



Awel y Môr Offshore Wind Farm

Designated Landscapes and Relevant Tests

Deadline 5

Date: 06 February 2023

Revision: A

Document Reference: 5.7

Application Reference: N/A



REVISION	DATE	STATUS/ REASON FOR ISSUE	AUTHOR	CHECKED BY	APPROVED BY
A	February 2023	Deadline 5	Burges Salmon	RWE	RWE

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AyM - Designated landscapes and relevant tests



1 INTRODUCTION AND OUTLINE OF ISSUES RAISED

1.1 As part of its First Written Questions (ExQ1) and Issue Specific Hearing 2 (ISH2) on 7 December 2022, the Examining Authority raised a number of questions regarding the impacts of the proposed Awel y Môr offshore wind farm (AyM) on designated landscapes, and in particular the Isle of Anglesey Area of Outstanding Natural Beauty (AONB), Clwydian Range and Dee Valley AONB, and Eryri/Snowdonia National Park (SNP). A number of these questions were directed at NRW, SNP, IoACC and DCC. In particular the ExA sought clarification as to whether the relevant parties:

- (a) Agree with the Applicant's assessment of effects in respect of these special qualities (Table 10) and its overall conclusion that any harm would not be to such a degree as to affect the integrity and inherent natural beauty of the National Park (paragraph 806) (ExQ1.17.1(c)); and
- (b) Agree that...harm would not occur to such a degree that it would affect the overall integrity of the Ynys Mon (Anglesey) AONB or its inherent natural beauty? (ExQ1.17.11).

1.2 The relevant parties and the Applicant responded to the ExQ1 at Deadline 1 (REP1-007), and these issues were further discussed at ISH2. Both the Applicant and NRW have provided summaries of their representations at ISH2 (REP3a-004 and REP3a-021, respectively). This document provides further detail in respect of the Applicant's case in respect of the impacts of AyM on designated landscapes, in particular whether the landscape and visual impacts of AyM are such as to affect the integrity and natural beauty of these protected landscapes and if so, how this should be considered in determining the application with reference to the relevant legal and policy tests as set out in the relevant National Policy Statements (NPS).

2 RELEVANT LEGAL AND POLICY TESTS

2.1 The relevant legal and policy tests are set out in the AyM application documents, and in particular in ES Volume 4, Annex 10.5: SLVIA Legislation and policy context (APP-116) and the Planning Statement (APP-298). In summary:

- (a) Section 5(1) of the National Parks and Access to the Countryside Act 1949 provides the framework for the establishment of National Parks and AONBs and sets out the statutory purpose of conserving and enhancing natural beauty, wildlife and cultural heritage of National Parks and of promoting opportunities for the understanding and enjoyment of the special qualities of those Parks by the public;
- (b) The Countryside and Rights of Way Act 2000 (CRoW) introduced provisions to help secure the better management and protection of AONBs. Under section 89 it requires the preparation and publication of a Management Plan for every AONB. It also places a duty on 'relevant authorities' when exercising or performing any function in relation to, or so as to affect, land in an AONB, to have regard to the purpose of conserving and enhancing the natural beauty of the AONB.
- (c) NPS EN-1 at Paragraph 5.9.12 advises that the "*duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of*

designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.” ... and paragraph 5.9.13 advises that “The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent”.

- (d) NPS EN-3 acknowledges in paragraph 2.6.20 that, *“Where a proposed offshore wind farm is within sight of the coast, there may be adverse effects. 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:*
 - (i) *It considers that an alternative layout within the identified site could be reasonably proposed which would minimise any harm, taking into account other constraints that the applicant has faced such as ecological effects, while maintaining safety or economic viability of the application; or*
 - (ii) *taking account of the sensitivity of the receptor(s) as set out in EN-1 paragraph 5.9.18, the harmful effects are considered to outweigh the benefits of the proposed scheme”*

3 SUMMARY OF APPLICANT’S POSITION

- 3.1 As set out in paragraph 2.6 of REP3a-004, it is agreed with NRW and Denbighshire County Council (DCC) that there are no significant adverse effects from AyM on the Clwydian Range and Dee Valley AONB and therefore there is no question of the integrity or natural beauty of this protected landscape being affected. This matter is therefore not considered further in this note.
- 3.2 The evolution of the AyM project is set out in the site selection chapter of the ES (APP-044). This sets out the key principles that were applied by the Applicant in refining the offshore array area with regard to the relevant tests in EN1 and the North Wales coastline, and summarised in Table 4 of the SLVIA (AS-027) as follows:
 - (a) The western part of the AyM Crown Estate (TCE) Agreement for Lease (AfL) area has been excluded from use as illustrated in Figure 2c (Annex 10.5). This reduces the horizontal extents of the AyM OWF primarily in views from the south where SNP and numerous settlements are located. The west to east extent of site has reduced from 25.8 km to 16.4 km (a reduction of 36% from scoping). Additionally, the distance from the Isle of Anglesey coast and AONB to the west is increased. At Viewpoint 2: Point Lynas on the north-east coast of Anglesey the site boundary was 20.2 km distant. The array area assessed in the ES has moved 8.5 km further away at 28.7 km. From locations to the south-west both changes may be experienced to some degree. Increased distance reduces the scale of wind turbines in views from the Isle of Anglesey AONB with the most marked difference occurring in the north.
 - (b) The reduced horizontal field of view and number of wind turbines leads to a reduction in impacts on both the IoA AONB and SNP. This change to the project design parameters followed SLVIA/ CH stakeholder and Section 42 consultation as well as having regard to NRW guidance. NRW’s Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance (March 2019) has been considered alongside other technical and environmental factors relating to OWF development within the AfL (See also Volume 1, Chapter 4 Site Selection and Alternatives (APP-044)).
 - (c) In particular the mitigation removes the array area from the area shown in the Guidance as Zone No 3: North Wales and North Anglesey Inshore, which is identified as having a high sensitivity.

