



Awel y Môr Offshore Wind Farm

Statement of Common Ground 5 – Natural Resources Wales (Seascape, Landscape and Visual Impact Assessment)

Deadline 8

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1 Introduction

1.1 Background

- 1 This Statement of Common Ground (SoCG) has been prepared between Awel y Môr Offshore Wind Farm Limited (hereafter referred to as 'the Applicant') and Natural Resources Wales (NRW) to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Awel y Môr Offshore Wind Farm (hereafter referred to as 'AyM').
- 2 This SoCG (SoCG 5) relates to the potential seascape, landscape and visual impacts of the Application and is one of three SoCGs that have been discussed between the Applicant and NRW that cover the following broad areas of the DCO application, with the relevant topics listed:
 - ▲ SoCG 5: Seascape, Landscape, Visual Impact aspects of the Application
 - Seascape;
 - Landscape;
 - Visual resources; and
 - Designated landscapes.
 - ▲ SoCG 6: Offshore aspects of the Application
 - Marine geology, oceanography and physical processes;
 - Marine water and sediment quality (including Water Framework Directive (WFD) Assessment);
 - Offshore ornithology;
 - Benthic subtidal and intertidal ecology;
 - Coastal habitats
 - Fish and shellfish ecology;
 - Marine mammals;
 - Habitats Regulations Assessment.
 - ▲ SoCG 7: Onshore aspects of the Application
 - Onshore biodiversity and nature conservation;
 - Hydrology, hydrogeology and flood risk;
 - Ground conditions and contamination;

- Air quality impacts; and
 - Waste management relating to onshore aspects of AyM.
- 3 The three SoCGs should be read in conjunction with one another in order to clarify the Applicant's and NRW's position on the application.
- 4 The need for a SoCG between the Applicant and NRW was set out within Rule 6 letter issued by the Examining Authority (ExA) on 23 August 2022.
- 5 In relation to the pre-app phase of the DCO, NRW's responsibilities have included engagement through membership of Expert Topic Group (ETG) meetings via the Evidence Plan process, and through bi-lateral discussion in relation to designated landscapes and visual impacts. Following detailed discussions undertaken through pre-application and post-application consultation, the Applicant and NRW have sought to progress a SoCG. It is the intention that this document provides the ExA with a clear overview of the level of common ground between both parties. This document will facilitate further discussions between the Applicant and NRW and will be updated as discussions progress during the Examination. .

1.2 Approach to SoCG

- 6 This SoCG has been developed during the pre-examination and examination phases of AyM. The SoCG makes reference to other submission documents that set out, in greater detail, the discussions that have taken place between NRW and the Applicant. These documents are:
- ▲ Consultation Report [APP-025];
 - ▲ Evidence Plan [APP-301]; and
 - ▲ The 'Consultation' section included within relevant chapters of the Environmental Statement.
- 7 In accordance with discussions between the Applicant and NRW, the SoCG is focused on the effects of the offshore and onshore works on designated landscapes as detailed in Paragraph 2.
- 8 The SoCG is structured as follows:
- ▲ **Introduction:** Outlining the background to the development of the SoCG;

- ▲ **NRW's role with respect to the SoCG:** Describing the main areas of discussion within the SoCG and a summary of consultation to date; and
- ▲ **Agreements Log:** A record of the positions of the Applicant alongside those of NRW as related to the topics of discussion and the status of agreement on those positions.

1.3 The Development

- 9 The Application is for development consent for the Applicant to construct and operate the proposed Awel y Môr project under the Planning Act 2008. The offshore development will also require a Marine Licence, which is to be determined independently under the Marine and Coastal Access Act 2009.
- 10 AyM will comprise up to 50 Wind Turbine Generators (WTGs) and will include infrastructure that is required to transmit the power generated by the turbines to the offshore substation via inter-array cables, before being transmitted via export cables to the proposed onshore substation (OnSS) located to the west of St Asaph Business Park (SABP) and then to the existing National Grid Bodelwyddan substation.
- 11 The key offshore components of AyM will include:
 - ▲ WTGs with associated foundations and scour protection;
 - ▲ Inter-array cables and associated cable protection;
 - ▲ Up to two Offshore Substation Platforms (OSPs) with associated foundations and scour protection;
 - ▲ Up to two offshore export cable circuits and associated cable protection;
 - ▲ A meteorological mast (met mast); and
 - ▲ Permanent Vessel Moorings (PVMs).
- 12 More details on the offshore aspects of the proposed development are described in the Environmental Statement (ES) Volume 2, Chapter 1: Offshore Project Description (APP-047).

