 Email Isle of Anglesey County Council	Further to the previous round of consultations the array area has been reduced from 88 km ² to 78 km ² . This follows an initial reduction from 106 km ² . As presented in the meeting	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.

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	<p>this is an overall reduction by 36% from scoping with the most recent reduction representing a further 11% reduction from the pre-consultation stage.</p> <p>This array area represents a variable number of turbines depending on the technology and options available at the time a windfarm such as this would be constructed. This has already resulted in a change in the number of turbines being considered, and the lower-end maximum tip-height of 252 m has increased to 282 m.</p> <p>The presentation notes refer to a 45% reduction in turbine numbers which is in relation to the smaller size turbines, which has now increased. This is perhaps slightly misleading as it does not compare like with like.</p> <p>However, where a comparison between like turbines is possible as with the 332m models, the maximum number of turbines has reduced in the region of 24% (our calculation) and to a greater degree than the array area. The reason for a much greater decrease in numbers than area is unclear in the presentation text, is possibly in response to other constraints, but should result in a less visually cluttered array than the one presented in PEIR visualisations.</p>	<p>A key factor when reviewing the potential for mitigation of SLV effects has been to try and reduce the impacts on the purpose and special qualities for which the SNP and AONBs have been designated.</p> <p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG numbers or dimensions.</p>

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	<p>With regard to further mitigation and in the absence of further visualisations to represent the change in array area and turbine numbers as now presented, we consider that a further reduction to the northwest aspect of the array could have most change to the nature of effect experienced from visual receptors. The purpose of this would be reduce the number of visually outlying turbines to the main group when seen from Ynys Môn viewpoints. The degree to which this will be effective should be informed by the SLVIA and the modelling of visual effects. It would be helpful if confirmation could be provided as to when the Group will be afforded the opportunity to review the updated assessments following the recent changes made to the project design.</p> <p>Overall, we consider that the changes in the area as now proposed, combined with a further reduction to the northwest of the array may go some way to the reduction of significant effects. Nonetheless, and as noted during the presentation, significant residual effects are likely from the proposed Offshore Windfarm.</p>	

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<p>18.01.2022 Email NRW</p>	<p>With regard to the mitigation proposals we offer the following advice:</p> <p>We note the proposed reduction in the area of the array and number of turbines (34 larger 332m turbines & 50 smaller 282m turbines, increased from a height of 252m). However, the meeting minutes acknowledge that 'the assessment will still predict multiple significant effects in terms of SLVIA'.</p> <p>We therefore note that the proposed reduction is likely to reduce visual effects to an extent, but not sufficiently to avoid likely significant effects at numerous viewpoints within the Isle of Anglesey AONB and Snowdonia National Park, as identified in the PEIR. These visual effects in turn are likely to lead to significant adverse effects on landscape character within these Nationally Designated Landscapes and within their seascape settings.</p> <p>We concur that various significant and adverse effects on these Designated Landscapes are likely to occur as well as effects that are not significant, but nevertheless adverse. This conflicts with the purpose of these landscapes to conserve and enhance natural beauty, as set out in PPW11.</p> <p>We therefore advise a further reduction in array area and/or scale of turbines to minimise adverse effects on the Isle of</p>	<p>Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.</p> <p>A key factor when reviewing the potential for mitigation of SLV effects has been to try and reduce the impacts on the purpose and special qualities for which the SNP and AONBs have been designated.</p> <p>Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.</p> <p>It is not possible for the AyM array area to comply with the threshold distances for low or medium magnitudes of change identified in the NRW (2019) Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance.</p>

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	<p>Anglesey AONB and Snowdonia National Park. We advise that further consideration should be given to NRW's evidence base: "Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance". The evidence base is divided into 3 reports, which have been referred to in our previous advice and should be read together.</p> <p>We do not repeat our previous advice here, but please note that the Stage 1 Report, Ready Reckoner indicates that the revised proposal for Maximum Design Scenario (MDS) A for 34 turbines of 332 m height to blade tip places them within the 301-350 m height range, where the report advises that a buffer distance of 32.8 km is required to avoid medium magnitude effects on high sensitivity receptors, which are frequently of major-moderate significance. A buffer distance of 44 km is required to avoid low magnitude effects on high sensitivity receptors, which are frequently of moderate significance.</p>	
<p>18.01.2022 Email NRW</p>	<p>Night-time mitigation</p> <p>We welcome the proposal for dimmable lights on perimeter turbines, from 2,000 candela to 200cd during periods of good meteorological visibility.</p>	<p>Further consultation will be undertaken by the Applicant with the CAA to ascertain if any further reduction in the number of aviation lights is acceptable. The currently proposed</p>