- (d) It is not possible for the Applicant to reduce the WTG heights from those assessed in the ES MDS A or MDS B or to consider either of these as more likely. The reasons for this are set out in Volume 1, Chapter 4: Site Selection and Alternatives (APP-044), with the underlying rationale acknowledged and accepted by the policy set out in the NPS.
- (e) Aviation lighting of 2000Cd was assessed in the PEIR as having significant effects at night-time from some locations. The Applicant has committed to install sensors so that when visibility from the WTGs is greater than 5 km at night the aviation lighting is reduced from 2000 Cd to 200 Cd. Thus, from the coastal areas, which are all at distances of greater than 5 km, the 2000 Cd lighting would never be visible to its full extent as this would only be 'on' when the visibility conditions are very poor e.g., during periods of high humidity/ fog. 200Cd would be the level of light most likely to be seen from the coast and illustrated in the ES visualisations. The reduction in the number of turbines and the array area has reduced the number of aviation lights and in many cases also the horizontal extent of the views affected by them.

3.3 Isle of Anglesey AONB

3.4 The landscape character assessment identified the areas within the Isle of Anglesey AONB where significant effects on landscape character may arise as a result of visibility of AyM within the range of between 17 km and approximately 29 km as follows:

- (a) **IoA LCA 8: Dulas Bay Hinterland** - Moderate effect (Significant), adverse, long term, reversible along the coastal edge extending to a maximum of approximately 1 km where there may be a direct association with the seascape to the north-east.
- (b) **IoA LCA 9: Red Wharf Bay** - Moderate effect (Significant), adverse, long term, reversible along the coastal edge extending to a maximum of approximately 1 km between Moelfre headland and Benllech and south of Benllech and round Red Wharfe Bay to a point level with Ty-mawr north of Pentraeth Forest where there may be a direct association with the seascape to the north-east.
- (c) **IoA LCA 10: Penmon and Puffin Island** - Moderate effect (Significant), adverse, long term, reversible in the coastal, northerly exposed areas of the LCA, extending inland to a maximum of 0.5 to 0.75 km.
- (d) **IoA LCA 11: Eastern Menai Strait** - Moderate-Major effect (Significant), adverse, long term, reversible in the coastal, north-easterly exposed areas to the north of Beaumaris, and south of Viewpoint 28 – Trwyn y Penrhyn parking layby, extending inland by 0.3-0.5 km.

3.5 Parts of these LCAs coincide with landward parts of the following seascape character areas (SCAs) that are shown on Figure 15: Seascape character with ZTV (APP-212):

- (a) SCA 3 – Traeth Lafan
- (b) SCA 5 – Penmon
- (c) SCA 6 – Red Wharfe Bay to Moelfre
- (d) SCA 7 – Dulas Bay

As these effects cover the same geographical areas of the IoA AONB they are considered within the LCA assessment to avoid 'double-counting' of impacts

3.6 Land Use Consultants undertook a review of the SLVIA in the Preliminary Environmental Impact Report (PEIR) as part of the Section 42 consultation and in the Environmental Statement submitted with the DCO Application on behalf of the North Wales Local

Planning Authorities. The findings of the LUC review were agreed by the Isle of Anglesey County Council at Issue Specific Hearing 2.

3.7 NRW and LUC have confirmed in their examination submissions where they agree with the findings of the SLVIA with regard to the LCAs and SCAs that would and would not be significantly affected by AyM.

3.8 However, there are some differences in the findings of NRW and LUC that relate to the geographical extent of those areas that would be significantly affected as set out in Table 1 of the Applicant's Deadline 2 submission, Comments on Land Use Consultant's Review of LVIA and SLVIA (REP1-091) and in the Applicant's response to the written representations (REP2-002). NRW also considers that the sensitivity of LCAs 8, 9 and 10 should be high. The Applicant's response to NRW disagreement is set out in its response to the Written Representations REP1-080-Annex B - 6.1.9 and 6.1.10.