2 NRW's role with respect to the SoCG

2.1 Introduction

- 13 In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation including (but not limited to) the Environmental Permitting (England and Wales) Regulations 2016 (as amended), and the Marine and Coastal Access Act 2009.
- 14 NRW broadly has two main functions in relation to marine development:
- As a marine licensing authority (acting on behalf of the Welsh Ministers)
 - As an advisor and statutory consultee.
- 15 NRW's roles as a licensing authority and statutory consultee are independent to ensure appropriate functional separation between them.
- 16 For the avoidance of doubt, this SoCG relates solely to NRW's advice in its capacity as a statutory consultee and advisor and the comments are therefore made solely in the context of the DCO. The permitting activities are not caught by this SoCG rather they operate independently under relevant legislation.

2.2 Consultation Summary

- 17 This section briefly summarises the consultation that the Applicant has undertaken with NRW including both statutory and non-statutory engagement during the pre-application and post-application phases. The list in Table 1 is not exhaustive but provides an indication of aspects of the key discussions undertaken. Some of the meetings below also include other parties however, for the avoidance of doubt, this SoCG is limited to matters agreed/not agreed between NRW and the Applicant.

Table 1: Consultation undertaken with NRW pre- and post-application on SLVIA matters in the DCO.

DATE AND TYPE	DESCRIPTION OF CONSULTATION
Expert Topic Group (ETG) - 10/12/2019	<p>Introductory/background meeting introducing the SLVIA and LVIA ETG to the AyM project, the Applicant and the Evidence Plan process. An introduction was given by the applicant of its views on the Planning Act process, the purpose of the Scoping Report and the ongoing site selection process. Key discussion points on the SLVIA and LVIA topics were:</p> <ul style="list-style-type: none"> ➤ The study area; ➤ The baseline data sources that would be used to characterise the receiving environment; ➤ The proposed methodology, including the use of photography from representative viewpoints to be agreed; and ➤ The appointment of an independent consultancy to advise the local authorities on LVIA and SLIVA matters.
ETG - 01/10/2020	<p>Project meeting to update ETG members after receiving the Scoping Opinion. The aims of the meeting were to:</p> <ul style="list-style-type: none"> ➤ Update stakeholders on the ongoing site selection and project refinement process; ➤ Discuss the scope of the SLVIA and the MDS approach taken; ➤ Discuss feedback on the proposed representative viewpoint locations; ➤ Outline the approach to the night-time lighting assessment; and ➤ How the archaeology and cultural heritage technical topic relates to the SLVIA.
ETG - 25/01/2021	<p>Meeting with the aim of providing a project update in the site selection, with a focus on the offshore</p>

DATE AND TYPE	DESCRIPTION OF CONSULTATION
	<p>array area and gaining feedback on the refinement options available. Key discussion points were:</p> <ul style="list-style-type: none"> ➤ The refinement off the array area from the initial Area of Search identified at the Crown Estate extensions leasing round stage; ➤ The options available for reduction of the array area; ➤ Development of MDS layouts for consideration in the SLVIA to be included in the PEIR; ➤ The proposed viewpoint locations; and ➤ Presentation of comparative wirelines from selected viewpoints.
ETG - 29/01/2021	<p>Follow-up of the meeting above on 25/01/2021 with the archaeology and cultural heritage sub-group. Further discussion was had around the viewpoints proposed in key cultural heritage sites, including Beaumaris, Bangor Pier, Colwyn Bay and Llandudno.</p>
ETG - 10/02/2021	<p>Follow-up with the SLVIA ETG on the comparative wireline images circulated previously. The aim of the meeting was to present and discuss the alternative MDSs identified for assessment and to gain ETG feedback on these alternatives in terms of which comprises the worst-case for SLVIA.</p>
Statutory Consultation carried out under Section 42 of the Planning Act 2008 (31 August 2021 – 11 October 2021)	<p>Consultation responses provided by NRW on 8/10/2021</p>
ETG - 04/11/2021	<p>Project update meeting following the receipt of stakeholder comments on the PEIR received during the statutory consultation and to propose how the</p>