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	<p>We advise that the following should also be considered:</p> <ul style="list-style-type: none"> • Minimising the number of visible lights in agreement with the CAA. • Limiting the highest intensity of visible lights to the horizontal plane and restricting it in other planes. • Using 'smart' transponder-based demand-controlled aviation lights that only switch on when aircraft are detected within a particular airspace around the wind farm (Aircraft Detection Lighting System – ADLS) • Reducing lighting effects from existing wind farm projects e.g. Gwynt y Môr, by retrofitting of mitigation, to reduce the combined cumulative effects of lighting. 	<p>arrangements accord with CAA guidance on the spacing between the lit WTGs in the MDSs.</p> <p>Consultation is currently ongoing between the Applicant and the MOD to ascertain if they will permit the use of aviation lighting that limits the 200/ 2000 candela intensity of visible lights to the horizontal plane and reduces it above and below the horizontal. Current MOD guidance states that the intensity of the aviation lights should be a minimum of 200 candela.</p> <p>The use of 'smart' transponder-based demand-controlled aviation lights is a relatively new concept and does not yet have full approval from the CAA. It would require all aircraft to carry transponder devices, which is not currently the case.</p> <p>The potential to reduce the lighting effects of the operational OWFs is under review, however, controls on other operational projects cannot, as a matter of principle, be included within any DCO or Marine Licence for AyM. Any changes to the current operation of</p>

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		GyM would need to be applied to that consent and be considered necessary to mitigate its impacts.
18.01.2022 Email NRW	We are in agreement with the viewpoint list for the SLVIA.	Agreement noted.
27.01.2022 SLVIA Expert Topic Group (ETG)	<p>The agenda included the following items:</p> <ul style="list-style-type: none"> ▲ Summary of the design rationale for the application ▲ Present, discuss, and invite feedback on proposed mitigation measures ▲ Discuss and agree to next steps <p>SL presented the ES boundary, noting that the project had reduced in terms of:</p> <ul style="list-style-type: none"> ▲ Number of turbines: from 107 at scoping, to 48 large/91 small at PEIR, to 34 large/50 small at ES. ▲ Smaller turbines have increased in size from 252 m tip height to 282 m tip height. ▲ Area: from 106 km² at scoping, to 88 km² at PEIR, to 78 km² at ES; ▲ Final application will be 78 km² and between 34 and 50 turbines depending on whether they are the 282 m or 332 m tip heights. 	<p>Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (application ref: 6.1.4) includes the design iteration.</p> <p>Section 10.9 of this Chapter includes information regarding the embedded mitigation.</p>

DATE AND CONSULTATION PHASE/ TYPE	CONSULTATION AND KEY ISSUES RAISED	SECTION OF ES CHAPTER 10 WHERE MATTER IS ADDRESSED
27.01.2022 SLVIA Expert Topic Group (ETG)	Feedback from NRW noted the risk of effects conflicting with the purpose of these landscapes to conserve and enhance natural beauty, as set out in PPW11 as well as possible further lighting mitigation (set out in 18.01.2022 Email) discussed.	Section 10.9 of this Chapter includes information regarding the embedded mitigation. Section 10.12 sets out the ongoing consultation relating to further lighting mitigation.
27.01.2022 SLVIA Expert Topic Group (ETG)	IoA County Council confirmed that the latest feedback (12.01.2022 Email) related to how (compared to the PEIR visuals, which were the only ones available to date) a further reduction to the western extents of the array could have the most change to the nature of effect experienced from visual receptors on the IoA to the north-west. IoA County Council reiterated the comments made previously (in relation to the PEIR layout) regarding the apparently outlying WTGs and closest rows of WTGs.	Noted.
27.01.2022 SLVIA Expert Topic Group (ETG)	SNP noted that it remained concerned as to the size and cumulative impact but appreciates the area has been reduced.	Noted.
27.01.2022 SLVIA Expert Topic Group (ETG)	GoBe stated mitigation options that have yet to be discussed include the opportunity to offset and consider enhancement of designated landscapes.	The mitigation measures adopted for SLVIA to date are described in Section 10.9 of Volume 2, Chapter 10: Seascape, Landscape and Visual Impact Assessment (application ref:

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	<p>Welsh National Marine Plan November 2019</p> <p>SOC_06: Designated landscapes</p> <ul style="list-style-type: none"> ▲ avoid adverse impacts on designated landscapes; and/or ▲ minimise impacts where they cannot be avoided; and/or ▲ mitigate impacts where they cannot be minimised <p><i>The policy notes that 'Opportunities to enhance designated landscapes are encouraged'.</i></p> <p>SL noted that it is hoped that these opportunities may be considered as offset mitigation to address/ mitigate impacts (noted as defined in EIA hierarchy as compensation) where they cannot be minimised.</p>	<p>6.2.10). Records of the consultation that has led to the adopted mitigation measures are provided within this document and within the Evidence Plan Report (application ref 8.2) and its appendices (application refs: 8.2.1 and 8.2.2).</p> <p>The Applicant recognizes that significant (in EIA terms) effects are predicted on the seascape, landscape and visual receptors. It is anticipated that discussions to agree compensation/ enhancement against the final project design will progress post-application.</p>
<p>27.01.2022</p> <p>SLVIA Expert Topic Group (ETG)</p>	<p>Examples of other infrastructure projects where landscape enhancement has been included as compensation were given by IoA County Council and NRW respectively as the Morlais Tidal project and the National Grid Landscape Fund relating to power lines within North Wales.</p>	<p>These examples are noted. It is anticipated that discussions to agree enhancement against the final project design will progress post-application.</p>
<p>27.01.2022</p> <p>SLVIA Expert Topic Group (ETG)</p>	<p>IoA County Council noted that if enhancement measures were to be proposed important to know how this would be organised/ implemented. Would the method include a sum of money to be used within the area affected? Who would</p>	<p>This example is noted. It is anticipated that discussions to agree enhancement against the</p>

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	<p>be in charge of how the money is spent? Would parties be able to apply to a fund for monies? More information is needed regarding scope of the compensation strategy.</p>	<p>final project design will progress post-application.</p>
<p>27.01.2022 SLVIA Expert Topic Group (ETG)</p>	<p>The Applicant stated that the purpose of the meeting was to determine what would be of interest to other parties, and that the question is being asked to determine where preferences could lie as the Applicant is keen to collaborate with the ETG members to develop enhancement measures.</p>	<p>This is noted by the Applicant.</p>
<p>17.02.2022 Email North Wales Local Planning Authorities</p>	<p>It is considered that it is too early in the process to consider what may be suitable as a compensation scheme in order to compensate for landscape and visual effect arising from AyM.</p> <p>This is given that we have not seen an updated version of the relevant ES assessments following the recent design changes that have been made to the project. Therefore currently the full significance of effects are not known to us and therefore the compensation package required to compensate for those effects is considered premature for discussion and cannot be entered to.</p> <p>Any compensation scheme should reflect a full understanding of the amount of harm to landscape and</p>	<p>The mitigation measures adopted for SLVIA to date are described in Section 10.9 of Volume 2, Chapter 10: Seascape, Landscape and Visual Impact Assessment (application ref: 6.2.10). Records of the consultation that has led to the adopted mitigation measures are provided within this document and within the Evidence Plan Report (application ref 8.2) and its appendices (application refs: 8.2.1 and 8.2.2).</p> <p>The Applicant recognizes that significant (in EIA terms) effects are predicted on the seascape, landscape and visual receptors. It is anticipated that discussions to agree</p>

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	<p>visual receptors across all the affected counties. The guidelines for Landscape and Visual Assessment (GLVIA) describe compensation as 'should generally be a measure of last resort'.</p> <p>We cannot be in a position to fully confirm at this stage that no further mitigation measures can be designed into the project as per the requirements of the mitigation hierarchy before moving the discussion onto compensation.</p>	<p>compensation/ enhancement against the final project design will progress post-application.</p>
<p>17.02.2022 Email North Wales Local Planning Authorities</p>	<p>Once the full significance of effects are known to us we would like RWE to initially provide a compensation package offer for our consideration with details of how the package has been formed.</p>	<p>This suggestion has been noted by the Applicant. It is anticipated that discussions to agree compensation/ enhancement against the final project design will progress post-application.</p>

1.2 References

See Volume 2, Chapter 10: Seascape, Landscape and Visual Impact Assessment for references.



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