(a) Assessment of Landscape Character

3.9 As set out in the Guidelines for Landscape and Visual Impact Assessment Edition 3, (GLVIA3) the assessment of landscape effects and the assessment of visual effects are distinct components of LVIA, or in this case SLVIA. GLVIA3 notes on page 21 that:

'Landscape result from the interplay of the physical, natural and cultural components of our surroundings. Different combinations of these elements and their spatial distribution create the distinctive character of landscapes in different places, allowing different landscapes to be mapped, analysed and described. Character is not just about the physical elements and features that make up a landscape, but also embraces the aesthetic, perceptual and experiential aspects of the landscape that make different places distinctive.'

In this instance both visual and landscape character effects could arise where there is visibility of the AyM Windfarm.

3.10 NRW suggests in its Written Representation (REP1-080-1.10) that on the Isle of Anglesey 'significant adverse landscape character effects are likely to extend further across these LCAs, as indicated by the Zone of Theoretical Visibility (ZTV), notwithstanding that some parts would be screened by topography, vegetation, and buildings'.

3.11 The Applicant does not agree with this view. Whilst there may be some degree of visibility of AyM within the areas of ZTV it is not agreed that visibility of AyM in part of the view looking in one direction translates to a significant effect on landscape character across these areas. Instead, it is the Applicant's position that significant effects are more confined to the coast and the areas within approximately 1km of the coast where the sea is a more definitive component of the contextual influence on the landscape character of these areas.

3.12 Figure 16 (APP-213) part 1 ZTV with LCA shows the Landscape character areas with the ZTV and the AONB boundary. Within much of the area beyond the immediate coastal hinterland the landscape is characterised by an extensive pattern of vegetation in the form of hedgerows and in some cases woodland, other characterising elements are also present in some instances in the form of built development. In the north of the island the landscape character is more defined by a rugged landscape of rocky terrain, gorse and scrub woodland. The further inland the greater the influence on character these elements have as opposed to the character being markedly defined by seascape views.

3.13 Viewpoint 42: Mynydd Bodafon (APP-271) usefully shows part of the landscape where the Zone of Theoretical Visibility is shown to spread further inland and the degree to which its character is defined by the inherent elements and patterns of the landscape. At ground level it may be possible to see AyM OWF from open areas but in the

professional opinion of the SLVIA authors it would not redefine the character of the inland parts of this landscape.

- 3.14 In the early days of landscape and visual assessment effects on landscape character were only assessed within the defined landscape character areas where the proposed development was located (where it would directly alter the pattern of elements that creates those distinctive, defined characteristics). Landscape character effects were not assessed for landscape character areas or types that were not physically changed by the proposed development.
- 3.15 Through the assessment of onshore windfarms it was realised that, in some cases (for example where the development was relatively close to an LCA boundary), the development could affect the characteristics within a defined area even if it was only visible from it, as part of its context, and did not physically change it. Notably, if the proposed development is visible from a defined landscape character area, and able to affect it through visibility, then its effects must be considered as part of a wider context that also contains any other influential features, visible beyond the LCA boundary.
- 3.16 To have a significant effect on landscape character within an LCA (or SCA) the visibility of a development beyond the geographically defined area within which it is situated would have to occur to such a degree that the development would become a defining feature of that landscape which is otherwise characterised by the '*distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse*' as set out in GLVIA3 at Page 157.
- 3.17 It is the Applicant's position that it is the inherent pattern of elements in the landscape in question that constitute its key characteristics and where these are strongly defined, as is the case in areas of the Isle of Anglesey that are set back from the coast, external (visual) influences are less likely to result in a significant effect on landscape character. Within these areas set back from the coast views out to sea towards AyM OWF would also be part of views that in many instances include the mountainous skyline of SNP as part of the wider influential context.

(a) Effects on IACC AONB Special Qualities

- 3.18 The fourteen Special Qualities of the Isle of Anglesey AONB are set out in the Isle of Anglesey AONB Management Plan Review (MPR) 2015-2020. These cover a variety of different aspects that together define the character and qualities of the AONB. The majority of these would not be affected by the AyM OWF with the SLVIA assessing the effects on the following three relevant Special Qualities. These were agreed with the members of the SLVIA Expert Topic Group (ETG) through the evidence plan process (APP-301, APP-302 and APP-303):
- (a) Expansive views;
- (b) Peace and tranquillity; and
- (c) Islands around Anglesey.
- 3.19 The SLVIA assesses in Table 7 (AS-027) that there would be Moderate or Major-Moderate effects (significant) effects on the 'Expansive views' Special Quality from some limited coastal areas and higher vantage points within the AONB between Point Lynas in the north and Beaumaris in the south. These would specifically relate to views over the Irish Sea, for example Viewpoint 4: Moelfre Headland at Sculpture (APP-233) and in some instances will affect local views to other landscape features such as the Great Orme and Puffin Island for example Viewpoint 8: Beaumaris Wales Coastal Path (APP-237).
- 3.20 From some of these locations there may in turn be effects on the perception of the sense of openness as a result of the introduction of the AyM OWF to views over the seascape. In some locations this would lead to Moderate to Major-Moderate effects on

relative wilderness and the feeling of isolation (from human intervention). This would apply in views from the sections of the coast between Moelfre and Point Llynas and along the coast between Penmon Point and Bwrdd Arthur. Viewpoints 14: Wales Coast Path near Penrhyn (APP-243) and Viewpoint 6: Bwrdd Arthur (APP-235) are located along these sections of the coast.