DATE AND TYPE	DESCRIPTION OF CONSULTATION
	<p>Applicant proposed to address this feedback in the final ES. Key discussion points were:</p> <ul style="list-style-type: none"> ➤ The assessment methodology, including viewpoints and the assessment of the MDS; ➤ Seascape and landscape character areas; ➤ Designated landscapes and their special qualities; ➤ The cumulative assessment; and ➤ Mitigation.
ETG - 14/12/2021	<p>Meeting to present the final project boundary that would form the basis of the application, and to review the list of final viewpoints. Key discussion points were:</p> <ul style="list-style-type: none"> ➤ Agreement of the viewpoints list; ➤ Presentation of the final proposed boundary for application; ➤ Presentation of the final design envelope; and ➤ Discussion of mitigation measures.
ETG - 27/01/2022	<p>Meeting to discuss stakeholder feedback in terms of further mitigation for SLVIA effects. Key points discussed included:</p> <ul style="list-style-type: none"> ➤ Summary of the design rationale for the application; ➤ Presentation, discussion and feedback on proposed mitigation measures; ➤ Adaptive lighting to mitigate night-time effects; and; ➤ Stakeholder suggestions of further mitigation and compensation measures.
05/09/2022	<p>Meeting to discuss NRW's Relevant Representation in respect of SLVIA matters.</p>

3 Agreements Log

- 18 The following sections of this SoCG set out the level of agreement between the Applicant and NRW for each relevant component of the Application. The tables below detail the positions of the Applicant alongside those of NRW and whether the matter is agreed or not agreed.
- 19 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion', the agreement logs in the tables below are colour-coded to represent the status of the position according to the criteria listed in Table 2 below.

Table 2: Position status key.

POSITION STATUS	COLOUR CODE
The matter is considered to be agreed between the parties	Agreed
The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	Ongoing point of discussion
The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant or NRW is not considered to result in a material outcome on the assessment conclusions.	Not agreed – No material impact
The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or NRW is considered to result in a materially different outcome on the assessment conclusions.	Not agreed – material impact

3.1 Seascape, Landscape and Visual Impact Assessment (Offshore)

20 The status of discussions relating to Seascape, Landscape and Visual Impact Assessment (Offshore) is set out in Table 3 below.

Table 3: Status of discussions relating to SLVIA.

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
Environmental Impact Assessment				
Planning and policy	SoCG05-1.1	The EIA has identified and given due regard to all appropriate plans and policies relevant to SLVIA, insofar as relevant to NRW's remit.	NRW is satisfied that due regard has been given to the plans and policies relevant to SLVIA identified in Section 10.2 of AS-027.	Agreed
Consultation	SoCG05-1.2	The EIA has had regard to matters raised by NRW via statutory and non-statutory consultation activities in relation to SLVIA.	Notwithstanding the specific issue below which is not agreed, NRW is satisfied that due regard has been given to the majority of matters raised by NRW in relation to SLVIA in respect of: ➤ Matters raised in the Scoping Opinion (APP-295); ➤ Comments on the PEIR raised during the formal consultation under Section 42 of the Planning Act 2008; and ➤ Matters raised in pre-application consultation via the Evidence Plan process, and ➤ In post-application discussions. Records of consultation in respect of SLVIA are accurately described in: ➤ The SLVIA Consultation Record (APP-113); ➤ The Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-302, respectively); and ➤ The Consultation Report (APP-024).	Agreed
		the Applicant notes that NRW's position with regard to White Consultants' Stage 3 Report is reflected in its written submissions and further notes that it is a technical guidance note as opposed to adopted policy and the report was not subject to industry consultation. Nevertheless, the Applicant has had regard to the White Consultants' Report in	NRW's PEIR response advised that the Applicant uses NRW's evidence base "Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and Guidance" (White Consultants for NRW, March 2019) to assist in informing an appropriate reduction in the extent/scale of the proposed development. NRW does not consider this to have been undertaken	Not agreed – material impact