- 3.21 Elsewhere the effects would be non-significant, adverse, short-term, and temporary. There would be no change to the perception of exposure as a result of the introduction of AyM OWF to views. Views across the Menai Strait or towards more distant borrowed landscapes of SNP, the Isle of Man, the Llyn Peninsula and the mountains of the Lake District would not be affected.
- 3.22 The SLVIA assesses in Table 7 (AS-027) that there would be Moderate or Major-Moderate effects (significant) effects on the visual aspects of the Special Quality of 'Peace and tranquillity' would arise in limited locations of the AONB related to a narrow section of coast around:
- (a) Viewpoint 14: Wales Coast Path near Penrhyn (Traeth yr Ora);
 - (b) Viewpoint 28: Trwyn y Penrhyn parking layby;
 - (c) The northerly section of WCP Section C: Dulas Bay;
 - (d) the northerly section of WCP Section E Red Wharfe Bay/ Penmon; and
 - (e) WCP Section F Penmon Point in part.
- 3.23 Elsewhere within the AONB the effects on Peace and tranquillity are assessed as minor (Non-significant).
- 3.24 The SLVIA assesses in Table 7 (AS-027) that there would be Moderate or Major-Moderate effects (significant) effects Major to Major-Moderate (Significant) adverse effects on the visual interaction between the landscape/ seascape where the AyM OWF would form part of the backdrop to the islands of Ynys Moelfre, Ynys Dulas and Puffin Island in views from limited locations along the coast represented by:
- (a) Wales Coast Path Sections:
 - (b) C – Dulas Bay (short section);
 - (c) E – Red Wharf Bay/ Penmon (eastern section); and
 - (d) F – Penmon and representative viewpoints:
 - (e) Viewpoint 4: Moelfre Headland; Viewpoint 7: Penmon Point; and
 - (f) Viewpoint 8: Beaumaris;
- 3.25 Elsewhere the effects on the Islands around Anglesey would be Minor to Moderate-Minor effect (Non-significant), adverse.
- 3.26 It is the Applicant's understanding that whilst there may be some minor disagreement surrounding the geographical extent of where the significant effects may arise the effects on the Special Qualities of the Isle of Anglesey AONB have been agreed with NRW and LUC on behalf of the NWLPAs in their written representations.
- (a) Purposes of designation
- 3.27 The Applicant's assessment has found there to be significant effects on landscape/ seascape and visual receptors within different parts of the AONB. In addition, significant effects on three Special Qualities have been identified. None of these effects are direct

but occur through visibility of AyM from parts of the AONB, as the development is located outside its boundary. This indicates that a degree of 'harm' is likely to arise in relation to the perceived impacts of the development on the wider setting of the AONB.

- 3.28 This raises the question of whether or not the relationship between AyM and the AONB meets the relevant legal and policy tests:
- (a) Has regard been had to the purpose of the AONB in line with the statutory duty?
 - (b) Would it be in accordance with the NPS policy on AONBs to consent AyM on the basis that any perceived adverse SLV impact of AyM would be outweighed by its benefits?
- 3.29 In determining the level of 'harmful' effects it is the Applicant's view that it is important to consider the likely effects of AyM on the overall integrity of the AONB, which is a measure of the degree to which its Special Qualities continue to define the area.
- 3.30 The factors to be considered in determining the degree of harm that may arise as a result of AyM, how this has been minimised through design, and how this should be considered in the decision-making process and the planning balance are set out below.
- (a) There are fourteen Special Qualities identified in the AONB MPR and it is the combination and interaction of distinctive resources and activities that form the basis of the designation. The majority of these resources (including features and special qualities) and activities would be unaffected by AyM due to its location at some distance from the AONB.
 - (b) The AONB would only be affected through visibility of AyM at a substantial distance offshore and not as a result of any physical change to the balance of its features or activities. It is the relationship and quality of the receptors and activities within the AONB that largely define its inherent character and integrity and these are not affected by AyM.
 - (c) By comparing the two ZTVs it can be seen that much of the more distant visibility of the AyM turbines would be of blades only (i.e. hubs are substantially less or not visible from these areas). This shows that actual visibility of AyM within the western and the majority of the northern coastal areas of the AONB would be extremely limited, particularly due to the incidence of intervening landscape and built features.
 - (d) Actual visibility of AyM from within the eastern coastal areas is also largely restricted to coastal areas and open areas immediately inland or where there are elevated high points. This is due to the prevalence of vegetation that is part of much of the intervening landscape. This has a screening effect on the views obtained by people, particularly the large numbers travelling along roads where roadside vegetation is prevalent.
 - (e) The viewpoints have been selected to show the views from where AyM would be most visible (coastal or elevated) to assist in providing a clear understanding of the proposals and as such these viewpoints are likely to give rise to a significant effect. They are therefore not representative of views obtained from within large parts of the eastern section of the AONB, where similar visibility does not arise.
 - (f) The IoA AONB is predominantly coastal but also includes inland areas that form the backdrop to the coast. Some of its characteristics and Special Qualities include expansive views that may be over the seascape as well as the relative tranquillity, relative openness and exposure the seascape can evoke on the perception of the AONB.

- (g) Expansive views from within the AONB are noted within the MPR to include not just views out to sea but ‘By virtue of their height, scale and sheer size, the mountains of Snowdonia dominate the majority of the AONB’s landscape.’ Expansive views are described as occurring across the Irish Sea (potentially including AyM) but they are also described as including ‘Views across those areas of Anglesey not included in the AONB designation; Local views, for example across the Menai Strait; and Distant views, such as to the Great Orme, Snowdonia, Llyn Peninsula and the Isle of Man, often described as “borrowed landscapes”. The majority of the expansive views that include these features would not be affected by AyM.
- (h) The Applicant has sought to reduce the SLV effects of AyM on the IoA AONB through measures set out in Section 10.9 (AS-027). This includes a substantial reduction in the AyM array area, which has increased its separation from the AONB, reduced its horizontal extent within many views and substantially reduced the number of WTGs. In addition, the Applicant has proposed mitigation of visible aviation lighting effects to minimise the night-time effects.
- (i) The orientation of the AyM array area is such that its narrower horizontal extents are largely directed towards the IoA coast. This is particularly the case when considering the views of AyM from the northerly, more remote areas of the coast where the proportion of the very wide panoramic views that are affected by AyM is small, as a result.
- (j) Much of the easterly area of the AONB is located at distances of greater than 27 km from the AyM array area. This northerly part of the east coast of the AONB (between Red Wharfe Bay and Point Lynas) has a varied coastline that includes bays, headlands and a small number of small islands. Headlands and straighter sections of the coast have expansive views out across a large-scale, simple seascape (factors that are considered to increase the ability of the seascape to accommodate development) where the AyM array area would form a relatively small component of the available views. Bays may offer more contained views that include AyM however, their containment tends to offer a variety of orientations and also a greater focus on the more immediate coastal and defining landscape features. The significant effects on the representative viewpoints located along this section of the coast have been assessed as being of moderate level.
- (k) The closer proximity area to the south-east of the IoA extends out along a short peninsula to include Puffin Island beyond Penmon Point (at a minimum range of 17.35 km from the AyM array area). It offers views that encompass a wide range of features including cultural heritage resources and large disused quarries. Views from locations such as Viewpoint 7: Penmon Point have been specifically sited (at the request of Stakeholders) so that there is the greatest interaction between the foreground lighthouse, Puffin Island and the AyM array beyond.
- (l) Views from the northern section of the peninsula’s coast (between Bwrdd Arthur and Penmon Point) include a wide expanse of open sea to the north between the north coast of the IoA and the AyM array area. Views to the east would, however, include the Great Orme with a backdrop that would include AyM. In views from the coastal areas of this short peninsula the effects are assessed as moderate-major (Significant).
- (m) The landscape of the AONB and its context has evolved substantially over time in response to landownership changes, the material and social needs of society (including to support extensive mining, industry and energy production), health and safety of shipping through the introduction of lighthouses in prominent coastal locations, transportation and agricultural practices.