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
		developing the ES, including discussions on it via the Evidence Plan process. Further consideration of the White Consultants' Report is given in the Applicant's Response to NRW REP1-080-3.1.24 to 3.1.25 (REP3-016).	satisfactorily. We also refer to our advice at Deadlines 3a [REP3a-021] and 4 [REP4-045] with respect to the Applicant's consideration of the White Consultants' Reports as submitted by the Applicant at Deadline 3.	
Site Selection and Consideration of Alternatives	SoCG05-1.3	The Site Selection and Alternatives Chapter of the ES (APP-044) provides a full and detailed account of the considerations and decision-making process undertaken to develop and refine the project boundary and design envelope.	NRW is satisfied that the Site Selection and Alternatives chapter of the ES (APP-044) provides a detailed and accurate record of the considerations and decision-making process undertaken to develop and refine the project boundary and project design envelope.	Agreed
	SoCG05-1.4	Refinements to the project boundary and design envelope made during pre-application consultation have reduced the potential significance of effects.	Notwithstanding comments made below in SoCG05-1.13 regarding a further reduction to the scheme, NRW acknowledges the embedded mitigation of the reduced western extent of the array, and that a reduction in the number of WTGs has been applied, as described in paragraph 3.1.20 of its Written Representations (REP1-080).	Agreed
Assessment scope and methodology	SoCG05-1.5	The EIA has identified and assessed all potential significant effects relevant to SLVIA as identified within the Scoping Report and Scoping Opinion.	NRW is satisfied that the SLVIA has identified and assessed all potential significant effects within the SLVIA chapter of the ES (AS-027).	Agreed
	SoCG05-1.6	The study area defined for the assessment is appropriate for the impacts, pathways and receptors considered.	NRW is satisfied with the study area defined in the SLVIA Methodology (APP-112).	Agreed
	SoCG05-1.7	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of assessment.	NRW is satisfied with the consideration of the dual MDS (MDS-A: largest turbines and MDS-B: most numerous turbines) and this has been agreed through the ETG process as identified in the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303, respectively).	Agreed
	SoCG05-1.8	The SLVIA has been completed in accordance with all relevant industry guidance.	NRW is satisfied that the SLVIA has been completed in accordance with the appropriate industry guidance.	Agreed

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
	SoCG05-1.9	The visualisations produced for the SLVIA meet appropriate standards and are suitable to inform judgements on the visual effects of the offshore infrastructure.	NRW is satisfied with the wirelines and visualisations produced and is content that they meet the appropriate standards to be suitable for assessing the visual effects of the offshore infrastructure.	Agreed
Baseline characterisation	SoCG05-1.10	Sufficient data (including site-specific information) have been collated to appropriately characterise the baseline environment for the purposes of EIA.	NRW is satisfied that sufficient data, including baseline photography and the creation of visualisations, have been collated to appropriately characterise the baseline and inform the SLVIA.	Agreed
	SoCG05-1.11	The viewpoint locations for the SLVIA are adequate and appropriate to understand and assess the likely significant effects of AyM.	NRW is in agreement with the viewpoint locations for the SLVIA, as agreed via the ETG process (see the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303, respectively).	Agreed
	SoCG05-1.12	The sensitivity of visual receptors has been appropriately and adequately described within the EIA.	NRW is broadly in agreement with the descriptions of sensitivity of visual receptors in the SLVIA, however there remain some points of disagreement. NRW consider these specific points of disagreement below to result in a materially different outcome on the assessment conclusions: <ul style="list-style-type: none"> NRW considers the sensitivity at Viewpoint 3 to be high, not medium-high, as described in the SLVIA. NRW considers the sensitivity at Viewpoint 36 to be high, not medium-high as described in the SLVIA. 	Not agreed – material impact
Mitigation measures	SoCG05-1.13	The iterative design process has resulted in a reduction in the extent of the project since the EIA Scoping stage and an associated reduction in the significance of predicted effects.	Notwithstanding comments made below in SoCG05-1.15 regarding further a further reduction to the scheme, NRW acknowledges that the iterative design process has resulted in a reduction of the array and number of turbines since the EIA Scoping stage.	Agreed
	SoCG05-1.14	The proposed lighting mitigation ensures night-time visual effects are non-significant.	The proposed lighting mitigation reduces night-time visual effects to non-significant, but there would still be adverse night time effects.	Agreed