- (n) Whilst there is no large-scale industrial development within the AONB there has, since its designation in 1966, been a strong association between the AONB and large-scale development, which is located very close to its boundaries. This includes the Wylfa nuclear power station; former aluminium smelting plant, and an RAF Training Base. In designating the AONB, it was considered acceptable for such large-scale developments to coexist alongside the designated area.
 - (o) The need to balance potential development that may be proposed within or affecting the AONB is recognised in the MPR. This notably relates to the tourist-related development, which is an important component of the economics of the IoA, but of more relevance is that 'There is a focus on Anglesey becoming an energy development Island both in Nuclear and Alternative Energy which may include large scale offshore wind farms, marine turbines and solar farms. The proximity of these industries to the AONB and the need to bring the energy ashore highlights their influence on both the landscape and the seascape of the AONB, and also the pressure from development in close proximity to the countryside and coast.' It must be construed from this that the MRP recognises the need to accommodate appropriately sited development alongside this nationally important landscape such that both aims can be achieved.
- 3.31 It is accepted by the Applicant that there would be some significant adverse impact on the views towards the seascape from the IoA AONB and that development of AyM would therefore not be consistent with objectives that seek to enhance the AONB. However, it is considered that almost no large-scale development would be able to comply with the principle of enhancement and therefore it must be anticipated that any major development would give rise to some degree of friction with such an aim.
- 3.32 There are 15 factors listed above, as noted, which need to be taken into account in determining the degree of harm that may arise as a result of AyM, how this has been minimised through design, and how this should be considered in the planning balance. As detailed in the Applicant's Written Summary of Oral Submissions (REP3a-004), it would be difficult for any large-scale development of this nature, visible from these designated landscapes, to be considered to directly conserve or enhance their natural beauty. This is acknowledged in EN-1 at paragraph 4.5.1 where it is stated that "*the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.*"
- 3.33 Moreover, a further factor to be taken into account is that the Applicant is working with NRW and the North Wales Planning Authorities towards an agreement of landscape enhancement measures within the Isle of Anglesey AONB to be funded by AyM. This suggests that AyM would provide some enhancement of the IoA AONB.
- 3.34 Whilst not a defined term applied in Wales in relation to AONBs or National Parks the Applicant suggests that considering the effect on 'overall integrity' is nonetheless a very clear way of expressing how the special qualities of a designated landscape area come together to represent the whole or overall value. It is a useful approach to adopt when considering the degree of harm overall especially where there is a management plan identifying Special Qualities as well as other features and activities '*that combine to make each AONB distinctive and nationally important*' (The Isle of Anglesey Areas of Outstanding Natural Beauty Management Plan Review 2015-2020).
- 3.35 While some special qualities might be adversely affected, the overall AONB designation would not be compromised, meaning its integrity would remain conserved.
- 3.36 Notably in relation to the purpose 'to conserve' the purpose of the AyM development is to provide mitigation of climate change impacts, which are predicted to give rise to widespread changes in our landscapes, habitats and species, including those in the AONBs and SNP. AyM would therefore also play a part in conserving aspects of the designated area.

3.37 It is accepted that there would be some perceived diminishment of (harmful effects on) three of the 14 special qualities and the natural beauty of the AONB associated with these, however, such effects would only occur within a limited geographical area. Therefore, substantial areas of the AONB, as well as 11 of its 14 special qualities, would be unaffected. Taking into account these factors, the effects are not considered to occur to such a degree that it would affect the integrity of the AONB or its inherent natural beauty and it would occur within a context and understanding of the need for change including accommodating new energy development as set out in the Anglesey AONB Management Plan Review.

3.38 The question is therefore whether, as noted above, taking account of the sensitivity of the receptor, are the harmful effects considered to outweigh the benefits of the proposed scheme. For the reasons set out in this response and in the Applicant's wider submissions to the Examination, it is considered that the harm that would result, would not outweigh the benefits of the proposed scheme.

3.39 Eryri/Snowdonia National Park

3.40 The SLVIA (AS-027) assessed the effects on the landscape character of SNP from paragraph 687. The effects are assessed to be Moderate (Non-significant) on LCA- 01: Northern Uplands and Moderate-Minor (Non-significant) on LCA-02: Carneddau Range.

3.41 NRW and LUC, on behalf of the NWLPAs, agree with the findings in relation to LCA-02: Carneddau Range but do not agree with the findings in relation to LCA-01: Northern Uplands.

3.42 The area shown to have any theoretical AyM WTG visibility equates to 42% of the LCA at ranges of 16.5 to 33 km.

(a) Assessment of landscape character

3.43 The northerly areas of the LCA are those that are at closest proximity to the AyM array area and the higher levels of magnitude of change in views as a result. Viewpoints 12, 36, 39, 40 and 60 (APP-241, APP-265, APP-268, APP-269 and APP-285, respectively) demonstrate this. These areas generally coincide with areas where there is the strongest existing human influence on character through visibility of existing development, including offshore wind farms, which is detrimental to the qualities of tranquillity, remoteness and wildness. The further impact on the characteristics of these areas through the introduction of AyM OWF as part of their setting would not result in a marked change to their character.

3.44 Landscape character effects are not derived purely as a result of visibility of something that is apparent in views in a single direction from the LCA but are also, in the main, comprised of the pattern of the elements within them, which makes them distinct and recognisable (GLVIA 3, p157).

3.45 Whilst it is agreed that existing coastal development is of a different scale and form to the proposed development it does indicate a human influence over the wider landscape of the intervening coastline. In addition the existing OWF are visible from much of the LCA that would also gain visibility of AyM so that changes in the character in this part of the contextual views are incremental.

3.46 It is the Applicant's position that it is the inherent pattern of elements in the landscape in question that constitute its key characteristics and where these are strongly defined, as is the case in the northerly parts of LCA 01, external (visual) influences are less likely to result in a significant effect on landscape character. Within these areas views out to sea towards AyM OWF would also be part of contextual views that in many instances include the more dramatic, mountainous skyline to the north as part of the wider influential context.

- 3.47 Views across the remotest parts of Snowdonia NP would not be affected by the proposed development as they are found to the north of LCA 01.
- (a) Effects on Special Qualities
- 3.48 Cynllun Eryri - The Snowdonia National Park Partnership Plan 2020 has been approved and outlines the nine identified Special Qualities of SNP. The Plan also defines Special Qualities as ‘The combination of distinctive features of each National Park that led to these areas being designated to be protected.’
- 3.49 The majority of the Special Qualities would not be affected by the AyM OWF with the SLVIA assessing, in Table 10, the effects on the following two relevant Special Qualities, as agreed through the Section 42 consultation with NRW and the North Wales Planning Authorities via the LUC (2021) North Wales Local Planning Authorities Awel y Môr Offshore Wind Farm SLVIA Review Draft report (REP1-091) which was prepared on their behalf.
- (a) Diverse landscapes; and
- (b) Tranquillity & solitude – Peaceful Areas.
- 3.50 It is agreed with NRW and LUC on behalf of the NWLPAs that the effect on the Diverse Landscapes Special Quality was assessed as Moderate-Minor to Moderate effect (Non-significant) and adverse. The effect on the Tranquillity & solitude – Peaceful Areas Special Quality was assessed as Moderate-Minor effect (Non-significant) and adverse.
- 3.51 However, NRW notes in REP1-080-6.1.40 that ‘Nevertheless, the effects are adverse and would detract from these qualities and on scenic views in the northern part of the park. Scenic views are a characteristic of Snowdonia’s landscapes, as noted in the SNP Partnership Plan 2020.’
- 3.52 The Applicant responded to NRW at Deadline 2 (REP2-002) noting that scenic views are not an identified Special Quality. Where specific views are mentioned in the Partnership Plan in relation to the Special Qualities for example on views from the Sychnant Pass, these have been considered in the Applicant’s assessment.
- (a) National Park Purposes for Designation
- 3.53 The Applicant’s assessment has found there to be significant visual effects on receptors within different parts of the SNP. However, no significant effects on landscape/ seascape character or Special Qualities have been identified although it is acknowledged that there would be non-significant effects that are adverse. This indicates that some degree of ‘harm’ may arise in relation to the impacts of the development on the wider setting of the SNP through its visibility from the northerly areas.
- 3.54 In considering whether AyM would cause such ‘harm’ to the SNP that its overall integrity would be diminished, such that it could no longer be considered to meet the objectives of a National Park, it is important to consider the likely effects of AyM on the integrity of the SNP, which is a measure of the degree to which its Special Qualities continue to define the area. Factors to be considered in determining the degree of harm that may arise as a result of AyM, how this has been minimised through design and how this should be balanced by decision makers are set out below.
- (a) There are nine Special Qualities identified in Cynllun Eryri - The Snowdonia National Park Partnership Plan 2020. The SNP Partnership Plan notes that it is ‘The combination of distinctive features of each National Park that led to these areas being designated to be protected.’ The majority of these distinctive features would be unaffected by AyM largely due to its location at some distance from the SNP.

- (b) The SNP would only be affected through visibility of AyM at a substantial distance offshore (16.5 km) and not as a result of any physical change to the balance of features or activities therein. It is the distinctive relationship and quality of the features and activities within the SNP that largely define its inherent character and integrity and not views out from SNP.
- (c) It is the Applicant's position that visibility of AyM from within SNP does not result in significant effects on any of the identified Special Qualities, landscape character or seascape character receptors within the SNP.
- (d) The SNP extends back from the steeply sided coastal hills. These as well as the next ridge of hills inland provide a high degree of visual screening of AyM from the majority of SNP further to the south. Between these sets of hills there is an area of open moorland which is influenced by pylon mounted transmission lines which cross over this area and through the southern set of hills.
- (e) The ZTV (Figures 18a and b (Annex 10.5 APP-219)) shows the extent of the theoretical visibility of MDS A, which has been calculated to equate to 18% of SNP within the Study Area. 94% of the total area of SNP would have negligible or no change to views or character as a result of visibility of the AyM OWF as part of its diverse context. Parts of the ZTV areas with theoretical visibility would have no or limited actual visibility due to there being the potential for only blade visibility (not hubs or towers - making the WTGs less likely to be discerned over long distances and extensive separating landform) or intervening screening by woodland across certain areas.
- (f) There would be no changes to the diverse landscapes of SNP around the Dyfi, Mawddach and Dwyryd estuaries or to the numerous valleys and passes between the upland areas that are specifically noted in the SNP Partnership Plan.
- (g) One of the SNP Special Qualities includes diverse views that include views over the seascape. The SNP Partnership Plan notes the importance of SNP's coastline, sandy beaches and unspoilt coastal settings as being highly valued and that this coastline extends to 23 km of the SNP boundary. Notably only 1.3 km of this coastline arises within the AyM study area, whilst the remainder is to the west coast where the SNP meets Cardigan Bay. The 1.3 km section of the coast has an immediate setting which has been highly modified by development uses which include the A55, rail infrastructure, and extensive views of urban development as well as operational OWF.
- (h) Whilst there would be no visibility of AyM from the Synchant Pass, which is set inland slightly from the coast the wider seascape setting of the northern parts of SNP around the Synchant Pass are important and scenically attractive with contrasting features of open sea, notable headlands (the Great Orme) and bays that have a strong sense of place. Nevertheless, views of AyM, which would be visible from the upland area in this northern part of SNP (Viewpoints 12, 40 and 60), would be seen across in the context of coastal development and operational OWFs.
- (i) It is acknowledged that there is a notable difference in WTG scale and spacing between AyM and Gwynt y Mor (GyM) and, AyM would add to the horizontal extent of OWF views in the seascape views from the SNP in a part of the views that often includes the Great Orme. However, it would almost always be the case that AyM would be seen in the context of the existing operational OWFs, including the closer range Rhyl Flats OWF. In areas where there is existing OWF development this generally helps to increase the capacity to accommodate further OWF development. Cumulative effects are focussed in one place, where there are already other development influences.