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
	SoCG05-1.15	The Applicant has taken a number of measures to mitigate effects, including reducing the western extent of the array boundary. The Applicant considers that (for reasons given in its response to Relevant Representations (RR-015-3.1.5-6 of REP1-001)), a further substantial reduction in the array area, number of turbines, or turbine scale to such an extent which would reduce effects to an adequate extent in NRW's view, is not possible.	NRW does not consider the reduction in extent of the array and number of turbines sufficient to reduce the likely significant effects at the numerous viewpoints within the Isle of Anglesey AONB and Snowdonia National Park. Certain Special Qualities set out in the respective management plans for the areas would be adversely affected.	Not agreed – material impact
		The Applicant considers enhancement measures may be necessary given the presence of residual significant effects. The Applicant has been liaising with NRW, Eryri National Park, IACC and CCBC as a group regarding a potential landscape enhancement fund, as set out in its response to actions arising from ISH2 (REP4-003), and discussions are ongoing. The Applicant has submitted an update on the Landscape Enhancement Package at Document 8.22 of the Applicant's Deadline 8 submission.	NRW advises that opportunities for enhancement of the designated landscapes should be considered in accordance with the Welsh National Marine Plan. It should be noted that enhancements, by their nature, would not directly mitigate the significant visual effects of the development. Discussions with the Applicant remain ongoing with regard to enhancement measures. We refer to our advice as set out in our Deadline 8 submission.	Ongoing point of discussion
Outcomes of the EIA	SoCG05-1.16	The conclusions of the SLVIA in relation to effects on seascape character are appropriate.	<p>Whilst NRW is in broad agreement with a number of the conclusions relating to effects on seascape character, NRW considers that some seascape effects have been underestimated. NRW is satisfied that the specific points of disagreement below are not considered to result in a material outcome on the assessment conclusions:</p> <ul style="list-style-type: none"> NRW considers the sensitivity of SCAF to be medium, not medium-low as described in the SLVIA and that the SCA does form part of the setting of IoA AONB. NRW agrees that the effects are not significant. NRW considers that some parts of SCA28 are of high sensitivity, not all medium as described in the SLVIA. NRW agrees that the effects are significant. 	Not agreed – No material impact

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
			<p>⬆ NRW considers that significant adverse effects would occur over a substantial part of SCA5, whereas the SLVIA says the effects are limited in extent. NRW agrees that the effects are significant.</p>	
	SoCG05-1.17	The conclusions of the SLVIA in relation to effects on seascape character are appropriate.	<p>Whilst NRW is in broad agreement with a number of the conclusions relating to effects on seascape character, NRW considers that some seascape effects have been underestimated. NRW considers that the specific points of disagreement below to result in a materially different outcome on the assessment conclusions</p> <p>⬆ NRW considers that significant adverse effects would occur over a greater extent of SCA2. It is agreed that the effects on this SCA are significant.</p>	Not agreed – material impact
	SoCG05-1.18	The conclusions of the SLVIA in relation to effects on landscape character are appropriate.	<p>Whilst NRW is in broad agreement with a number of the conclusions relating to effects on landscape character, NRW considers that some landscape effects have been underestimated. NRW considers that the specific points of disagreement below to result in a materially different outcome on the assessment conclusions:</p> <p>⬆ NRW considers that significant adverse effects would occur over a greater extent of LCAs 8, 9 & 10 and that sensitivity is high, not medium-high as described in the SLVIA. It is agreed that the effects on these LCAs are significant.</p> <p>⬆ NRW considers that significant adverse effects would occur across a large part of LCA01 & considers the effects on the LCA to be significant, whereas the SLVIA describes the effects as not significant.</p>	Not agreed – material impact
	SoCG05-1.19	The conclusions of the SLVIA in relation to effects on visual receptors are appropriate.	<p>Whilst NRW is in broad agreement with a number of conclusions relating to effects on visual receptors, NRW considers that some visual effects have been underestimated. NRW considers that the specific points</p>	Not agreed – material impact

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
			<p>of disagreement below to result in a materially different outcome on the assessment conclusions</p> <ul style="list-style-type: none"> NRW considers that the effects on Viewpoints 1, 2 & 3 would be significant adverse (moderate), whereas the SLVIA considers them not significant (moderate-minor). NRW considers that the effect on Viewpoint 36 would be significant, whereas the SLVIA considers it not significant. 	
	SoCG05-1.20	The findings of the SLVIA in relation to the effects on the three special qualities of the Isle of Anglesey AONB assessed are appropriate.	NRW agrees that the effects on three Special Qualities of the Isle of Anglesey AONB would be significant and adverse.	Agreed
	SoCG05-1.21	The conclusions of the SLVIA in relation to the Isle of Anglesey Area of Outstanding Natural Beauty (AONB) are appropriate.	NRW does not agree with the conclusions in respect of the effects on the Isle of Anglesey AONB, for the reasons outlined in Annex B of REP1-080.	Not agreed – material impact
	SoCG05-1.22	The conclusion of “not significant” of the SLVIA in relation to the Clwydian Range and Dee Valley AONB and its special qualities are appropriate.	NRW agrees with the conclusions of the SLVIA in relation to the Clwydian Range and Dee Valley AONB and its special qualities. The non-significant but adverse effects are however considered detrimental.	Agreed
	SoCG05-1.23	The findings of the SLVIA in relation to the Snowdonia National Park special qualities of Diverse Landscapes and Tranquillity and Solitude are appropriate.	NRW agrees with the SLVIA findings in relation to the two special qualities as being non-significant and adverse.	Agreed
	SoCG05-1.24	In relation to scenic views, as outlined in the Applicant's response to Written Representations (REP1-080-6.1.40 of REP2-002) whilst scenery and views may be noted as occurring in Snowdonia National Park scenic views are not an identified Special Quality.	NRW considers that scenic views are a noted characteristic of Snowdonia National Park's landscape and that the effect on scenic views in LCA01 would be significant adverse.	Not agreed – material impact

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
	SoCG05-1.25	The conclusions of the SLVIA in relation to the Snowdonia National Park are appropriate.	NRW does not agree with the conclusions in respect of the effects on Snowdonia National Park, for the reasons outlined in Annex B of REP1-080.	Not agreed – material impact
	SoCG05-1.26	The conclusions of “not significant” of the SLVIA in relation to night-time visual effects are appropriate.	NRW agrees with the conclusions of the SLVIA in relation to night-time visual effects being non-significant, but considers the effects adverse.	Agreed
	SoCG05-1.27	The conclusions of the SLVIA in relation to cumulative effects are appropriate. With regard to Pre-Assessed Areas for Wind, the Applicant considers that there is a high level of uncertainty associated with the potential onshore wind farm development within the PAWE (geographical extent and location of WTGs as well as their height and number). There is also no actual development to consider in the cumulative assessment of AyM. Following a review of the information available at this time it has been determined that policy areas such as this are considered to have a low level of certainty and as such, whilst it is recognised that onshore wind farms may come forward within the PAWE areas no quantifiable assessment is included within the assessment chapter. The Applicant further considers that where onshore wind farm developments do come forward within the PAWE areas, the applications would have to include AyM within their cumulative LVIA's.	<p>NRW agrees with the SLVIA regarding cumulative effects with existing windfarms.</p> <p>As explained in paragraphs 3.1.14 – 3.1.19 of its Written Representations (REP1-080), NRW is concerned that the potential for significant adverse cumulative effects from future windfarms located in leased and pre-assessed areas is likely.</p>	<p>Agreed</p> <p>Not agreed – Material impact</p>

3.2 Landscape and Visual Impact Assessment (Onshore)

21 The status of discussions relating to Landscape and Visual Impact Assessment (Onshore) is set out in Table 4 below.

Table 4: Status of discussions relating to LVIA.