- (j) The viewpoints were selected to show the views from where AyM would be most visible to assist in providing a clear understanding of the proposals and as such these viewpoints are likely to give rise to a significant effect. They are therefore not representative of views obtained from within the large majority of the SNP, where similar visibility does not arise.
 - (k) In relation to landscape character change it is considered that the strong inherent character of the LCA, which is largely informed by the features and patterns of elements within the geographical extent of the LCA itself and make it distinctive from other parts of the landscape, will remain predominant.
 - (l) The Applicant has sought to reduce the SLV effects of AyM on the SNP through measures set out in Section 10.9 of AS-027. This includes a substantial reduction in the AyM array area, which has reduced its horizontal extent within views and substantially reduced the number of WTGs. In addition, the Applicant has proposed mitigation of visible aviation lighting effects to minimise the night-time effects.
- 3.55 It is accepted by the Applicant that there would be some significant adverse impact on the views towards the seascape from the SNP and that development of AyM would therefore not be consistent with objectives that seek to enhance the natural beauty or quality of SNP. However, the Applicant considers that almost no large-scale development would be able to comply with the principle of enhancement and therefore it must be anticipated that any major development would give rise to some degree of friction with such an aim. This is also acknowledged in NPS EN-1 at paragraph 4.5.1 whereby it is stated that *“the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.”*
- 3.56 The Applicant considers that there may be some perceived diminishment of (harmful effects on) the Special Qualities of Diverse Views and Tranquillity but such effects are not considered to be significant and are therefore limited. There would also be some localised areas where significant adverse visual effects would arise. However, it is not considered that the SLV receptors within the SNP would be diminished to such a degree that the overall integrity of the SNP or its inherent natural beauty would be affected. In addition, such impacts would occur within a context and understanding of the need for change including accommodating alternative energy.
- 3.57 AyM is not located within this designated area and whilst there are some significant effects identified within it, these effects are agreed as not relating to the relevant Special Qualities identified and do not undermine the reasons for designation. Seven of its nine special qualities and the majority of its geographical extent would remain entirely unaffected by AyM.
- 3.58 Whilst not a defined term applied in Wales in relation to National Parks, the Applicant suggests that considering the effect on ‘overall integrity’ is nonetheless a very clear way of expressing how the special qualities of a designated landscape area come together to represent the whole or overall value. It is a helpful approach to adopt when considering the degree of harm overall especially where there is a Management Plan that identifies Special Qualities. As acknowledged by the Cynllun Eryri Snowdonia National Park Partnership Plan 2020 ‘The Combination of these Special Qualities are the core of designation as a National Park.’
- 3.59 While two Special Qualities may be adversely (but not significantly) affected, the overall SNP designation would not be compromised, meaning its integrity would remain conserved.
- 3.60 A further factor to be taken into account, is that the Applicant is working with NRW and the North Wales Planning Authorities towards an agreement of landscape enhancement measures within the SNP to be funded by AyM. This suggests that AyM would provide some enhancement of SNP..

- 3.61 Notably in relation to the purpose 'to conserve' the purpose of the AyM development is to provide mitigation of climate change impacts, which if they remain unchecked, are predicted to give rise to widespread adverse changes in our landscapes, habitats and species, including those in the AONBs and SNP. AyM would therefore also play a part in conserving aspects of the designated area.
- 3.62 For the reasons set out in this response and in the Applicant's wider submissions to the Examination, it is considered that the harm that would result, would not outweigh the benefits of the proposed scheme.

4 CONCLUSION

- 4.1 The Applicant considers that it has had due regard to the purpose of the IoA AONB and the SNP, consistent with the statutory duty. The Applicant has demonstrated how it has sought to avoid compromising the purposes of designation of both the AoNB and SNP.
- 4.2 The significant effects on the IoA AoNB and SNP are limited . The identified Special Qualities will continue to define the overall and fundamental character of these designated landscapes.
- 4.3 The proposed AyM development has been designed sensitively in the context of the various siting, operational and other constraints, such that the effects arising in relation to designated landscapes are considered to be acceptable. Moreover, enhancement measures are being proposed.
- 4.4 Overall, on the basis of the evidential position set out, it is considered that the Secretary of State can conclude with confidence that the effects of AyM on designated landscapes would be consistent with the relevant policy in the NPS, in particular para 5.9.12 of EN1, and that the benefits that would result, would outweigh the identified harm, in the overall balance that needs to be struck.



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