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
Environmental Impact Assessment				
Planning and policy	SoCG05-2.1	The EIA has identified all relevant legislation and policy and appropriate consideration has been given to them in the assessment of landscape and visual impacts of onshore aspects of AyM on designated landscapes	NRW is satisfied that due regard has been given to the plans and policies relevant to LVIA identified in Section 10.2 of AS-029.	Agreed
Consultation	SoCG05-2.2	The EIA has had regard to matters raised by NRW via statutory and non-statutory consultation activities in relation to LVIA.	<p>NRW is satisfied that due regard has been given to all matters raised by NRW in relation to LVIA in respect of:</p> <ul style="list-style-type: none"> ▲ Matters raised in the Scoping Opinion (APP-295); ▲ Comments on the PEIR raised during the formal consultation under Section 42 of the Planning Act 2008; and ▲ Matters raised in pre-application consultation via the Evidence Plan process, and ▲ In post-application discussions. <p>Records of consultation in respect of LVIA are accurately described in:</p> <ul style="list-style-type: none"> ▲ Section 2.3 of the LVIA chapter (AS-029); ▲ The Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-302, respectively); and ▲ The Consultation Report (APP-024). 	Agreed
Baseline characterisation	SoCG05-2.3	The EIA adequately characterises the baseline environment relevant to landscape and visual impacts of onshore aspects of AyM on designated landscapes.	NRW is satisfied that sufficient data, including baseline photography and the creation of visualisations, have been collated to appropriately characterise the baseline and inform the LVIA in AS-029.	Agreed

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
	SoCG05-2.4	The field survey described in Section 2.4 of Volume 3, Chapter 2 landscape and visual assessment (PINS Ref APP-063) appropriately characterises the baseline environment in order to inform the assessment of landscape and visual impacts of onshore aspects of AyM on designated landscapes to inform the EIA.		Agreed
	SoCG05-2.5	The viewpoint locations for the LVIA are adequate and appropriate to understand and assess the likely significant effects of AyM.		Agreed
Assessment scope and methodology	SoCG05-2.6	The EIA has identified and assessed all likely significant effects relevant to LVIA as identified within the Scoping Report and Scoping Opinion.	NRW is satisfied that the LVIA has identified and assessed all likely significant effects within the LVIA chapter of the ES (AS-029).	Agreed
	SoCG05-2.7	The study area defined for the onshore LVIA is appropriate for the impacts, pathways and receptors considered.	NRW is satisfied with the study area defined in Section 2.4 of the LVIA chapter (AS-029).	Agreed
	SoCG05-2.8	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of assessment.	NRW is satisfied with the consideration of the dual MDS (AIS and GIS substations) and this has been agreed through the ETG process as identified in the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303, respectively).	Agreed
	SoCG05-2.9	The LVIA has been completed in accordance with all relevant industry guidance.	NRW is satisfied that the LVIA has been completed in accordance with the appropriate industry guidance.	Agreed
	SoCG05-2.10	The visualisations produced for the LVIA meet appropriate standards and are suitable to inform judgements on the visual effects of the offshore infrastructure.	NRW is satisfied with the wirelines and visualisations produced and is content that they meet the appropriate standards to be suitable for assessing the visual effects of the onshore infrastructure.	Agreed
Mitigation measures	SoCG05-2.11	The approval by Denbighshire County Council of the layout, scale, materials and colours of the proposed onshore substation, secured under a DCO Requirement, is considered an appropriate	NRW agrees that approval by DCC of the layout, scale, materials and colours of the proposed onshore substation, secured under a DCO Requirement, is considered an appropriate method for the control of	

DISCUSSION POINT	REF	APPLICANT'S POSITION	NRW POSITION	POSITION STATUS
		method for the control of landscape and visual effects arising from onshore aspects of AyM on designated landscapes.	landscape and visual effects arising from onshore aspects of AyM on Clwydian Range and Dee Valley AONB.	
Outcomes of the EIA	SoCG05-2.12	The landscape and visual effects of the onshore aspects of AyM on the Clwydian Range and Dee Valley AONB are unlikely to be significant in EIA terms.	NRW agrees that the effects of the onshore infrastructure on the Clwydian Range and Dee Valley AONB are unlikely to be significant in EIA terms.	Agreed



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